



Response to the West Sussex LNRS consultation

Draft report produced by the Sussex Nature Recovery team
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Executive Summary

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

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

About the consultation:

- **225 responses were received** from 124 surveys, 36 emails/letters and 65 map pins. Note that as surveys and emails often contained multiple comments, so the number of individual points raised is higher. In addition, relevant themes raised through the East Sussex and Brighton & Hove LNRS consultation were reviewed to help ensure a consistent Sussex-wide approach where appropriate.
- **Public feedback across all channels is strongly supportive of the draft LNRS.** The strategy is seen as a comprehensive and practical framework for nature recovery, that is useful, clear, well-structured, joined-up, and ambitious. A sample of [positive comments and endorsements](#) have been captured in this document.
- **86% of survey respondents agreed that the LNRS gave them a better understanding of what we have to do to help nature** in West Sussex. Nearly 80% of those involved in nature's recovery felt that the strategy could help support funding, collaboration or the delivery of recovery projects.
- **Organisations and groups across all sectors expressed their intention to collaborate and support the West Sussex LNRS** in its delivery phase. They also provided examples of projects that are already delivering, or have the potential to deliver, LNRS measures.

Overarching response themes and actions

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

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

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

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

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

Next steps

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

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

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

Overview of consultation responses

i. About the LNRS and the consultation

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

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

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

Who was involved in the development of the LNRS

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

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

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

How the consultation was promoted

A press release, social media campaign and newsletter content were shared by West and East Sussex County Councils, [Sussex Nature Recovery](#) (the online home of both Sussex strategies), members of the Supporting Authority Group and Working Group, and by a wider network of Sussex-based community groups, organisations and forums. Those promoting the consultation included Living Coast, The Woodland, Flora & Fauna Group, Love West Sussex, Lost Woods Project, Weald to Waves, CLM, NFU, Sussex Wildlife Trust, Western Sussex Rivers Trust, Chichester Observer, The Argus, Sussex World, and many others.

Posters advertised the consultation in libraries across West Sussex (with printed copies available for those without digital access). The consultation was also promoted on BBC Radio 2, V2 Radio (Chichester) and by a [30-minute interview on Latest TV](#) (covering Worthing, South Chichester, Brighton, Hove).

This activity drove just shy of 5,000 visits to the West Sussex LNRS consultation portal and 2,400 downloads of LNRS documents.

How responders were supported to complete the consultation

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

Two PDF guides on how to navigate the Local Habitat Map and documents were also available in the consultation portal, as well as FAQs.

How feedback was invited

Views were captured in one of three ways:

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

How many responses were received

225 responses (124 surveys, 36 emails, 65 map pins) were recorded to the West Sussex LNRS. A further 517 responses to the East Sussex and Brighton & Hove LNRS were also reviewed to ensure a consistent Sussex-wide approach where appropriate.

Who responded to the consultation across all channels

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

LNRS Supporting Authority Group and Working Group	Organisations and charities (excluding parish and town councils)
<ul style="list-style-type: none"> - Adur & Worthing Councils - Arun District Council - Chichester District Council - Crawley Borough Council - Farming and Wildlife Advisory Group – South East - High Weald National Landscape - Horsham District Council - Knepp Wildland Foundation - Living Coast UNESCO Biosphere - Mid Sussex District Council - Natural England 	<ul style="list-style-type: none"> - Adur River Recovery - British Association for Shooting and Conservation (BASC) - Butterfly Conservation - Bignor Park Estate - Community People - CPRE Sussex - Crown Estate - CSA Environmental - Cuckfield Parish Council - The Church Commissioners for England (The Commissioners)

<ul style="list-style-type: none"> - National Farmers Union (NFU) - South Downs National Park - Sussex Wildlife Trust - Sussex Biodiversity Record Centre - Weald to Waves - West Sussex County Council Public Health 	<ul style="list-style-type: none"> - Elvia Homes - Environment Bank - Historic England - Nature Unlocked, a UK research programme at Wakefield - Marine Management Organisation - National Highways - National Trails UK / South East England Coast Path Trail Partnership - RSPB - South East Rivers Trust - Southern Water - Southwood Foundation - Sport England - Sussex Local Wildlife Site Initiative - The Duke of Norfolk - Woodlands Trust
Parish & town councils	Community Groups
<ul style="list-style-type: none"> - Arundel Town Council - Ashington Parish Council - Cuckfield Parish Council - Henfield Parish Council - Lindfield Parish Council 	<ul style="list-style-type: none"> - Amberley Millennium Green Trust - Amberley Showstopper - Arun to Adur Farmer Cluster - Campaign to Protect Rural Henfield - East Preston and Kingston Preservation Society - Ferring Conservation Group - Friends of the Ems - Horsham Green Spaces - The Ifield Society - Manhood Wildlife and Heritage Group - Steyning For Trees (hedge planting charity) - Swifts Local Network: Swifts & Planning Group - The Woodland, Flora & Fauna Group

ii. Positive comments and endorsements

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

- “The LNRS brings hope for nature recovery and will **provide the support** that is needed on a wider scale to help nature recover.”
- “The RSPB welcomes the West Sussex LNRS and finds it to be a **well-structured and ambitious strategy**.”
- “Overall, we strongly support the strategic direction in Part 2. The seven principles, 24 priorities, and series of measures are **well structured and provide clear guidance**. Overall, the measures are detailed and actionable.”
- “Clearly an incredible amount of work has gone into this strategy and indeed enormous thanks to all those involved in writing it. I believe it does provide a really **excellent assessment** of the current state of nature within West Sussex.”
- “I love it and am **excited** to see the progress over the years to come”
- “Thank you again for all the **brilliant work** that has gone into the draft LNRS. We are truly encouraged by its **ambition**, and we look forward to working collaboratively to deliver nature recovery in Sussex.”
- “Thank you for all who compiled the survey and its supporting documentation which has been a pleasure to interact with in making my response”
- “As a Landscape Architect, nature lover and CPRE rep, I’m particularly **excited** for the West Sussex LNRS, as a key element of national biodiversity and climate policies. The data helps to understand local biodiversity priorities, ecological networks, and habitat connectivity, which are particularly important when reviewing planning applications or working on proposed housing development sites. The **LNRS supports the design of landscapes for both people and nature**, creating spaces that enhance biodiversity, support pollinators, and strengthen green corridors as well as highlighting opportunities for flood mitigation, carbon sequestration, and climate adaptation through nature-based design.”
- “Part 1 Section 4 is valuable because it provides a **consistent baseline and understanding of the pressures** we are facing. It’s a reliable reference with sufficient detail”
- “**Consolidation of the local needs, ecology and measures** required for nature recovery. Particularly excited in how the data and land management expertise we have at Wakehurst could support delivery, plus using the local views on what nature means for people to guide research direction.”
- “Cuckfield Parish Council very much welcomes these local nature recovery strategies and recognises the **considerable effort and work** involved.”
- “This initiative will help support the efforts of those people who have been battling for its [wildlife] survival for many years and improve the prospects for flora & fauna throughout the county.”
- “Hopefully will give some protection to what we still have and a **framework** for what we want to achieve”
- “I am generally very interested in wildlife, and it's good to see that plans are being made (and already being carried out) to promote good practices, which will hopefully bring about positive change.”
- “I'm a freelance ecologist working on species and habitat recovery across the entirety of Sussex, so am already aware of what needs to be done. However, I believe this will be **incredibly useful** for many others.”
- “The strategy is **well informed, considered and presented**.”

