

**South of Tyne and Wear
Local Nature Recovery Strategy
Consultation Draft
January 2026**

**Report on Consultation Responses
Public Consultation:
27th November 2025- 18th January 2026**

Contents

1. Background	3
2. Public Consultation	4
3. Summary Schedule of Changes.....	6
Appendix 1- Surveys.....	11
.....	24
Appendix 2- Multiple-choice Question Results.....	25
Appendix 3- Summary of Responses	38

Version	Date Issued	Amendment
V1	16.02.26	- First Draft -
V2	23.02.26	Draft responses added to Tables 2 and 3, Appendix 3. Additional proposed changes added to Schedule of Changes, Section 3.
V3	02.03.26	Amendments/refinements made to Schedule of Changes in Section 3, and to responses in Table 3 in Appendix 3.
V4	03.03.26	Minor refinements to Table Headings.

1. Background

Local Nature Recovery Strategies (LNRSs) are a new system of spatial strategies in England, designed to help restore nature at a local level.

The Environment Act 2021 introduced Local Nature Recovery Strategies to support more coordinated and targeted action to restore nature and deliver wider environmental benefits.

Gateshead Council has been appointed the Responsible Authority for the South of Tyne and Wear LNRS which covers Gateshead, South Tyneside, and Sunderland, and has led the preparation of the draft Strategy.

South Tyneside Council, Sunderland City Council, the North East Combined Authority (NECA), and Natural England are Supporting Authorities for the South of Tyne and Wear LNRS, and have been closely involved in the development of the draft Strategy.

The public consultation on the draft South of Tyne and Wear LNRS was undertaken in accordance with Regulation 7 of The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023. It took place from 27th November 2025 until 18th January 2026.

This report sets out how the consultation was undertaken, the responses received during the public consultation, how the Responsible Authority and Supporting Authorities have responded to them, and a schedule of proposed changes to the Strategy.

2. Public Consultation

Overview

Public consultation took place on the draft LNRS from 27th November 2025 until 18th January 2026.

Gateshead Council led the consultation with support from South Tyneside and Sunderland Councils. The consultation exercise included:

- Direct notification to Statutory consultees and those individuals and organisations on the LNRS and Local Plan consultee databases.
- Publishing the LNRS on the dedicated South of Tyne and Wear LNRS website ([NaturePlan - South of Tyne & Wear LNRS](#)) and signposting to this from the individual Council web pages.
- Social media campaign, mobile marketing and digital audio activity.
- Press notifications and online sponsored content with key regional press websites.
- Tyne & Wear metro carriage card campaign.
- Use of an online consultation portal and form to allow electronic responses.

The draft LNRS included:

- [Statement of Biodiversity Priorities](#) (PDF written document)
- [Interactive Local Habitat Map](#) There were two online Surveys available for respondents to complete. Survey 2 could be completed following the completion of Survey 1 if respondents wished to comment on a specific site(s), whereby they were given the option to drop a 'pin' locator on an interactive map. A copy of the Surveys can be found at **Appendix 1**.

Consultation Results

The total number of responses received for each survey were as follows:

- Survey 1: **55**
- Survey 2: **36**

A total of **12** responses were also submitted via email to the LNRS mailbox.

Responses

Overall, the majority of respondents either strongly agreed or agreed with the following:

- Overarching Priorities and Potential Measures
- Habitat Priorities and Potential Measures
- Species Priorities and Potential Measures
- That the Local Habitat Map is clear and easy to use
- Habitat Mapped Measures

- Species Mapped Measures
- That they are satisfied overall with the content of the Strategy
- That the Strategy overall is easy to use

Graphs showing the responses to each multiple-choice question from Survey 1, alongside the locations of specific sites submitted from Survey 2 are provided at **Appendix 2**.

Some of the issues raised most frequently through the Consultation responses were as follows:

- Views on the legal position of the LNRS in terms of landowners implementing potential measures, and role of LNRS in Local Plan-making and decision-making.
- Views on lack of mention of Bats within the LNRS.
- Views on covering the potential impacts of artificial lighting on nature within the LNRS.
- Views on covering reference to the requirement for Swift Bricks in development proposals within the LNRS.

A summary 'Schedule of Changes' that are proposed to be made to the draft LNRS as a result of the consultation can be found in **Chapter 3**.

A summary of each of the consultation responses received, alongside the Responsible Authority's responses to them is set out in Tables 1, 2 and 3 in **Appendix 3**.

3. Summary Schedule of Changes

Proposed Change	Chapters or Page Number(s) Affected
LNRS Document	
Add in references to game management.	Chapters 3, 4 and 5.
Remove the wording “(such as conifers on peat bogs).”	Page 9.
Replace the word “logging” with “felling”.	Page 9.
<p>Amend the existing Biodiversity Net Gain wording to clarify that:</p> <p>Baseline habitats, both on-site and off-site, located within LNRS mapped areas are assigned low strategic significance. On-site and off-site habitat interventions that align with LNRS mapped areas and mapped measures, are assigned high strategic significance (commonly x1.15) in the strategic significance multiplier.</p> <p>Certain mapped LNRS measure are eligible for a 15% uplift in biodiversity units via the strategic significance multiplier <i>Note:</i> this uplift in not a change to the statutory BNG percentage requirement (which remains 10% nationally). Instead, it increases the unit value of qualifying habitat interventions carried out in LNRS mapped areas.</p>	Page 21.
Provide further clarification that, for the purpose of Biodiversity Net Gain, all areas (excluding Irreplaceable Habitats) mapped as APIB and ACB within the Local Habitat Map form part of the ‘Strategic (LNRS –priorities) Area’.	Chapter 2, Page 21.
Include “elected members” under ‘General public- Promote Awareness.’	Page 25.
<p>Amend Coastal Habitats wording to read:</p> <p><i>“The South of Tyne and Wear coastline stretches approximately 19.5 km, from the River Tyne to Ryhope Dene. This narrow</i></p>	Chapter 3, Page 59.

Proposed Change	Chapters or Page Number(s) Affected
<p><i>coastal corridor is ecologically rich, supporting a mosaic of interconnected habitats including maritime cliffs and slopes, sand dunes, vegetated shingle, sandy beaches, strandlines, and rocky shores. The coastline also incorporates part of the King Charles III England Coast Path, providing a continuous, nationally significant walking route that is used extensively by the public."</i></p>	
<p>Add 'National Trails' and 'Public Rights of Way' to the list of Public Land Management examples.</p>	<p>Chapter 4, Page 73.</p>
<p>Consider making formatting of Table subheadings clearer.</p>	<p>Chapter 5, pages 80-110.</p>
<p>Introduce wording within the Strategy document to clarify that the scope of the LNRS extends to the mean low tide mark, outline the regulatory framework governing to marine and coastal waters, and emphasise the importance of collaborative working to ensure close integration and consistency across the land-sea interface, including in relation to both habitats and species.</p>	<p>Chapter 5- pages 80-82.</p>
<p>Incorporate invasive species as an Overarching Priority or, alternatively, include references to invasive species within relevant existing Potential Measures for all Habitats, or provide link within document to published invasive species technical and good practice guidance.</p>	<p>Chapter 5, pages 80-99.</p>
<p>Amend the wording of Priority OP4 and the accompanying Potential Measures to include an explicit reference to land managers.</p>	<p>Chapter 5, page 82.</p>
<p>Amend formatting of Habitat and Species Priorities to improve clarity.</p>	<p>Chapter 5, pages 83-110.</p>
<p>Consider cross-referencing complimentary habitat and species potential measures within other relevant habitat priorities and measures sections. For example, include RP1 Md as a footnote under Woodland Priorities and Potential Measures.</p>	<p>Chapter 5, pages 83-110.</p>
<p>Amend RP1 Mb to read: "<i>Undertake the targeted restoration, enhancement, and long-term positive management of watercourses, estuaries, and wetland habitats, including the</i></p>	<p>Chapter 5, page 91.</p>

Proposed Change	Chapters or Page Number(s) Affected
<i>control of invasive species, to achieve and maintain good ecological condition."</i>	
Delete Priority CP2 and associated Potential Measures, as content is covered under CP1.	Chapter 5, page 94.
<p>Amend FP2 Mb to read: <i>"Support the development of farm clusters and networks to enable knowledge sharing and peer-to-peer support, encouraging wider adoption of nature-friendly farming and land management practices such as organic farming, regenerative agriculture, agroforestry, and the equicentral system."</i></p> <p>Note: Consider amending Priority FP2 to <i>"More farm and equine businesses are supported to contribute to nature's recovery."</i></p>	Chapter 5, page 96.
<p>Include a list of examples of green and blue infrastructure within the Statement of Biodiversity Priorities. For example alongside the Urban Habitats Priorities and Potential Measures. Including:</p> <ul style="list-style-type: none"> - Greenspaces within industrial estates and golf courses - Trees and Woodland - National Trails - Public Rights of Way 	Chapter 5, pages 97-99.
<p>Add a non-mapped potential measure relating to the introduction of Northern Brown Argus and Small Blue Butterflies within the Strategy area, for example:</p> <p>Possible Potential Measure could include:</p> <p><i>Explore, and where feasible support, the introduction or natural colonisation of Northern Brown Argus and Small Blue butterflies within the Strategy area."</i></p>	Chapter 5, page 107.
<p>Amend SP1-FMa to read:</p> <p><i>"Retain, and where necessary, introduce coarse sediment (e.g. gravel) and in-stream woody debris to increase habitat complexity, improve spawning and nursery habitat, and enhanced food availability."</i></p>	Chapter 5, page 108.

Proposed Change	Chapters or Page Number(s) Affected
Add a list of data sources used in mapping the Potential Measures to Appendix E.	Pages 137-143 (Appendix E).
Amend Mapping Methodology wording at Appendix E to provide improved clarity.	Page 143 (Appendix E).
Include hyperlinks in Strategy to published habitat and species technical guidance and good practice information.	Throughout the Strategy where relevant.
Include a hyperlink within the Strategy document to National Trails Nature Recovery Toolkit.	Throughout Strategy where relevant.
Undertake review of the interface between South of Tyne and Wear LNRS and the Durham and North of Tyne LNRSs and, where appropriate, address inconsistencies.	Throughout Strategy where relevant.
Review and, where appropriate, include minor amendments to Heritage-related wording, as suggested by Historic England, within Strategy document.	Throughout Strategy where relevant.
Local Habitat Map	
<ul style="list-style-type: none"> - River Don - Amend Local Habitat Map to include currently omitted barriers to fish movement, subject to availability and quality of supporting data. - Amend Local Habitat Map <i>Areas of Particular Importance for Biodiversity (ACIBs) layer</i> and associated pop-up information, to identify areas of Irreplaceable Habitat. - Damhead Wood, Winlaton Mill, Gateshead - Amend Local Habitat Map to apply mapped measure GP1-Mb (Grassland Enhancement) to land parcel centred on NZ 19377 61181. - Fellgate, South Tyneside - Amend Local Habitat Map to remove mapped measures WP1-Mc Woodland Buffering (UID 40 and UID 90) and WP4-Mc Scrub Expansion (UID 615, UID 617 and UID 690). - Boldon Hills, South Tyneside - Review and, where appropriate, amend extent of mapped measures in line with mapping methodology. - Land at Boldon Flats - Review and, where appropriate, amend extent of mapped measures in line with mapping methodology. - Land at Whitburn - Review and, where appropriate, amend extent of mapped measures in line with mapping methodology. - Fulwell Quarry – Amend Local Habitat Map to ensure all individual mapped polygons have a different unique Identifier (UID). 	

Proposed Change	Chapters or Page Number(s) Affected
<ul style="list-style-type: none"> - Barnes Park – Amend Local Habitat Map (UID 228 and UID 229) to include mapped measure GP1-Mb (Grassland Enhancement). 	
<ul style="list-style-type: none"> - Hendon Sidings – Amend Local Habitat Map (UID 312 and 313) to include OMH mapped measure GP3-Mb (OMH Enhancement). 	
<ul style="list-style-type: none"> - Hendon Sidings – Amend Local Habitat Map (UID 22) to remove mapped measure GP3-Md (OMH Expansion). 	
<ul style="list-style-type: none"> - Hendon Sidings – Amend Local Habitat Map to ensure all individual mapped polygons have a different unique Identifier (UID). 	
<ul style="list-style-type: none"> - Timber Beach – Amend Local Habitat Map (UID 140) to more accurately reflect distribution of grassland and inter-tidal habitats. 	
<ul style="list-style-type: none"> - Land between Castletown Road and Wessington Way – Amend Local Habitat Map to include mapped measure GP1-Md (Grassland Expansion). 	
<ul style="list-style-type: none"> - Warden Law – Amend Local Habitat Map to resolve extents of grassland mapped measures within LWS boundary (UID 13). 	
<ul style="list-style-type: none"> - Land north of Ocean Road, Hendon – Amend Local Habitat Map to include former industrial site, applying mapped measure GP3-Md (OMH Enhancement). 	
<ul style="list-style-type: none"> - Fulwell Quarry – Amend Local Habitat Map to resolve conflicts in mapped measures, including the application of GP3-Md (OMH Expansion) within and adjoining the SSSI and LWS site boundaries (UID 24 and UID 25) 	
<ul style="list-style-type: none"> - Land north of Fulwell Quarry – Amend Local Habitat Map to include application of GP1-Md (Grassland Expansion) to arable fields. 	
<ul style="list-style-type: none"> - Land at Cleadon Hills – Amend Local Habitat Map to resolve omissions in mapping of SP1-BMg Farmland Birds Measures. 	

Appendix 1- Surveys

Survey 1

LNRS Consultation

Please note you are not obliged to respond to every question, except for those marked mandatory.*

The South of Tyne & Wear is referred to as 'the Strategy Area.'

The South of Tyne & Wear Local Nature Recovery Strategy is referred to as 'the Strategy'.

About You

What is your full name?

What is your email address?*

We'll only contact you if we need to follow up on your response.

Are you completing this consultation:

As an Interested Individual?

As a Land Owner or Land Manager?

On behalf of a company or organisation?

If company or organisation, please tell us its name:

How did you find out about this consultation?

Local Media

Social Media

Council Websites

Council Email or Newsletter

Council Staff or other Professionals

Poster or Leaflet

Friend or Family Member

Local Community or Special Interest Group

Councillor, Town/Parish Council or Community Board

Other

Do you live or work within the Strategy Area?

Yes

No

Prefer not to say

Priorities and Potential Measures: Overarching

How much do you agree with the Overarching Priorities identified in Section 5 and the Potential Measures in Tables 1 to 4?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

Are there any Overarching Priorities or Potential Measures you think should be added or removed? Please explain your answer.

Habitat Priorities and Potential Measures

How much do you agree with the Habitat Priorities identified within Section 5 and the Potential Measures in Tables 5 to 22?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

Are there any Habitat Priorities or Potential Measures you think should be added or removed? Please explain your answer.

Species Priorities and Potential Measures

How much do you agree with the Species Priorities identified within Section 5 and the Potential Measures in Tables 23 to 28?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

Are there any Species Priorities or Potential Measures you think should be added or removed? Please explain your answer.

Interactive Local Habitat Map ▼

Please read and answer the following questions in conjunction with the Interactive Local Habitat Map: <https://tinyurl.com/SoTWNRS>

How much do you agree that the Local Habitat Map is clear and easy to use?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

How much do you agree with the Habitat Mapped (Potential) Measures?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

How much do you agree with the Species Mapped (Potential) Measures?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Would you like to comment on the Habitat or Species Mapped (Potential) Measures relating to a specific site?

If yes, please proceed to complete the remaining questions in this survey, and click 'Submit' at the end of this form. Then complete our second survey titled 'Local Habitat Map' which can be found on the Consultation Website, where you will be given the opportunity to comment on a specific site.

If no, please proceed to complete the remaining questions in this survey, and click 'Submit' at the end of this form.

Yes

No

Do you have any comments about specific sites shown as Areas of Particular Importance for Biodiversity (APIBs), Areas that could Become of Particular Importance for Biodiversity (ACBs), or other sites not included in the LNRS Network?

If yes, please proceed to complete the remaining questions in this survey, and click 'Submit' at the end of this form. Then complete our second survey titled 'Local Habitat Map' which can be found on the Consultation Website, where you will be given the opportunity to comment on a specific site.

If no, please proceed to complete the remaining questions in this survey, and click 'Submit' at the end of this form.

Yes

No

Closing Questions

How much do you agree with the following statement: "Overall I am satisfied with the content of the Strategy"?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

How much do you agree with the following statement: "Overall, the Strategy is easy to use"?

Strongly Agree

Agree

Neither Agree nor Disagree

Disagree

Strongly Disagree

Please explain your answer.

Do you have any other comments on the Strategy, including suggestions for improvement?

Submit

Survey 2

Interactive Local Habitat Map

PLEASE NOTE: This form will allow you to comment on one site only. Should you wish to comment on more than one site, please submit a separate form for each site.

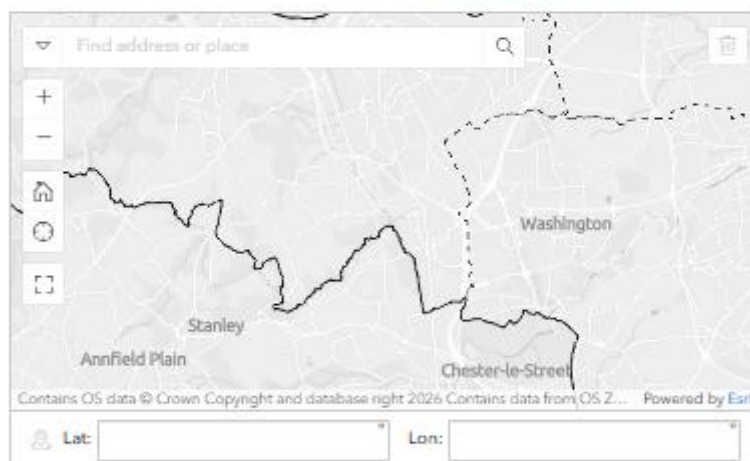
What is your full name?

What is your email address?*

We'll only contact you if we need to follow up on your response.

Please identify the site on which you wish to comment by dropping a 'pin' on its location in the map below:*

This can be any specific site covered by any of the mapped layers, or any site not included in the LNRS network as shown on the Local Habitat Map: <https://tinyurl.com/SoTWNRS>



Please provide comments on the site you have identified on the map:*


Submit

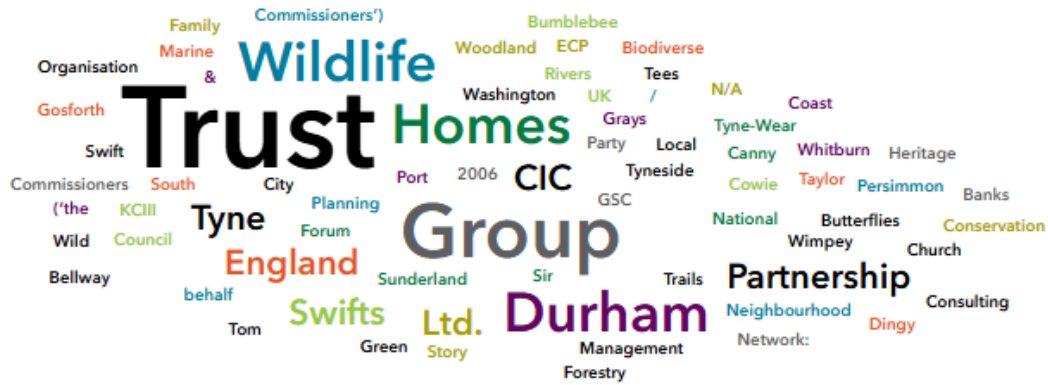
Appendix 2- Multiple-choice Question Results

Survey 1: Charts illustrating responses to each multiple-choice question generated by ArcGIS Survey 123




• If company or organisation, please tell us its name:

Word cloud 



[Hide table](#)

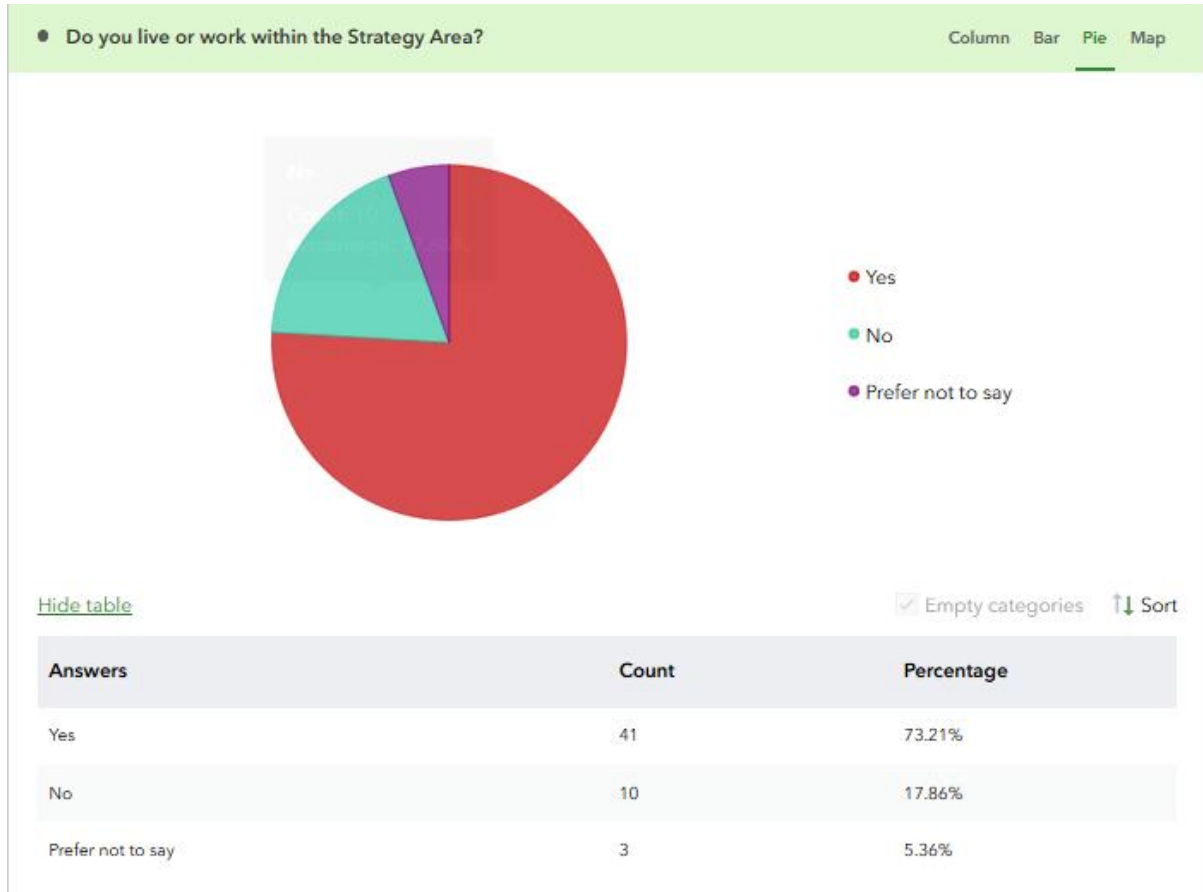
 [Show words](#)

Response	Count
Durham Wildlife Trust	2
Whitburn Neighbourhood Forum	1
Washington Wildlife Group	1
Tyne Rivers Trust	1
The Woodland Trust	1
Taylor Wimpey	1
Swifts Local Network: Swifts & Planning Group	1
Sunderland City Council	1
Story Homes Ltd.	1
South Tyneside Green Party	1
Port of Tyne	1

How did you find out about this consultation?

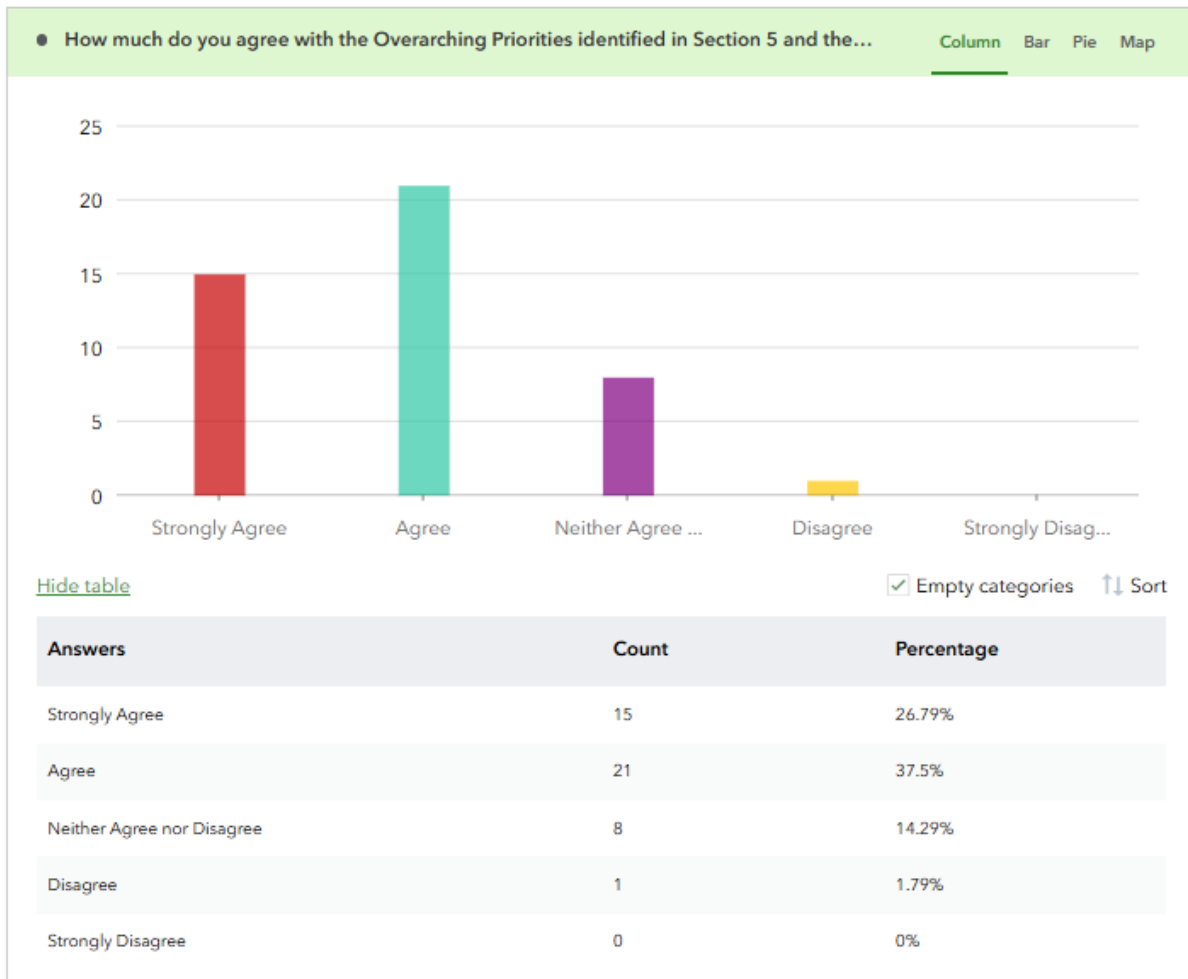


Do you live or work within the Strategy Area?



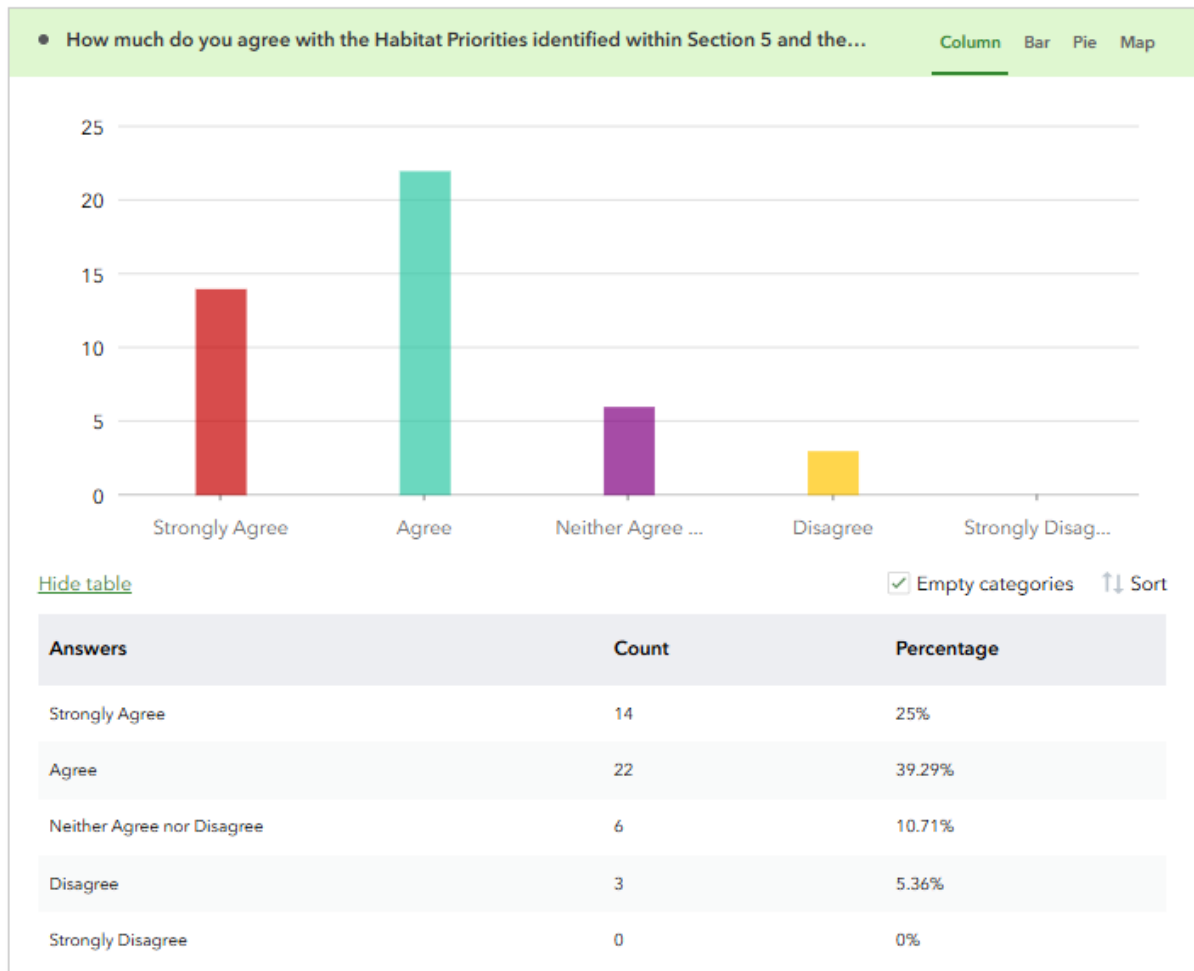
How much do you agree with the Overarching Priorities identified in Section 5 and the Potential Measures in Tables 1 to 4?

Priorities and Potential Measures: Overarching



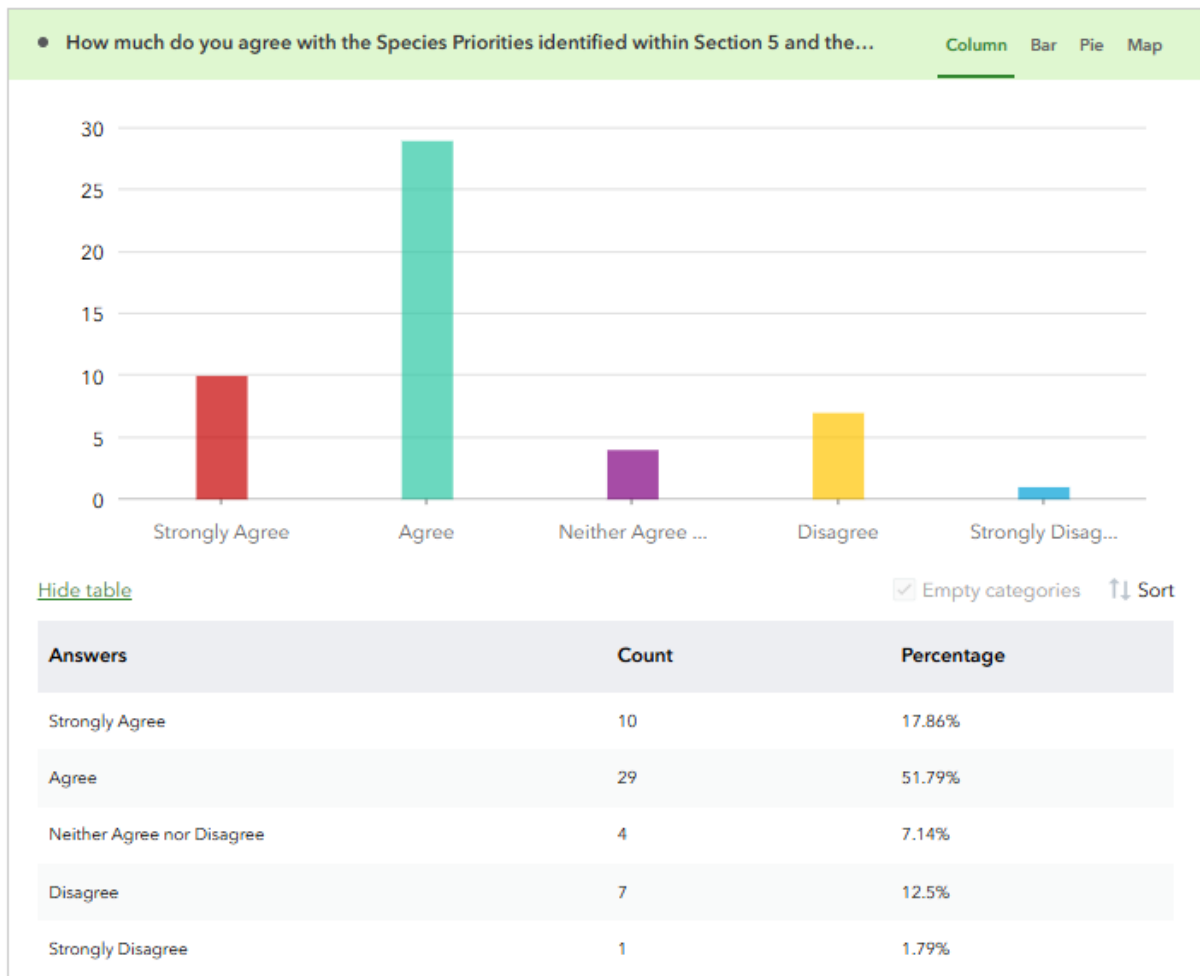
How much do you agree with the Habitat Priorities identified in Section 5 and the Potential Measures in Tables 5 to 22?

Habitat Priorities and Potential Measures



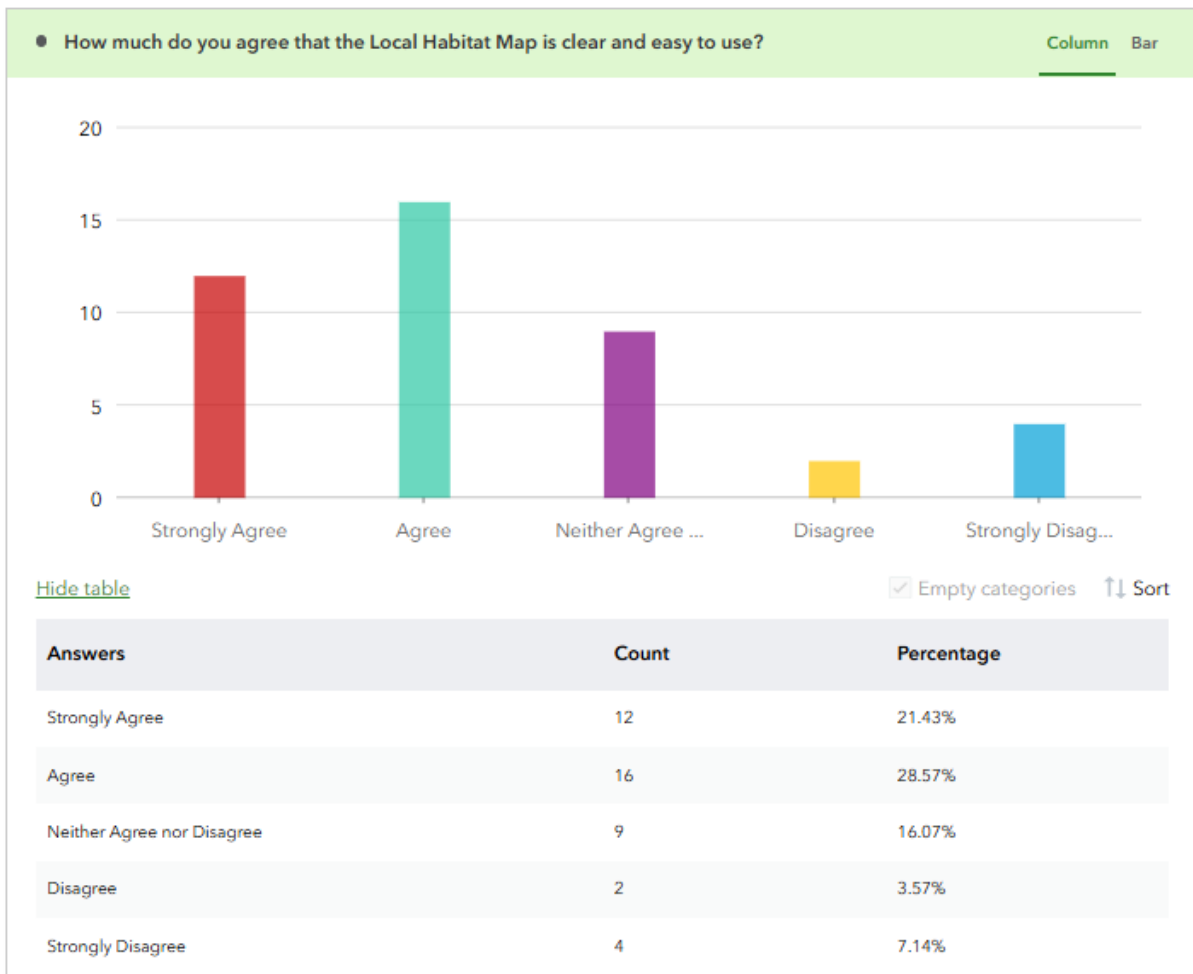
How much do you agree with the Species Priorities identified in Section 5 and the Potential Measures in Tables 23 to 28?

Species Priorities and Potential Measures

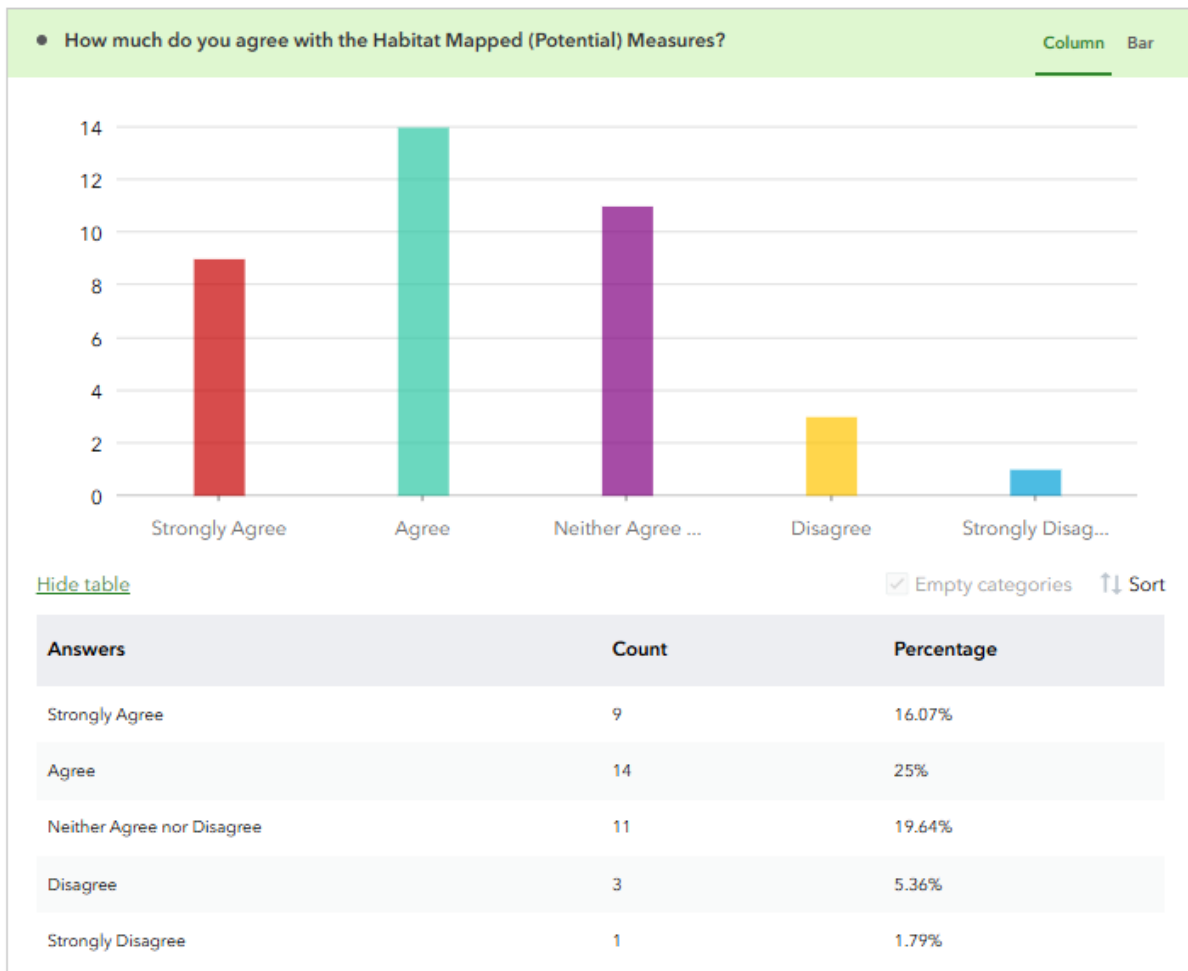


How much do you agree that the Local Habitat Map is clear and easy to use?

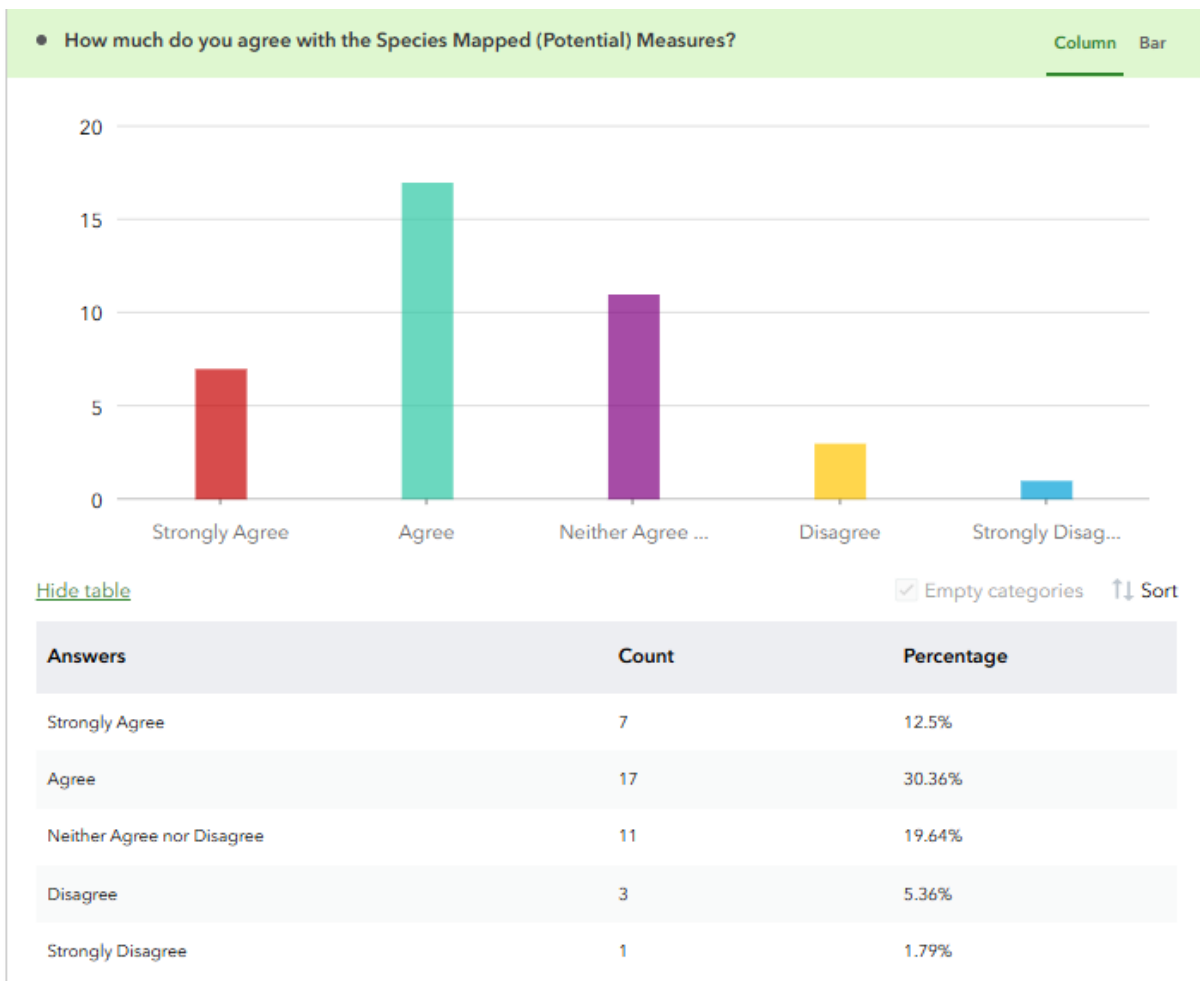
Interactive Local Habitat Map



How much do you agree with the Habitat Mapped (Potential) Measures?



How much do you agree with the Species Mapped (Potential) Measures?



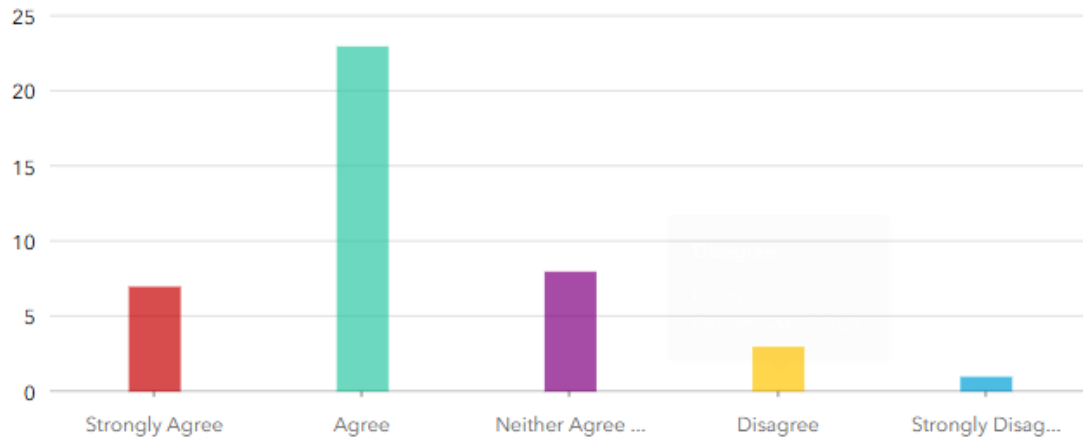
How much do you agree with the following statement: "Overall I am satisfied with the content of the Strategy?"

Closing Questions



How much do you agree with the following statement: “Overall, the Strategy is easy to use?”

● How much do you agree with the following statement: “Overall, the Strategy is easy to use”? [Column](#) [Bar](#) [Pie](#) [Map](#)

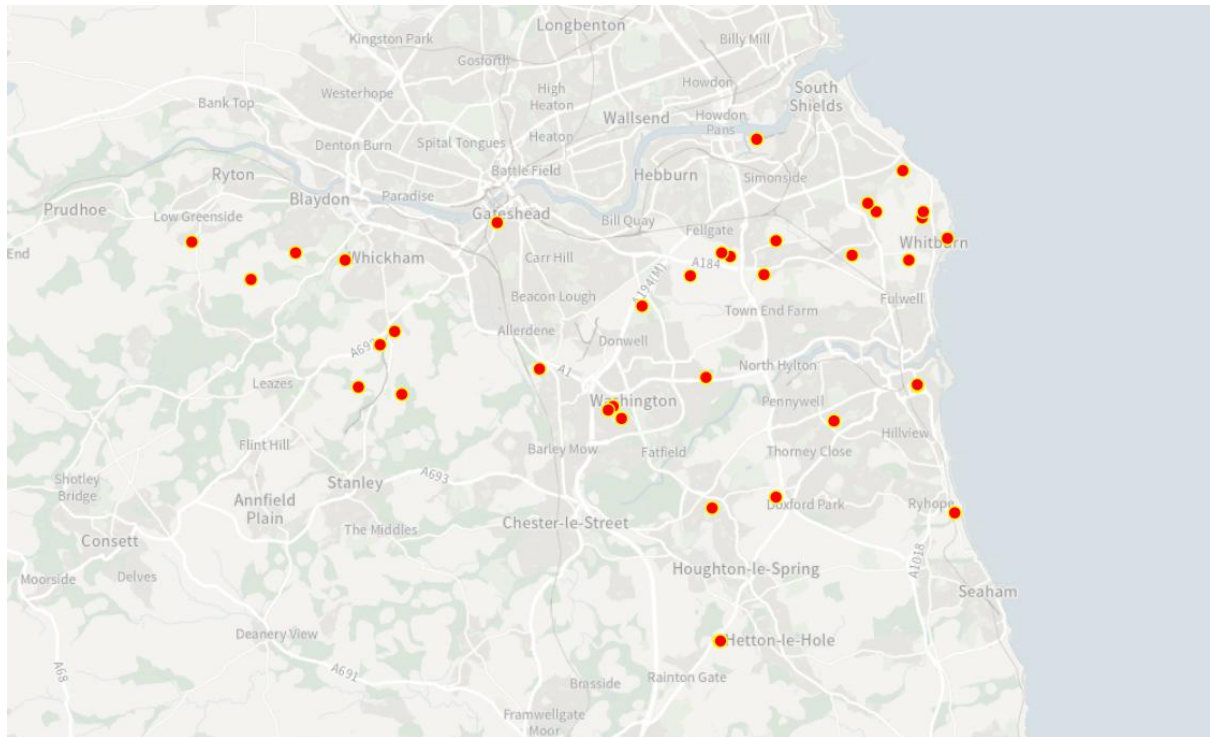


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Empty categories [↑↓ Sort](#)

Answers	Count	Percentage
Strongly Agree	7	12.5%
Agree	23	41.07%
Neither Agree nor Disagree	8	14.29%
Disagree	3	5.36%
Strongly Disagree	1	1.79%

Survey 2: Map illustrating sites identified for comment



Appendix 3- Summary of Responses

Table 1- Survey 1 Responses

Response Number	Summary of Issues Raised	Response
<p>1 Individual and Landowner / Land Manager (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with Overarching, Habitat and Species Priorities.</p> <p>Disagrees with content of strategy.</p> <p>Neither Agrees or Disagrees that the Strategy is easy to use.</p> <p>Strongly disagrees with local habitat map.</p> <p>Strongly disagrees with Habitat and Species Mapped (Potential) Measures.</p> <p><u>Content of Strategy and Local Habitat Map</u></p> <p>Does not agree with designating sites or proposing to designate sites based on desktop information.</p>	<p><u>Content of Strategy and Local Habitat Map</u></p> <p>To clarify, the Strategy does not <i>designate</i> sites, Local Nature Recovery Strategies (LNRSs) are strategic planning documents, not statutory designations. They do not confer legal protection on any land.</p> <p>The Strategy uses data and local expertise to set clear priorities for nature recovery. It identifies locations where habitat and species enhancements would deliver the greatest benefit. Participation in the LNRS is voluntary, and landowners cannot be required to carry out nature recovery activities on their land.</p> <p>The Environmental Records Information Centre North East (ERIC NE) is the Local Environmental Records Centre for the North East of England. It is responsible for collecting, managing, and providing environmental information to support planning, conservation, and wider decision-making. ERIC NE led the mapping work for the LNRS throughout its preparation.</p>

Response Number	Summary of Issues Raised	Response
		<p>The Local Habitat Map, including the mapping of existing areas of high conservation value (such as designated sites), as well as potential habitat and species measures, was prepared in line with statutory guidance. It is based on the best available evidence and follows a robust and transparent methodology. Full details regarding the methodology can be found at Appendix E of the Strategy. Given the scale and complexity of the Strategy area, conducting field surveys for every individual land parcel would not be feasible or practicable.</p>
<p>2 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees with all.</p>	<p>Response noted and welcomed.</p>

Response Number	Summary of Issues Raised	Response
<p>3 Individual (Lives or works outside of Strategy Area)</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Content of Strategy</u></p> <p>Suggests it's a shame that the areas are not linked up to allow migration of species.</p>	<p>Broad support for the LNRS noted and welcomed.</p> <p><u>Content of Strategy</u></p> <p>Improving ecological connectivity is a key aim of the Strategy. If implemented, the mapped measure would strengthen ecological connectivity both within the Strategy area and with neighbouring LNRSs. This would enhance the ability of plants and animals, including migratory species, to move through the landscape.</p>
<p>4 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees with all.</p> <p><u>Content of Strategy</u></p> <p>Highlights importance of working in partnership with others to protect biodiversity, educating others about the harm we are doing (often quite innocently and unknowingly) to the environment.</p>	<p>Response noted and welcomed.</p> <p><u>Content of Strategy</u></p> <p>As we move from preparation to delivery of the LNRS, a Nature Recovery Partnership will be established, bringing together a wide range of local partners and stakeholders to coordinate and drive implementation of the Strategy. A key element of the Partnership's role will be to advance the priorities and measures within the Strategy that focus on increasing public awareness, appreciation, and participation in nature.</p>