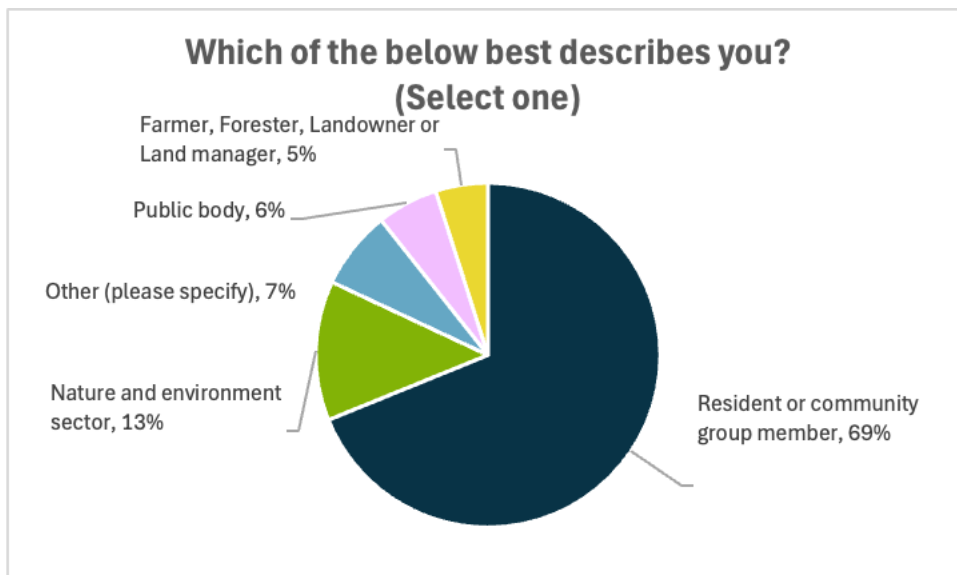
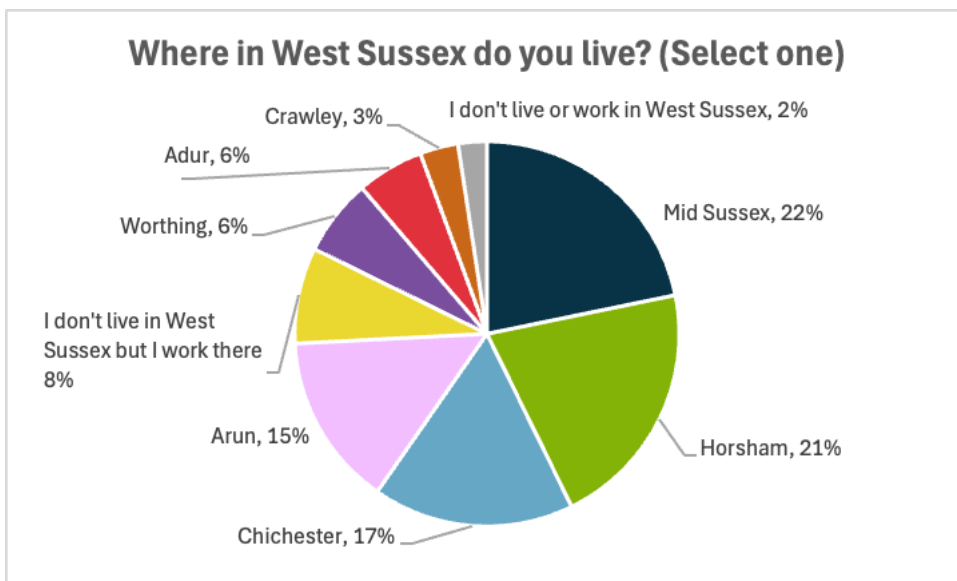
- “There is plenty of opportunity to be guided by the LNRS measures both in land acquisitions and habitat design.”
- “The LNRS **sets out an inspiring and coherent vision** for how trees and woodland can be protected, restored and reconnected as part of wider landscape scale nature recovery across West Sussex”
- “The LNRS provides a **framework** for nature recovery that is **thorough and wide-ranging.**”
- “The 'overview' and in depth analysis of local nature depletion is very encouraging.”
- “Aside from the very specific comments I have made, it is **thoroughly excellent.**”
- “A **robust framework** to create vital positive steps to increase and restore biodiversity on a widespread scale.”
- “I'm really pleased West Sussex is taking this so seriously.”
- “If we can get this implemented it will do so much good for nature and future generations.”
- It is a **clear, easy to read and understand** document that is invaluable for people like myself to help speak up for nature and increase understanding for others.
- “It is a **comprehensive strategy** that is needed to ensure that things do not get any worse in the future than they already are.”
- “It is a **fascinating resource**, which is worth re-reading. (East Preston and Kingston Preservation Society)”
- “It is a **very thorough** piece of work. Congrats to all involved. It brings so much relevant and important information together and should make development of future projects much easier.”
- “It **provides confidence** that collectively we can protect, conserve and enhance nature in West Sussex.”
- “It's a deeply **comprehensive survey** of the massive pressures placed on the lived environment. As someone with an interest in these matters, it's helped me learn more of the different ecosystems present in the county, and despite many typos and errors in grammar, it has absolutely helped to tie together the work done across different contexts within West Sussex.”
- “It's been very **well thought out** and presented and addresses very pertinent concerns.”
- “Its a **huge step forward** for the environment, its nice to see them prioritised for once (albeit maybe slightly ambitious), but I'm hopeful we can pull it off. Go big or go home!”
- “I'm excited that the LNRS may nudge some of this forward and that it is being done in terms of **landscape scale thinking** and that everyone can play their part to connect across the county and beyond.”
- “Thank you for all the work that has gone into this strategy, which looks generally **comprehensive, robust and useful.**”
- “I would like to congratulate you on your effort in **collating and producing all that information.** Thank you for all the effort you and your colleagues are providing to ensure the survival of our Sussex natural environment.”
- “The LNRS gives a **comprehensive, thorough and detailed picture** of nature in Sussex and it **sets out a number of clear steps** to take action for nature recovery in the form of principles and measures.”

iii. Feedback from the survey

124 submissions of the survey were received in the West Sussex consultation.

Who responded

Responses were received from all seven districts and boroughs in West Sussex. 8% of responders don't live in West Sussex but work there, such as those involved in environmental or land management initiatives in the LNRS area. Similarly, a smaller percentage don't live or work in the strategy area and are responding on behalf of national organisations.



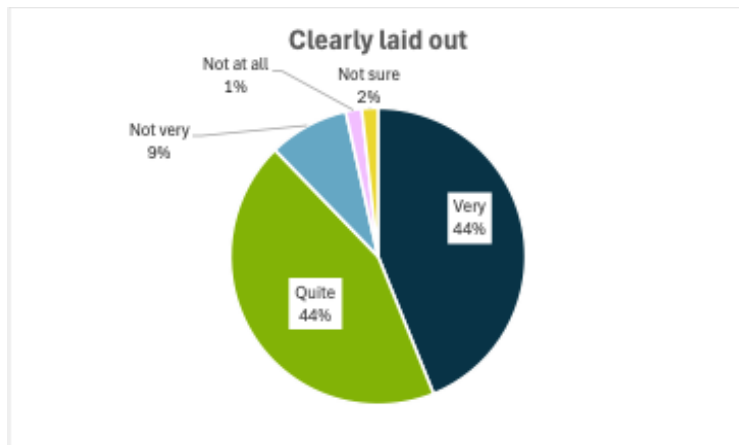
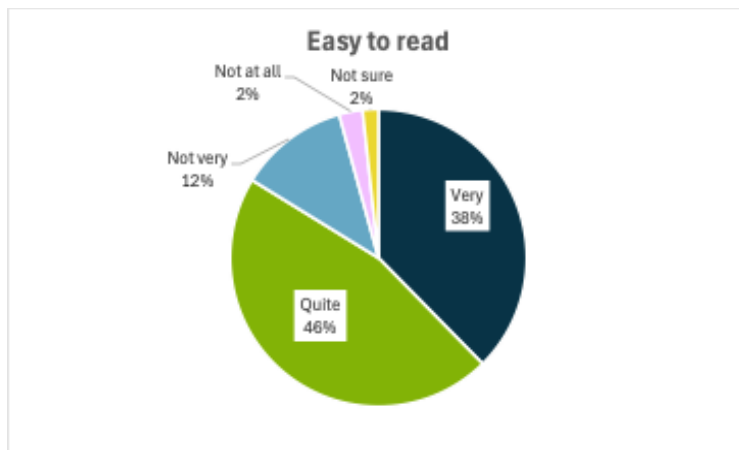
- **28%** (29) of those who responded did so on behalf of an organisation, business or group including Woodland Trust, Butterfly Conservation, Living Coast Biosphere, South East Rivers Trust, Sussex Wildlife Trust, Weald to Waves, Sussex Amphibian and Reptile Group, CPRE Sussex, Sussex Local Wildlife Sites Initiative, Sport England, National Highways and others.

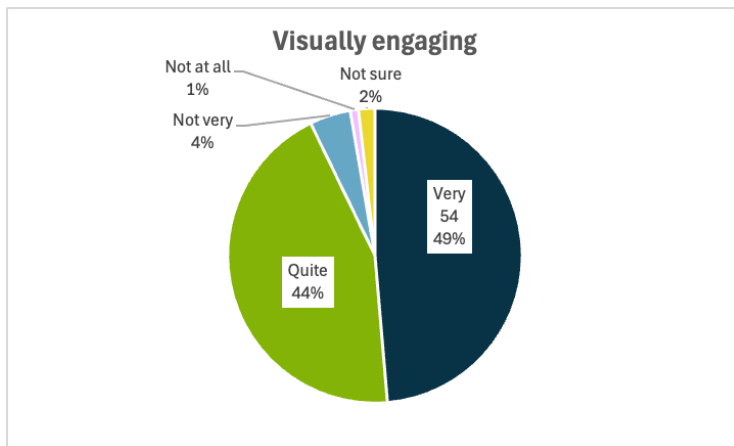
Awareness of the LNRS

- **61%** had heard about the strategy before public consultation, 8% weren't sure and 31% had not.
- **76%** felt they have a good understanding of the purpose of Local Nature Recovery Strategies, 20% weren't sure and 4% do not.
- **54%** had participated in the development of the LNRS for West Sussex in some way before the consultation by for example, watching a webinar, taking a survey, visiting the website, receiving a newsletter and so on.

Format and legibility

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





Over 80% of responders found the LNRS to be *quite* or *very* easy to read, clearly laid out and visually engaging, but when asked what could be done to improve the format of the strategy, a large amount of feedback concerned its length and complexity which many respondents found prohibitive and overwhelming. Many responders suggested a summary could help people navigate and digest information.

Sample of verbatim comments related to improvements to format and legibility

- *“It is REALLY important but it I **struggle** to get other people to engage as it is necessarily a **weighty and detailed** set of documents.”*
- *“It does indeed need to be this long, but it is **VERY long**, long enough to stop many from reading it.”*
- *“I was immediately overcome by **the amount of info** that I had to read. x 4!”*
- *“**No one will read this**. Its 300 pages”*
- *“There’s just **too much information** to take in.”*
- *“The amount of information provided is comprehensive and clear but may **overwhelm**.”*
- *“The whole strategy is massively **over complicated** and **off-putting** for a member of the general public (even though I have an ecology and botany degree).”*
- *“Very 'bitty' so **hard to follow** and no idea what is being done to help nature, despite a long list of things needing to be done.”*
- *“It needs a brief **executive summary** to capture the attention of "the public".”*
- *“**Too long**, needs a **shorter version** for those who have limited time”*
- *“This **needs to be easier to read**. With much clearer **precis topics** available as many do not have vast amounts of time to spend while earning a living and dealing with everything else. It should be much clearer for those who want to make a difference.”*
- *“**Larger font** - while magnifying on a computer is straightforward, a printed version might prove challenging. “*

Feedback on key components of the draft LNRS

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

- **72%** felt the **Description** effectively set the scene for West Sussex's current land use, condition of its natural environment and the pressures it faces. 21% felt it partially did so. 7% weren't sure. 1% said No.
- **77%** felt the seven **Principles** helped them understand the issues impacting nature in West Sussex and how we might respond to them. 19% felt they partially did so. 3% weren't sure and 1% said No.