Response Number	Summary of Issues Raised	Response
<p>5 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with Overarching and Habitat Priorities and Potential Measures.</p> <p>Strongly Disagrees with Species Priorities.</p> <p>Disagrees that satisfied with content of Strategy overall, and disagrees that the Strategy is easy to use.</p> <p>Agrees the Local Habitat Map is easy to use.</p> <p>Disagrees with the Habitat and Species Mapped Measures.</p> <p><u>Species</u></p> <p>Suggests no value without habitat restoration, mentions lack of reference to bats.</p> <p><u>Content of Strategy</u></p> <p>Lack of governance, accountability and resource to implement.</p> <p><u>Ease of Use of Strategy</u></p> <p>Only easy if Strategy is resourced and actionable.</p> <p>Suggests author should be cognisant of the work of Rights of Rivers.</p> <p><u>Local Habitat Map</u></p> <p>Suggests for mapped streams, need to highlight that during times of excessive rain they receive direct pollution.</p>	<p><u>Overarching Priorities and Measures</u></p> <p>LNRSs are central to the Government’s efforts to reverse biodiversity decline. They differ from previous efforts in their statutory basis, wider scope, dedicated resourcing, and the integration of spatial mapping.</p> <p>The South of Tyne and Wear LNRS was developed through a strong governance framework that provided strategic oversight, operational coordination, and inclusive engagement.</p> <p>Work is ongoing to establish a Local Nature Recovery Partnership that will lead and coordinate delivery of the LNRS. Its membership, governance, and resourcing arrangements are currently being developed.</p> <p><u>Habitat Priorities and Measures</u></p> <p>WP1-Ma relates to <i>accelerating the restoration</i> of Plantations on Ancient Woodland Sites (PAWS), not Ancient Woodland itself.</p> <p>CP1-Mb focuses on reducing recreational disturbance through targeted access management where this significantly affects priority coastal habitats and species.</p> <p>The Strategy identifies a range of threats to nature recovery arising from the keeping of domestic livestock, horses, and dogs (including the use of <i>flea treatments</i>), and outlines priorities and potential measures to mitigate these.</p>

Response Number	Summary of Issues Raised	Response
	<p><u>Suggestions for Improvement</u></p> <p>Raises concerns about water pollution, impact of domestic animals on wildlife, impact of pheasant rearing on wildlife, role of homeowners tarmacking driveways, plastic grass, removing hedges, no mention of bats, no mention of a ban on neonicotinoides.</p> <p>Full comments also sent separately via email.</p>	<p>Public involvement is fundamental to the LNRS. Relevant actions are set out under 'Overarching Priorities and Measures' and 'Urban Habitats'. LNRSs are required to take a strategic, area-wide approach, identifying where habitat and species enhancements will deliver the most benefit.</p> <p>While the regulation of private gardens is outside the scope of the LNRS, the Strategy highlights the use of artificial grass and the paving over of vegetated gardens as threats to nature recovery (Chapter 4).</p> <p>The current absence of references to game management is acknowledged; it's inclusion in Chapters 3, 4, and 5 is under consideration.</p> <p><u>Species</u></p> <p>Most species-related priorities and potential measures focus on restoring, enhancing, or creating habitat.</p> <p>Artificial lighting is identified in the Strategy as a threat to biodiversity. Lighting associated with new development is managed through the Development Management process, where impacts on species (including bats) must be addressed.</p> <p>Streetlighting changes undertaken outside planning are typically the responsibility of the Local Highway Authority, which, like all public bodies, is subject to the enhanced Biodiversity Duty. This requires consideration of biodiversity, including bat conservation, when designing and implementation lighting schemes.</p>

Response Number	Summary of Issues Raised	Response
		<p>Bats are a key indicator group within the Strategy area and are legally protected, along with their roosts. Avoidance, mitigation, compensation, and enhancement measures for bats are embedded in planning practice. Although no species-specific measures for bats are listed in the LNRS, they would benefit extensively from the habitat-themed measures relating to woodland, hedgerows, ancient and veteran trees, freshwater, farmland, and urban habitats.</p> <p><u>Local Habitat Map</u></p> <p>The Strategy (Statement of Biodiversity Priorities) recognises potential point source pollution impacts on watercourses and identifies relevant mitigation measures in the form of potential measures.</p> <p>Mapping every drainage outfall is neither feasible nor consistent with statutory guidance and advice. Instead, the Local Habitat Map identifies broad areas and features where habitat and species enhancements would deliver the greatest benefit.</p>

Response Number	Summary of Issues Raised	Response
<p>6 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees with Overarching, Habitat and Species Priorities and Potential Measures.</p> <p>Agrees that they are satisfied with content of Strategy overall.</p> <p>Strongly Disagrees that the Strategy and Local Habitat Map are easy to use.</p> <p><u>Overarching</u></p> <p>Mentions recalling a stream and pond at Temple Park no longer there. Asks if drainage can be better managed there as it results in stagnant flooded areas.</p> <p>Suggests additions to overarching priorities:</p> <ul style="list-style-type: none"> - Consideration of light pollution on nocturnal activities. - Should reinstate hedgerows, ponds and watercourses as a natural way of preventing flooding. - Should aim to preserve existing trees and green spaces, and replace damaged or diseased trees in the same locality: for example trees removed on Sunderland and King George Road, and around Harton Village. - Mentions loss of green spaces and green belt for housing for Local Plan. <p><u>Content of Strategy</u></p> <p>Thinks more can be done, thinks it should be the strategy that takes</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Response noted and broad support for the LNRS welcomed.</p> <p>On the issues of flooding and drainage at Temple Park, while the creation and/or enhancement of habitat can aid in the amelioration of flood risk, it is not the role or responsibility of the LNRS to manage flood risk and drainage. Instead, this would be a matter for the Lead Local Flood Authority or Northumbrian Water, depending on the nature and source of the flooding.</p> <p>The LNRS prioritises increasing the resilience and improving the ecological condition and connectivity of watercourses, estuaries and wetlands, and increasing the extent of biodiverse water-dependent habitats within the Strategy area (RP1). In some areas of Temple Park, the Strategy identifies potential measures (actions) such as undertaking the targeted restoration, enhancement, and long-term positive management of watercourses, estuaries, and wetland habitats to achieve and maintain good ecological condition (RP1-Mb), and undertaking the creation of new biodiverse water-dependant habitats where conditions allow, prioritising opportunities to expand, buffer and connect existing high-value wetland and riparian habitats (RP1-Mc).</p> <p>The Strategy identifies artificial lighting as a potential threat to nature recovery. Potential measures identified in the Strategy would aid in mitigating the impacts of artificial lighting on biodiversity including priority habitats and species. The installation of new street lighting and changes to existing street</p>

Response Number	Summary of Issues Raised	Response
	<p>priority over Local Plans etc.</p> <p><u>Ease of Use of Strategy</u></p> <p>Too much information to read through.</p> <p><u>Local Habitat Map</u></p> <p>Cannot access it on their technology.</p>	<p>lighting is typically regulated through the Development Management process and Highways legislation respectively. As public bodies, Local Planning Authorities and Local Highways Authorities are subject to the enhanced Biodiversity Duty. This requires that in undertaking their functions they have regard to the conservation and enhancement of biodiversity.</p> <p>The Strategy is cognisant of the use of Natural Flood Management and Nature-Based Solutions as a way of alleviating flooding, which is promoted via potential measure RP2-Mb.</p> <p>The Strategy is also cognisant of existing trees via the woodland, ancient and veteran trees, scrub and hedgerows priorities and potential measures set out in tables 5-9 in Section 5.</p> <p><u>Content of Strategy</u></p> <p>LNRSs are strategic documents, not statutory designations. They do not confer legal protection or planning status on land. Local Nature Recovery Strategies constitute an important element of the evidence base for Local Plans. The Planning Practice Guidance (PPG) sets out that LPAs will have regard to the priorities, opportunities, and spatial information within the LNRS when developing planning policies and identifying locations for nature recovery. The 2025 consultation draft NPPF (whilst noting that this is not implemented National Planning Policy yet) makes it clear that land identified as Areas That Could Become of Particular Importance for Biodiversity (ACBs) should be taken into account as opportunities to</p>

Response Number	Summary of Issues Raised	Response
		<p>integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development.</p> <p><u>Ease of Use of Strategy and Local Habitat Map</u></p> <p>Every effort has been made to make the LNRS, including the Local Habitat Map, as accessible and easy to use as possible. However, as Responsible Authority, Gateshead Council recognises the unavoidable challenges faced by some stakeholders in accessing and navigating the LNRS, owing to its size and the use of spatial mapping software. This is something that will be further considered as part of any future scheduled review of the LNRS as instructed by the Secretary of State.</p>
<p>7 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all.</p>	<p>Response noted and welcomed.</p>

Response Number	Summary of Issues Raised	Response
<p>8 Washington Wildlife Group</p>	<p>Agrees with Habitat Priorities but thinks more recognition should be given to areas of scrub which can be valuable to birds and invertebrates.</p> <p>Mentions that a lot of grassland is vulnerable to development.</p>	<p>The value of scrub is recognised in the Consultation Draft, including through Priority WP4, which states that “<i>Priority scrub habitat has increased in extent and is more resilient, in good ecological condition, and better connected across the landscape</i>” supported by accompanying Potential Measures Ma – Mc. Further recognition is provided under Potential Measure SP1-BMd on Page 105, which commits to “Undertake the targeted creation, enhancement, and management of high-value habitats for priority bird species, including wet woodland and scrub...”.</p>
<p>9 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all, except that the Strategy is easy to use. Suggests all questions should have a link to the information the question is about.</p> <p>Suggests there should be 'Prevention of degradation by anti-social elements' added to Overarching Priorities.</p>	<p>While every effort has been made to ensure the draft LNRS and online consultation are accessible and easy to use, it is recognised that, owing to their size and complexity, some stakeholders may find them difficult to navigate. Unfortunately, it is not feasible to link each consultation question directly to specific sections of the LNRS, as several questions relate to information which is spread across multiple pages. Where practicable, respondents were signposted to the most relevant sections of the LNRS.</p> <p>Indirect habitat loss and degradation resulting from misuse and antisocial behaviour is identified as a threat to nature recovery in Chapter 4 of the draft LNRS. Several Priorities and Potential Measures specifically aim to increase public participation in nature recovery - raising awareness, fostering appreciation of nature, and reducing incidents of misuse and antisocial behaviour. These include:</p> <ul style="list-style-type: none"> • OP3-Mb - People and Nature: “Support school and youth engagement through outdoor learning and the

Response Number	Summary of Issues Raised	Response
		<p>creation of youth ambassador roles to give young people a voice in nature recovery;”</p> <ul style="list-style-type: none"> • UP3-Ma - Urban Habitats: “Support community-led initiatives to maintain and enhance local green and blue spaces, improving biodiversity and social value” • UP4-Mc - Urban Habitats: “Support citizen science and community-led monitoring schemes to track the presence and health of priority species and pollinators, raising public awareness and informing adaptive management”.
<p>10 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all.</p>	<p>Response noted and welcomed.</p>

Response Number	Summary of Issues Raised	Response
<p>11 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching Priorities</u></p> <p>Feels OP4 must take priority particularly around coastal and farmland habitats. Mentions that the volume of coastal habitat lost to development is alarming.</p> <p>Asks how effective the advice given to most land owners is- suggests a lot of areas around Sunderland have been neglected by land owners.</p> <p><u>Habitat Priorities</u></p> <p>Concerns raised over lack of coastal cover for migrating birds arriving in the Spring and Autumn- mentioned particularly evident from Hendon to Ryhope Dene. Adds that a lot of scrub and woodland has been lost between this area due to housing and commercial developments around Toll Bar. The scrub at the old gas tanks have now been lost to development.</p> <p>Mentions Durham and Sunderland is one of the strongholds of Willow Tits in the UK. Scrub and hedgerow habitats are essential for this species.</p> <p>Adds that Farmland habitats must also be a main priority.</p> <p>Suggests 'Coastal Scrub for migrating bird cover' should be added as a Habitat Priority.</p> <p><u>Species Priorities</u></p> <p>Mentions Grey Partridge, Yellowhammer, Tree Sparrow and Willow Tits</p>	<p><u>Overarching Priorities</u></p> <p>The decision has been taken not to rank individual priorities in order, as all are considered essential to achieving the sustainable recovery of nature within the Strategy area. However, your comments regarding OP4 are noted and appreciated.</p> <p><u>Habitat Priorities</u></p> <p>The importance of coastal habitats, including scrub, for migrant birds is fully recognised. The draft LNRS includes several Priorities and Potential Measures that support the creation, restoration, and enhancement of coastal and associated habitats that benefit migrating bird species. These include:</p> <ul style="list-style-type: none"> • OP4 Ma – Md: Local Wildlife Sites • WP2 Ma: Woodland expansion • WP4 Ma – Mc: Scrub • WP5 Ma – Mc: Hedgerows • CP1 Ma – Md: Coastal Habitats • FP1 Ma: Farmland Habitats <p>While landowner participation in the LNRS is voluntary, a core aim of the Strategy is to inspire, guide, and provide practical support to landowners, including farmers, to contribute to nature recovery. This is most clearly expressed in the following Potential Measures:</p> <ul style="list-style-type: none"> • FP2 Ma: “Establish a local funding hub to connect farmers and land managers with public and private

Response Number	Summary of Issues Raised	Response
	<p>have suffered terribly due to habitat loss.</p> <p>Mentions creating new habitat for butterflies. Plenty of habitat lost for a variety of species of butterflies.</p> <p><u>Suggested addition</u></p> <p>No mention of coastal cover for migrating birds to replace what has been lost over recent years.</p>	<p>funding sources, expert advice, and collaborative opportunities to support nature recovery activity, enhance climate resilience, and strengthen the diversification and sustainability of farm and equine businesses.”</p> <ul style="list-style-type: none"> • FP2 Mb: “Support the development of farm clusters and networks to enable knowledge sharing and peer-to-peer support, encouraging wider adoption of nature-friendly farming practices such as organic farming, regenerative agriculture, and agroforestry.” <p><u>Species Priorities</u></p> <p>The respondent’s comments regarding the bird species listed as conservation priorities within the LNRS, including willow tit, is noted and welcomed.</p> <p>The respondent’s concerns regarding habitat loss and its impacts on butterfly species are also acknowledged. Several of the overarching and habitat themed Priorities and Potential Measures within the draft LNRS will contribute to the wider recovery of butterfly populations. The Priorities and Potential Measures set out on page 107 of the Strategy will support the recovery of a number of butterfly species identified as priorities for the Strategy area.</p>

Response Number	Summary of Issues Raised	Response
<p>12 Persimmon Homes</p>	<p>Agrees with all.</p> <p><u>Habitat Priorities</u></p> <p>Suggests natural regeneration of woodland cannot be left alone- balance to achieve.</p> <p>Likes the wildflower meadow idea, but feedback from customers suggests they can look untidy- asks if there is resource to manage these areas or are we expecting the local community to manage?</p> <p><u>Overall content of strategy</u></p> <p>Asks whether there is a possible way of making collecting data available to the public- for example the great butterfly survey? Also asks why reducing the grey squirrel population is not an aspiration?</p> <p><u>Ease of Use of Strategy</u></p> <p>Questions the implications for housebuilders.</p>	<p>The respondent's broad support for the LNRS is noted and welcomed.</p> <p><u>Habitat Priorities</u></p> <p>Potential Measure WP2 Ma allows for woodland expansion to be achieved through either planting or natural regeneration. This reflects the understanding that the most appropriate method will depend on a range of factors including environmental, ecological, and funding considerations.</p> <p>The maintenance of biodiverse grassland, including types commonly encountered on development sites, such as sown wildflower meadows, relies on effective, ongoing management. At the same time, the LNRS seeks to increase public awareness, appreciation, and participation in nature. In this context, the Urban Habitats Priorities and Potential Measures set out on pages 97 – 99 are considered most relevant.</p> <p><u>Overall content of strategy</u></p> <p>On the matter of involving the public in data collection, this is addressed through the following potential measures:</p> <ul style="list-style-type: none"> • OP1 Mc: “Inspire more people to participate in and enjoy observing and recording nature by: <ul style="list-style-type: none"> ○ supporting citizen science and encouraging local groups, schools, universities, charities, and businesses to take part

Response Number	Summary of Issues Raised	Response
		<ul style="list-style-type: none"> ○ making it easy and rewarding to share wildlife sightings and habitat data with the Local Environmental Records Centre helping build a better picture of nature across the Strategy area.” ● UP4 Mc: “Support citizen science and community-led monitoring schemes to track the presence and health of priority species and pollinators, raising public awareness, and informing adaptive management.” <p>The decision not to include red squirrel as a priority species within the LNRS was taken on the following grounds:</p> <ul style="list-style-type: none"> ● The species is functionally extinct within the Strategy area. ● Not feasible to re-establish a viable population within the LNRS timeframe. ● Presence and dominance of grey squirrel and lack of viable, effective method to eradicate or control grey squirrels at the required landscape scale. ● Evidence base does not indicate any realistic opportunity for recolonisation and population recovery. ● Prioritisation and resources must focus on species with realistic prospects of recovery. ● Red squirrel conservation efforts are more appropriately targeted elsewhere (e.g. Northumberland and parts of Durham) where populations remain and conservation interventions have a higher likelihood of success.

Response Number	Summary of Issues Raised	Response
		<ul style="list-style-type: none"> • Inclusion could result in misleading expectations among stakeholders. <p><u>Ease of Use of Strategy</u></p> <p>LNRSs are strategic documents rather than statutory designations, and they do not confer legal protection or planning status on land. Instead, they form an important part of the evidence base for Local Plans. The Planning Practice Guidance (PPG) sets out that Local Planning Authorities will have regard to the priorities, opportunities, and spatial information within the LNRS when developing planning policies and identifying locations for nature recovery.</p> <p>The 2025 consultation draft NPPF (whilst noting that this is not implemented National Planning Policy yet) also clarifies that land identified as Areas That Could Become of Particular Importance for Biodiversity (ACBs) should be considered as opportunities to integrate development with environmental restoration, but this does not necessarily preclude such land from being allocated for development.</p>

Response Number	Summary of Issues Raised	Response
<p>13 Gosforth Swift Group</p>	<p>Agrees with Overarching Priorities. Disagrees with the Habitat and Species Priorities. Disagrees with the Content of the Strategy. Agrees that the Strategy is easy to use. Disagrees that the Local Habitat Map is easy to use.</p> <p><u>Habitats</u></p> <p>Table 22, Section UP4 Ma mentions provision of nesting sites. Swift brick provision into new housing should be specifically mentioned as per CIEEM & BS42021 guidance.</p> <p><u>Species</u></p> <p>Table 25 Section SP1-BMb mentions nest box schemes but needs to be more specific i.e. there should be reference to inserting on average 1 swift brick in every new dwelling in new housing developments as per CIEEM and BS42021 Guidance.</p> <p>There should be reference to protection of existing swift nest sites and if not possible, to ensure that adequate mitigation measures are made.</p> <p><u>Content of Strategy</u></p> <p>There is no mapping of swifts in the document and there should be specific mention of protecting these birds during roofing renovations and also provision of swift bricks in new housing as per CIEEM and BS42021 guidance.</p> <p><u>Local Habitat Map</u></p>	<p>The respondent's comments relate specifically to swifts and include recommendations that the LNRS should:</p> <ul style="list-style-type: none"> • require the inclusion of a swift brick in every new property within the Strategy area • include a reference to the protection of existing swift nest sites, with mitigation where protection is not possible; and • map areas within the Strategy area used by swifts <p>It is important to note that the LNRS does not set new policy, nor does it have the scope or authority to mandate the provision of swift bricks in new development.</p> <p>Potential Measure SP1 BMb within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p> <p>Potential Measure SP1 BMC supports engagement of building owners and managers, aiming to: "Raise awareness among public building and social housing owners and managers about the importance of conserving and enhancing nesting opportunities for priority bird species, including swifts, during repair and maintenance works and scheduled upgrades. This</p>

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	<p>The map does not contain any reference to urban bird presence in particular swift nest sites.</p>	<p>aligns with the respondent's request for the Strategy to reference the protection of existing swift nest sites.</p> <p>Regarding mapping, the presence of urban birds, including swifts, cannot be reliably or meaningfully mapped at LNRS scale due to:</p> <ul style="list-style-type: none"> • a lack of a comprehensive, up-to-date evidence base • significant spatial variation in recording effort • practical limitations in data licencing, integration, and resolution <p>Attempting to map swift presence would risk misinterpretation by planners, developers, and building owners/managers, and any such mapping would quickly become outdated.</p> <p>Finally, the Local Habitat Map within the LNRS is intended to depict habitats, not individual species occurrences, and therefore is not an appropriate vehicle for mapping swift distribution.</p>

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<p>14 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all, except that the Local Habitat Map is easy to use (Strongly Disagrees).</p> <p><u>Overarching Priorities</u></p> <p>Suggests we need to know where we were 30-40 years ago to show over a longer timeline how we have fared.</p> <p>Comments on bio-diversity of trees- how many more sycamores do we really need. Do we not need to introduce hedgerows and also look after them?</p> <p><u>Habitat Priorities</u></p> <p>Refers to proposed tree removal in South Shields college area.</p> <p>Asks how a "targeted engagement programme " will be defined and how this will be measured?</p> <p>Adds that water, sewage, run off of water should be considered.</p> <p><u>Species Priorities</u></p> <p>Asks how do you decide to create a pond to expand a population? Suggests a corridor of ponds/wetlands needs to be created.</p> <p><u>Overall Content of Strategy</u></p> <p>Suggests it needs legal protection.</p> <p><u>Local Habitat Map</u></p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Woodland creation operations typically involve planting locally native tree species suited to the site's conditions. In some cases, particularly amenity planting in urban areas, the use of non-native species, including sycamore, may be appropriate.</p> <p><i>Note:</i> Sycamore is a robust broadleaf tree that provides valuable public amenity benefits, including shade and visual character. Ecologically, it provides nectar, pollen, and habitat for a range of insects and other wildlife.</p> <p>Priority WP5 and its accompanying Potential Measures (WP5 Ma – Mc) aim to increase the extent, resilience, ecological condition and landscape connectivity of native hedgerows. This will be achieved through the restoration, enhancement, and active management of existing native hedgerows, alongside the targeted planting of new native hedgerows.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The proposals for South Shields College are subject to a separate planning application with South Tyneside Council and therefore fall outside the scope of the LNRS.</p> <p>The LNRS will form part of the evidence base used by Local Planning Authorities in preparing their Local Plans, including the allocation of land for development. The LNRS does not seek to prevent sustainable development; rather, sustainable development is recognised as an important mechanism for delivering positive biodiversity outcomes.</p>

Response Number	Summary of Issues Raised	Response
	<p>Suggests this should be made simpler.</p> <p>Suggests bullet point overview- too many words.</p>	<p>Regarding the respondent's reference to "Targeted Engagement Programme", it is unclear what specific concern is being raised. Overarching Potential Measure OP4 Mb states: "Develop a targeted engagement programme offering advice, recognition and incentives to Local Wildlife Site (LWS) owners." The SMART targets and metrics for this Potential Measure will be set by the Local Nature Recovery Partnership following adoption of the LNRS. Potential areas for measurement include:</p> <ul style="list-style-type: none"> • Engagement and participation • Advisory support and capacity-building • Recognition and reward schemes • Incentive uptake • Conservation outcomes and habitat management <p>Although the LNRS cannot regulate water companies, it does include a wide range of Priorities and Potential Measures (see pages 91, 92, and 95) that support water-quality improvements and help reduce flood risk through Natural Flood Management and Nature-Based Solutions.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>Following adoption, a Nature Recovery Partnership will be established to drive and coordinate delivery of the LNRS's Priorities and Potential Measures.</p> <p>The LNRS does not cover the reporting, investigation, and prosecution of environmental or wildlife crimes, as they fall</p>

Response Number	Summary of Issues Raised	Response
		<p>outside the scope of the LNRS. Suspected incidents should be reported to the appropriate authority (e.g. the Police, Environment Agency, Natural England, or Local Authorities).</p> <p>Potential Measure RP1 Mc (p. 91) promotes the creation of new biodiverse water-dependant habitats, including ponds, with a focus on expanding, buffering, and connecting existing high-value wetlands. Similarly, Potential Measure SP1 AMc (p. 101) encourages the creation of new ponds, ponds clusters, terrestrial habitat, refugia, and hibernacula in locations that reduce fragmentation and improve ecological connectivity.</p> <p><u>Overall Content of Strategy</u></p> <p>LNRSs are statutory, legally required documents prepared in accordance with the Environment Act 2021 and associated regulations. They do not replace or alter existing environmental or wildlife-protection laws.</p> <p>This first iteration of the LNRS is expected to cover 3 – 10 years. Within that period, the Secretary of State for Environment, Food and Rural Affairs will instruct its review and republication. LNRSs represent a long-term national commitment to coordinated, targeted nature recovery.</p> <p><u>Local Habitat Map</u></p> <p>Every effort has been made to make the LNRS, including the Local Habitat Map, as accessible and easy to use as possible. However, it is recognised that some stakeholders may experience challenges due to the Strategy’s scale, level of</p>

Response Number	Summary of Issues Raised	Response
		<p>detail, and use of spatial mapping software. These considerations will inform the future review of the LNRS directed by the Secretary of State.</p>
<p>15 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all.</p>	<p>Response noted and welcomed.</p>
<p>16 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all, except neither agrees nor disagrees that overall the strategy is easy to use.</p> <p>Makes a number of points:</p> <ul style="list-style-type: none"> - Important to map all of the existing facets of the rural areas in as simple a way as possible so this can be understood easily by all members of the public. A GIS based map platform will be ideal for this. 	<p>The respondent's broad support for the LNRS is noted and welcomed.</p> <p>The LNRS includes a Local Habitat Map, an interactive GIS-based tool that identifies existing areas of high conservation value (such as designated sites). It also illustrates the Strategy's Overarching, Habitat, and Species-themed Potential Measures, which can be viewed together or as separate map layers.</p>

Response Number	Summary of Issues Raised	Response
	<ul style="list-style-type: none"> - Get all 3 of the Councils invested in this but also land owners and especially young people - schools and youth projects. - Creating new and supporting existing habitats is crucial. - With the pressure placed upon councils to constantly find new area for urban development the habitat and biodiversity of our countryside can easily be forgotten therefore projects like this are very important. - The success of this project will fully be determined by firstly how all of the good quality data is captured and secondly how this can be best published or displayed over a GIS platform that makes everything clear and obvious. 	
<p>17 The Sir Tom Cowie Family Trust 2006</p>	<p>Neither Agrees nor Disagrees with all, except strongly agrees that the Local Habitat Map is easy to use.</p>	<p>Response noted and welcomed.</p>
<p>18 Forestry England</p>	<p>Suggests the following amendments to the Strategy:</p> <p><u>WP1-Ma, text on P65</u></p> <p>Forestry England note the use of 'accelerated' in this measure. It is important to note that restoration can take time and it is not always beneficial to implement immediate or accelerated change. PAWS (Plantations on Ancient Woodland Sites) restoration by Forestry England is undertaken at each thinning cycle, which over time will shift the woodland to an increased level of semi-naturalness with a greater mix of species and a greater proportion of native species at each intervention. In relation to threat on P65, this does not mean that conifers will never</p>	<p><u>WP1-Ma, text on P65</u></p> <p>The use of the term “accelerated” in this context does not imply that restoration should be carried out in a hurried or careless manner. Rather, it reflects the significant extent of PAWS woodland within the Strategy area for which no proposals or approved plans currently exist to begin their considered restoration in accordance with established industry standards and good practice guidance.</p> <p><u>Page 9- Conifer Planting on Peat Bogs and Logging</u></p>

Response Number	Summary of Issues Raised	Response
	<p>be replanted but where this is undertaken it would be in conjunction with restoration. Forestry England are required to produce long term Forest Plans which detail when and where restoration will be implemented. Both our forest plans, and our approach to PAWS are publicly available.</p> <p><u>Page 9- Conifer Planting on Peat Bogs and Logging</u></p> <p>Page 9 refers to conifer planting on peat bogs: given the changes in policy and strategy in relation to planting Forestry England feels that the inclusion of this example is not appropriate and that this text should be removed. Page 9 also refers to 'logging' - it may be more appropriate to use 'felling'.</p> <p><u>Page 43- Coniferous Plantations Description</u></p> <p>Page 43 coniferous plantations description. Given the requirements in UKWAS/UKFS in relation to species diversity, and Forestry England's resilience strategy, this phrasing could be amended to acknowledge that 'historically woodlands have been uniform.... but modern forest management is resulting in valuable habitats....'</p>	<p>It should be noted that the list on Page 9 refers to human activities occurring globally, not solely within England.</p> <p>Additionally, in England, the planting of commercial forestry on peat with up to 30cm deep is still permitted subject to Forestry Commission, while in Scotland planting is permitted on peat up to 50cm deep.</p> <p>Agreed:</p> <p>Page 9 - Remove the wording "(such as conifers on peat bogs)."</p> <p>Page 9 - Replace "logging" with "felling".</p> <p><u>Page 43- Coniferous Plantations Description</u></p> <p>The existing wording is considered reasonable and factually accurate, and no amendments are required.</p>
<p>19 Individual</p>	<p>Agrees with Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert</p>