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

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

- **“Marine Conservation Zones** have not been acknowledged in this document.”
- **“Does not cover issue of the large amount of farmland lost to housing development and the resulting fragmented of the natural landscape. Fails to mention **the low weald** is especially vulnerable and is the most threatened landscape as it has no protection”**
- **“Deer Pressure.** It is mentioned in relation to woodland but it is also significant in **wetlands** like Amberley Wildbrooks. Deer numbers have soared in the last 40 years. Their numbers can be damaging to nest sites, particularly if they stampede. Should **Chalk Streams** be included in the table of irreplaceable habitats?”
- **“The Arun estuary is not a “slow-flowing river” Rather, it is said to be the 2nd fastest-flowing river in England”**
- **“No information on **light pollution**”**
- **“Water Pollution** is mentioned but it is general statement, should be more specific about types of pollutants.”
- **“Please list **chalk watercourses** as Irreplaceable Habitats in strategy”**
- **“It doesn't address some of the key issues of highly invasive species, eg **carex pendula**, which is depriving native species, such as bluebells and delicate grasses, of light, causing them to die.”**
- **“Analyse and share collective RPA data** of what farmers are currently doing on farms and ensuring farms are allowed to be both environmentally friendly and productive”
- **“The importance of community engagement is valued throughout, but **signposting to local data** on the population would be an enabler within the strategy and support stakeholders to identify areas of health inequalities.”**

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

- **58%** felt the 24 **Priorities** captured everything they feel strongly about, 31% felt they partially did so. 6% weren't sure. 5% said No.
- **59%** felt the 108 **Measures** were generally written in a way that feels practical and easy to follow for those who might want to implement them. 26% felt they partially did so. 9% weren't sure. 6% said No.

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

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

- *“C1.4: We strongly support the measure, but recommend a specific reference to **island creation and enhancement**.”*
- *“FL1.2 Cultivated fallow: shouldn’t be on high weed burdened areas and often rotational if it is to reflect the rare plants of the past it needs rotation and livestock to recreate it and timing of cultivation, it is likely to be better on edges and margins with the rest of the field in crop.”*
- *“Lots on new woodland but that takes a century before it becomes a viable habitat. We should do much more to protect mature trees/woods”*
- *“W1 and W2, need to ensure new trees planted are spaced evenly apart to avoid crowding, and mindful of the type of trees that are planted. Some grow really quick, with a large canopy which will halt other trees and plants etc to grow. Also no mention of **woodland management plans** specifically being created which i think will be a good idea for new and existing woodlands”*
- *“In priority H1 re lowland heath no mention is made to enhancing it to benefit rare **reptiles** ie Smooth Snakes and Sand Lizards, this is an unacceptable omission. (And you should probably mention near endangered Adders.)”*
- *“R1: More emphasis in all **chalk watercourses** in the Western Streams group ie Ham Brook, Bosham and Fishbourne streams. For some of these **abstraction** is definitely a more significant problem than pollution and their survival is threatened especially the Ems.”*
- *“U2 it would be worth guidance on **installing/maintaining bird boxes** etc so as not to damage trees. (This is actually difficult to find...)”*
- *“P85 in Part 1 recognises **light pollution** impacts on moths. It is essential that light pollution is negated in development. (U2.6 EM) only an enabling measure we ask an objective of reducing **light pollution** is included”*
- *“Not enough on **support for local community groups and volunteers** who manage the network of nature reserves etc”*

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

- **67%** agreed that the list of **Prioritised Species** is right. 17% felt it is partially right. 12% weren't sure and 5% said no.
- **66%** agreed the **Species Measures** were right. 18% felt they were partially right. 13% weren't sure and 3% said no.

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

Sample of verbatim comments about improvements to Part 3 – Species

- *“**Bats** need more help with corridors.”*
- *“Ensuring that Turtle Dove measures explicitly reference supporting and scaling up existing Operation Turtle Dove work, including advisory and habitat management across relevant farmland and edge habitats.”*
- *“It's extremely disappointing that there are no meaningful measures for the **White Tailed Eagle**, with a successful breeding pair in Sussex being key to the future sustainability of a native population alongside existing territorial pairs in Dorset. We know from tracking data*

that the West Sussex rivers, estuaries and wetlands are critical to the future success of this project of national importance.”

- “RE: Grazing for Chalk grassland species, generally the measures here are good but would caveat / amend grazing with “carefully timed and considered grazing taking into account range of species present on each site”. Timing, stock type and density is crucial. Specific addition for WEST: Timing, stock type and density is crucial and where **Duke of Burgundy** is present low density winter cattle grazing only.”
- “**Marine** species are underrepresented in the priority list. Although we appreciate that the LNRS boundary is the mean low water mark, there are a number of important intertidal species that should be acknowledged.”
- “I’m pleased to see hedgehogs, skylarks and swifts on the list, all of which have protections in place in our village. It would be nice to see **barn owls** included too.”
- “The rare reptiles (smooth snake and sand lizard) are listed but not the near-endangered **Adder**. I doubt this document will be frequently updated so I put in a plea to include Adders, our vanishing vipers, as they are right on the cusp.”
- “Please include **Wood White** with bespoke measures.”
- “I personally don’t agree with the priority list of dragonfly and bee species in the table - I think **Black Darter** should be on the list alongside with Brilliant Emerald.”

[Local Habitat Map \(opens ArcGIS\)](#)

- **53%** found the **Local Habitat Map** easy to use and navigate. 31% said partially. 12% said no and 5% weren’t sure.
- **49%** agreed that where measures were mapped to land they owned, managed or advised on, this would help support the planning, designing or seeking of funding for nature’s recovery. 40% didn’t know or weren’t sure. 12% said no.

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

Sample of verbatim comments about improvements to the Local Habitat Map

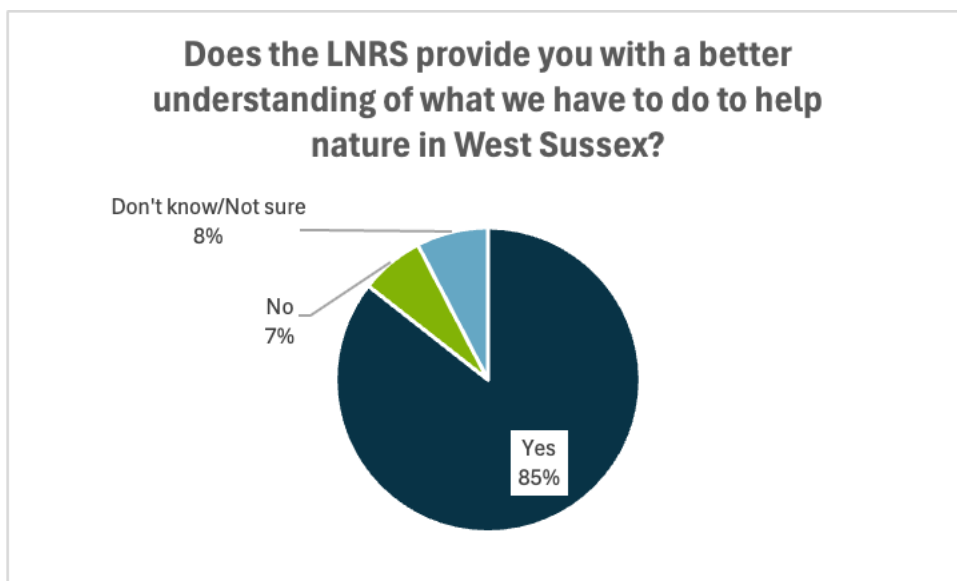
- “It is **too complex**. Having more maps each with less data might help.”
- “It can be easy to miss important features as you turn layers and features on and off.”
- “**Wasn’t great** on my phone”
- “These are detailed maps covering a large area. Being able to see a much smaller local area would be helpful. A lot of work has gone into creating these maps and they will be useful for those working for many wildlife and rural agencies ie RSBP and the woodland Trust.”
- “As an advisor to members who manage land throughout the LNRS area, I believe spatially informative data will prove beneficial. The **number of mapped measures is on the conservative side** in my opinion.”
- “Each map was too similar. area divisions too similar”
- “Consider **adding a layer for nature conservation projects/wildlife conservation initiatives**. There is APiB, ACiB, but I feel there was a third layer of importance that

should be added where nature conservation projects undertaken within it are reliant on the existing valued terrain to support wildlife conservation initiatives.”

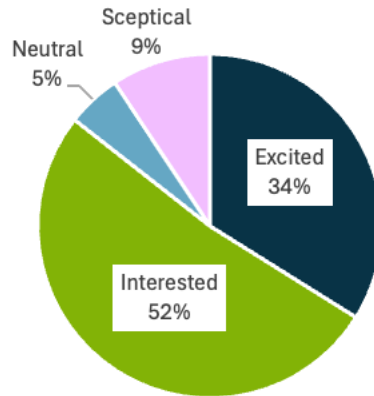
- “My worry is that the **LNRS will create a hierarchy**, where areas not mapped will actually be **undervalued** more than before. I would like to see the information extended further, to represent another tier to ensure this doesn't happen.”
- “It's easy to use but **information missing**. There is more woodland, hedgerow and scrubland than mentioned on the map.”
- “National Trails UK is **excited to see the inclusion of the South Downs Way & King Charles III England Coast Path & coastal margin corridors** on your habitat mapping under Measure Cor3.6.”
- “Important to **collate information from local residents** regarding smaller streams and watercourses, as these are important blue and green infrastructure links to support varying habitats and species.”