Response Number	Summary of Issues Raised	Response
		judgement, including input from the Local Planning Authority ecologist.
<p>20 Individual (Lives or works within Strategy Area)</p>	<p>Neither agrees nor disagrees with the Overarching Priorities.</p> <p>Disagrees with Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>
<p>21 Individual</p>	<p>Agrees with Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>
<p>22 Individual (Lives or words outside of</p>	<p>Agrees with the Overarching Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes</p>

Response Number	Summary of Issues Raised	Response
Strategy Area)		for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.
23 Individual (Lives or works within Strategy Area)	<p>Agrees with all, except neither agrees nor disagrees that the strategy is easy to use.</p> <p><u>Species</u></p> <p>States coastal habitat is important for migration paths, therefore scrub areas/buffering zones are critical.</p> <p><u>Overall content of strategy</u></p> <p>Doesn't feel it goes into enough depth and obvious omission regarding light pollution for example.</p> <p><u>Suggestions for Improvement</u></p> <p>States there are important opportunities in this coastal area which they feel are not fully being recognised. The increased use of bright white LED street lighting for example has had a huge effect on nocturnal wildlife here. This is supported by citizen and scientific data e.g. GMS.</p>	<p><u>Species</u></p> <p>The importance of coastal habitats, including scrub, for migrant birds is acknowledged. The draft LNRS includes several Priorities and Potential Measures that support the creation, restoration, and enhancement of coastal and associated habitats that benefit migrating bird species. These include:</p> <ul style="list-style-type: none"> • OP4 Ma – Md: Local Wildlife Sites • WP2 Ma: Woodland expansion • WP4 Ma – Mc: Scrub • WP5 Ma – Mc: Hedgerows • CP1 Ma – Md: Coastal Habitats • FP1 Ma: Farmland Habitats <p><u>Overall content of Strategy</u></p> <p>Artificial lighting is identified on page 66 of the Strategy as posing a threat to biodiversity, recognising its potential to disrupt species behaviour, movement, and habitat use. Several of the habitat-themed potential measures included in the Strategy provide opportunities to mitigate the impacts of artificial lighting, particularly in situations where its use is unavoidable.</p>

Response Number	Summary of Issues Raised	Response
		<p>The installation of new street lighting, as well as alterations to existing lighting, is typically governed through the Development Management process and relevant Highways legislation. As public bodies, both Local Planning Authorities and Local Highways Authorities are subject to the enhanced Biodiversity Duty, which requires them to have regard to the conservation and enhancement of biodiversity when exercising their functions. This includes ensuring that decisions relating to lighting design, placement, and operation carefully mitigate potential ecological impacts.</p> <p><u>Suggestions for Improvement</u></p> <p>As per previous response, artificial lighting is identified on page 66 of the Strategy as posing a threat to biodiversity, recognising its potential to disrupt species behaviour, movement, and habitat use. Several of the habitat-themed potential measures included in the Strategy provide opportunities to mitigate the impacts of artificial lighting, particularly in situations where its use is unavoidable.</p>

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<p>24 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with the Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>

Response Number	Summary of Issues Raised	Response
<p>25 Individual (Lives or works within Strategy Area)</p>	<p>Neither agrees or disagrees with the Overarching and Habitat Priorities and Potential Measures.</p> <p>Disagrees with Species Priorities and Potential Measures.</p> <p>Disagrees with the overall content of the Strategy.</p> <p>Strongly agrees Strategy is easy to use.</p> <p>Neither agrees or disagrees that the Local Habitat Map is easy to use.</p> <p>Neither agrees or disagrees with the Habitat and Species Mapped Potential Measures.</p> <p><u>Overarching Priorities</u></p> <p>Suggests that the measures sound more like actions. Measures should either measure actions (not just state them) or measure outcomes or impact. Without targets these seem meaningless.</p> <p>Would like to see more focus on reversing the long-term nature negative management of urban green spaces, suggests the LNRS should have power to mandate action from landowners including home owners. For example by putting a TPO on all trees in the region.</p> <p><u>Habitats</u></p> <p>Suggests some are not strict enough and should be mandated. Surprised not to see urban plantations and micro woodlands in the woodland section, and makes reference to loss of these habitats in the Sunderland Council area.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The term “Potential Measures” and its use within LNRSs originates from Defra. As outlined on pages 19 and 78 of the Strategy, Potential Measures represent practical actions which, if implemented, would help to deliver the LNRS Priorities.</p> <p>The development and setting of SMART targets and associated metrics for these Priorities and Potential Measures will be undertaken by the Local Nature Recovery Partnership following publication of the LNRS.</p> <p>It’s important to note that landowner participation in the LNRS is entirely voluntary. The LNRS does not mandate the undertaking of nature-recovery actions on either private or public land. Instead, the Strategy aims to inspire, encourage, and support efforts to recover nature – promoting, for example, the nature-friendly management of land across all sectors (p.97).</p> <p><u>Habitats Priorities and Potential Measures</u></p> <p>WP2 Ma supports the planting of native woodland, with a focus on expanding, buffering and connecting existing woodlands. In addition, UP1 Ma specifically promotes increasing urban green and blue spaces, including through the planting of native trees and shrubs.</p> <p>WP5 Ma encourages the restoration, enhancement, and long-term positive management of native hedgerow, including in</p>

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	<p>Suggests that nature first management of urban head rows (not cutting every side every year), leaving log piles when felling on council land rather than taking all the wood away, dead hedges created from maintenance. Promotion of a change of risk appetite among councils and the general population around bushes and trees.</p> <p><u>Species</u></p> <p>Suggests would like to see the Strategy go further in terms of building owners. Recommends the law should be changed to require all homes with appropriately sited walls to be retrofitted with nest boxes to help red listed birds or bats. This should be mandated in all new build properties and extensions.</p> <p>Recommends stricter laws against blocked nesting opportunities for house martins, mandatory nest boxes on properties, banning of fake grass.</p> <p><u>Content of Strategy</u></p> <p>Suggests that for the strategy to be more effective would have preferred it to be backed by powers to force change on landowners, not just talk to them.</p> <p><u>Local Habitat Map</u></p> <p>Suggests it is missing a bottom layer explaining in more detail why a site is marked as it is.</p>	<p>urban and peri-urban areas, to help bring them into good ecological condition.</p> <p>The retention of deadwood habitat, such as log piles created during local authority felling operations, aligns with Potential Measure UP1 Mb, which aims to “Promote nature-friendly management of public and private land to increase the area of green and blue infrastructure actively managed for nature.”</p> <p>Additionally, Potential Measure SP1-BMd on page 105 supports the creation, enhancement and management of high-value habitats for priority birds, including wet woodland and scrub with standing and fallen deadwood.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>It is not within the scope of the LNRS to require building or homeowners to install bird or bat boxes. However, Potential Measures SP1 BMb and SP1 BMc provide a strong basis for encouraging enhanced nesting provision for priority bird species in both new and existing buildings. These measures offer practical opportunities to integrate wildlife-friendly features into the built environment on a voluntary basis.</p> <p><u>Content of Strategy</u></p> <p>The LNRS does not impose mandatory actions on landowners; all Potential Measures set out in the Strategy rely on voluntary participation. Nonetheless, the aim of the LNRS is to inspire and support environmental stewardship across communities. It is hoped that landowners will find the guidance and</p>

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		<p>recommendations within the Strategy helpful in identifying opportunities to contribute to nature recovery in ways that align with their land management priorities.</p> <p><u>Local Habitat Map</u></p> <p>The Local Habitat Map includes a pop-up information box that appears in the bottom-left corner of the screen when a user clicks on a site or location. This pop-up provides details of the mapped measure(s) associated with that location, including the relevant Potential Measure code(s), the accompanying wording, and a unique identifier number (UID).</p>

Response Number	Summary of Issues Raised	Response
<p>26 Individual (Lives or works outside of Strategy Area)</p>	<p>Agrees with Species Priorities and Potential Measures. Agrees that the Strategy is overall easy to use.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>
<p>27 Individual (Lives or works outside of Strategy Area)</p>	<p>Agrees with Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>
<p>28 Durham Wildlife Trust</p>	<p>Agrees with the Species Priorities and Potential Measures.</p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>Potential Measure SP1 BMB within the draft Strategy states: "... require integrated and externally mounted nest boxes for priority species (including swifts) in new development proposals." In applying this measure through the Development Management process, details such as the number, location, and specification of integrated and externally mounted nest boxes for priority bird species, including swifts, would need to be informed by ecological evidence, practical feasibility, and expert judgement, including input from the Local Planning Authority ecologist.</p>

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<p>29 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with Overarching, Habitat and Species Priorities.</p> <p><u>Overarching Priorities</u></p> <p>No mention of Wildlife Corridors in 'OP4: Local Wildlife Sites', suggests should not miss the opportunity of stating the importance of protecting and enhancing wildlife corridors, to link up 'LWSs'.</p> <p><u>Habitat Priorities</u></p> <p>Suggests it would be beneficial to include a similar priority to WP3-Ma, to educate and 'support residents on the identification, care and management of ancient and veteran trees.'</p> <p>Table 10 'GP1: Grasslands' states 'long-term positive management of grasslands'. Suggests an additional priority to 'Provide advice, training and ongoing support to local authorities on the identification, care and management of grasslands.' It is hinted at in 'UP1-Mb' but needs clearer wording to overcome the contractor (internal or external) led mismanagement of grassland, which defers to the efficient deployment of staff and machinery, rather than enhancement of habitats.</p> <p><u>Species Priorities</u></p> <p>There is no specific mention of bats. Suggests an additional or a reworded priority to state 'reduce fragmentation and improve ecological connectivity' of hunting areas for bats.</p> <p><u>Ease of use of Strategy and Local Habitat Map</u></p> <p>Neither agrees or disagrees that the Strategy is easy to use, suggests it</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Throughout its development, the LNRS has been guided by the Lawton principles, which call for nature to be “more, bigger, better, and better connected”. Reducing habitat fragmentation and improving ecological connectivity form a central pillar of the LNRS.</p> <p>This commitment is reflected throughout the Strategy – most of the habitat-themed Priorities explicitly include the aim for habitats to be “better connected across the landscape.” This principle is then translated into practical action through the accompanying Potential Measures. For example, WP2 Ma states: “Undertake the planting or allow for the natural regeneration and colonisation of native woodland, targeting the expansion, buffering and connection of existing woodlands.”</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>WP3 Ma is particularly relevant to landowners and land managers responsible for land containing ancient and veteran trees. Potential Measures OP1 Mc and UP4 Mc encourage increasing the public’s understanding, appreciation, and participation in nature recovery, including through citizen science. This could be applied more specifically to ancient and veteran trees; indeed, the Ancient Tree Inventory is a UK-wide citizen science project led by the Woodland Trust.</p> <p>The current wording of Potential Measures GP1 Ma, GP1 Mb, and UP1 Mb is considered sufficiently detailed to support the</p>

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	<p>relies on use of terms that are not well understood by the average resident.</p> <p>Disagrees that Local Habitat Map is easy to use, suggests it is composed of areas and terms that may be understood by ecologists and planners, but will be poorly understood by residents or landowners. Recommends a version where the layers are given titles or explanations in plain English.</p>	<p>improved identification and management of high-biodiversity-value grasslands on public land. It is not the intention of the Strategy to be overly prescriptive at this stage. Further detail is expected to emerge during the delivery phase of the LNRS, including, where appropriate, the development of delivery plans to guide implementation.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>The decision not to identify bats as a specific priority for the LNRS reflects the view that, as a group, bats are likely to benefit substantially from the habitat-themed Priorities and Potential Measures. These measures collectively will support an increase in the extent, quality, and connectedness of high value roosting, foraging, and commuting habitat, features that are critical to bat conservation.</p> <p>Bats and their habitats remain of high conservation importance, and their protection is firmly embedded within the Development Management process, ensuring they continue to receive robust consideration through existing regulatory mechanisms.</p> <p><u>Ease of use of Strategy and Local Habitat Map</u></p> <p>Every effort has been made to make the LNRS, including the Local Habitat Map, as accessible and easy to use as possible. However, it is recognised that some stakeholders may experience challenges due to the Strategy’s scale, technical nature, and use of spatial mapping software. These</p>

Response Number	Summary of Issues Raised	Response
		considerations will inform any future review of the LNRS as directed by the Secretary of State.

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<p>30 Canny Wild CIC</p>	<p>Agrees with Overarching, Habitat and Species Priorities.</p> <p><u>Overarching Priorities</u></p> <p>Suggests an overarching priority on extending the quality and extent of habitats across the strategy area with a measurable target to measure success.</p> <p>Suggests a focus within the overarching priorities on enhancing and protecting connections/ corridors between the local wildlife sites (OP4) and other green sites, particularly those Areas that Could Become of Particular Importance for Biodiversity (ACBs) and other green and blue spaces that have potential for improvement and have not yet been mapped.</p> <p>The overarching priorities should be clear on how they build on work already ongoing to engage residents and visitors with biodiversity. In particular UP1, 2, 3 and 4 should clearly state how they will build on groups already supporting public engagement with biodiversity.</p> <p><u>Habitat Priorities</u></p> <p>It's important that scrub is included as it can be under-valued/not well understood.</p> <p>Would like to see the priorities include an education/engagement strand including residents, council officers and councillors consistently as within the urban habitats priorities (UP1-4) so more people understand the biodiversity within scrubland habitats and trees/shrubs/hedging.</p> <p>A specific objective would be to ensure grassland typically sub-</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The respondent's comment regarding the need to build on existing nature-recovery efforts and community engagement undertaken by local groups is noted. The contribution of these groups, both now and in the future, is vital, and their role as partners in delivering the LNRS cannot be overstated.</p> <p>That said, the LNRS is not intended to be overly prescriptive at this stage. Potential Measures OP1 Mc, OP3 Mb, UP2 Ma, UP3 Ma, and UP4 Mc all promote increasing public awareness, appreciation, and participation in nature recovery. It is implicit that this includes supporting and working alongside those groups and individuals who are already actively engaged in conservation and community-led initiatives.</p> <p>Almost all of the habitat-themed Priorities within the LNRS emphasise increasing the extent of priority habitats across the Strategy area. These include native woodland, scrub, native hedgerow, biodiverse grassland, lowland heath, open mosaic habitats, biodiverse water-dependent habitats, coastal habitats, agricultural land positively managed for nature, and biodiverse multifunctional green and blue infrastructure.</p> <p>The development of SMART targets and metrics to measure progress against these ambitions will form part of the transition to the delivery phase of the Strategy. This work will be led by the Local Nature Recovery Partnership, which will be established following publication of the LNRS and will include community representation. This approach will be repeated in respect of the quality of habitats within the Strategy area.</p>

Response Number	Summary of Issues Raised	Response
	<p>contracted by our councils is focussed on enhanced bio-diversity - a big opportunity to improve the management of these urban habitats.</p> <p>Connecting both blue and green habitats which have become fragmented should be embedded in these priorities.</p> <p><u>Species Priorities</u></p> <p>Species - We are concerned that bats are not named in this section and we think this is a big omission.</p> <p>We agree with the priorities focussed on invertebrates and suggest that an education strand would strengthen this focus so people are aware of the vital role of insects.</p> <p>We noticed that the birds species within the priority are specified by habitat but other species are specified consistently?</p> <p><u>Local Habitat Map</u></p> <p>At present it is very difficult to use without a good understanding of all the terminology adopted throughout the strategy.</p> <p><u>Suggestions for Improvement</u></p> <p>We'd really like to see greater engagement of community groups and residents at every stage of this process, particularly those already working to engage residents.</p> <p>We'd like to see a commitment to improving habitats with strong resident and volunteering groups already committed to them. We can</p>	<p>Throughout its development, the LNRS, including the Local Habitat Map, has been guided by the Lawton principles, which call for nature to be “more, bigger, better, and better connected”. Reducing habitat fragmentation and improving ecological connectivity form a central pillar of the LNRS.</p> <p>This commitment is reflected throughout the Strategy – most of the habitat-themed Priorities explicitly include the aim for habitats to be “better connected across the landscape.” This principle is then translated into practical action through the accompanying Potential Measures. For example, WP2 Ma states: “Undertake the planting or allow for the natural regeneration and colonisation of native woodland, targeting the expansion, buffering and connection of existing woodlands.”</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The respondent’s comments regarding scrub and grassland habitats are noted. Potential Measures WP4 Ma – WP4 Mc aim to increase the extent, ecological condition, and connectivity of priority scrub habitats across the Strategy area.</p> <p>The current wording of Potential Measure UP1 Mb, together with Potential Measures GP1 Ma and GP1 Mb, is considered sufficiently comprehensive to support greater awareness of valuable scrub and grassland habitats among council officers, elected members, and residents. These measures also provide an appropriate basis for the improved identification and management of such habitats.</p>

Response Number	Summary of Issues Raised	Response
	<p>see that the establishment of a multi-stakeholder partnership with strong representation from landowners, businesses, and communities is planned to coordinate and lead delivery efforts. We think it is a missed opportunity not to embed this engagement at every stage of the development, planning, implementation and review of the strategy.</p>	<p>It is not the intention of the Strategy to be overly prescriptive at this stage. Further detail is expected to emerge during the delivery phase of the LNRS, including, where appropriate, the development of delivery plans to guide implementation.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>The decision not to identify bats as a specific priority within the LNRS reflects the view that, as a group, bats are likely to benefit considerably from the habitat-themed Priorities and Potential Measures. Taken together, these measures will enhance the extent, quality, and connectivity of high-value roosting, foraging, and commuting habitat, features that are critical to bat conservation.</p> <p>Bats and their habitats remain of high conservation importance, and their protection is firmly embedded within the Development Management process. This ensures they continue to receive robust consideration through existing regulatory mechanisms.</p> <p><i>Note:</i> The omission of a species from the LNRS does not imply it is of lesser conservation importance, nor does it alter its legal protection.</p> <p>It is considered that Potential Measure UP4 Mc “Support citizen science and community-led monitoring schemes to track the presence and health of priority species and pollinators, raising public awareness, and informing adaptive management.”, already addresses the respondent’s comments regarding</p>

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		<p>education of the public and other stakeholders on role and value of insects.</p> <p>Due to their number and shared habitat requirements, individual priority bird species have been grouped into assemblage (Farmland, Urban, Wader, and Woodland). Species are still listed individually alongside each Potential Measure and, in some cases, specific measures relate to species across more than one assemblage.</p> <p>For example, Potential Measure SP1 BMb “Design and implement targeted nest box schemes to increase and improve nesting sites for priority birds and require integrated and externally mounted nest boxes for priority bird species in new development proposals.” applies to several species within the Farmland, Urban, and Woodland assemblages.</p> <p><i>Note:</i> Twenty-five individual priority bird species have been included in the LNRS following a rigorous selection process that accords with statutory guidance and incorporates advice from local experts. The number of species within the other priority species groups is as follows:</p> <ul style="list-style-type: none"> • Amphibians: 2no • Butterflies: 5no • Fish: 8no • Mammals: 5no • Reptiles: 4no <p><u>Ease of use of Local Habitat Map</u></p>

Response Number	Summary of Issues Raised	Response
		<p>Every effort has been made to ensure that the LNRS, including the Local Habitat Map, is as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology, such as Areas of Particular Importance for Biodiversity (APIBs). However, it is recognised that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and reliance on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p> <p><u>Suggestions for Improvement</u></p> <p>During the preparation of the Strategy, engagement has taken place with a broad range of stakeholders. It is anticipated that community representation, including local groups already involved in nature recovery and community outreach, will form a key part of the Local Nature Recovery Partnership to be established following publication of the LNRS. This Partnership will lead on the further development of the Strategy (e.g., target setting) and its implementation.</p>

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<p>31 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all.</p> <p><u>Overarching Priorities</u></p> <p>Suggests things could be explored further, such as:</p> <p>i) working with local elected representatives, who really know the detail of their local areas and potential groups for involvement. ii) making used of funding available through Biology Week (Royal Society of Biology).</p> <p><u>Habitat Priorities</u></p> <p>Suggests a section for Industrial Habitats- for example the Team Valley Trading Estate (TVTE) and the Metro Centre footprint. There are a lot of green areas on both estates that could be really important, and aware that in the past the TVTE management team have done a lot of work with things like preserving and replacing the Elm population. These sites could potentially be added to the list of Areas of Particular Importance for Biodiversity.</p> <p>Also suggests could be focused tree species planting on golf courses.</p> <p><u>Species Priorities</u></p> <p>Suggests tree species which thrive on riversides i.e. the banks of the River Team e.g Willow (especially the Weeping variety) and Alder at Team Valley.</p> <p><u>Local Habitat Map</u></p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Following publication of the LNRS, a Local Nature Recovery Partnership will be established to lead on its further development (e.g., target setting) and implementation. The Partnership will be responsible for putting in place a robust governance structure and ensuring effective engagement with stakeholders, securing appropriate representation to maximise ownership and participation in delivering the Strategy. It will also play a key role in identifying and maximising opportunities to fund the delivery of nature recovery.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>Formal and informal greenspaces within industrial estates and golf courses form important components of the Strategy areas green and blue infrastructure. Enhancing the ecological condition, extent, connectivity, and accessibility of such areas is a key aim of the LNRS and is addressed under Priorities UP1 – UP4.</p> <p>For golf courses, many are also extensively covered under other habitat-themed Priorities and Potential Measures including (but not limited to) those relating to woodland restoration, enhancement, and expansion.</p> <p>It is also anticipated that landowner and business engagement, and their representation, will be a key feature of the Local Nature Recovery Partnership to be established following publication of the Strategy.</p>

Response Number	Summary of Issues Raised	Response
	<p>Thinks it's very useful- can see that the TVTE or the Metro Centre site are not currently considered to be important to the strategy.</p> <p><u>Suggestions for Improvement</u></p> <p>Suggests that within Priorities, a section for Trees & Shrubs (in addition to birds, butterflies and fish) is added. Suggests a list of trees that should not be planted either because they are invasive or are non-native and do not support a wide range of insect life etc. Particularly thinking of having a position on sycamore, which as a former Nature Reserve Warden has never been in favour of and was surprised by its inclusion in the recently planted Millers Wood in Swalwell.</p> <p>Asks whether more of the Nature Towns and Cities programme could be utilised and the fact that Sunderland City Council is already receiving funding as part of this initiative? Perhaps could encourage and support the other two partners to apply for this also.</p> <p>To Promote Awareness (page 25), perhaps could add "and also via elected members and School Governing Bodies."</p>	<p>Action – Include a list of examples of green and blue infrastructure, including greenspaces within industrial estates and golf courses, within the Statement of Biodiversity Priorities, for example alongside the Urban Habitats Priorities and Potential Measures.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>The inclusion of individual tree species would not align with the statutory guidance on selecting and including priority species within the LNRS. However, the expansion of tree planting, including in association with riparian habitats, is addressed extensively throughout the Strategy, particularly through Potential Measures: WP2 Ma, RP1 Md, and UP2 Ma.</p> <p><u>Suggestions for Improvement</u></p> <p>Priorities WP1 - WP5 support the enhanced extent, ecological condition, connectivity, and management of woodland, trees, scrub and native hedgerows.</p> <p>The purpose of the Strategy is to provide strategic direction. It is not intended to offer detailed technical guidance, such as species lists for habitat creation, restoration, or enhancement projects. However, it is possible to signpost readers to existing published information including online via a hyperlink within the Strategy document.</p> <p>Action – Where available, include hyperlinks in Strategy to published habitat and species technical guidance and good practice information.</p>

Response Number	Summary of Issues Raised	Response
		<p>Once established, the Local Nature Recovery Partnership will be responsible for identifying and pursuing funding opportunities to support the delivery of nature recovery, including potential programmes such as Nature Towns and Cities.</p> <p><i>Note:</i> Gateshead and South Tyneside councils have previously submitted bids to the Nature Towns and Cities Fund, but were unsuccessful.</p> <p>The comment regarding inclusion of “elected members” and “school governing bodies” under <i>General public - Promote Awareness</i> on page 25 of Strategy is noted. Schools are already referenced.</p> <p>Action – Amend wording to include elected members (i.e. local councillors and MPs).</p>

Response Number	Summary of Issues Raised	Response
<p>32 The Woodland Trust</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching Priorities</u></p> <p>Suggests the Strategy would be strengthened by the inclusion of an explicit overarching priority, with associated measures, focused on protecting, expanding and enhancing nature. This would provide a unifying framework for delivery and ensure all actions contribute to measurable improvements in habitat extent, condition and connectivity. Such a priority should emphasise the protection of existing high-value habitats, including irreplaceable habitats such as ancient woodland; the expansion of nature at scale through well-sited habitat creation; and the enhancement of habitat condition to improve ecological resilience and function.</p> <p><u>Habitat Priorities</u></p> <p>Supports the woodland measures within the LNRS but recommends their strengthening through the inclusion of additional actions.</p> <p>Recommend new measures that explicitly address the impacts of invasive species and pressures such as deer browsing, rhododendron and other non-native invasive species, which can significantly degrade woodland condition and prevent regeneration. [<i>Invasive species</i>].</p> <p>Advocate for a specific measure focused on the provision of woodland buffers to protect core woodland habitats from edge effects, pollution and disturbance, while enhancing connectivity. [<i>Woodland Buffers</i>].</p> <p>Recommend amending existing measures to clarify that natural colonisation may not be appropriate in all circumstances. In some</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>It is not within the scope of the LNRS to provide additional protection for sites, habitats, or species beyond that already afforded through existing legislation.</p> <p>The Strategy identifies the targeted expansion, enhanced resilience, improved ecological condition, and increased connectivity as priorities for all priority habitats featured. These are supported by accompanying Potential Measures, practical actions which, if implemented, will contribute directly to delivering these priorities.</p> <p>Likewise, the priorities and Potential Measures relating to priority species are designed to support their sustainable recovery and progress towards favourable conservation status.</p> <p>The development of SMART targets and associated metrics to enable effective monitoring will be undertaken by the Local Nature Recovery Partnership, which will be established following publication of the Strategy.</p> <p>Given this framework, it is not considered necessary to include an Overarching Priority and associated Potential Measures for the general expansion and enhancement of nature.</p> <p><i>Note:</i> The expansion of ancient woodland (including PAWS) and ancient trees is not included as a priority in the LNRS, as this is not feasible.</p> <p><u>Habitat Priorities and Potential Measures</u></p>