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

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

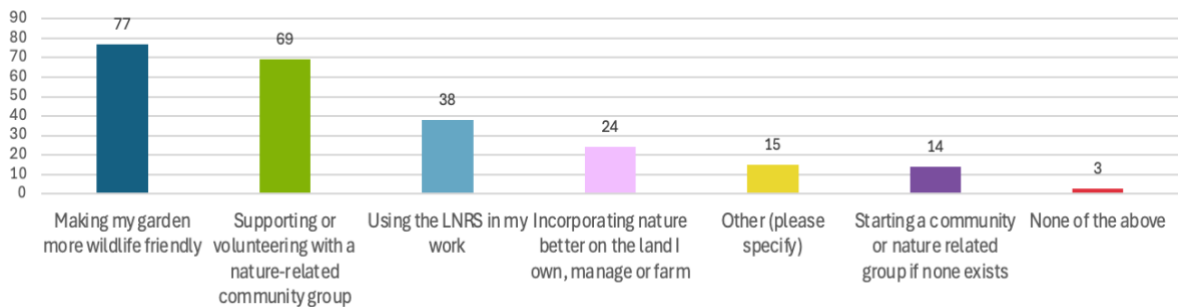


What one word below best describes how you feel about the LNRS for West Sussex?

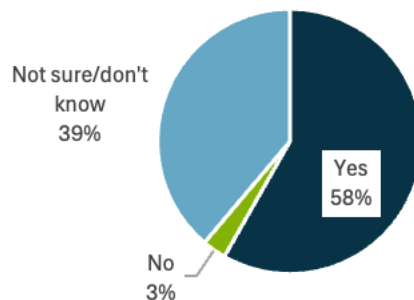


- Overall, survey respondents are excited or interested in the LNRS – just 14% are not interested or sceptical about it.
- **89%** of responders stated they would take an action forward to help deliver it.

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



If you are involved in nature recovery, do you think the strategy could help support funding, collaboration or the delivery of recovery projects?



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

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

Sample of verbatim comments concerned about delivery and implementation

- “No mention of **funding** mechanisms that I could find.”
- “Importantly there needs to be information on the features and benefits, including what the **cost** is and where the **funding** comes from.”
- “I understand a delivery plan follows next, but I think the strategy should have included some **more defined, measurable targets with timescales**”
- “Nothing will come of this. It is a fantasy because there are **no real proposals or commitments.**”
- “The priorities are generally fine, but I'd have liked more information on **how, when and where** these are going to be addressed, we desperately need **ACTION!**”
- “While you quite rightly state aspiration alone is not enough, the ‘success in ten years’ sections do seem to be just that - **how will you actually measure what success is?** – will there be an annual review as to what progress has been made and how will any momentum, once established, be maintained?”
- “I think this does lead to the question of **who actually ‘owns’ the strategy** and who exactly will be providing the **leadership** required to **provide implementation, delivery and co-ordination of activities.** None of this seems clear in the strategy.”
- “Much clearer information about **what needs to be done** and **who is responsible**”
- “Give it **teeth**”
- “Proof will be in the implementation and the results. Previous experience suggests nature always comes a very poor second in matters of **building development** and the economy.”
- “I am deeply sceptical that any nature recovery project will survive conflict with **central government** objectives.”
- “**Low expectation of the plan** making a meaningful impact because of track record of over development of coastal strip and building on the Downland. Plus river pollution and dreadful seawater quality.”
- “It is difficult to see how these interact with other authorities and even with other priorities within **WSCC.**”

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

- “Perhaps need to go on to produce **more specialist manuals & webinars** for farmers, developers, Planning Officers etc.”
- “Will take a bit of getting one's head round (as a community volunteer). Maybe **small toolkits** to follow?”
- “There will be some issues that **landowners and farmers** need further help to implement these changes.”

- *“Just to make some of this important information **easy to access and use** for individuals and community groups so everyone feels they can take action to support nature recovery at whatever scale.”*
- *“I would love to participate to a **workshop online/webinar** to better understand it.”*
- *“I would like to see **more engagement** with the community and will planning in Horsham.”*
- *“Integrate the LNRS to local **education** and health services. It may help local people being more aware of it and engage with the content, given a less extensive report is made available to the public.”*
- *“Interested to know more about my local area and perhaps **voluntary organisations** I could investigate to help out.”*

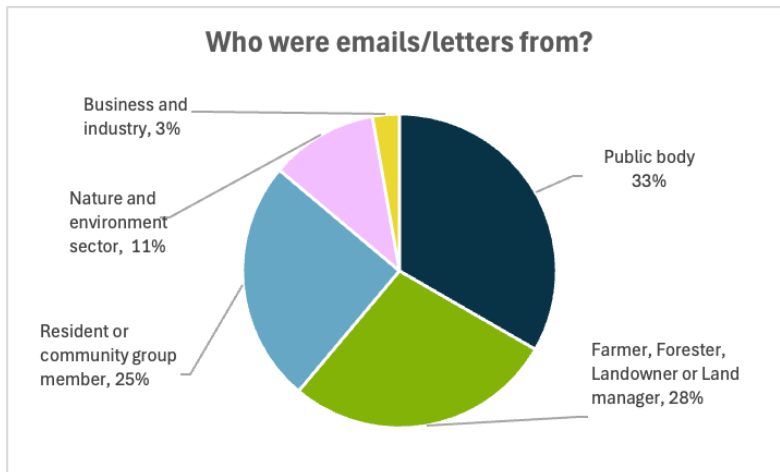
Demographic information

- 51% of survey responders completing demographic questions are female, 48% male and 1% preferred not to say.
- 94% of survey responders completing demographic questions have a white, British ethnicity, 1% were of mixed or multiple ethnic groups, 1% selected Other, and 4% preferred not to say.
- 13% of survey responders completing demographic questions consider they have a mental or physical disability. 4% prefer not to say.

iv. Feedback from emails/letters

36 emails/letters were sent directly to the West Sussex LNRS lead.

Who responded



The majority of those who responded did so on behalf of an organisation, business or group including Arundel Town Council, The Crown Estate, Marine Management Organisation (MMO), High Weald National Landscape, South Downs National Landscape, The Woodland Fauna and Flora Group, Historic England, BASC, and others.

Key themes from emails/letters.

Endorsement

- Many responders expressed their support for the strategy. Additionally, some members of the LNRS Working Group and Supporting Authority Group acknowledged the collaborative process in which the strategy had been developed:
 - *“We welcome the collaborative and partnership approach.”*
 - *“Approach very thorough and logical. Final documents layout of the is very good. It is wordy and long, but I suspect that it has to be and it is easy enough to pull out key headings and visuals.”*
 - *“Firstly, congratulations on launching the public consultation for your Local Nature Recovery Strategy (LNRS). We recognise the huge amount of effort that has gone into gathering the baseline data and local knowledge needed to identify the priority species and habitats to include in the LNRS, the areas of particular importance for biodiversity, and the measures that can help enable nature’s recovery.”*
 - *“LNRS is an achievement, so much information, well done! On the whole it reads really well, the measures are clear and am looking forward to seeing how we can start delivering!”*
 - *“Thank you for all the work that has gone into this strategy, which looks generally comprehensive, robust and useful.”*

Wording changes

- Many responses requested changes to wording in the Description, for clarity, to correct typos, or provide additional detail. Examples include finessing outcome statements and referencing specific pollutants.

Rivers and streams

- Some responders requested that chalk streams be referenced as an ‘irreplaceable habitat’.
- Others were concerned that rising sea levels and flood risks, particularly around Arundel, should be emphasised as risks to nature (from saline inclusion) as well as to people. There was also a request that the link between poor water quality and pollution was made stronger.

Changes to the map

- **19%** of correspondence shared details about current biodiversity or nature-improvement projects underway at sites in the strategy area, along with requests to add or amend the Local Habitat Map. These came from landowners and land managers including RSPB, as well as from interested parties.

The need for an executive summary and bespoke guidance

- A few responders mentioned the length and technical nature of the strategies as a barrier to engagement and then need for a shorter, clearer summary.
 - *“We do consider that a clear executive summary would be very beneficial.”*
 - *“It would be helpful to have an executive summary for the LNRS to assist the reader.”*

Source to sea connectivity and marine generally

- Some correspondence queried the lack of marine mammals in the LNRS, such as seals.
- Several recommended greater emphasis on the connectivity between terrestrial, riverine and marine environments to highlight that what happens up streams impacts estuarine and marine habitats and species.
- A request was made to provide greater context around regulation of the marine environment such as through Marine Management Plans.

Supporting materials/engagement for planners and farmers

- Additional advice, tool kits and events were requested to Local Planning Authorities and land managers to help them implement the LNRS.
 - *“The Council suggests that consideration is given to providing a shorter guide aimed at local authority planners explaining how to use the LNRS and which sections to check when reviewing development proposals. This would assist local authority planners to ensure that development proposals are aligned with the objectives of the LNRS and that opportunities to deliver nature recovery are embedded in development proposals.”*
 - *“Sussex LNRS is a large, detailed document. Concern that farmers and land managers will not have the time/capacity to look through in detail. The delivery phase and coordination of advice and action amongst partners/ stakeholders will be vital if the LNRS are to be used to inform on the ground delivery”*

Species

- Several responses concerned particular species and how they were referenced in the strategy. One submission provided expert detail on dragonflies and damselflies and requested the inclusion of three dragonfly species to the priority list. A separate submission supplied additional detail around measures for pine martin and grey partridge recovery.

Delivery

- Some responses were sceptical about delivery of the strategy given uncertainties around funding and a lack of ‘teeth’ to enforce change.

- *“It isn’t really a true strategy. I say this because in my opinion, a true strategy must go some way to defining priorities and sequences of interventions. A strategy should at least scope these things out. Need to include sources of funding defined in some detail”*
- *“We are also concerned that the strategy does not refer to the very real risk posed to nature recovery, and specifically to many of the aims referred to in your document, by the withdrawal of CSS and SFI funding.”*

Light pollution/dark skies

- One response encouraged measures related to the mitigation of light pollution. Another wanted to map parish-level dark skies initiatives.

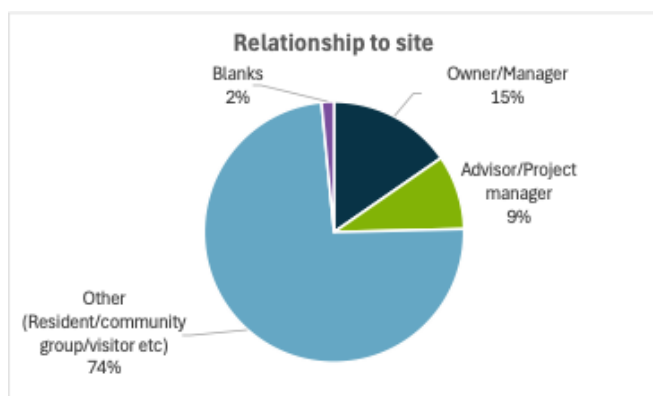
v. Feedback from pins added to the Local Habitat Map

65 pins were added to the West Sussex interactive Local Habitat Map, enabling responders to comment about how a specific site/location had been mapped.

The Local Habitat Map is made up of:

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

Who responded:



Key themes from map pins

Almost all pins provided information about habitats and species found at the location. Some advised of nature-recovery actions taking place or planned.

57% of pins requested a site be added to the map while 2% requested a change to how it had been mapped. 12% requested a site be removed from the map. For the remainder, no action was discerned and information has been noted. Each request was considered on a case-by-case basis. In some instances, the responder was asked to provide additional information.

Examples of comments:

- *“The "orchard" on the local habitats map no longer exists. The site has housing on it now”*
- *“The village is proposing a nature reserve on east St farm centred on the improvement of the chalk stream & with huge potential for BNG”*
- *“There is a measure marked here (W2.1)... Suggest that this measure is removed from this small area as it is not likely to be implemented given the existing use of the land.”*
- *“This is one of about 15 wildflower verges in Burgess Hill, looked after by the town council.”*
- *“Abundant signs of water voles - latrines, burrows, feeding stations - in this stretch of the River Ems”*
- *“Wide road verge being managed to become wildflower grassland with restored connectivity through hedge planting.”*
- *“Brown hairstreak butterfly eggs sighted here”*

Our response and actions to key feedback themes

A: Format and structure

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

<p>2. Language</p> <ul style="list-style-type: none"> • Too technical • Contains jargon • Difficult to understand • Not sure who the LNRS is written for 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that some of the language used within the LNRS is technical which will have made it harder to read and understand. • Some technical language was required and/or specified by the statutory guidance. Some terms are difficult to avoid as they are used by land managers and ecological practitioners who expect the strategy to reflect professional/technical standards and be precise enough for application in the field. Some terms are also used within formal systems such as planning and thus need to be used where this is appropriate. • We appreciate that responders may have felt unable to comment on aspects of the LNRS due to its technical nature / that a level of expertise was required to do so. • To aid comprehension of technical words, explanations were provided either within the text or in a linked glossary at the back of Part 1. • Government guidance specified that the consultation seek feedback on all key parts of the LNRS such as the Description, Priorities & Measures, Local Habitat Map, Priority species list and so on. Recognising that not all responders would want to do this or feel they could, all consultation survey questions were voluntary, and responders advised to skip any not personally relevant. Additionally, time was spent crafting questions so that they catered for a range of expertise-levels, with multiple-choice answers including 'I don't know/not sure'. <p>Actions:</p> <ul style="list-style-type: none"> • The team will consider what resources can be provided post publication to assist in understanding technical terms and concepts that meet the needs of a wider range of audiences.
<p>3. Imagery</p> <ul style="list-style-type: none"> • Stag beetle image should a different species • Red Valerian features heavily in vegetated shingle image 	<p>Our response</p> <ul style="list-style-type: none"> • Thank you to the responder who alerted us that the photo used in Part 2, page 128 is a lesser stag beetle (<i>Dorcus parallelipedus</i>), and not a stag beetle (<i>Lucanus cervus</i>) as per the caption. • We appreciate that an image of vegetated shingle on Shoreham Beach (Part 2, page 22) features Red Valerian, a naturalised but invasive species. <p>Actions:</p> <ul style="list-style-type: none"> • A new photo of a stag beetle will be sourced. • Alternative images of vegetated shingle in West Sussex will be considered.

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

Summary of key feedback	Our response and actions
<p>1. Marine habitats & species</p> <ul style="list-style-type: none"> • Lack of description of the marine environment and the pressures on marine habitats and species • Mention of Marine Conservation Zones • Mention marine conservation plans • Seals should be added to the priority list. • Greater emphasis on the interconnectivity of sea and land needed 	<p>Our response:</p> <ul style="list-style-type: none"> • The statutory scope of the LNRS is to mean low water (MLW), essentially the average low tide, which means marine habitats and species are out of scope. This is highlighted in Part 1 Section 2.7. • As a coastal county, we recognise the huge importance of our marine environment and the pressures on it. As set out in Part 1, the LNRS team is working with Sussex Bay and the marine recovery sector to develop a Sussex Seascape strategy ('The Blueprint') to identify priority habitats and species and agree recovery actions. The Blueprint is due to be published in Autumn 2026 and can act as a voluntary marine extension to this LNRS. • We acknowledge that greater reference to intertidal habitats and to the pressures on the marine environment could be made in the LNRS, as well as to the connection between land, rivers and sea. • Harbour seals, which come onto land to moult, rest and breed, are a priority species in the West Sussex LNRS. Other marine mammals e.g. dolphins were not longlisted as they are out of scope. <p>Actions:</p> <ul style="list-style-type: none"> • Wording has been added to Part 1 Section 2.7 to draw more attention to, and expand on, the scope of the LNRS regarding the marine environment, including reference to Marine Plans and marine protected areas (MPAs). • A new Principle '<i>Work together through a source-to-sea approach...</i>' has been added to Part 2 to recognise that activities upstream and on land can impact marine habitats and species. This ethos has been embedded in relevant opportunities, priorities and measures and pressures (particularly pollution).
<p>2. Coastal habitats description</p> <ul style="list-style-type: none"> • Importance of Langstone, Chichester and Pagham Harbours to species and wider benefits • Importance of Three Harbour Strategy 	<p>Our response:</p> <ul style="list-style-type: none"> • We recognise that in the description of coastal habitats we could further recognise the importance of Langstone, Chichester and Pagham Harbours. <p>Actions:</p> <ul style="list-style-type: none"> • The following has been added to Part 1 Section 4.3 Coastal habitats: "<i>Chichester and Pagham Harbours, together with Langstone Harbour in Hampshire, form one of the most important wetland complexes on the south coast, with extensive SPA, Ramsar and SSSI coverage and the largest mixed seabird colonies on this coastline</i>" • A reference to the Three Harbours Strategy has also been added to Part 1 Section 5.1