Response Number	Summary of Issues Raised	Response
	<p>locations, active planting of locally appropriate native species within woodland buffers may be a more effective and timely approach to delivering protection, resilience and biodiversity benefits. [Natural Colonisation].</p> <p>Recommend a new priority in the urban habitat section that supports the retention and proactive management of existing urban trees where safe to do so, recognising their vital role in biodiversity, climate resilience, air quality and public health. The same priority, or a new one if more suitable, should promote the planting of new, well-designed urban trees to address gaps in canopy cover and deliver benefits to communities most in need. [Urban Trees].</p> <p>Recommend the use of the Woodland Trust’s Tree Equity Score as an evidence-based tool to help identify areas of low tree cover and high social need, ensuring that new tree planting is targeted fairly and effectively. Embedding this approach within the LNRS would support more equitable, resilient and nature-rich urban environments across the South of Tyne area. [Tree Equity Score].</p> <p><u>Suggestions for Improvement</u></p> <p>[Long- established woodland]- Strongly advocate for the additional inclusion of long-established woodland within the LNRS mapping. Long-established woodland, while not meeting the strict definition of ancient woodland, often retain high ecological value, complex soil structures and continuity of woodland cover over centuries. They can support important species assemblages and act as buffers and stepping stones that enhance the resilience and connectivity of ancient woodland sites.</p> <p>Mapping long-established woodland would provide a more complete</p>	<p>The impacts arising from, and need for, effective detection, control, and monitoring of invasive non-native species and invasive native species (collectively referred to as invasive species) are referenced extensively throughout the Strategy. This includes explicit references to the impacts on woodland habitats, particularly those associated with grey squirrel and deer.</p> <p>Although the detection, control, and monitoring of invasive species are not referenced explicitly within certain sections, it is reasonable to assume that actions aimed at improving the resilience and ecological condition of woodland habitats (Priority WP1 Woodland), including the implementation of Potential Measures WP1 Ma and WP1 Mb, would encompass the detection, management, and monitoring on invasive species.</p> <p>Given the effect of invasive species on other priority habitats, it would not be appropriate to include explicit wording on invasive species solely within woodland-related priorities and potential measures.</p> <p>Action: Consider incorporating invasive species as an Overarching Priority; alternatively, include reference to invasive species within relevant existing Potential Measures for all habitats, or provide a link within the document to published invasive species technical and good practice guidance.</p> <p>The Strategy’s existing Potential Measure WP1 Mb (“Undertake the buffering of ancient and native woodland through the</p>

Response Number	Summary of Issues Raised	Response
	<p>evidence base to inform strategic planning, targeting of restoration and appropriate protection from loss or degradation. It would also support better alignment with development planning and woodland creation initiatives by identifying opportunities to strengthen existing woodland networks.</p>	<p>restoration, enhancement and long-term positive management of adjoining semi-natural habitat”) and Potential Measure WP2 Ma (“Undertake the planting or allow for the natural regeneration and colonisation of native woodland, targeting the expansion, buffering and connection of existing woodlands”), directly addresses the respondent’s comments regarding woodland buffers.</p> <p>The role of the LNRS is to provide strategic rather than detailed technical guidance. Determining whether planting or natural regeneration is the most appropriate means of increasing woodland cover at a specific site will depend on a range of ecological and funding considerations. Therefore, the wording of Potential Measure WP2 Ma, which cites both planting and natural regeneration as valid approaches to expanding native woodland, is considered appropriate.</p> <p>Priorities UP1 and UP2 within the Urban Habitats section of the Strategy promote the restoration, enhancement, management, expansion, and improved connectivity of green and blue infrastructure, including trees and woodland. Furthermore, Priorities WP1 and WP2, supporting the positive management of existing woodland and increasing the extent of native woodland, are also applicable to urban areas. Potential Measure RP1 Md refers to enhancement of the riparian zones of rivers and streams, including in urban areas, through the creation, restoration, enhancement, and long-term positive management of semi-natural habitats including, where appropriate, native woodland and non-woodland tree cover. It is therefore considered that the existing provisions within the Strategy relating to urban trees are sufficiently comprehensive.</p>

Response Number	Summary of Issues Raised	Response
		<p>Action: Include a list of example green and blue infrastructure assets, including trees and woodland, alongside the Urban Habitats Priorities and Potential Measures.</p> <p><i>Note:</i> The forthcoming North East Community Forest – Forest Plan is expected to provide more detailed proposals for increasing tree and woodland cover within urban areas of the LNRS, with a focus on areas of social need and low existing canopy cover.</p> <p><u>Suggestions for Improvement</u></p> <p><i>As irreplaceable habitat</i>, all ancient woodland, including Plantation on Ancient Woodland Sites (PAWS), listed in the Ancient Woodland Inventory, is included in the Local Habitat Map as Areas of Particular Importance for Biodiversity (APIBs).</p> <p>Areas of long-established woodland identified within the Priority Habitat Inventory – Deciduous Woodland (England) have been mapped as core habitat for the purpose of the LNRS. This dataset, combined with the Ancient Woodland layer, forms the basis of the Mapped Measures:</p> <ul style="list-style-type: none"> • WP1 Mb “Undertake the enhancement and long-term positive management of ancient and native woodland to achieve good ecological condition.” • WP1 Mc “Undertake the buffering of ancient and native woodland through the restoration, enhancement and long-term management of adjoining semi-natural habitat.”

Response Number	Summary of Issues Raised	Response
		<ul style="list-style-type: none"><li data-bbox="1323 280 1962 416">• WP2 Ma “Undertake the planting or allow for the natural regeneration and colonisation of native woodland, targeting the expansion, buffering and connection of existing woodlands.”

Response Number	Summary of Issues Raised	Response
<p>33 Biodiverse Consulting</p>	<p>Neither Agrees nor Disagrees with the Overarching, Habitat and Species Priorities. Or the habitat and species mapped measures.</p> <p>Agrees that satisfied overall with content of the Strategy.</p> <p>Agrees that the Strategy is easy to use.</p> <p>Suggests the following minor changes to the section 'Biodiversity Net Gain and the role of LNRS':</p> <ol style="list-style-type: none"> 1. Clarify that the 'strategic significance' multiplier applies to onsite and offsite habitat interventions (it currently indicates that this only applies to offsite biodiversity gains) 2. The value of the multiplier should be specified (15% boost in biodiversity units for developments which deliver LNRS measures) 3. Confirm that 'strategic significance' only applies to newly created/enhanced habitat and does not affect the baseline value of any site. <p><u>Suggestions for improvement:</u></p> <p>Appendix E considers allocated sites and consented development sites unsuitable for delivery for LNRS measures. We believe this indicates that development and nature recovery are incompatible. The emerging 2025 NPPF specifically states that large scale residential and mixed-use development should "[address] strategic environmental opportunities and safeguards, including those set out in Local Nature Recovery Strategies" (HO4) and land identified as ACIB in an LNRS "should not necessarily preclude the allocation of land for development" (N1).</p>	<p><u>Biodiversity Net Gain and the Role of LNRS</u></p> <p>Action: Amend wording on page 21 to clarify that:</p> <p>Baseline habitats, both on-site and off-site, located within LNRS mapped areas are assigned low strategic significance. On-site and off-site habitat interventions that align with LNRS mapped areas and mapped measures, are assigned high strategic significance. Certain mapped LNRS measure are eligible for a 15% uplift in biodiversity units via the strategic significance multiplier <i>Note:</i> this uplift in not a change to the statutory BNG percentage requirement (which remains 10% nationally). Instead, it increases the unit value of qualifying habitat interventions carried out in LNRS mapped areas.</p> <p><u>Suggestions for Improvement</u></p> <p>The decision not to include permitted, allocated, or safeguarded sites within LNRS mapped areas was taken to avoid creating uncertainty and confusion for landowners, developers, and communities. It is still expected that opportunities to support nature recovery in relation to the future development of such will be required in line with national and local planning policy.</p> <p>The Strategy makes it clear that the mapping of land as Areas That Could Become of Particular Importance for Biodiversity (ACBs) does not necessarily preclude it being allocated for development through the normal Local Plan making process.</p>

Response Number	Summary of Issues Raised	Response
	<p>Developers should be encouraged to see the LNRS as an opportunity and not a constraint. The Kent LNRS explains on page 22 why sites allocated for development are important for delivery of LNRS measures. It may be a good idea to give an example of an allocated site, the specific LNRS measures which apply to it and suggestions for delivery as part of the allocation. This would bring the concept to life for a developer dealing with this issue.</p>	<p>The Strategy does encourage developers to view development as an opportunity to support nature recovery, informed and supported by the LNRS and other statutory frameworks (e.g. BNG).</p> <p>Action: Amend wording on page 143 to provide improved clarity.</p>
<p>34 Bumblebee Conservation Trust</p>	<p>Neither agrees nor disagrees with the Habitat Priorities.</p> <p><u>Suggestions for Improvement:</u></p> <p>States they have prepared guidance on developing Local Nature Recovery Strategies that are effective in helping our most threatened bumblebee species recover and supporting the populations of more common species. This includes prioritising rare bumblebees found within the LNRS area; integrating bumblebee monitoring into LNRS plans; and collaborating with conservation organisations to address specific habitat needs of priority bumblebee species.</p> <p>Disagrees with the Species Priorities, as believes that consideration should be given to identifying the Moss carder as a priority species.</p>	<p><u>Suggestions for Improvement</u></p> <p>The selection of priority species for inclusion in the LNRS was carried out in accordance with statutory guidance and accompanying advice. The decision not to include the moss carder bumblebee as a priority species was based on the number, age, and reliability of records for this species within the Strategy area, as provided by the local records centre. It is also considered that the species will benefit from several of the habitat-themed priorities and associated potential measures, particularly GP1 Ma – GP1 Md which support the restoration, enhancement, positive management, and expansion of the priority grassland habitats, including at the coast, upon which the species depends.</p>

Response Number	Summary of Issues Raised	Response
<p>35 Marine Management Organisation</p>	<p><u>Overarching Priorities</u></p> <p>Agrees with the Overarching Priorities and Potential Measures, but thinks they could be strengthened by clearer reference to the role of coastal and marine planning where priorities relate to estuarine and coastal environments, helping to ensure consistency across the land–sea interface.</p> <p><u>Habitat Priorities</u></p> <p>Agrees with the Habitat Priorities and Potential Measures, but suggests that for measures affecting coastal or estuarine habitats, it may be helpful to more clearly acknowledge coastal processes and existing management frameworks, to support effective and deliverable outcomes.</p> <p><u>Species Priorities</u></p> <p>Agrees with the Species Priorities and Potential Measures, but suggests that where measures relate to migratory or coastal species, clearer signposting of the need for coordination across land and sea could further strengthen the strategy.</p> <p><u>Ease of Use of Strategy</u></p> <p>Suggests that additional guidance on how the map relates to coastal and marine planning could further enhance usability.</p> <p><u>Suggested improvements</u></p> <p>Continued engagement with a wide range of stakeholders, including</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Action: introduce wording within the Strategy document to clarify that the scope of the LNRS extends to the mean low tide mark, outline the regulatory framework governing to marine and coastal waters, and emphasise the importance of collaborative working to ensure close integration and consistency across the land-sea interface, including in relation to both habitats and species.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>Potential Measure CP1 Ma states:</p> <p><i>“Restore, enhance, and manage priority coastal habitats and support natural coastal process by controlling invasive species and removing or modifying anthropogenic features such as land drains and hard coastal defences, where feasible.”</i></p> <p>This existing wording, together with the proposed amendments above, is considered sufficient to address the respondent’s comments.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>Proposed amendments above, considered sufficient to address the respondent’s comments.</p> <p><u>Ease of Use of Strategy</u></p>

Response Number	Summary of Issues Raised	Response
	<p>those with responsibilities for coastal and marine environments, will be important as the strategy moves towards implementation to ensure joined-up outcomes across land and sea.</p>	<p>Proposed amendments above, considered sufficient to address the respondent's comments.</p> <p><u>Suggestions for Improvement</u></p> <p>Proposed amendments above, considered sufficient to address the respondent's comments.</p>

Response Number	Summary of Issues Raised	Response
<p>36 National Trails UK</p>	<p><u>Overarching Priorities</u></p> <p>Neither agrees or disagrees with the Overarching Priorities and Potential Measures. Highlights that as an internationally recognised and publicly funded access route, the King Charles III England Coast Path and its coastal margin should be recognised throughout the LNRS in its ability to connect people with nature and the coast, and in its potential as ecological corridors.</p> <p><u>Habitat Priorities</u></p> <p>Neither agrees or disagrees with the Habitat Priorities and Potential Measures. Suggests that in UP2:Ma and GP1 National Trail & Public Rights of Way should be included as their verges can be managed similarly if not more easily than road/rail verges, plus bring additional access to nature/health & wellbeing benefits, especially in areas with limited access to green space, especially along the King Charles III England Coast Path with its designated corridor, the coastal margin.</p> <p>In CP1 and CP1-Mb, National Trails UK recognises the impact of recreational disturbance on nature, especially at the coast, however, would ask that more positive examples delivering for people and nature shared. E.g. from the wider National Trails network; the Brancaster board walk and the Species Survival Funded Coastal Grasslands Reconnected project.</p> <p><u>Overall content of Strategy</u></p> <p>Disagrees with the content of the strategy overall. Recommends the recognition of the multifunctioning benefits, including for biodiversity, that come with sustainable access and heritage management. Both the</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The Strategy includes multiple references to the health and well-being benefits associated with access to nature and the opportunities to enhance public access.</p> <p>Priority OP3 states:</p> <p><i>“More people regularly access, benefit from, and take positive action for nature locally.”</i></p> <p>The corresponding Potential Measure OP3 Ma reads:</p> <p><i>“Where appropriate and feasible, improve access to nature sites for everyone, including those without private transport.”</i></p> <p>Action: Consider amending the wording on page 59 of the Strategy document to read:</p> <p><i>“The South of Tyne and Wear coastline stretches approximately 19.5 km, from the River Tyne to Ryhope Dene. This narrow coastal corridor is ecologically rich, supporting a mosaic of interconnected habitats including maritime cliffs and slopes, sand dunes, vegetated shingle, sandy beaches, strandlines, and rocky shores. The coastline also incorporates part of the King Charles III England Coast Path, providing a continuous, nationally significant walking route that is used extensively by the public.”</i></p> <p><u>Habitat Priorities and Potential Measures</u></p>

Response Number	Summary of Issues Raised	Response
	<p>King Charles III England Coast Path National Trail and its associated coastal margin, Public Rights of Way and the Durham Heritage Coast designations should be recognised in their role in connecting people with heritage and nature and in their potential as ecological corridors. Also requests the mention of 'Coastal Wildbelt'. National Trails UK are developing this new initiative funded via the Protected Landscapes Partnership that aims to unlock the potential of the King Charles III England Coast Path's coastal margin, and the spaces beyond – amplifying its importance and influence.</p> <p><u>Suggestions for improvement</u></p> <p>Requests for the mention of the King Charles III England Coast Path, its coastal margin and the Public Rights of Way network in the 'Description of the Strategy Area'. As an internationally recognised and publicly funded route, the King Charles III England Coast path and its coastal margin should be recognised throughout the LNRS for its ability to connect people with nature and the coast, and in its potential as ecological corridors.</p> <p>When mentioning "roadside verges" on page 73, National Trails UK requests the mention of National Trail corridors. National Trail and Public Rights of Way verges can be managed similarly if not more easily than road/rail verges, plus bring additional access to nature/health & wellbeing benefits, especially in areas with limited access to green space.</p> <p><u>Local Habitat Map</u></p> <p>Neither agrees or disagrees that the Local Habitat Map is easy to use.</p> <p>Ask that the National Trails and the King Charles III England Coast Path's</p>	<p>The LNRS is intended to provide strategic, rather than detailed technical guidance. For this reason, the inclusion of explicit references to National Trails and Public Rights of Way in Priority GP1 and Potential Measure UP2 Ma is not considered appropriate.</p> <p>Action: Include National Trails and Public Rights of Way to list of example green and blue infrastructure assets to accompany the Urban Habitats Priorities and Potential Measures.</p> <p>Action: Consider including a hyperlink within the Strategy document to National Trails Nature Recovery Toolkit.</p> <p>The Wildbelt initiative is not sufficiently developed at present to warrant inclusion within the LNRS. Any detailed actions aimed at addressing recreational disturbance impacts would be co-designed with broad stakeholder involvement, ensuring constructive collaboration and shared positive outcomes. The existing wording within CP1 and CP1 Mb is considered appropriate, and no changes are proposed.</p> <p><u>Overall Content of Strategy</u></p> <p>Previous responses are considered to adequately address the respondent's comments.</p> <p><u>Suggestions for Improvement</u></p> <p>Previous responses address the suggestion to include reference to the King Charles III England Coastal Path.</p>

Response Number	Summary of Issues Raised	Response
	<p>associated coastal margin are added to the Habitat Map so that they can more easily be related to opportunities for nature recovery.</p>	<p>Action: Add 'National Trails' and 'Public Rights of Way' to the list of Public Land Management examples on page 73.</p> <p><u>Local Habitat Map</u></p> <p>Statutory regulations, guidance and accompanying advice require the Local Habitat Map to include only the following layers:</p> <ul style="list-style-type: none"> • Areas of Particular Importance for Biodiversity (APIBs) • Mapped Measures • Areas That Could Become of Particular Importance for Biodiversity (ACBs) <p>The addition of further layers, such as National Trails and Public Rights of Way, would represent a departure from statutory requirements and is not considered necessary or desirable.</p>

Response Number	Summary of Issues Raised	Response
<p>37 Tyne Rivers Trust</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching</u></p> <p>OP1 Evidence Base relies on biodiversity data e.g. ERIC and biological recording. Perhaps other types of data should be included such as physical habitat (geology, geomorphology), chemical (e.g. water quality, air quality etc.)</p> <p><u>Habitat</u></p> <p>Recognise the aim to avoid duplicating measures across different habitats/species, but state that some measures are not where they would expect to find them. For example, riparian planting is not mentioned in the Woodland habitat, but it is mentioned in RP1 Md (Freshwater habitat).</p> <p>Also involving landowners and educating them in land management for agriculture and horsiculture is not mentioned in Freshwater habitats, but is mentioned in FP1 (Farmland habitat). There may be value in referring to the overlap while avoiding duplication.</p> <p>NNS (Non-Native Species) and controlling invasive species are not mentioned in any of the Freshwater habitat measures. However, it is specifically mentioned in the Coastal habitat measures. Given the importance of waterways as vectors for transporting invasive plant species, this feels like something that should be referenced more clearly.</p> <p>FP2 Mb could specifically mention the ‘equicentral system’ in the same vein that it mentions organic farming, regenerative agriculture and agroforestry, given it mentions equine businesses.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>When referring to ‘a comprehensive, up-to-date evidence base...’, this is understood to include not only biological information but also a wide range of other datasets, such as geology, geomorphology, water quality, flood risk, spatial planning, land use, and social need.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>Potential Measure WP2 Ma is intended to encompass the planting, natural regeneration, and colonisation of a range of woodland typologies across diverse settings, with the aim of expanding, buffering, and connecting existing woodlands. This would include riparian planting.</p> <p>As riparian zones form the transitional interface between terrestrial and freshwater environments, it is more appropriate to reference their expansion and enhancement explicitly within the Freshwater and Estuaries Priorities and Potential Measures section of the Strategy. This includes the creation, restoration, enhancement, and long-term management of semi-natural riparian habitats, including where appropriate, both native woodland and non-woodland tree cover.</p> <p>Action: Consider cross-referencing complimentary habitat and species potential measures within other relevant habitat priorities and measures sections. For example, include RP1 Md as a footnote under Woodland Priorities and Potential Measures.</p>

Response Number	Summary of Issues Raised	Response
	<p>There are three duplicates in the measures for CP1 and CP2. These may need to be revisited.</p> <p><u>Species</u></p> <p>Fish are well covered with measures for introducing gravel and removing/mitigating barriers but opportunities for introducing or retaining woody structures would be very valuable for fish and a range of other species. It would also be helpful to communicate the value of these features to the public as the consensus is often that they should be removed.</p> <p><u>Overall easy to use</u></p> <p>Linking measures to only one priority does mean they can be hard to find if categorized under another priority. While necessary to avoid duplication, it may be helpful to provide a reference to the relevant measures under different priorities.</p> <p><u>Suggestions for Improvement</u></p> <p>The barriers to fish which is a mapped layer doesn't seem to include all the known barriers on the Don. It looks like only weirs have been included, not culverts. The methodology for identifying barriers may need revisiting.</p>	<p>Action: Amend RP1 Mb to read: "Undertake the targeted restoration, enhancement, and long-term positive management of watercourses, estuaries, and wetland habitats, including the control of invasive species, to achieve and maintain good ecological condition."</p> <p>Action: Amend FP2 Mb to read: "Support the development of farm clusters and networks to enable knowledge sharing and peer-to-peer support, encouraging wider adoption of nature-friendly farming and land management practices such as organic farming, regenerative agriculture, agroforestry, and the equicentral system." Note: Consider amending Priority FP2 to "More farm and equine businesses are supported to contribute to nature's recovery,"</p> <p>Action: Delete CP2 and associated Potential Measures as covered under CP1.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>Action: Amend SP1 FMa to read:</p> <p>"Retain, and where necessary, introduce coarse sediment (e.g. gravel) and in-stream woody debris to increase habitat complexity, improve spawning and nursery habitat, and enhanced food availability."</p> <p><u>East of Use of Strategy</u></p> <p>Refer to previous response under Habitat Priorities and Potential Measures.</p>

Response Number	Summary of Issues Raised	Response
		<p data-bbox="1272 316 1630 347"><u>Suggestions for Improvement</u></p> <p data-bbox="1272 387 1944 451">Action: Review and where necessary amend mapping of barriers to fish movement.</p>

Response Number	Summary of Issues Raised	Response
<p>38 Port of Tyne</p>	<p>Agrees with all, except neither agrees or disagrees that the strategy or LNRS map is easy to use, and with the habitat/species mapped measures.</p> <p><u>Suggested additions to Overarching, Habitat and Species Priorities (same answer given for each)</u></p> <p>The Port recognises the importance of the River Tyne and supports these priorities however, the River is critical to the region’s economic growth and these priorities have to be balanced with economic growth. The Port of Tyne is one of the UK’s major deep seaports, and consequently is a vital trading gateway between six continents. The quayside locations within the Port have been identified as part of the Mayor of the NECA’s Mission to make the North East the Home of the Green Energy Revolution. This will create 25000 skilled and well paid jobs.</p> <p>The role the Port will play in developing the Off Shore Wind and Renewables by the creation of a Green Sectors is essential and specifically mentioned in the Mission Statement.</p> <p>The Port welcomes the opportunity to engage with the authority to assist with understanding the extent and condition of habitats on Port land to ensure the data base is correct and consider how this may be reconciled with economic growth within the LNRS area.</p> <p><u>Ease of Use of Strategy</u></p> <p>It is unclear from the consultation what the purpose of the LNRS is for initial reading. The Port were not aware of any previous consultations on this, at which they are surprised given ongoing dialogue with South Tyneside Council.</p>	<p><u>Suggested additions to Overarching, Habitat and Species Priorities</u></p> <p>The authors of the LNRS, together with strategic partners including the Environment Agency, welcome the opportunity to engage constructively with the Port of Tyne to further discuss the extent and condition of habitats on the Port’s land, and to ensure the shared aims of economic growth, job creation, climate adaptation and resilience, and nature recovery are achieved.</p> <p><u>Ease of Use of Strategy</u></p> <p>The purpose of the LNRS is to identify local nature recovery priorities, map areas where action will deliver the greatest benefit, coordinate partners, and guide planning and investment, ultimately contributing to England’s national Nature Recovery Network.</p> <p><u>Suggestions for Improvement</u></p> <p>As above, the authors of the LNRS, together with strategic partners including the Environment Agency, welcome the opportunity to engage constructively with the Port of Tyne on the aims and objectives of the Strategy, and to discuss the shared goals of economic growth, job creation, climate adaptation and resilience, and nature recovery.</p>

Response Number	Summary of Issues Raised	Response
	<p data-bbox="371 280 730 309"><u>Suggestions for Improvement</u></p> <p data-bbox="371 352 1211 523">The Port would query whether there is the provision for strategic solutions and the opportunity for stakeholder engagement on these? The Port would welcome a strategic approach for coastal habitats that enable a balance between economic and biodiversity targets to be found, recognising the importance of both.</p>	

Response Number	Summary of Issues Raised	Response
<p>39 Durham Heritage Coast Partnership / Tyne-Wear Tees KCIII ECP Partnership</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching</u></p> <p>OP3 - The coastal section of the LNRS has the King Charles III England Coast Path running through it. As a National Trail this provides free access to nature, keeping people away from but close enough to sensitive habitats. Even if the ECP isn't mentioned here it should be mentioned somewhere for it.</p> <p><u>Suggestions for Improvement</u></p> <p>Suggests amendments in two areas:</p> <ul style="list-style-type: none"> - Inclusion of the KCIII ECP as a publicly funded National Trail that is easy to access and gives coastal access in a controlled way. - Inclusion of the Heritage Coast definition from the border with County Durham to Hendon. Having this as context demonstrates the significance of the landscape, giving weight to measures in this area. Sunderland CC is one of the partners in the Heritage Coast Partnership. <p>Highlights some overlap of layers on the Sunderland section of coast as buffering and expansion of grassland.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>See response to response number 36 including proposed amended wording including reference to King Charles III England Coastal Path:</p> <p>Action: Consider amending the wording on page 59 of the Strategy document to read:</p> <p><i>“The South of Tyne and Wear coastline stretches approximately 19.5 km, from the River Tyne to Ryhope Dene. This narrow coastal corridor is ecologically rich, supporting a mosaic of interconnected habitats including maritime cliffs and slopes, sand dunes, vegetated shingle, sandy beaches, strandlines, and rocky shores. The coastline also incorporates part of the King Charles III England Coast Path, providing a continuous, nationally significant walking route that is used extensively by the public.”</i></p> <p><u>Suggestions for Improvement</u></p> <p>King Charles III England Coastal Path – See previous comment.</p> <p>The Durham Heritage Coast is not a nationally designated protected landscape (such as a National Park or AONB). Given the time-limited status of the Durham Heritage Coast Partnership and its geographic extent, its inclusion within the South of Tyne and Wear LNRS is not considered necessary.</p>

Response Number	Summary of Issues Raised	Response
<p>40 Individual</p>	<p>Agrees with Overarching, Habitat and Species Priorities and Potential Measures.</p> <p>Neither agrees nor disagrees with the remaining.</p> <p><u>Species Priorities</u></p> <p>Same response as response no. 13 with regards to integrated swift boxes and protection of existing nest sites.</p>	<p>See response to response number 13.</p>

Response Number	Summary of Issues Raised	Response
<p>41 Banks Group</p>	<p>Agrees with Overarching, Habitat and Species Priorities and Potential Measures.</p> <p>Neither agrees or disagrees with overall content of the strategy.</p> <p>Agrees the strategy is easy to use.</p> <p>Neither agrees or disagrees that Local Habitat Map is easy to use.</p> <p>Disagrees with Habitat and Species Mapped Potential Measures.</p> <p><u>Overarching</u></p> <p>In Table 4, there needs to be consideration for failing LWS. Where the ecological importance has been lost and cannot be restored, efforts will be better spent improving areas that can achieve nature recovery.</p> <p>Suggests there should be consideration for nature recovery within an urbanised and ever-changing setting given the urbanised nature of the South of Tyne and Wear. There needs to be links to how nature recovery and conservation can work alongside social and economic growth, which is vital to the success of the area. All three pillars of sustainability (social, economic and environmental) need to work together to ensure success in every area. This will include ensuring nature recovery it compatible with residential, employment, leisure and retail development.</p> <p><u>Habitat</u></p> <p>Table 5 - ancient and native woodland should not be grouped, as they can be very different. Ancient woodland is offered a lot more protection than native, especially if it is young plantation native woodland. Ancient</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The selection and de-selection of Local Wildlife Sites set out within Local Sites – Guidance on their Identification, Selection and Management (Defra, 2006).</p> <p>The Strategy recognises the shared aims of sustainable development, economic growth, climate adaptation and resilience, and nature recovery. It does not consider these aims to be incompatible.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The LNRS does not confer any additional legal protection on land or habitats.</p> <p>The enhancement of ancient woodland where it has become ecologically degraded is a legitimate aim of the LNRS, as is securing its long-term positive management. Changes to the wording or arrange of Table 5 - 7 are therefore not considered necessary or desirable.</p> <p>Landowner participation in the LNRS is entirely voluntary. Landowners cannot be required to undertake nature recovery actions, including the enhancement of existing habitats such as Open Mosaic Habitats, on their land. However, where feasible, the retention and integration of Open Mosaic Habitats within development proposals can deliver both ecological and financial benefits for developers.</p> <p><u>Species Priorities and Potential Measures</u></p>