<p>3. Farmland description / farming with nature case studies</p> <ul style="list-style-type: none"> • More focus on the work already undertaken by farmers in Sussex to help nature • Understates how much farmland has been lost, particularly to housing. • Out-of-date figures for land registered in Defra’s environmental schemes. 	<p>Our response:</p> <ul style="list-style-type: none"> • This LNRS was developed with support from the agricultural and landowning sector including NFU, CLA, The Farming and Wildlife Advisory Group (FWAG) and our Protected Landscapes. One of its key Principles is to ‘<i>Showcase and support action for nature across our farmed landscapes</i>’ and references to farmer-led nature initiatives are included throughout the documents, in particular Section 5: <i>What is already happening</i>. That said, we welcome the opportunity to add further farming case studies into supplementary materials produced after publication and will be working with local partners to identify these. • Farming is a land use that covers >60% of the LNRS area landscape. In many cases it is intensive. It is also true that many farmers and land managers are working to manage woodland, hedgerows, field margins and other habitats for wildlife on their land, and some are working together through farm clusters to support wildlife across a wider scale. This is not to say that more should not/could not be done. Hence this LNRS has a suite of measures for the farmed landscape which have been developed with input from the farming sector and are applicable for implementation in most places. • We appreciate that responders are concerned about the loss of farmland to development. Development as a key pressure on nature is covered in Part 1, Section 4.9. • Land use change statistics to illustrate the percentage of agricultural land lost to development over recent decades is available at national but not county-scale. This would be useful so has been added to list of data to be improved ahead of the next LNRS iteration. <p>Actions:</p> <ul style="list-style-type: none"> • In Part 1, Section 4.3 Farmland and soils, statistics related to land in Sussex registered in environmental schemes have been updated with Defra 2025 figures.
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<p>4. Low Weald description and vulnerability</p> <ul style="list-style-type: none"> • Low Weald is very vulnerable to land use change • Fewer habitats mapped in the Low Weald 	<p>Our response:</p> <ul style="list-style-type: none"> • We agree that the Low Weald is particularly vulnerable to development given its location and lack of designation and that it should be highlighted. • In relation to mapping more habitats in the Low Weald, unfortunately this is restricted by the available data. Grassland data is very poor for the Low Weald area and as a result Grassland measures could not easily be mapped. Improvement of this data will be prioritised for the next version of the LNRS. <p>Actions:</p> <ul style="list-style-type: none"> • Wording under Urbanisation (Part 1 section 4.9) has been amended to: <i>“Pressure is greatest within the Low Weald which carries higher housing delivery targets as it lies between the two protected landscapes of the South Downs National Park and the High Weald National Landscape.”</i>
<p>5. River Systems description</p> <ul style="list-style-type: none"> • Description of the Arun is incorrect. • Riverine water quality is affected by erosion 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that our description of the Arun as a “slow-flowing river” is not accurate and have amended this. We have also expanded the description to reference the impact of erosion and sediment on water quality in the Western Rother. <p>Actions:</p> <ul style="list-style-type: none"> • Wording change to Part 1 Section 4.3 Rivers & River Systems <i>“In general, they change greatly in character from their source, ranging from fast-flowing headwater streams to slow-flowing meandering rivers in our broad valleys and floodplains. Notable in West Sussex is the Arun which is said to be one of the fastest flowing rivers in England, and the Western Rother which is the most erodible catchment in the UK where the sandy soils are easily washed into the river during rainfall, affecting water quality.”</i>
<p>6. Deer pressure in wetlands</p> <ul style="list-style-type: none"> • Deer pressure is an issue in wetlands as well as woodland 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that deer pressure, which is one of the major factors impacting woodland, can also be significant in wetlands, such as Amberley Wildbrooks. While we have amended wording to reference this pressure, we have not added a bespoke measure. This is because measure W1.1, whilst written to support woodlands, would have the effect of reducing deer numbers and hence their impacts on other habitats such as wetlands. <p>Actions:</p> <ul style="list-style-type: none"> • Wording on deer pressure in Part 1 Section 4.9 has been amended to: <i>“...significant impact on the health of many of our habitats, including wetlands, grasslands and heathlands, but is one of the most significant pressures on our woodlands”.</i>

<p>7. Species included in the Priority Species list</p> <ul style="list-style-type: none"> • Badgers, barn owls, harvest mice, kingfishers etc. should be added to the priority species list. 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1, Section 4.4 Species is intended to provide an overview of how Priority Species were selected in the LNRS; a more detailed explanation is provided in Part 3, and within this report under D: Priority Species list and species measures • Badgers did not make the priority species list as, while they are protected under the Protection of Badgers Act 1992, this is for their welfare rather than for conservation as they are listed as being of Least Concern (they face a low risk of extinction in wild). • Barn owl, harvest mouse and kingfisher are all on the species longlist but, as it was considered that they would be supported by the habitat measures outlined in Part 2 of the draft LNRS, they were not shortlisted. <p>No action</p>
<p>8. List of irreplaceable habitats</p> <ul style="list-style-type: none"> • Definition of • Chalk streams should be included as an irreplaceable habitat 	<p>Our response:</p> <ul style="list-style-type: none"> • The definition of irreplaceable habitats provided in Part 1 Section 4.7 is the recognised legal definition in the National Planning Policy Framework (NPPF) which is the primary means for their protection. Habitats that have been defined as irreplaceable in government Regulations are also listed in this section. • We agree that chalk streams (and in our opinion sandstone outcrops) would meet the NPPF definition however they are not formally or legally recognised as such and so have not been added. <p>No action</p>
<p>9. Ecosystem services and benefits table</p> <ul style="list-style-type: none"> • Species-rich grassland and heathland do support water supply • Wetlands, rivers and streams do support pollination • Wetlands do support food/fibre 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1, Section 4.8 includes the table: '<i>Ecosystem services and benefits provided by natural capital</i>'. This was developed in 2019 based on the Millennium Ecosystem Assessment and other literature at the time. Several responders requested changes to this table. <p>Actions:</p> <ul style="list-style-type: none"> • The table has been amended in line with the following: species-rich grasslands support water flow regulation (storage and recharge); wetlands, rivers and streams support pollination (via their flowering plants, riparian habitats, floodplains and saltmarshes); wetlands produce food and fibre (they support fisheries and fish nurseries (such as coastal wetlands), and fibres such as reeds, while floodplains support grazing livestock.

<p>10. Invasive species list</p> <ul style="list-style-type: none"> • Carex pendula • New Zealand pygmyweed • Rosa rugosa (Japanese rose) • Yellow-legged hornet 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1, Section 4.9 Pressures on nature in West Sussex, includes a table of the invasive non-native species (INNS) that pose the greatest risk. • Pendulous sedge Carex pendula is a native species found in deciduous woodland by ditches, ponds, streams, in hedgerows and on tracksides. It is said to be indicative of ancient woodland, but the association is weak. The Botanical Society of Britain and Ireland notes that it is becoming ubiquitous and locally invasive in many areas, often originating as a garden escapee. As it favours shaded habitats, positive management of woodland to reduce shading of ground flora should help to ensure it does not out-compete other woodland ground flora. Due to this, we have not added it to the invasive species list. • Three other INNS were also suggested by responders, these have been considered and added. <p>Actions:</p> <ul style="list-style-type: none"> • New Zealand pygmyweed, rosa rugosa and yellow-legged hornet have been added to the list of Invasive species [table].
<p>11. Light pollution</p> <ul style="list-style-type: none"> • Not enough emphasis on this as a pressure • More emphasis on initiatives to combat it e.g. Dark Skies • Measures needed to reduce light pollution 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1 Section 4.9 of the LNRS details the key Pressures on nature in West Sussex. While light pollution is mentioned under Pollution in this section (which notes its impact on “<i>moths, bats and other nocturnal species</i>”) and Urbanisation, ‘Dark Skies’ initiatives were not referenced. This has been amended. • While the LNRS can highlight the impact of pressures on nature, it has no power to tackle the source of these. It does, however, provide an enabling measure U2.6 (EM) in Part 2, Section 4, Urban Nature, which encourages the adoption of planning policies to “<i>avoid and reduce light impacts on flying bats, birds and other wildlife</i>”. <p>Actions:</p> <ul style="list-style-type: none"> • Wording has been added to Part 1 Section part 4.9: “<i>Minimising light pollution is a particular focus in parts of the LNRS area notable for their current lower levels of light pollution and where ‘dark skies’ approaches are encouraged. For example, High Weald National Landscape provides guidance for local authorities on how to reduce light pollution impacts from new development while the South Downs National Park, as a planning authority, has produced a Dark Skies Technical Advice Note.</i>”

12. Water quality, abstraction and flooding

- Champion the need for clean and plentiful water
- Abstraction is a greater risk to chalk streams than pollution in West Sussex
- Wording around pollution and water quality is not strong enough given the damage to SSSIs.
- More emphasis on flood risk and its impact to nature (esp from saline intrusion).
- Pollution from plastics and impact to water quality

Our response

- The need to support the health of rivers and aquifer systems, and their ability to supply clean and plentiful water, has been included in the LNRS through its habitat creation and enhancement actions. We do, however, recognise the need for greater emphasis on the impacts of poor water quality on our important habitats.
- The LNRS itself cannot influence the regulation of pollution as this sits with other regulatory systems. LNRS measures must work within existing permissions and licensing systems where required, to ensure they support other public interest objectives. Flood risk management, for example, is not covered by the LNRS as it is set out in flood risk and drainage strategies.
- We acknowledge respondents concerns regarding the abstraction of water from rivers and the ground by water companies, and the impacts this can have on water levels and therefore, biodiversity. The description of habitats in Part 1, Section 4 notes the impacts of abstraction on chalk streams in West Sussex. Within the measures, R2.1, the 'Where' section refers to the targeting of all chalk streams and winterbournes, particularly those at greatest risk of low base flows. It also states that specific efforts should be focused on the more pressurised chalk streams, including the River Ems and the Lavant and Bosham streams.
- Increased risk of flooding generally and coastal flooding specifically is referenced within Part 1, Section 4.9 'Pressures on nature in West Sussex'. However, we accept that saline intrusion could be further emphasised, so new wording has been added.