Response Number	Summary of Issues Raised	Response
	<p>woodland should be protected, whilst native woodland should be used for enhancement. Consider Table 5 being ancient and table 6 being native, could merge table 7 into an ancient specific table.</p> <p>The LNRS is not used to prevent development, however encouragement of open mosaic habitat enhancement on brownfield sites that are appropriate for development may result in loss of viable development land for the area's economic growth. OMH is difficult to replicate for BNG purposes and can result in a site not being developed when opportunities for OMH exist elsewhere.</p> <p><u>Species</u></p> <p>Preparing habitats in the more open and undeveloped areas of the authorities will help to encourage species to live here and have undisturbed habitats. There will need to be further consideration for recreational disturbance in busy areas, such as country parks.</p> <p><u>Overall content of Strategy</u></p> <p>Whilst the strategy provides opportunities for nature recovery, there are elements that could block growth for the area, particularly in Gateshead which has been washed over with different requirements anywhere that is currently open land. Nature recovery is important, but cannot come forward alone without social and economic growth in the area.</p> <p><u>Ease of Use of Strategy</u></p> <p>Strategy document easy to follow. Interactive map may not be as easy for users who aren't familiar with interactive mapping.</p>	<p>Comments noted.</p> <p><u>Content of Strategy</u></p> <p>The Strategy recognises the shared aims of sustainable development, economic growth, climate adaptation and resilience, and nature recovery, and does not regard these objectives as incompatible.</p> <p>The mapping of potential measures has been undertaken in line with statutory guidance, using best available information and robust, evidence-based criteria and methodologies.</p> <p>The inclusion of land within the LNRS mapping does not prevent it from being allocated for development through the Local Plan process, nor does it preclude planning applications from being submitted for land identified within the LNRS.</p> <p><u>Ease of Use of Strategy and Local Habitat Map</u></p> <p>Every effort has been made to ensure that the LNRS, including the Local Habitat Map, is as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology, such as Areas of Particular Importance for Biodiversity (APIBs). However, it is recognised that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and reliance on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p>

Response Number	Summary of Issues Raised	Response
	<p data-bbox="371 280 770 309"><u>Ease of Use of Local Habitat Map</u></p> <p data-bbox="371 352 1205 451">Whilst the map is easy to use for someone who regularly uses policies maps etc., the mixed layers and overlapping information is not the clearest for those who are unfamiliar.</p>	

Response Number	Summary of Issues Raised	Response
<p>42 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees with the Overarching and Habitat Priorities and Potential Measures.</p> <p>Disagrees with the Species Priorities and Potential Measures.</p> <p>Neither Agrees or Disagrees that they are satisfied with the content of the strategy.</p> <p>Agrees the Strategy is easy to use.</p> <p>Neither Agrees or Disagrees that the Local Habitat Map is easy to use, or with the Habitat or Species Mapped Measures.</p> <p><u>Species</u></p> <p>States despite artificial light pollution being identified as a threat to biodiversity in section 4 (page 66), no measure is identified in section 5 that might address this for invertebrates, mammals and birds. Suggests a review of lighting should take place in APIBs.</p> <p>Suggests bats should be included as they are endangered and legally protected in the UK. Moths in addition to butterflies. Also a review of artificial lighting timing, height, brightness, colour & direction re. threats of indirect habitat loss and degradation.</p> <p><u>Content of Strategy</u></p> <p>States that the risk posed to biodiversity by artificial light is not addressed and should be.</p> <p><u>Ease of use of Strategy</u></p>	<p><u>Species Priorities and Potential Measures</u></p> <p>Lighting associated with new development is controlled through the Development Management process, where impacts on species (including bats) must be addressed.</p> <p>Street-lighting changes undertaken outside planning are typically the responsibility of the Local Highway Authority, which, like all public bodies, is subject to the enhanced Biodiversity Duty. This requires consideration of biodiversity, including bat conservation, when designing and operating street-lighting.</p> <p>Bats are a key indicator group within the Strategy area and are legally protected, along with their roosts. Avoidance, mitigation, compensation, and enhancement measures for bats are well-established within planning practice.</p> <p>Although no species-specific measures for bats are listed in the LNRS, they are expected to benefit significantly from the habitat-focused measures relating to woodland, hedgerows, ancient and veteran trees, freshwater, farmland, and urban habitats.</p> <p><u>Content of Strategy</u></p> <p>Refer to comments provided under Species Priorities and Potential Measures.</p> <p><u>Ease of Use of Strategy and Local Habitat Map</u></p>

Response Number	Summary of Issues Raised	Response
	<p>Expresses disappointment at the lack of opportunity for a public meeting, states online survey insufficient.</p> <p><u>Ease of use of Local Habitat Map</u></p> <p>Suggests useability perhaps dependent on what devices people are using. States Species measures unclear when colours are overlaid.</p>	<p>Every effort has been made to ensure that the LNRS, including the Local Habitat Map, is as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology, such as Areas of Particular Importance for Biodiversity (APIBs). However, it is recognised that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and reliance on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p>

Response Number	Summary of Issues Raised	Response
<p>43 Taylor Wimpey</p>	<p>Neither Agrees or Disagrees with the Overarching Priorities and Potential Measures.</p> <p>Agrees with the Habitat and Species Priorities and Potential Measures.</p> <p>Neither Agrees or Disagrees that they are satisfied with overall content of Strategy.</p> <p>Agrees that the Strategy is easy to use, and that the Local Habitat Map is easy to use.</p> <p>Neither Agrees or Disagrees with the Habitat and Species Mapped Measures.</p> <p><u>Overarching</u></p> <p>Suggestions are offered to keep the Strategy focused and prevent misuse blocking development. Suggest strengthening comment on page 115.</p> <p>The LNRS should allow flexibility for additional enhancement opportunities agreed with the ecological advisor for BNG uplift.</p> <p>If habitats may be absent or other site-specific constraints exist, enhancement requirements should be waived.</p> <p>Any mapping differences from GIS usage by LERC (Local Environmental Records Centres) should be accommodated to ensure evidence-led outcomes.</p> <p><u>Habitats</u></p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The scope of the LNRS and the status of land mapped within the Strategy, namely that it does not confer additional legal protection, prevent land being allocated for development in Local Plans, or preclude the submission of planning, is reiterated throughout the document.</p> <p>Participation in the LNRS by landowners is voluntary. The mapped measures are designed to typically offer flexibility for those who choose to undertake nature recovery on their land.</p> <p>It is not within the remit of the LNRS to allow departure from statutory or policy requirements relating to Biodiversity Net Gain or the conservation of nature through the planning system. Where further clarification is required for a specific site, it is recommended a pre-application enquiry be submitted to the relevant local planning authority.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The LNRS does not remove the need for detailed survey work or the preparation an Ecological Impact Assessment by a suitably qualified and experienced ecologist to addresses the specific ecological issues associated with a proposed development site.</p> <p><u>Content of Strategy</u></p>

Response Number	Summary of Issues Raised	Response
	<p>States whilst the principles are broadly agreed, the appropriate enhancement and mitigation can differ on a site-by-site basis and, therefore, it is key that flexibility is retained to allow this. Further, it should be recognised that not all priorities can be achieved on individual development sites. There are many factors that need to be taken into account when looking at opportunities for biodiversity and, therefore, it may be that the priorities are prioritised as not all types of enhancements will be able to be delivered. It is appropriate that this is recognised and the determination of priorities for enhancement should be undertaken on a site-by-site basis.</p> <p><u>Content of Strategy</u></p> <p>Suggests geographical information systems may lack the accuracy of site-specific data, LNRS should address potential data discrepancies and prioritise site-specific findings. NPPF Paragraph 159 emphasises proposals' contribution to identified habitats; however, improper development could result if applied without in-depth site-specific data. In such cases, recent and robust surveys should overrule LNRS mapping.</p> <p>Though LNRS is a consideration, it's not decisive, and misuse may hinder development. Clarity about LNRS intentions and restrictions is needed. Recent site-specific surveys should be considered and take precedence.</p> <p>LNRS lacks guidelines on updates and monitoring frequency. Proposals illustrating LNRS's adaptability would better enable the development industry and landowners to contribute to the process.</p> <p><u>Suggestions for Improvement</u></p> <p>States a zonal nature of ecological opportunities through utilising a</p>	<p>Please refer to the previous responses provided under Overarching, Habitat, and Species Priorities and Potential Measures.</p> <p>The timeframe for review and republication of the LNRS, three to ten years, as directed by the Secretary for State, is set out in the Strategy document.</p> <p><u>Suggestions for Improvement</u></p> <p>Respondent's comments addressed in responses to previous questions.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Respondent's comments are partially addressed in responses to earlier questions.</p> <p>For clarity, Areas of Particular Importance for Biodiversity (APIBs) are those within the Strategy area that are subject to a statutory or non-statutory nature conservation designation and/or comprise irreplaceable habitats.</p> <p>Areas That Could Become of Particular Importance for Biodiversity (ACBs) exclude all land mapped as APIBs. While mapping an area as an ACB does not prevent it from being allocated for development through the normal Local Plan process, it would not be appropriate to imply that any such area is suitable for development as they may be subject to other constraints (e.g., Green Belt, landscape, heritage).</p>

Response Number	Summary of Issues Raised	Response
	<p>blanket layer of colour could be viewed negatively for future development applications, especially for land that has been identified as 'Areas Which Could Become of Particular Importance'. Recommend it must be made clear that these are viewed as opportunity areas, rather than being perceived as protective from development. It is suggested that the Authorities consider an alternative and more targeted way of identifying opportunities.</p> <p><u>Ease of use of Local Habitat Map</u></p> <p>Agree user friendly, but fear broad, zonal opportunities presentation may give the impression the land should be protected, which isn't the LNRS goal.</p> <p>Suggest for Areas of Particular Importance for Biodiversity, it should be clear that development in these areas is allowed. Land marked as recovery zones should be understood as potential development sites.</p>	

Response Number	Summary of Issues Raised	Response
<p>44 Bellway Homes Ltd</p>	<p>Neither Agrees or Disagrees with the Overarching Priorities and Potential Measures.</p> <p>Agrees with the Habitat and Species Priorities and Potential Measures.</p> <p>Neither Agrees or Disagrees that they are satisfied with overall content of Strategy.</p> <p>Agrees that the Strategy is easy to use, and that the Local Habitat Map is easy to use.</p> <p>Neither Agrees or Disagrees with the Habitat and Species Mapped Measures</p> <p><u>Overarching</u></p> <p>Suggests the comment on page 115 could be stronger.</p> <p>Suggests the LNRS needs flexibility for additional enhancement opportunities with ecological advisor agreement and no enforced enhancement where unsuitable.</p> <p>Mapping discrepancies from LERC's (Local Environmental Records Centre) GIS usage and evolving circumstances should be accommodated for accurate, evidence-led results.</p> <p><u>Habitats</u></p> <p>States whilst the principles are broadly agreed, the appropriate enhancement and mitigation can differ on a site-by-site basis and, therefore, it is key that flexibility is retained to allow this. Further, it</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Please refer to response to consultation response No. 43.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>Please refer to response to consultation response No. 43.</p> <p><u>Content of Strategy</u></p> <p>Please refer to response to consultation response No. 43.</p> <p><u>Suggestions for Improvement</u></p> <p>Please refer to response to consultation response No. 43.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Please refer to response to consultation response No. 43.</p>

Response Number	Summary of Issues Raised	Response
	<p>should be recognised that not all priorities can be achieved on individual development sites. There are many factors that need to be taken into account when looking at opportunities for biodiversity and, therefore, it may be that the priorities are prioritised as not all types of enhancements will be able to be delivered. It is appropriate that this is recognised and the determination of priorities for enhancement should be undertaken on a site-by-site basis.</p> <p><u>Content of Strategy</u></p> <p>Suggests geographical information systems may lack the accuracy of site-specific data, LNRS should address potential data discrepancies and prioritise site-specific findings. NPPF Paragraph 159 emphasises proposals' contribution to identified habitats; however, improper development could result if applied without in-depth site-specific data. In such cases, recent and robust surveys should overrule LNRS mapping.</p> <p>Though LNRS is a consideration, it's not decisive, and misuse may hinder development. Clarity about LNRS intentions and restrictions is needed. Recent site-specific surveys should be considered and take precedence.</p> <p>LNRS lacks guidelines on updates and monitoring frequency. Proposals illustrating LNRS's adaptability would better enable the development industry and landowners to contribute to the process.</p> <p><u>Suggestions for Improvement</u></p> <p>States a zonal nature of ecological opportunities through utilising a blanket layer of colour could be viewed negatively for future development applications, especially for land that has been identified as 'Areas Which Could Become of Particular Importance'. Recommend it</p>	

Response Number	Summary of Issues Raised	Response
	<p>must be made clear that these are viewed as opportunity areas, rather than being perceived as protective from development. It is suggested that the Authorities consider an alternative and more targeted way of identifying opportunities.</p> <p><u>Ease of use of Local Habitat Map</u></p> <p>Agree user friendly, but fear broad, zonal opportunities presentation may give the impression the land should be protected, which isn't the LNRS goal.</p> <p>Suggest for Areas of Particular Importance for Biodiversity, it should be clear that development in these areas is allowed. Land marked as recovery zones should be understood as potential development sites.</p>	

Response Number	Summary of Issues Raised	Response
<p>45 Story Homes Ltd</p>	<p>Neither Agrees or Disagrees with the Overarching, Habitat and Species Priorities.</p> <p>Neither Agrees or Disagrees with the content of Strategy overall.</p> <p>Strongly Agrees that the Strategy is easy to use.</p> <p>Agrees that the Local Habitat Map is easy to use.</p> <p>Neither Agrees or Disagrees with Habitat and Species Mapped Measures.</p> <p><u>Overarching</u></p> <p>Implementation should not undermine viability or create policy barriers to meeting South of Tyne’s housing and employment needs, especially at sustainable settlement edges. Mapping should be updated regularly to remove allocated/permissioned sites.</p> <p>The LNRS should ensure proportionality and recognise the significant biodiversity contributions already made by new development (statutory BNG with additional ‘strategic significance’ multiplier within LNRS areas, SuDS, nutrient neutrality, and high-quality design/landscaping) and by using the LNRS primarily to target these investments where they deliver the greatest strategic benefits.</p> <p>Suggest a planning alignment statement should be included reaffirming LNRS’s non designatory status and that it will not prevent development and create protections, but is intended purely to inform where nature conservation could have the greatest impact. Additionally, any measures including ACBs should be a policy decision considered alongside the need to deliver new homes, employment land and infrastructure and is a</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>It is stated clearly on page 16 that the LNRS is not a statutory designation tool; it is a strategic document and therefore does not confer legal protection or planning status on land. The role of the LNRS in Local Plans will be informed by emerging National Planning Policy. As such, the inclusion of a ‘planning alignment statement’ is therefore not considered necessary.</p> <p>The LNRS acknowledges the role of Biodiversity Net Gain (BNG) in supporting sustainable development and nature recovery. The Strategy also highlights the potential biodiversity benefits of well-designed SuDS and landscaping.</p> <p><u>Content of Strategy</u></p> <p>The existing wording within the Strategy is considered sufficient to address respondent’s concerns.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>The Local Habitat Map allows users to search for sites using a postcode or grid reference. Selecting a site opens a pop-up box listing relevant overarching, habitat, and species mapped measures.</p> <p>At present, it is not possible to extract ShareFile layers directly from the map.</p>

Response Number	Summary of Issues Raised	Response
	<p>matter that should be deliberated through the Council's new Local Plan process.</p> <p><u>Content of Strategy</u></p> <p>States that satisfaction with the strategy will largely depend on the implementation of the strategy and if it undermines the viability of, or creates policy barriers to meeting South of Tyne's housing and employment needs, especially at sustainable settlement edges. Mapping should also be updated regularly to remove allocated/permissioned sites.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Suggests the map could benefit from a 'site selection' tool to allow a site to be drawn and show the various layers that are present within it. Extracting layers as shapefiles would also be useful for accurately viewing data alongside development proposals.</p>	

Response Number	Summary of Issues Raised	Response
<p>46 Church Commissioners for England</p>	<p>Agrees with the Overarching Priorities and Potential Measures.</p> <p>Disagrees with the Habitat Priorities and Potential Measures.</p> <p>Agrees they are satisfied with the content of the Strategy overall, and that the Strategy and the Local Habitat Map is easy to use.</p> <p>Disagrees with the Habitat and Species Mapped Measures.</p> <p><u>Overarching</u></p> <p>Page 119 notes alignment with Local Plans as a key next step. They stress the importance of appropriate alignment to existing and emerging Local Plans, ensuring development is not unduly impacted by conflicting LNRS targets. Thinks it is crucial that the LNRS remains a separate strategy and not part of the Local Plan, reiterating that the LNRS provides an evidence base for integrating nature recovery into policy and decision-making, but should always be considered within the existing planning framework.</p> <p><u>Species</u></p> <p>Suggests the wording of Measures RP2-Ma and FP1-MB be amended to include reference to reducing nutrient input in line with the relevant legislation. (Pesticide use is regulated by the Control of Pesticides Regulations 1986 (COPR) alongside the Food and Environment Protection Act 1985 (FEPA)).</p> <p>Whilst the Commissioners are supportive of Measure FP2-Mb, which seeks to encourage farm clusters and networks, they consider it would also be beneficial to include reference to Environmental Land Management Schemes specifically in this measure.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>It is stated clearly on page 16 that the LNRS is not a statutory designation tool; it is a strategic document and therefore does not confer legal protection or planning status on land. The LNRS is a standalone document which constitutes an important element of the evidence base for Local Plans, and its role alongside the new Local Plan(s) will be shaped by the PPG and emerging national planning policy. The PPG sets out that LPAs will have regard to the priorities, opportunities, and spatial information within the LNRS when developing planning policies and identifying locations for nature recovery.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>No conflict is considered to exist between the current wording of Potential Measures RP2 Ma and FP1 Mb and the regulation of pesticide use under the Control of Pesticides Regulations and Food and Environment Protection Act. Consequently, no amendments to the wording are proposed.</p> <p>Environmental Land Management Schemes (ELMS) are described in detail on page 22 of the Strategy. Potential Measure FP2 Ma already refers to ‘public and private funding sources,’ and it is therefore not considered necessary to amend FP2 Mb to include a specific reference to ELMS.</p> <p><u>Content of Strategy</u></p> <p>The Strategy makes multiple references to landscape-scale, catchment-scale, and large-scale nature recovery. This is</p>

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	<p><u>Content of Strategy</u></p> <p>Suggest strengthening the emphasis on utilising large-scale, strategic sites for BNG delivery.</p> <p>Suggest actively encouraging landowners to propose strategic sites that could accommodate BNG uplift. This would be particularly valuable for undevelopable but habitat-rich land (e.g. flood zones or land unsuitable for agriculture). Integrating such sites into the LNRS would reinforce its role as an evidence-based, continually updated document, thereby maximising its potential for achieving nature recovery goals.</p> <p><u>Suggestions for Improvement</u></p> <p>In its current format, Priority WP1 and WP2 appear to be the same. However, the actual priorities are included below in smaller text. Request that the publication version of the South of Tyne and Wear LNRS, amend the formatting so that each priority reads as follows:</p> <p><i>Priority WP1: Ancient and native woodlands are more resilient, in good ecological condition, and better connected across the landscape.</i></p> <p>Although the draft Local Habitat Map shows the APIB layer, it does not appear on the output once you click on a parcel of land. We therefore request that the publication version of the Local Habitat Map fix this issue.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Consider that a persona-based filtering (i.e. farmer, resident, landowner</p>	<p>considered sufficient to convey the need for habitat creation, restoration, and enhancement efforts to be delivered at scale wherever possible, including in respect of BNG offsetting sites.</p> <p><u>Suggestions for Improvement</u></p> <p>Action: Amend formatting of Habitat and Species Priorities to improve clarity.</p> <p>Action: Consider amending the Local Habitat Map to address respondent’s comment regarding APIB layer.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Filtering areas or mapped measures by user type (e.g. farmer, resident, landowner) is not considered to be feasible, practicable, or desirable.</p>

Response Number	Summary of Issues Raised	Response
	<p>etc) could be provided as an option to navigate across the Local Habitat Map to enable clear identification and distinction between high-level strategy and potential personal action. Following an approach used in the published West of England Local Habitat Map, this would avoid information overload by providing tailored advice for each user group, making the map an action-oriented toolkit.</p>	

Response Number	Summary of Issues Raised	Response
<p>47 Durham Wildlife Trust</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching</u></p> <p>Suggests OP4 should mention land managers, as well as landowners.</p> <p><u>Habitat</u></p> <p>States it is unclear why some areas of the coast not identified as APiBs have not been identified as ACBs (for example, the area between Whitburn and Seaburn).</p> <p><u>Species</u></p> <p>Highlights that the Durham LNRS identifies areas on the boundary of the South of Tyne and Wear LNRS for the assessment, connection and expansion of Northern Brown Argus. The adjacent areas within the SoTW LNRS have been identified for grassland enhancement and buffering. Is there potential to include potential measures for the Northern Brown Argus?</p> <p><u>Content of Strategy</u></p> <p>Suggest the map would be improved by one click giving all the information on a piece of land.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Suggest an explanation of general GIS principles and sources of data would be helpful, to show the methodology behind the mapped measures.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Action: Amend the wording of Priority OP4 and the accompanying Potential Measures to include an explicit reference to land managers.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>Not all measures within the LNRS are mapped. For example, CP1 Mb “Encourage more nature-friendly approaches to managing priority coastal habitats such as strandlines and sand dunes by modifying visitor-focused maintenance practices that negatively impact wildlife and natural processes” is intentionally presented as an unmapped measure.</p> <p>Action: Review and, where appropriate, amend the approach to mapping Potential Measures and Areas That Could Become of Particular Importance to Biodiversity in relational to coastal habitats.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>The selection of priority butterfly species included in the LNRS has been undertaken in accordance with statutory guidance and following consultation with Butterfly Conservation North East.</p> <p>Action: Reconsult Butterfly Conservation North East on the merits of including Northern Brown Argus and Small Blue Butterflies as Priority Species within the LNRS. Possible Potential Measure could include: “Explore, and where feasible,</p>

Response Number	Summary of Issues Raised	Response
	<p>There are multiple inconsistencies between the mapped measures across the boundary with the Durham LNRS. For LNRS Boundary continuity see West of England LNRS 'Neighbouring LNRS Layers' potential idea.</p> <p>Unlike some other LNRS (eg: Yorkshire and Northumberland), irreplaceable habitats are not distinguished within the APIB mapping, which may be both a missed opportunity and a risk.</p> <p>How should non APIB/ACB sites, such as LA parks and gardens or cemeteries, be represented? Again, this might be a risk, and leave them unable to benefit from potential funding.</p> <p>With regards BNG and the 'strategic significant multiplier', it is unclear whether an APIB is equivalent to a prioritised area for nature recovery?</p> <p>The ease of use and functionality could be improved by utilising the 'one click for all information' approach of the West of England LNRS.</p>	<p>develop proposals for actively introducing or supporting the colonisation of Northern Brown Argus and Small Blue butterflies within the Strategy area.”</p> <p><u>Content of Strategy</u></p> <p>Please refer to the response provided below regarding the functionality of the Local Habitat Map.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>An explanation of the general principles and mapping methodology used in preparing the Local Habitat Map is set out in Section 6: <i>Mapping of Measures and the Local Habitat Map</i> and Appendix E of the Strategy.</p> <p>Action: Add a list of data sources used in mapping the Potential Measures to Appendix E.</p> <p>Action: Undertake review of the interface between South of Tyne and Wear LNRS and the Durham and North of Tyne LNRSs and, where appropriate, address inconsistencies.</p> <p>Action: Amend the APIBs layer and associated pop-up box to identify areas of Irreplaceable Habitat.</p> <p>It is not the purpose of the LNRS to map all areas of green and blue infrastructure, including Local Authority parks and cemeteries. Instead, when considering nature recovery actions relating to such features, regard should be had to the priorities and potential measures listed under Urban Habitats on pages</p>

Response Number	Summary of Issues Raised	Response
		<p>97 – 99 of the Strategy, alongside other relevant habitat and species-focused measures (e.g. SP1 BMa and SP1 BMb).</p> <p>Action: Page 21 - provide further clarification that, for the purpose of Biodiversity Net Gain, all areas (excluding Irreplaceable Habitats) mapped as APIB and ACB within the Local Habitat Map form part of the 'Strategic (LNRS –priorities) Area'.</p> <p>The Local Habitat Map includes a pop-up feature that details all applicable habitat and species potential measures and provides a unique identifier number for all MasterMap polygons with the Strategy area where one or more mapped measure applies.</p> <p>Action: Review and, where feasible and appropriate, improve the functionality of Local Habitat Map.</p>

Response Number	Summary of Issues Raised	Response
<p>48 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching, Habitat and Species Priorities and Potential Measures</u></p> <p>Strong emphasis on the importance of education- suggested additions to priorities and potential measures.</p> <p><u>Ease of use of Local Habitat Map</u></p> <p>States colouring is difficult to understand when multiple layers turned on.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The Strategy includes a strong focus on raising public awareness, appreciation, and active participation in nature’s recovery.</p> <p><u>Ease of Use of Local Habitat Map</u></p> <p>Every effort has been made to ensure that the LNRS, including the Local Habitat Map, is as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology, such as Areas of Particular Importance for Biodiversity (APIBs). However, it is recognised that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and reliance on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p>
<p>49 Swifts Local Network: Swifts & Planning Group</p>	<p>Agrees with the Habitat and Species Priorities and Potential Measures. Also agrees that satisfied with overall content of Strategy.</p> <p><u>Habitat and Species Priorities and Potential Measures</u></p> <p>States reference to integrated swift boxes and protection of existing nest sites in SP1-BMb and SP1-BMc is welcome, but requests that text from NPPG Natural Environment 2025 paragraph 017; to clarify that all nest boxes on new build developments should be swift bricks; at least one swift brick per dwelling on average for new developments; a universal nest brick for a range of small bird species; swift boxes are also a universal nest box for small bird species; include best-practice guidance</p>	<p><u>Habitat and Species Priorities and Potential Measures</u></p> <p>Please refer to the response provided for consultation comment No. 13.</p> <p><u>Overall content of the Strategy</u></p> <p>Please refer to the response provided for consultation comment No. 13.</p> <p><u>Suggestions for Improvement</u></p>

Response Number	Summary of Issues Raised	Response
	<p>referenced in the NPPG.</p> <p>Also highlights that Note that recently published LNRS for Berkshire, Cumbria, Hertfordshire, Norfolk, Oxfordshire. Suffolk, and Wiltshire (amongst others) state specific numbers for swift bricks.</p> <p><u>Overall content of the Strategy</u></p> <p>Requests that House Martin Conservation UK & Ireland is sourced as a source of best-practice guidance: https://housemartinconservation.com/how-to-help.</p> <p><u>Suggested Improvements</u></p> <p>Agrees that existing nest sites for building-dependent birds should be protected and retained where possible, with mitigation provided where not possible; in line with the "exemplar" published Isle of Wight LNRS (UGG1.6 (part 2, page 90)).</p>	<p>Please refer to the response provided for consultation comment No. 13.</p>
<p>50 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with the Habitat Priorities and Potential Measures.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>States reference to integrated swift boxes and protection of existing nest sites in SP1-BMb and SP1-BMc is welcome, but requests that text from NPPG Natural Environment 2025 paragraph 017; to clarify that all nest boxes on new build developments should be swift bricks; at least one swift brick per dwelling on average for new developments; a universal nest brick for a range of small bird species; swift boxes are also a universal nest box for small bird species; include best-practice guidance referenced in the NPPG.</p>	<p><u>Habitat Priorities and Potential Measures</u></p> <p>Please refer to the response provided for consultation comment No. 13.</p>