Actions:

- A new Principle '*Work together through a source-to-sea approach...*' has been added to place even greater emphasis on the importance of the water environment to nature recovery and the need for catchment scale approaches.
- A concluding sentence has been added in Part 1 Section 4.9, under 'Poor water quality': "*This is having particularly serious knock-on impacts on protected wetland sites, coastal habitats and estuaries, harbours and marine areas, and is one of the most significant barriers to nature's recovery in the LNRS area*".
- Wording has also been added to Section 4.9, under 'Pollution': "*In West Sussex, the River Rother is notable as one of the most erodible river catchments in the country. The sandy greensand soils of the catchment are highly mobile and vulnerable to erosion. Sediment finding its way from the land into the river then has significant impacts for water quality downstream. Soil loss in this area is a particular focus of the Catchment*

	<p><i>Partnership and Water Companies, and work is underway with farmers and landowners in the catchment to support soil health and reduce erosion.”</i></p> <ul style="list-style-type: none">• Wording has also been added to the Section 4.9 under ‘Climate change’: <i>“Rising sea levels are increasing the risk of flooding along tidal reaches of rivers and the risk of saline intrusion into freshwater habitats. Saline intrusion can completely change the characteristics of these habitats, placing their future at risk.”</i>• Wording has been added to Part 1 Section 4.9 under ‘Plastics’ to reference the presence and impact of plastic pollution and microplastics in all of our ecosystems, but particularly fresh water and marine.
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<p>13. Development pressure</p> <ul style="list-style-type: none"> • Greater emphasis on the loss of nature to housebuilding 	<p>Our Response</p> <ul style="list-style-type: none"> • We acknowledge respondents concerns about the loss of nature to housebuilding and development in West Sussex. The impact of this is mentioned throughout Part 1, in particular under ‘Urbanisation’ in the Section 4.9 Pressures on nature in West Sussex. However, we accept that we could add more emphasis to this in the document. <p>Actions</p> <ul style="list-style-type: none"> • Wording has been added under Urbanisation: <i>“House building is going to continue and is a priority for the current government with all local planning authorities having to revise their housing targets upwards. As such it will continue to put pressure on nature.”</i>
<p>14. Scale and accumulation of pressures</p> <ul style="list-style-type: none"> • Add the scale of impact/strength of each pressure • Acknowledge the cumulative impacts of pressures 	<p>Our response</p> <ul style="list-style-type: none"> • Unfortunately, the data does not exist to understand the precise impact of every pressure on habitats and species in Sussex. • We acknowledge that many pressures on nature are interconnected and that their individual impact is increased when accumulated. This will be highlighted. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to the start of Part 1 Section 4.9 to reference accumulation: <i>“Pressures on the environment, such as climate change, pollution, urbanisation etc, are complex and interconnected and are creating some direct impacts on nature, many of which are likely to be cumulative”</i>.
<p>15. National Trails and related initiatives</p> <ul style="list-style-type: none"> • Add King Charles III trail, South Downs Way and Coastal Wildbelt initiative. 	<p>Our response:</p> <ul style="list-style-type: none"> • National Trails are designated long distance routes across the UK that provide access to nature for people. • The draft Local Habitat Map’s ACIB layer had mapped the King Charles III trail and its associated coastal margin layer (see measure Cor 3.6). However, areas of this measure which fall within SSSIs (e.g. Chichester Harbour, Pagham Harbour) have not been mapped at the request of Natural England. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to Part 1 Section 2.5 Our LNRS area to highlight National Trails: <i>“Two National Trails run through the LNRS area and provide opportunities to connect people with nature: the South Downs Way and the King Charles III England Coast Path”</i> • Reference to ‘Coastal Wildbelt’, a new national initiative has been added to Part 1, Section 5.2.

<p>16. Has the LNRS considered the historic environment?</p>	<p>Our response</p> <ul style="list-style-type: none"> • Yes. The LNRS contains many measures that seek to restore, improve, buffer etc., the historic environment including ancient woodland (Priority W1 and all the measures that support it, plus W2.1, SCr1.3, SL1.2), ancient grassland (G1.3), ancient hedges (FL1.5) and lost ponds (SWB1.2). Links to relevant guidance and support have also been provided where possible. • Any nature recovery work should consider the impact to the historic environment, with landowners and land managers advised to seek historic and archaeological records or guidance to better understand their site. • Note that the LNRS is not a landscape character strategy. To develop this LNRS, we have relied upon National Character Area profiles which cover the county, the detailed Landscape Character Assessments that exist for West Sussex and the South Downs National Park, and the High Weald National Landscape Management Plan – all of which take the historic environment into account. <p>No action.</p>
<p>17. Role of community groups, volunteers and parish councils</p> <ul style="list-style-type: none"> • Emphasise importance to nature recovery • Add other community group achievements • Need to invest and support voluntary groups and volunteers • Important role of parish councils 	<p>Our response:</p> <ul style="list-style-type: none"> • We have reflected on the invaluable work of local community groups, town and parish councils and others, many of whom are volunteers, in Part 1 Section 5.3 Community Action, and shared a flavour of their key achievements (as submitted to our Sussex LNRS community groups survey, open Feb 2024-Sept 2025). We also appreciate the need for funding and resources, without which, their activities and impact are limited. <p>Actions</p> <ul style="list-style-type: none"> • While we cannot add additional achievements into the documents in time for publication, we aim to continue highlighting the amazing nature recovery work that is taking place across the LNRS area as we move towards delivery. We will also consider how these groups and organisations can be supported to implement the LNRS within the delivery phase.

<p>18. Focus on specific nature recovery projects and initiatives.</p>	<p>Our response:</p> <ul style="list-style-type: none"> • A few responders were concerned about a focus on specific recovery initiatives over others in the LNRS area. • We have tried to reference the key landscape-scale recovery initiatives and partnerships active in West Sussex in Part 1 Section 5. Some initiatives have a higher profile and thus greater recognition for readers, an example being the Knepp Estate, but we have also referenced other large estates in this section including Stroodelande, Barlavington and Wiston. To expand our range of examples, additional wording will be added into Section 5, to highlight the commitment to nature made by those estates completing a Whole Estate Plan. • Where we have featured specific projects or initiatives outside of Part 1 Section 5, this is because we believe they provide a good example of what is being recommended. For example, we have referenced Arun Landscape Recovery bids to demonstrate a clear ambition for farmers and landowners to work together at scale to achieve nature recovery. <p>Actions</p> <ul style="list-style-type: none"> • Wording in Part 1 Section 5 has been amended to reference the development of Whole Estate Plans by large estates within the South Downs National Park.
<p>19. How does the LNRS address public access to nature?</p> <ul style="list-style-type: none"> • Stress importance of maintaining access to the countryside • Improve footpaths 	<p>Our response</p> <ul style="list-style-type: none"> • The primary function of the LNRS is to encourage the creation and improvement of habitats. Repairing our connection to nature, and having more nature nearby, is championed within Principle 7: <i>Bring nature into everyday life...'. The way that the LNRS can achieve this within its scope is by encouraging the creation and improvement of habitats near people (e.g. in urban areas) rather than by removing the obstacles to people accessing them. By way of example, the LNRS aims to encourage more nature near footpaths, however maintenance of footpaths, or provision of additional access is out of its scope.</i> <p>No action.</p>

<p>20. Data and evidence</p> <ul style="list-style-type: none"> • Greater prominence in the strategy and how it underpins all decision making • Description is too high level • Need to be aware of what we have before deciding on priorities. • Role and need of local recorders 	<p>Our response:</p> <ul style="list-style-type: none"> • Data and evidence have been instrumental in producing this LNRS. While not a driver of nature recovery in and of themselves, they are an enabler that underpins this strategy as well as decisions about how and where to recover nature on the ground. We accept the need to give this greater prominence in the LNRS. • The LNRS relies heavily on the evidence, mapping, and species data available which varies in quality, coverage and consistency. For example, some habitat data held at a national level hasn't been ground-truthed and may be out date. Wherever possible, this LNRS uses local data where we know it is accurate. However, this is limited in its extent and dependent on records submitted by local recorders who do so in their own time. • A list will be made of data gaps to be addressed ahead of the next iteration of the LNRS. However, gaps which require significant funding (e.g. for surveys) may not be possible to fill. • We acknowledge that whilst it is desirable to have all evidence before taking decisions, in this case the LNRS had to be produced using the data available; and more generally the plight of nature requires action to be taken now, thus we have designed this LNRS in a way that is mindful of gaps in evidence to ensure no harm is done. <p>Actions:</p> <ul style="list-style-type: none"> • Within Part 1, Section 5.2, Data and evidence will now be represented within the graphic: '<i>Our building blocks of landscape recovery</i>', to illustrate that they are integral to the success of recovery initiatives. • Anyone can contribute to improving our local evidence base to help boost local understanding of our most important areas for wildlife. Additional wording has been added to Part 1 Section 2.10 to encourage those with an interest to submit species records via online platforms like iRecord.
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<p>21. Opportunity statements</p> <ul style="list-style-type: none"> • Include chalk streams, bournes and headwaters as opportunities. • Low Weald statement advocates for wet pasture though this could have a negative impact on farmland. • Wording suggests Arun and Adur can be treated in the same way 	<p>Our response:</p> <ul style="list-style-type: none"> • The high-level opportunity statements found in Part 1, Section 6 are taken from a review of the Natural Character Area (NCA) statements for these areas and other plans and strategies, such as catchment management plans. This section is not intended to be comprehensive but to provide a broad picture of the types of habitat opportunities available. • Any local implications of habitat enhancement or creation should be considered in project design, and work undertaken to ensure there are no unintended consequences. A reminder that nothing in the LNRS is binding on landowners and so would never require replacement of agricultural land with other habitats if this was not the landowners wish. <p>Actions</p> <ul style="list-style-type: none"> • The Low Weald NCA statement has been reviewed and broadened to ensure less emphasis on wet pasture and to remove reference to Arun and Adur rivers specifically: <i>“Rivers and wetlands – Improve the quality, state and structure of all Wealden rivers, streams and standing water bodies and their appropriate floodplains. Specific habitat opportunities include maintenance and restoration of waterside pollards, lines of riparian trees, wet pasture and wet woodland.”</i>
<p>22. Principle 1: In our core areas hold on to what we have</p> <ul style="list-style-type: none"> • Highlight the resilience needed to help ‘what we have’ cope with climate change 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that holding on to what we have will require building in resilience so that habitats are more adaptable to climate extremes. <p>Actions:</p> <ul style="list-style-type: none"> • Wording amended in Part 2, Principle 1: <i>“This will include understanding the impacts of climate change on our most vulnerable habitats and species, and how approaches to management may need to change through time.”</i>