Response Number	Summary of Issues Raised	Response
	<p>Also highlights that Note that recently published LNRS for Berkshire, Cumbria, Hertfordshire, Norfolk, Oxfordshire. Suffolk, and Wiltshire (amongst others) state specific numbers for swift bricks.</p>	

Response Number	Summary of Issues Raised	Response
<p>51 Individual (Lives or works within Strategy Area)</p>	<p>Strongly Agrees or Agrees with all.</p> <p><u>Overarching</u></p> <p>Suggests that adding timeframes would be an improvement.</p> <p>Suggest adding (OP1-Mc section): 'Councillors to be encouraged to engage/participate'. They are the link between officers (council ambitions) and the community.</p> <p><u>Habitats</u></p> <p>Suggested additions:</p> <ul style="list-style-type: none"> - Add the importance of protection to these priorities: specifically WP1-Ma/Mb and Mc (table 5) within the priorities of this plan. - Add a priorities section on Mature Trees alongside the 'Ancient and Veteran Trees' section. The protection, management and ecological importance is vital to have embedded in the LNRS. <p><u>Species</u></p> <p>SP1-AMb- requests adding working with the Animal Charter Working Group to have written into policy that homes will be humanely found for any non-native/invasive species removed from the ponds.</p> <p>Requests increased protection/enforcement action regarding Great Crested Newt disturbance/habitat damage.</p> <p><u>Ease of use of Strategy</u></p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The development of SMART targets and metrics to monitor the successful delivery of the Strategy will be undertaken by the Local Nature Recovery Partnership following its establishment and the publication of the LNRS.</p> <p>Action: In Chapters 2 and 4, include reference to local MPs and ward councillors in raising public awareness and encouraging participation in nature recovery.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The LNRS does not provide additional protection for habitats and species, including trees. Rather, the Strategy promotes their expansion, enhancement, management, and connectivity.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>Action: Add a note to Strategy stating that any control of invasive animal species (both native and non-native) undertaken for nature conservation purposes must be lawful and fully compliant with animal welfare legislation, published good-practice guidelines, and any applicable licencing requires.</p> <p>Great Crested Newts and their habitats (places used for breeding, shelter, or protection) are protected in law. It is not the purpose of the LNRS to provide additional protection for Great Crested Newts.</p> <p><u>Ease of Use of Strategy</u></p>

Response Number	Summary of Issues Raised	Response
	<p>Would like to see the Strategy simplified if possible for maximum understanding, including monitoring, timescales if feasible.</p> <p><u>Suggested Improvements</u></p> <p>States when using a mobile phone to complete consultation survey, all comments added get deleted when you leave the consultation page to read the map and LNRS information. Suggests you need to use 2 devices to fill it out- one to read the documents and a second to fill in the consultation. Suggests need to make sure such barriers are removed in future for maximum resident engagement.</p>	<p>Every effort has been made to ensure that the LNRS, including the Local Habitat Map, is as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology, such as Areas of Particular Importance for Biodiversity (APIBs). However, it is recognised that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and use on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p> <p>The development of SMART targets and metrics to monitor the successful delivery of the Strategy will be undertaken by the Local Nature Recovery Partnership following its establishment and the publication of the LNRS.</p> <p><u>Suggested Improvements</u></p> <p>We note the concerns raised regarding the online survey. While it is possible to open the Strategy, the Local Habitat Map and the Survey in separate windows or tabs on a mobile device to switch between them, we recognise that not all users will be familiar with digital navigation. The consultation webpage confirmed that alternative formats of the LNRS were available on request, and we remain committed to supporting accessibility, wherever possible.</p>

Response Number	Summary of Issues Raised	Response
<p>52 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all, except Disagrees with overall content of Strategy.</p> <p><u>Overarching</u></p> <p>Highlights no detail of how water body health is measured. Suggests there should be specific points in the waterways where water quality is measured including identification of sewage pollution and eutrophication.</p> <p><u>Habitats</u></p> <p>Suggests more should be done to identify sewage pollution and the impacts on nature.</p> <p><u>Species</u></p> <p>Suggests birds are under threat from the building of solar farms.</p> <p><u>Overall content of Strategy</u></p> <p>States the sewage pollution in the area is not identified and is not addressed.</p>	<p><u>Overarching and Habitat Priorities and Potential Measures</u></p> <p>Section 4 of the Strategy acknowledges that watercourses and wetlands are subject to pressures from sewage discharges, including storm overflows, which can degrade aquatic habitats and limit biodiversity. The While the Strategy is not responsible for regulating water quality, it seeks to support improvement efforts by promoting:</p> <ul style="list-style-type: none"> - The delivery of site-specific and catchment-scale Nature-based Solutions (NbS). - Targeted livestock and equine management, nutrient input reduction, and the use of riparian and wetland buffer strips. - Water conservation and biodiversity awareness through community engagement and education. <p>The development of SMART targets and metrics to monitor the successful delivery of the Strategy will be undertaken by the Local Nature Recovery Partnership following its establishment and the publication of the LNRS.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>The LNRS includes Priority SP1: Birds, which seeks to encourage sustainable recovery of priority species and species assemblages, including improving their resilience to environmental change and progressing towards favourable conservation status.</p>

Response Number	Summary of Issues Raised	Response
		<p>Planning applications for solar farms would be required to submit an Ecological Impact Assessment. Depending on the scale and location of the proposals, this would typically involve surveys and the identification of appropriate avoidance, mitigation, compensation, and enhancement measures for relevant priority bird species.</p> <p><u>Overall Content of Strategy</u></p> <p>Please refer to the response provided under <i>Overarching and Habitat Priorities and Potential Measures</i>.</p>

Response Number	Summary of Issues Raised	Response
<p>53 Dingy Butterflies CIC</p>	<p>Strongly Agrees or Agrees with all, except Disagrees with the Species Priorities and Potential Measures.</p> <p><u>Overarching</u></p> <p>States would like to see more of an emphasis on urban biodiversity.</p> <p>Suggests there needs to be more of an emphasis on working with local communities and organisations to support citizen science and capturing of data; supporting people in making decisions and understanding their role in supporting nature improvement and how it can support wellbeing connecting to social prescribing.</p> <p>Work with other departments so this isn't isolated- e.g. mowing team are aware of what they can do to support biodiversity.</p> <p>Link it to the health, culture and community strategies.</p> <p><u>Habitats</u></p> <p>Suggests it should be easier for organisations and communities to understand biodiversity net gain and be able to improve spaces with less red tape.</p> <p><u>Species</u></p> <p>Highlights there is no mention of pollinators, such as bees, hoverflies, bats, and expresses disappointment that there is no pollinator strategy.</p> <p>Suggests including pollinators as a priority, including improving wild flower areas and water access. Should be about supporting communities</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>Potential Measure UP2 Ma promotes increasing the extent of green and blue spaces by transforming underused land into biodiverse areas such as wildflower meadows, rain gardens, and pocket parks.</p> <p>Potential Measures OP1 Mc and UP4 Mc promote citizen-science as a means of increasing awareness and supporting public involvement in recording and monitoring nature.</p> <p>Potential Measure UP3 Ma encourages support community-led initiatives to maintain and enhance local green and blue spaces, improve both their biodiversity and social value.</p> <p>Potential Measure UP1 Mb aims to promote nature-friendly management of public and private land, increasing the extent of green and blue infrastructure that is positively managed for biodiversity.</p> <p>The Strategy makes repeated reference to the role of nature in supporting physical and mental health, including on page 4.</p> <p><u>Habitat Priorities and Potential Measures</u></p> <p>The role of Biodiversity Net Gain (BNG) is explained on page 21 of the Strategy.</p> <p>The Strategy also aims to promote support for community-led initiatives to maintain and enhance local green and blue spaces, as set out in Potential Measure UP3 Ma.</p>

Response Number	Summary of Issues Raised	Response
	<p>to develop small areas of wild flower as well as larger spaces where possible, improving nesting opportunities, citizen science monitoring, and work with the mowing and public park teams to be more aware of how they can support pollinators through more controlled mowing, leaf collection and planting pollinator-friendly flowers.</p> <p><u>Content of Strategy</u></p> <p>Suggests there should be a Pollinator Strategy, and an app-version of the Local Habitat Map to enable use out on site/out in the environment.</p>	<p><u>Species Priorities and Potential Measures</u></p> <p>The development of Species Recovery Plans targeting priority species, including pollinators, is referenced on page 75 of the Strategy.</p> <p>Potential Measure FP1 Mb promotes the creation, restoration, and management of in-field and boundary features, such as flower-rich field margins and beetle banks, that enhance farmland biodiversity, including pollinators.</p> <p>Potential Measure UP4 Mb promotes the integration of priority species and pollinators into urban planning, green infrastructure design, and land management.</p> <p>Potential Measure UP4 Mb also supports citizen science and community-led monitoring schemes to track the presence and health of priority species and pollinators, raise public awareness, and inform adaptive management.</p> <p><u>Content of Strategy</u></p> <p>Please refer to previous responses addressing comments regarding pollinators.</p> <p>Every effort has been made to ensure that the Strategy including the Local Habitat Map, is accessible and easy to use. While the Local Habitat Map can be viewed on a mobile device, it is acknowledged that its use in the field is inevitably limited.</p>

Response Number	Summary of Issues Raised	Response

Response Number	Summary of Issues Raised	Response
<p>54 Individual (Lives or works within Strategy Area)</p>	<p>Agrees with all, except neither agrees or disagrees that the Local Habitat Map is easy to use.</p> <p>Highlights the importance of engagement with stakeholders, landowners and residents.</p> <p><u>Local Habitat Map</u></p> <p>Suggests open engagement sessions in the community for those who do not have access to a computer.</p>	<p><u>Local Habitat Map</u></p> <p>As part of the consultation, we invited respondents to contact us directly if they required the Strategy in an alternative format, and we offered support at the Gateshead Civic Centre for anyone needing assistance to complete the online survey.</p> <p>Following publication, a Local Nature Recovery Partnership, featuring community representation, will be established. The Partnership will coordinate and drive delivery of the Strategy, including further promoting its aims and objectives and engaging with stakeholders, local residents, and community groups.</p>

Response Number	Summary of Issues Raised	Response
<p>55 Whitburn Neighbourhood Forum</p>	<p>Disagrees with the Overarching, Habitat and Species Priorities and Potential Measures, and disagrees that the Strategy is easy to use.</p> <p>Agrees that the Local Habitat Map is easy to use.</p> <p><u>Overarching</u></p> <p>States it is unclear why this doesn't include all sites important to nature, e.g. the SAC and SPA at Whitburn?</p> <p>Suggests the measures are not specific enough, e.g. where, how, when. The measures do not address the threats identified. None of the measures try to prevent the loss of natural features.</p> <p>Highlights they will support initiatives for the community and youth/schools of Whitburn to be involved in nature-based activities and gain better access to nature.</p> <p>Suggests other important nature sites and species, not just local wildlife sites should be added to the priorities and potential measures.</p> <p><u>Habitat</u></p> <p>Suggests the measures are not specific enough, e.g. where, how, when. The measures do not address the threats identified. None of the measures try to prevent the loss of natural features.</p> <p>On ancient and veteran trees: there is very little enforcement of pruning and cutting down trees that are in Whitburn's conservation area, which have a TPO.</p>	<p><u>Overarching Priorities and Potential Measures</u></p> <p>The Durham Coast Special Area of Conservation (SAC) and Northumbria Coast Special Protection Area (SPA) are referenced within the LNRS and included in the Local Habitat Map as Areas of Particular Importance for Biodiversity (APIBs). These sites benefit from the highest level of legal protection, including through the planning system. The protection and management of statutory designated sites, such as SACs, SPAs, and SSSIs, falls outside the scope of the LNRS.</p> <p>The purpose of the Strategy is to provide strategic guidance; it is not a delivery plan. Following publication, a Local Nature Recovery Partnership will be established to coordinate and drive delivery of the LNRS. This will include developing SMART targets and metrics measure the Strategy success.</p> <p>All of the habitat priorities and potential measures in the Strategy aim to increase the extent and/or improve the resilience, condition, and connectivity of priority habitats. The retention of existing priority habitat and priority species populations is inherent in this aim.</p> <p>The respondent's support initiatives involving local communities and young people (including schools) is noted and welcomed. Such initiatives are supported through several Potential Measures, including:</p> <ul style="list-style-type: none"> • OP3 Mb: "Support school and youth engagement through outdoor learning and the creation of youth


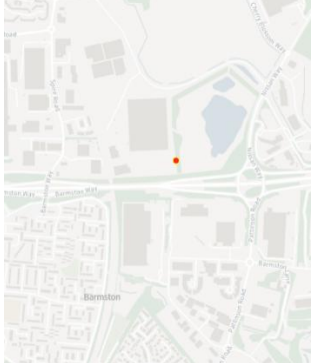
Response Number	Summary of Issues Raised	Response
	<p>This means there is a risk that some trees will not live long. Hedgerows: first step is to prevent loss of any more hedgerows (mitigation hierarchy).</p> <p><u>Species</u></p> <p>Suggests the measures are not specific enough, e.g. where, how, when. The measures do not address the threats identified. None of the measures try to prevent the loss of natural features.</p> <p>On the priority birds, there needs to be a measure to protect their existing habitat and prevent any further loss, e.g. for farmland birds and waders in Whitburn.</p> <p><u>Ease of use of Strategy</u></p> <p>State the Strategy is hard to read, and Survey tricky when linking the questions to sections and tables when these sections and tables are not clearly found in the Strategy.</p> <p><u>Suggested Improvements</u></p> <p>Recommends that the function of the LNRS should not only include climate change adaptation, but also mitigation.</p> <p>Hydrology should include the north sea, and its water quality, including pressures on this from combined sewer overflows and pollution from the rivers.</p> <p>The table in section 4 should specifically mention threat from pollution through systemic release of sewage into rivers and the sea.</p>	<p>ambassador roles to give young people a voice in nature recovery”</p> <ul style="list-style-type: none"> • UP3 Ma: Support community-led initiatives to maintain and enhance local green and blue spaces, improving biodiversity and social value” • UP4 Mc: Support citizen science and community-led monitoring schemes to track the presence and health of priority species and pollinators, raising public awareness, and informing adaptive management”. <p><u>Habitat Priorities and Potential Measures</u></p> <p>As noted above, the Strategy provides strategic guidance, rather than being a delivery plan. The Local Nature Recovery Partnership will be responsible for coordinating implementation and developing SMART targets and monitoring metrics once the LNRS is published.</p> <p>It is not the within the scope of the LNRS alone to address all the threats to nature recovery identified in Chapter 4. Many issues, including the management of trees within Conservation Areas and those subject to Tree Preservation Orders (TPOs), require coordinated action across multiple sectors and regulatory frameworks.</p> <p>All priorities and potential measures seek to increase the extent, and/or improve the resilience, condition, and</p>

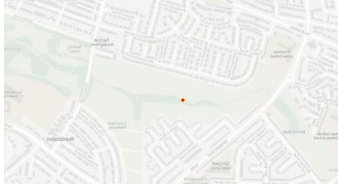

Response Number	Summary of Issues Raised	Response
	<p>What are the steps to achieve realisation of the ACBs?</p> <p><u>Local Habitat Map</u></p> <p>Suggests it would be useful to be able to draw an area, and it would tell you all the relevant layers.</p>	<p>connectivity of priority habitats. Retention of existing priority habitats and species is integral to this.</p> <p><u>Species Priorities and Potential Measures</u></p> <p>Please refer to previous comments.</p> <p>Potential Measures: FP1 Ma, SP1 BMd, and SP1 BMe relate to the conservation of priority farmland and wading bird species. Their mapping within the Local Habitat Map includes key strategic areas in and around Whitburn.</p> <p><u>Ease of Use of Strategy</u></p> <p>Every effort has been made to ensure that the LNRS, the Local Habitat Map, and consultation survey are as accessible and user-friendly as possible. This includes providing a glossary of terms and clearly defining key terminology such as Areas of Particular Importance for Biodiversity (APIBs). However, it is acknowledged that some stakeholders may still find aspects of the Strategy challenging to navigate or interpret due to its scale, technical content, and use on spatial mapping software. These considerations will be taken into account during any future review of the LNRS, as directed by the Secretary of State.</p> <p>Action: Improving formatting of Chapter 5 and associated Priorities and Potential Measures tables, ensuring table subheading are made clearer (e.g., in bold).</p> <p><u>Suggested Improvements</u></p>



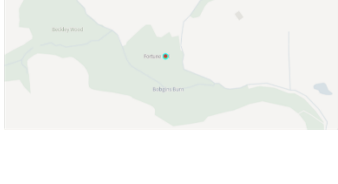
Response Number	Summary of Issues Raised	Response
		<p>While the LNRS does promote measures that contribute to climate change mitigation over the longer term (e.g., woodland expansion to increase CO2 sequestration), its primary focus is on supporting nature and communities adapt to the impacts of climate change and to improve resilience in the short to medium term.</p> <p>It is not the role of LNRSs to regulate water companies. However, the Strategy does include several priorities and potential measures that will help improve water quality in watercourses, wetlands, and estuaries within the Strategy area (see pages 91 and 92).</p> <p>The LNRS (pages 66 and 70) identifies “sewage discharges including storm overflows” and “urban and rural diffuse and point-source pollution impacting terrestrial, freshwater, and coastal habitats”, as pressures on nature recovery.</p> <p>ACBs are areas that, with appropriate nature recovery actions, could become especially valuable for biodiversity. The potential measures in the strategy outline the most suitable for particular locations; however, these actions are voluntary and intended as guidance. The realisation of ACBs will be encouraged and supported through implementation of the LNRS.</p> <p><u>Local Habitat Map</u></p> <p>When a site or area is selected on the Local Habitat Map, a pop-up box appears in the bottom lefthand corner of the screen listing the relevant mapped measures, and site</p>

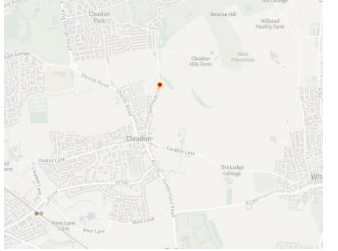



Response Number	Summary of Issues Raised	Response
		<p>boundary is highlighted. No results will appear for locations where no mapped measures apply.</p> <p>Note: Not all Potential Measures within the LNRS are mapped. The LNRS does not prevent nature recovery activities occurring outside mapped areas; in such cases, relevant Priorities and Potential Measures within the Strategy should still be used for guidance.</p>

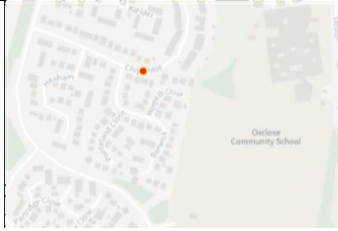


Table 2- Survey 2 Responses


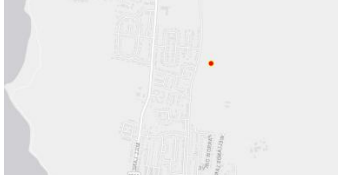
Response Number	Summary of Issues Raised	Site	Response
<p>1 Individual and Land Owner / Land Manager (Lives or works within Strategy Area)</p>	<p>Marley Hill Gateshead</p> <p>Concerns raised about map not representing what is physically on site and Local Wildlife Site boundaries were drawn by title deeds and not by the actual conditions of the area.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>2 Washington Wildlife Group</p>	<p>Barmston Pond Washington Sunderland</p> <p>Concerns raised about impact of Angling on important species (such as regionally important Black Darter, Small Red eyed damselfly and Willow Emerald damselfly) at Barmston Pond in Washington.</p>		<p>Comments noted. No changes to mapping proposed.</p>


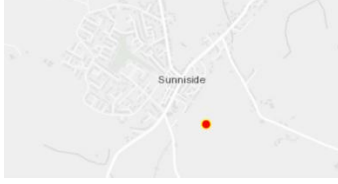
Response Number	Summary of Issues Raised	Site	Response
<p>3 Individual (Lives or works within Strategy Area)</p>	<p>Barnes Burn though Barnes Park Extension Sunderland</p> <p>Concerns raised about this area needing to be cleaned up, enhanced and protected.</p>		<p>Comments noted. No changes to mapping proposed.</p>
<p>4 Individual (Lives or works within Strategy Area)</p>	<p>Ryhope Sunderland</p> <p>Concerns raised about fly tipping in this area which is important for bird species.</p> <p>Concerns raised about loss of coastal scrub and cover for migrating bird along this stretch of coast-asks whether any plans in place for planting hedgerows or scrub along the coast?</p>		<p>Comments noted. Refer to Survey 1 (Table 1) response No.11.</p> <p>The importance of coastal habitats, including scrub, for migrant birds is fully recognised. The draft LNRS includes several Priorities and Potential Measures that support the creation, restoration, and enhancement of coastal and associated habitats that benefit migrating bird species. These include:</p> <ul style="list-style-type: none"> • OP4 Ma – Md: Local Wildlife Sites • WP2 Ma: Woodland expansion • WP4 Ma – Mc: Scrub • WP5 Ma – Mc: Hedgerows • CP1 Ma – Md: Coastal Habitats • FP1 Ma: Farmland Habitats <p>No changes to mapping proposed.</p>



Response Number	Summary of Issues Raised	Site	Response
<p>5 Individual (Lives or works within Strategy Area)</p>	<p>Damhead Wood Winlaton Mill Gateshead</p> <p>States field has red, yellow and white waxcaps (Fungi) and is worth considering for special attention.</p>		<p>Field is also mapped under measure GP1-Mc <i>“Undertake the buffering of priority grasslands through the restoration, enhancement and long-term positive management of adjoining semi-natural habitat.”</i></p> <p>The implementation of habitat interventions should be informed by detailed site survey and assessment, prior to measures being undertaken.</p> <p>Action: Amend Local Habitat Map to include mapped measure GP1-Mb.</p>
<p>6 Individual (Lives or works within Strategy Area)</p>	<p>East of Causey Gateshead</p> <p>Audio recording produced Common Pipistrelle, Soprano Pipistrelle, Noctule, Daubenton's, Whiskered Brown long-eared bats, Natterers Bats - also Barn Owl Grasshopper warbler, Lapwing.</p>		<p>Comments noted. No changes to mapping proposed.</p>
<p>7 Individual (Lives or works within Strategy Area)</p>	<p>Bobgins Burn Gateshead</p> <p>Audio recording produced Brandts bats, Noctule Bats, Soprano Pipistrelle, Common Pipistrelle and Brown long-eared bats.</p>		<p>Comments noted. No changes to mapping proposed.</p>

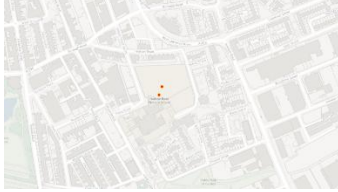
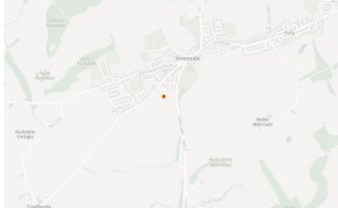
Response Number	Summary of Issues Raised	Site	Response
<p>8 Individual (Lives or works within Strategy Area)</p>	<p>Cleadon Hills South Tyneside</p> <p>Highlights designation of Cleadon Hills as a SSSI, Local Nature Reserve and contains Wildlife Corridor.</p>		<p>Cleadon Hills is identified as an Area of Particular Importance for Biodiversity on the Local Habitat Map, which includes SSSIs, Local Wildlife Sites and Local Nature Reserves.</p> <p>No changes to mapping proposed.</p>
<p>9 The Sir Tom Cowie Family Trust 2006</p>	<p>West Herrington Sunderland</p> <p>Grassland option extends onto the productive arable land that they would be looking to continue farming due to its good productivity levels.</p>		<p>Comment noted. As set out within the Strategy, landowner participation is voluntary and does not affect the continued lawful use of land.</p> <p>No changes to mapping proposed.</p>
<p>10 Individual (Lives or works within Strategy Area)</p>	<p>Holley Park Lambton Sunderland</p> <p>Local park does not seem to have been classified at all.</p>		<p>Urban Measures (not mapped) would apply to this and other similar areas.</p> <p>No changes to mapping proposed.</p>
<p>11 Individual (Lives or works within Strategy Area)</p>	<p>Washington Sunderland</p> <p>This area does not seem to have been classified at all.</p>		<p>Urban Measures (not mapped) would apply to this and other similar areas.</p> <p>No changes to mapping proposed.</p>

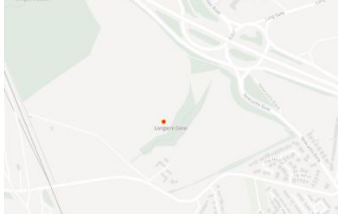
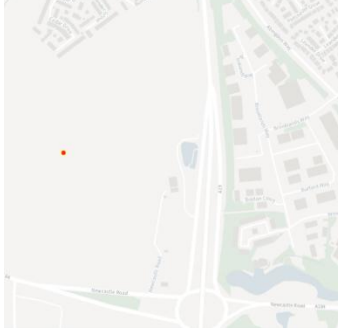
Response Number	Summary of Issues Raised	Site	Response
<p>12 Individual (Lives or works within Strategy Area)</p>	<p>Washington Sunderland</p> <p>Street needs to be mapped for potential improvements to help species such as House Sparrow.</p>		<p>Urban Measures (not mapped) would apply to this and other similar areas.</p> <p>No changes to mapping proposed.</p>
<p>13 Individual (Lives or works within Strategy Area)</p>	<p>Marsden Quarry South Tyneside</p> <p>Grassland and scrub has been cut too short in Marsden Quarry area over the past 3 years.</p> <p>Recommends narrow corridors are cut in the meadow grass so people have easy access to enjoy nature and wildlife.</p> <p>Use of LED lighting is endangering the "corridor concept".</p>		<p>Comments noted.</p> <p>No changes to mapping proposed.</p>
<p>14 Port of Tyne</p>	<p>Port of Tyne South Tyneside</p> <p>Port of Tyne considers that the value of these mudflats needs to be clearly established before further layers of policy protection are applied to them.</p> <p>To this end the Port welcomes the opportunity to engage with the authority to assist with understanding the extent and condition of habitats on Port land to ensure the data base is correct and</p>		<p>The Councils welcome the opportunity to engage with the Port of Tyne to discuss the extent and condition of habitats on the Port's land further. Ultimately, the LNRS is a strategic document, it does not designate land or confer legal protections or planning status on land.</p> <p>No changes to mapping proposed.</p>

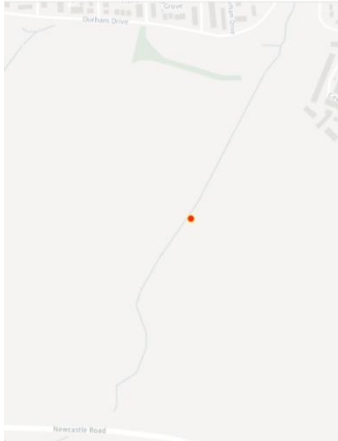

Response Number	Summary of Issues Raised	Site	Response
	consider how this may be reconciled with economic growth within the LNRS area.		
<p>15 Banks Group</p>	<p>Great Usworth Sunderland</p> <p>Asks what habitats/potential species are contributing towards this site being identified as an area that could become of particular importance.</p> <p>Questions the areas identified for water dependent habitat expansion where there is no water located.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>16 Banks Group</p>	<p>Whitburn South Tyneside</p> <p>Asks what habitats/potential species are contributing towards this site being identified as an area that could become of particular importance.</p> <p>Questions the areas identified for water dependent habitat expansion when it has been subject to small pooling of water onsite from rainfall, no formalised ponds/lakes on site previously.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>


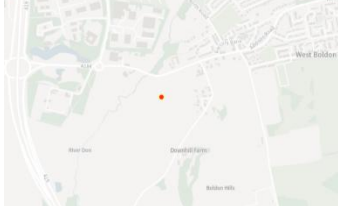
Response Number	Summary of Issues Raised	Site	Response
<p>17 Banks Group</p>	<p>Middle Rainton Sunderland</p> <p>Asks what habitats/potential species are contributing towards this site being identified as an area that could become of particular importance.</p> <p>Questions why it has been selected for bird habitat enhancement when there is a nature reserve north of the site- Rainton Meadows.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>18 Banks Group</p>	<p>Sunnyside Gateshead</p> <p>Asks what habitats/potential species are contributing towards this site being identified as an area that could become of particular importance.</p> <p>Questions why it has been selected for woodland expansion when it is not currently present or neighbouring woodland.</p> <p>Questions why most of Gateshead's undeveloped land is covered by some nature recovery- asks where social and economic growth is supposed to take place if all areas covered by the LNRS.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>

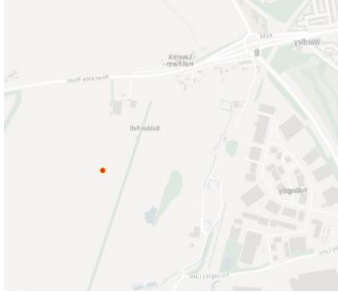
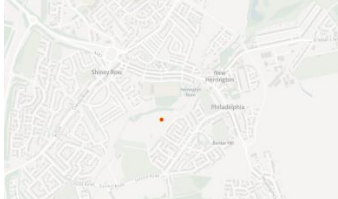
Response Number	Summary of Issues Raised	Site	Response
<p>19 Banks Group</p>	<p>Winlaton Gateshead</p> <p>Asks what habitats/potential species are contributing towards this site being identified as an area that could become of particular importance.</p> <p>Questions why it has been selected for woodland expansion when it is not currently present or neighbouring woodland.</p> <p>Questions why most of Gateshead's undeveloped land is covered by some nature recovery- a lot of Gateshead is swept over in the southwest- asks where social and economic growth is supposed to take place if all areas covered by the LNRS.</p>		<p>The Mapping of Habitats and Species is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>20 Taylor Wimpey</p>	<p>No site-specific comment. General comment.</p> <p>Taylor Wimpey looks forward to working with the South of Tyne Authorities in due course to share site specific ecological information already collected on their development portfolio to inform the LNRS and improve its accuracy in implementation. It should be recognised that landowners and developers will have differing levels of ecological information and, therefore, it would be helpful if the mapping could be used as a 'live' resource and be updated/ adapted to reflect the growing information over time, which will improve the accuracy of the LNRS.</p>		<p>Comment noted.</p> <p>No changes to mapping proposed.</p>

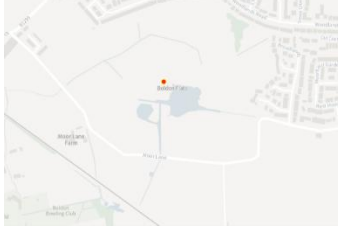

Response Number	Summary of Issues Raised	Site	Response
<p>21 Bellway Homes</p>	<p>No site-specific comment. General comment.</p> <p>Bellway Homes looks forward to working with the South of Tyne Authorities in due course to share site specific ecological information already collected on their development portfolio to inform the LNRS and improve its accuracy in implementation. It should be recognised that landowners and developers will have differing levels of ecological information and, therefore, it would be helpful if the mapping could be used as a 'live' resource and be updated/ adapted to reflect the growing information over time, which will improve the accuracy of the LNRS</p>		<p>Comment noted.</p> <p>No changes to mapping proposed.</p>
<p>22 Story Homes</p>	<p>Greenside Ryton Gateshead</p> <p>Story Homes Object to designation as an ACB:</p> <p>The site is predominately arable and supports very low ecological value. High soil fertility would hinder the creation of a species-rich grassland. It is not a suitable or priority location for grassland recovery and should not be designated as an ACB. We object to this and believe such decisions are more appropriately made through the Local Plan.</p>		<p>The Mapping of Habitats and Species Potential Measures is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>The arable fields referred to are not covered under mapped measure GP1-Md "<i>Undertake the creation of biodiverse grasslands where appropriate and soil conditions allow, targeting the expansion, buffering and connecting of grasslands of high conservation value.</i>"</p> <p>No changes to mapping proposed.</p>

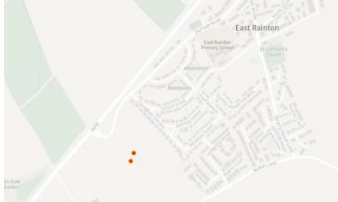
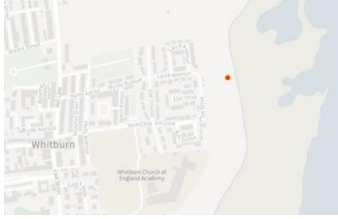
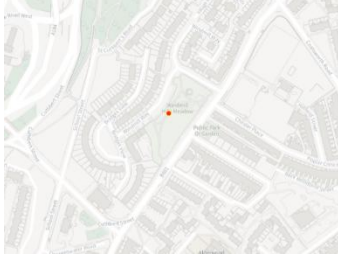
Response Number	Summary of Issues Raised	Site	Response
<p>23 Story Homes</p>	<p>Birtley Gateshead</p> <p>Story Homes Object to designation as an ACB:</p> <p>The site is predominately arable and supports very low ecological value. High soil fertility results in an overabundance of nitrophiles limiting the establishment of species-rich grassland, heathland, or woodland flora. It is not a suitable or priority location for these habitats and should not be designated as an ACB. We object to this and believe such decisions are more appropriately made through the Local Plan.</p>		<p>The Mapping of Habitats and Species Potential Measures is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>24 The Church Commissioners</p>	<p>Fellgate South Tyneside</p> <p>The Commissioners disagree with these proposed actions as there is an unclear connection to existing woodland and scrub here, and the proposed extents of the measures appear arbitrary. There is no woodland, let alone ancient woodland, on or in close proximity to this land. The Commissioners recommend targeting actions in areas with existing natural connections to maximise biodiversity benefits and the targeting resources effectively. As such, these actions should be removed from this location.</p>		<p>Action: Amend Local Habitat Map to remove mapped measures WP1-Mc and WP4-Mc.</p>

Response Number	Summary of Issues Raised	Site	Response
<p>25 The Church Commissioners</p>	<p>Fellgate South Tyneside</p> <p>The Commissioners question this eastward expansion beyond the LWS and consider that the extent of these two proposed measures in this location should be reduced to align with the LWS boundary, which has been drawn accurately to reflect the situation on the ground.</p>		<p>The Mapping of Habitats and Species Potential Measures is based on the best available information and follows a robust methodology. Full details regarding the methodology can be found at Appendix E of the Strategy.</p> <p>No changes to mapping proposed.</p>
<p>26 The Church Commissioners</p>	<p>Cleadon South Tyneside</p> <p>The Commissioners is supportive of the proposed measures to an extent, recognising the site's proximity to the Cleadon Pumping Station Local Wildlife Site (east of the site) and the obvious opportunity to expand and enhance this existing asset. However, the Commissioners note that the strong physical barrier between the site and the LWS (stone wall, height difference, residential road) may limit the effectiveness of on-site habitat expansion, suggesting efforts may be most effective focusing eastward of the LWS.</p>		<p>Comments noted. No mapping changes proposed.</p>

Response Number	Summary of Issues Raised	Site	Response
<p>27 The Church Commissioners</p>	<p>Boldon South Tyneside</p> <p>The Commissioners acknowledge these identified local priorities and are supportive of exploring such measures, particularly given the site's proximity to Colliery Wood and the obvious opportunity to expand and enhance this existing asset. However, any implementation of woodland and scrub habitat expansion must be carefully considered within the context of the Commissioners' wider objectives as landowners.</p> <p>The Commissioners remain open to exploring how woodland and scrub habitat can be delivered on site, provided it can be appropriately incorporated into any future sustainable development masterplan that balances ecological benefits with long-term land management and economic considerations.</p>		<p>Comments noted. No mapping changes proposed.</p>
<p>28 The Church Commissioners</p>	<p>Boldon Hills South Tyneside</p> <p>The Commissioners disagree with these proposed actions as there is an unclear connection to existing woodland and scrub and grassland habitats in this location, and the proposed extents of the measures appear arbitrary. The site is separated from larger habitats in the wider vicinity by major roads. The Commissioners recommend targeting actions in areas with existing natural connections to maximise biodiversity benefits and the targeting resources</p>		<p>Action: Review and, where appropriate, amend extent/location of mapped measures in line with mapping methodology.</p>

Response Number	Summary of Issues Raised	Site	Response
	effectively. As such, these actions should be removed from this location.		
<p>29 The Church Commissioners</p>	<p>Boldon Fell South Tyneside</p> <p>The Commissioners is supportive of the proposed measures to an extent given the proximity to the Wardley Colliery LWS directly to the west and the obvious opportunity to expand and enhance this existing asset. The Commissioners is open to exploring how the delivery of open mosaic habitat and associated butterfly species habitat can be expanded on site insofar as it can be incorporated into any future sustainable development masterplan of the site.</p>		<p>Comments noted. No mapping changes proposed.</p>
<p>30 The Church Commissioners</p>	<p>Shiney Row Sunderland</p> <p>The Commissioners is supportive of the proposed measures to an extent given the woodland north of the site and the obvious opportunity to expand and enhance this existing asset. The Commissioners is open to exploring how the delivery of woodland and scrub habitat can be expanded on site insofar as it can be incorporated into any future sustainable development masterplan of the site.</p>		<p>Comments noted. No mapping changes proposed.</p>

Response Number	Summary of Issues Raised	Site	Response
<p>31 The Church Commissioners</p>	<p>Boldon Flats South Tyneside</p> <p>The Commissioners broadly support the identification of their landholdings at Boldon Flats for nature recovery. As an LWS, Boldon Flats represents a logical location for targeted nature recovery. The Commissioners are working with Durham Wildlife Trust and Natural England to manage the site, improving the condition of the Boldon Pastures SSSI, recognised for its unique lowland wetland habitat and role in an exceptionally biodiverse wildlife corridor.</p> <p>Consider the land could have a greater impact on nature recovery if identified under Measure RP1-Mb (wetland restoration). Targeted nature recovery at Boldon Flats will assist in achieving Priority RP1 to ‘increase the extent of biodiverse water-dependent habitats’, which in turn will support the population of breeding waders. Furthermore, wetland restoration at the site could unlock wider development sites in South Tyneside.</p>		<p>Review and, where appropriate, amend to ensure accuracy of mapped measures.</p>
<p>32 The Church Commissioners</p>	<p>Whitburn South Tyneside</p> <p>The Commissioners' landholdings at Whitburn are identified as an ACB. Their landholdings are identified for a number of measures, including Woodland Buffering (ref. WP1- Mc). From a desk-based assessment, the woodland surrounding Cut Throat Dene is not identified as Ancient Woodland.</p>		<p>Review and, where appropriate, amend to ensure accuracy of mapped measures.</p>

Response Number	Summary of Issues Raised	Site	Response
	<p>We therefore consider that alternative landholdings should be proposed for this measure to improve the effectiveness of the South of Tyne and Wear LNRS.</p>		
<p>33 Individual (Lives or works within Strategy Area)</p>	<p>East Rainton Sunderland</p> <p>States the field needs to be protected as has become an area of particular importance for wildlife.</p>		<p>Comments noted. No mapping changes proposed.</p>
<p>34 Individual (Lives or works within Strategy Area)</p>	<p>Whitburn South Tyneside</p> <p>Concerned that the issue of sewage pollution at Whitburn is not identified or addressed.</p>		<p>Comments noted. No mapping changes proposed.</p> <p>Refer to Survey 1 (Table 1) response No.52.</p>
<p>35 Dingy Butterflies CIC</p>	<p>Bensham Gateshead</p> <p>Interest in bringing Bensham Wildflower Meadow back as a Wildflower Meadow as it has currently been heavily mown and cut back.</p>		<p>Comments noted. No mapping changes proposed.</p>

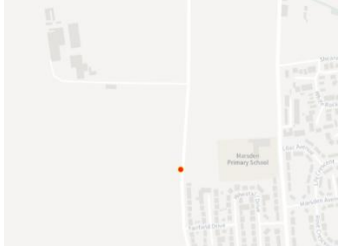
Response Number	Summary of Issues Raised	Site	Response
<p>36 Whitburn Neighbourhood Forum</p>	<p>Whitburn South Tyneside</p> <p><u>Mostly observations:</u></p> <p>Support the identification of ACBs in and around Whitburn, showing the importance of the green areas in Whitburn to nature and wildlife.</p> <p>Agree that the site north of Marsden Primary School is of importance to farmland birds and waders and requires careful management and improvement, including new blue infrastructure.</p> <p>The coastal areas also need to be managed to avoid damage and harm from recreational disturbance to habitats and species.</p> <p>We agree with the need to improve grassland and new woodland north/south of Moor Lane as well, as these are again important habitats.</p> <p>Advise that the mature trees in the Whitburn Conservation Area require careful management.</p> <p>Overall concerned that the LNRS will not have enough teeth to realise this all.</p>		<p>Comments noted.</p> <p>Refer to Survey 1 (Table 1) response No.55.</p> <p>No mapping changes proposed.</p>

Table 3- Responses received via email

Respondent	Summary of Comments	Response
<p>Individual (Lives or works within Strategy Area)</p>	<p>Highlights 5 actions they feel would enhance the South of Tyne LNRS:</p> <ul style="list-style-type: none"> • Action 1: Reduce the long list of potential measures down to a few specific measurable indicators using OEP guidance. • Action 2: Develop a specific communication and engagement strategy for interested groups and individuals as well as taking it to the public requires a dedicated resource. • Action 3: Ensure bats as an Order of mammals is addressed in the LNRS so that the opportunity that their role as indicators of habitat/ecological health and habitat connectivity is lost. Their unique legal status can be utilised to improve nature related outcomes. • Action 4: Ensure LNRS is not a paper exercise by committing to follow the science and do a few things well rather than listing loads of things we aren't resourced to achieve. • Action 5: Do not let the LNRS prioritise species activity over habitat enhancement. If the LNRS still feels it needs to comply with the guidance ensure the species list produced is transparent so the public can understand why extinct species in the area are prioritised of red listed species. <p>Overall suggesting the LNRS would be improved by being a shorter document pushing for LNRS to be referenced strongly in local planning policy; securing seed funding for at least one visible pilot project in a priority corridor in each of the three local authority areas; and demonstrating a clear monitoring framework in the final LNRS.</p>	<p>Comments noted. Refer to Survey 1 (Table 1) response No.5.</p> <p>No amendments to Strategy document proposed.</p>

Respondent	Summary of Comments	Response
The Coal Authority	We note that this consultation relates to a Nature Recovery Strategy, and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this.	Response noted and welcomed. No amendments to Strategy document proposed.
NEXUS	Nexus welcomes the South of Tyne and Wear Local Nature Recovery Strategy and welcomes support from local authorities and other stakeholders to access funding and other schemes for Nexus to: <ul style="list-style-type: none"> • Improve the biodiversity of our estate. • Meet our Biodiversity Net Gain obligations. • Improve the climate resilience and decarbonisation of our infrastructure. • Ensure expansion of our infrastructure also supports nature recovery. • Support landscape-scale nature recovery projects with other landowners and the community. 	Response noted and welcomed. No amendments to Strategy document proposed.
Durham County Council	Thank you for consulting Durham County Council on the South of Tyne and Wear Local Nature Recovery Strategy. We've reviewed the consultation draft and have no comments to make. We are keen to continue working together as a region to keep our Local Nature Recovery Strategies aligned, and look forward to continuing to work collaboratively in this area.	Response noted and welcomed. No amendments to Strategy document proposed.
The Crown Estate	Once the LNRS is finalised, we would welcome a copy of the GIS Shapefiles so that we can better understand overlap between potential measures and The Crown Estate's portfolio. We would also encourage the LNRS team to reach out as they start to consider how best to deliver the measures contained within the strategy. We are keen to stay involved and continue to liaise with LNRS teams, exploring opportunities to help enable the delivery of measures within	Response noted and welcomed. No amendments to Strategy document proposed.

Respondent	Summary of Comments	Response
	<p>the strategy and to ensure any potential conflicts between nature projects and existing agreements are managed.</p>	
<p>Biodiverse Consulting</p>	<p>Aligned with recommendations made in our responses to the North of Tyne and Durham LNRS consultation we recommend the introduction of a non-technical annex into the final LNRS which clarifies several important points for developers and landowners across the NECA region. This succinct document would be designed to be standalone and aimed at the layperson, explaining the LNRS's relationship to the following:</p> <ol style="list-style-type: none"> 1. Policy weight (with reference to the emerging December 2025 National Planning Policy Framework, which mentions Local Nature Recovery Strategies in relation to five separate policies, including climate change, site allocation and large scale residential/mixed use developments). 2. Allocated sites and LNRS (as noted in our consultation response, we do not support the exclusion of allocated sites from ACIB-identified "opportunity" land as these represent distinct opportunities for delivery of LNRS measures). 3. Strategic significance and Biodiversity Net Gain (BNG) <p>This Annex could utilise flowcharts depicting the interaction of developers/landowners with the LNRS. These interactions would occur during optioneering, when making a planning application, when establishing a habitat bank and when seeking ELM/Countryside Stewardship funding bids.</p>	<p>The current level of detail and guidance provided within the Strategy document relating to planning status and BNG (Strategic Significance) is considered sufficient.</p> <p>No amendments to Strategy document proposed.</p>

Respondent	Summary of Comments	Response
	<p>Thank you for considering this additional input which we feel strongly would actively contribute to the clarity and consistency of LNRS's use and relevance across the NECA region. We would be delighted to elaborate on the above and provide further input if needed.</p>	

Respondent	Summary of Comments	Response
<p>Historic England</p>	<p><u>Comments on the draft text</u></p> <p>Page 12 – the co-benefits to the historic environment could be added as an additional bullet point.</p> <p>Page 29 ‘Heritage’ - if heritage importance is represented by the NCAs built heritage - Penshaw Monument is Grade I listed and used as the example on this page, you could refer to designated heritage assets, generally or refer to specific designations.</p> <p>Page 31 - ‘Heritage’ – we suggest you add reference to the Heritage Coast designation.</p> <p>Page 117 - ‘Historic Environment’- request this section is expanded to highlight the important synergy between nature recovery and the conservation and enhancement of the historic environment set out below. Also noting that many of the images in the document, and referenced in Appendix F, are designated heritage assets.</p> <p><u>Important synergies between LNRS and the historic environment</u></p> <p>Including heritage assets within your strategy, seeking to manage them effectively and with policies and actions that are appropriate for those assets, can bring about additional value and sense of place. We recommend the LNRS seeks to highlight these synergies and the ways in which the natural and historic environment can complement one another.</p> <p><u>General Strategy</u></p> <p>In developing the strategy, we recommend that you consider the following factors in relation to the historic environment:</p>	<p>Review and, where appropriate, include minor amendments to wording within Strategy document.</p>

Respondent	Summary of Comments	Response
	<p>1. The Strategy should acknowledge links between nature recovery sites and heritage assets in the area and set an appropriate methodology for considering prospective locations.</p> <p>2. To what extent is the historic environment affected, both positively and negatively, by habitat creation proposals?</p> <p>3. How, if at all, have recent and ongoing BNG or similar projects considered the historic environment in developing habitat enhancing land management plans?</p> <p>4. Are there any conflicts between the Strategy’s proposals for nature recovery or enhancement and the historic environment? For example, proposals:</p> <ul style="list-style-type: none"> a. within designated areas that would impact on significance, such as nature recovery or habitat creation that does not sufficiently take heritage impacts into account, including historic character and setting b. for nature recovery projects that include afforestation on ‘open’ landscapes, which could interrupt the relationships and inter-visibility between heritage assets c. that will alter the condition of soils, or the water environment may impact on below ground archaeology d. to change land management practices which could affect the character of historic landscapes. <p>5. Are there opportunities for biodiversity enhancements that would benefit both the natural and historic environments that should be included in the Strategy? For example:</p>	

Respondent	Summary of Comments	Response
	<p>a. restoring historic hedgerows</p> <p>b. restoring priority habitats that support both nature recovery and historic character of particular landscapes e.g. wood pasture and parkland, traditional orchards, open water, meadows etc.</p> <p>c. changes to land management practices that protect archaeological features, such as the reversion of arable land to meadow or pasture where appropriate</p> <p>d. measures that improve the water quality of historic lakes, ponds, and canals, or that restore historic water management features</p> <p>e. improving public access and interpretation of both natural and historic features</p> <p>f. restoring historic structures, many of which can be designated or non-designated heritage assets, or landscape features that could also support wildlife, e.g. icehouses, follies, walled gardens and ha – ha’s (sunken garden structures) etc.</p> <p>6. The Strategy should set out how landowners and land managers can conserve and enhance the historic environment and the wider historic landscape on BNG offsite locations.</p>	

Respondent	Summary of Comments	Response
British Association for Shooting and Conservation	<p>We can support multiple opportunities for the shooting community to assist as you with the transition into delivery. We certainly look forward to using the published LNRS in our work with the shooting community in the South Tyne and Wear area.</p> <p>BASC provides training on both deer and grey squirrel management and have substantial expertise. You may be aware that BASC has created a Register of competent deer stalkers to connect competent people with organisations like the Woodland Trust and other landowners who need deer management. If you would like to highlight this in the LNRS then we would be happy for you to do so.</p>	<p>Comment noted.</p> <p>No amendments to Strategy document proposed.</p>
Durham Bird Club	<p>Is satisfied with the draft priorities and measures for priority bird species (pages 103-106) in the Statement of Biodiversity Priorities. Particularly welcomes the potential measure to support urban breeding Kittiwakes. Thinks the Local Habitat Map is difficult to use and requires further work.</p>	<p>Comments noted and welcomed.</p> <p>No amendments to Strategy document proposed.</p>
Individual on behalf of LNRS Birds Working Group-	<p>Questions whether there are many Pied Flycatchers left breeding in area. Peregrine Falcon possibly a surprise being listed amongst nest box species, although is aware of nest platforms being provided.</p>	<p>Comments noted and welcomed.</p> <p>No amendments to Strategy document proposed.</p>
Individual on behalf of LNRS Birds Working Group-	<p>Thinks the Strategy review period of 3 -10 years (page13) should be narrowed to 3 - 5 years due to the current rate of climate and habitat change.</p> <p>In regards to the Bird section. Thinks the content of Priorities and Potential Measures is fine but for continuity asks why the layout is different. For other categories - Herptile, Butterflies, Fish and Mammals there is a generic listing of priority species as part of the introduction to that section. Under the Birds section we have four green blocks headed with 3 habitat types, Farmland, Urban and Woodland and 1 species type, Waders. Could you clarify why we have the blocks that are not present in</p>	<p>Comments noted and welcomed.</p> <p>No amendments to Strategy document proposed.</p>

Respondent	Summary of Comments	Response
	the other sections and why the difference in headings (3 habitat and 1 species).	
Glead Ecological & Environmental Services (GEES)	<p>Suggests that the following have been omitted from the mapped farmland bird measures:</p> <p><u>In Gateshead</u></p> <ul style="list-style-type: none"> • Cross Lane Meadows, the area of fields sandwiched between Market Lane and the A1, to the west of the old pub (The Poachers Pocket?) • All of the arable fields on Barlow Fell on the north and south side of Ashtree Lane, running east to west, and across Barlow Fell Road • In Barlow Burn, the farmland between Martin’s Wood to the south west of Reely Mires Wood • ‘Above’ (i.e. north of) Chopwell, the farmland to the west of Ashtree Farm, west towards Bowers Hill Farm and from there across to Labourn’s Fell, and the western boundary of the LNR, to the south of Leadgate – there is a good population of linnet and some tree sparrows in this area • The farmland to the north of Kibblesworth village, north of Kibblesworth Bank and to the east of Ouslaw Lane • On the road running south off ‘Ravensworth or Blackburn Fell’. The fields to the north of Pockerley Farm Buildings, and northwards, to the west of Birkhead Lane <p><u>In South Tyneside</u></p>	<p>Comments noted and welcomed.</p> <p>Amend Local Habitat Map to address the omission of Farmland Birds Mapped Measures, ensuring alignment with mapping methodology.</p> <p>Locations identified by respondent under Bird Disturbance mapped measure are already included within the Local Habitat Map; therefore, no changes are proposed.</p>

Respondent	Summary of Comments	Response
	<ul style="list-style-type: none"> • Farmland areas on the eastern side of Cleadon Hill, to the south west of Hillhead Poultry Farm, and to the north and south of Cleadon Hills Farm • Land to the south of Fellgate, to the south east of the Lakeside Inn, east of Luke’s Lane – guess this might be going for housing? • The farmland pastures and arable fields on and to the north of the Old Rifle Ranges pastures at Marsden Village/Whitburn – the Old Rifle Ranges appears brown on the interactive map, couldn’t quite workout what that colour meant in relation to birds? <p><u>In Sunderland</u></p> <ul style="list-style-type: none"> • The farmland to the south of Burdon Lane, , moving west to east along this, as far south as Burdon Village – guess this might be going for housing? • The farmland north east of Washington New Town, to the north and north west of the A1290, to the north west of the Nissan ‘industrial complex’ i.e. to the south of the land along the Don – I am guessing that this is all down to development/employment use? <p>SP1-BMe Birds - Disturbance Measures</p> <p>Birds disturbance issues: There seem to be a number of areas that I was expecting would be highlighted under this provision but which are not, in particular along the coastal strip. Such as:</p> <p><u>In South Tyneside</u></p> <ul style="list-style-type: none"> • The area of land at the landward base of the South Shields Pier, on the south side of the pier. This is a complex of sand dune, rocky foreshore and beach, abutting the pier, as well as the pier 	

Respondent	Summary of Comments	Response
	<p>wall itself, running out 'to sea'. This is an area used as a high tide roost by a number of species and as a feeding area by various wader species at various states of the tide, depending upon disturbance elsewhere on Sandhaven Beach. Exclusion of dog-walker and pedestrians would help hugely.</p> <ul style="list-style-type: none"> • Jackie's Beach – at Marsden Village, east of the Old Rifle Ranges. This location presents an excellent range of opportunities for birds under the disturbance measure. These include temporary fencing targeting breeding ringed plover, and the protection of high tide roosts and feeding areas at other times of the year – this doesn't seem to be on the map. • Whitburn Bents shoreline – there is a ribbon of shoreline locations in this area, (opposite Nicholas and Markham Ave and northwards to Whitburn Academy), at the base of the cliffs, running north-south along the high tide limit, which should be mapped under this measure. Reduced disturbance in this area would very much benefit waders by reducing disturbance at roosts and provide additional undisturbed feeding areas when disturbance is high elsewhere. • As above, an area at the landward base of Roker Pier, on the north side of the pier, perhaps with temporary fencing targeting the protection of high wader tide roosts and protecting some sanderling feeding areas in this location? • Likewise areas at the base of Roker Cliff and in relation to Parson's Rock area – which once attracted purple sandpiper roosts, at some stages of the tide. • Possibly – an area, down on the beach area, near the outlet that runs out to sea at the North (little) Ryhope Dene, to the east of the A1018. 	