<p>23. Principle 2: Create a network of ‘bigger, better, more and joined-up’ wildlife rich spaces</p> <ul style="list-style-type: none"> • Reference 30by30 goal • Clarify how Principle 2 fits with other strategies e.g. National Highways. 	<p>Our response</p> <ul style="list-style-type: none"> • 30by30 refers to the UK commitment to protect 30% of land and sea for nature by 2030. This goal is referenced within the graphic and footnote in Part 1 Section 2.7, but we agree it is relevant to Principle 2. • The LNRS sets out the approach to nature recovery, but it is not a land use strategy so does not seek to identify trade-offs between different land uses. However, it is an evidence base that other plans, strategies and documents will need to take into account. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to Principle 2 to show how the LNRS supports 30by30: <i>“Whilst the LNRS cannot identify new areas to be given legal protection, this principle, and priorities and measures arising from it, will help to support the UK’s commitment to protect and conserve a minimum 30% of land and sea for biodiversity by 2030, known as 30by30. The target is seen as a key driver in reversing the decline of nature in the UK, by expanding and improving our protected areas and creating new areas for wildlife, allowing nature to spill over into the wider landscape.”</i>
<p>24. Principle 3: Think big and work at scale</p> <ul style="list-style-type: none"> • How can big actions be translated to clear tangible action at an accessible scale. • The need to bring partners together in support of this principle. 	<p>Our response:</p> <ul style="list-style-type: none"> • In relation to translating big interventions into tangible actions, we believe this is covered by Principle 7 in the draft LNRS which is about bringing nature into everyday life and reflects the ambition of communities and residents to take action for nature. Additionally, multiple measures have been provided that can be implemented by anyone, anywhere, at any scale, particularly those supporting the Nature Networks priority. <p>Actions</p> <ul style="list-style-type: none"> • We agree that bringing partners together to help achieve the aims of the LNRS will be essential and will be considered as part of the delivery phase.

<p>25. Principle 5: Support species special to West Sussex</p> <ul style="list-style-type: none">• Adonis Blue alternative species maybe better indicator• Principle could be extended to cover ecosystems not just species	<p>Our response:</p> <ul style="list-style-type: none">• There are many species which can be used as indicators of habitat health, and it is not possible to list all in this Principle. Species are considered in more detail in Part 3. However, Adonis blue is considered one of the most characteristic butterflies of unimproved chalk grassland in southern England, hence its inclusion.• Under the regulations and statutory guidance, the LNRS is primarily focused on habitats, with guidance on how species should be integrated being non-statutory. Ecosystems are considered throughout the LNRS, with Part 1 Section 4.8 specifically about ecosystems and natural capital, while Part 2 provides priorities for nature networks. Principle 5 is specifically intended to highlight the inherent value of species special to the LNRS area. <p>No action.</p>
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<p>26. Priorities & Measures</p> <ul style="list-style-type: none"> • Too many priorities and measures • Difficult to navigate • Include 'Who' will implement them • The 'Where' column doesn't contain locations • Further information links to external sites may go out of date • Add other case studies or links e.g. to MAGIC 	<p>Our response:</p> <ul style="list-style-type: none"> • There are 24 priorities in this LNRS and 108 measures. These were agreed as a result of extensive stakeholder engagement and ecological evidence, as summarised at the beginning of Part 2 Section 4. • We appreciate that the measures can be hard to navigate in the PDF format. We are considering a more interactive version post publication to improve navigation. (See A1). • Many additional resources and case studies were suggested for the 'Further info/guidance' column. Some will be added to the published version where space allows, but a future interactive version would be able to accommodate more of these. • A column to highlight which stakeholders each measure is relevant for was considered but not included as it was repetitive and made the tables and document longer. It will be considered for a future interactive version of the LNRS, along with bespoke guides for different users. • The 'Where' column describes the type of places that could be suitable e.g. "All sand dunes sites" rather than specific places. This is especially necessary for measures that cannot be mapped. The Local Habitat Map, meanwhile, shows where those measures that can be mapped could be implemented in the LNRS area to achieve the greatest benefits for nature and the wider environment. Both resources are intended to help you decide upon the most appropriate measures for your land or area of management, along with external resources. <p>Actions:</p> <ul style="list-style-type: none"> • The following has been added into the definitions table at the beginning of Part 2 Section 4 in relation to 'Where': <i>"This is particularly important for measures that could not be mapped, either because of insufficient data, or because they could be implemented anywhere with similar benefits. MAGIC maps includes a range of national data on habitats, geology and soil, flood zones etc which may be helpful in identifying areas for beneficial implementation of measures."</i> • We appreciate that some links to guidance and case studies may expire. A footnote has been added to state that links were correct at the time of publication.
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<p>27. Enabling measures</p> <ul style="list-style-type: none"> • Role and function • Who will deliver them • Should all priorities have an enabling measure for monitoring? • Should all priorities have an enabling measure for best practice? 	<p>Our response:</p> <ul style="list-style-type: none"> • While ‘<i>measures</i>’ are the actions that will deliver the priorities on the ground, ‘<i>enabling measures</i>’ (denoted in the LNRS with ‘(EM)’), are various types of activities that are needed to make delivery easier or more likely. They fall out of scope of the LNRS and so are noted separately from core measures. They are included as stakeholders frequently raised them as being vital to underpin and support the delivery of LNRS priorities. • No specific responsibility for enabling measures has been identified within the LNRS. It will be up to the wider delivery community (including local authorities, environmental organisations, partnerships and initiatives) to work together to identify who is best placed to take them forward in the years ahead. • A monitoring and evidence gathering enabling measure was specifically included for farmland habitats (FL1.12 (EM) as good ecological data isn’t currently available (other than RPA data which we do not have access to). A full analysis of the data and monitoring required for delivery and for the LNRS review will be developed as part of the delivery phase. <p>Actions</p> <ul style="list-style-type: none"> • Rather than add an enabling measure related to best practice for all priorities (which would become repetitive), the following statement has been added to the definitions table at the start of Part 2 Section 4: <i>“Further information includes references to best practice on habitat management where available. It is expected that all habitat management should give due regard to the potential for protected species and follow best practice guidance.”</i>
<p>28. Coastal priority and measures (ex of marine covered by B1)</p> <ul style="list-style-type: none"> • C1.4 should reference to island creation and enhancement • C1.4 should specify the retention of natural tide swept debris • Consider Voluntary no anchor zones and eco-moorings to protect areas of seagrass from boating pressure 	<p>Our response:</p> <ul style="list-style-type: none"> • Measure C1.4 is related to coastal vegetated shingle habitat rather than shingle island and creation for birds. However, measures for the breeding and migrating/ wintering shorebirds assemblage in Part 3 include the creation of a network of new breeding areas including shingle islands. • C1.4 specifically references the retention of natural tide swept debris. We acknowledge that the impacts of shingle reprofiling will vary. However, the reference to shingle profiling as a potential option for the expansion/ creation of new areas gives an option for how new areas could be created and does not refer to shingle reprofiling for coastal defence works. • We note the initiatives used to reduce damage from mooring chains and to enhance existing areas of seagrass. These actions are, however, out of scope of the LNRS as they are below mean low water (MLW). <p>No action</p>

<p>29. Farmland priorities and measures – comments on</p> <ul style="list-style-type: none"> • FL1: importance of highlighting that food production can also benefit nature / conservation is already happening on farms • Reduce use of pesticides and herbicides. • FL1.2: Stress the importance of site section to minimise the risk of seed spread onto neighbouring land • FL1.2: mowing should be used instead of pesticides • Add priority farmland species: beaver, otter, amphibian and reptile • Reference the role that BNG can play in helping delivery 	<p>Our response:</p> <ul style="list-style-type: none"> • That food production is compatible with nature recovery is recognised throughout the LNRS. It appears in Part 1, Section 4.8 Table 1 (<i>Ecosystem services and benefits...</i>), in Sections 4.9, 5.1, 5.2 and 6, and in Part 2 Principle 4: <i>Showcase and support action for nature across our farmed landscape</i>. Principle 4 also recognises that initiatives for nature are being implemented by farmers and land managers, while the farmland description in Part 1 Section 4.3 states that 55% of farmland in West Sussex is under Environmental Stewardship. • Reducing use of pesticides and herbicides is already covered by measures: FL1.2, FL1.5 and FL1.7 as well as SL1.3, U2, Cor3.3, Cor3.4 and Cor3.5. • We welcome the clarifications to measure FL1.2 which have been added. • Whilst the priority species beaver is likely to benefit from farmland habitat measures such as FL1.5, there may be reticence over their introduction into the farmed landscape in some locations. It is therefore important that future beaver reintroductions are fully informed through collaboration between beaver management groups and landowners to ensure coexistence and the maximisation of ecological and natural water management benefits. <p>Actions:</p> <ul style="list-style-type: none"> • FL1.2: clarifying wording added to (Where): <i>“Likely to be best on edges and margins with rest of the field in crop”</i>. And <i>“Avoid areas with high weed burden, especially where there are injurious weeds in the seed bank”</i> and <i>“Note: At the end of the rotation, areas should be cleared by mowing or cultivation rather than the application of herbicides.”</i> • In relation to otters, the Streams & rivers assemblage (which includes otter) has been added to the priority species that would benefit from FL measures. • We agree that BNG as a farming incentive for nature recovery could be further emphasised. Wording has been added to the final F1 outcome statement: <i>“Farm and land-based business are on a positive trend towards economic and environmental sustainability, with nature-based solutions and the establishment of habitat banks for biodiversity net gain forming part of their farm business model”</i>.
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<p>30. Soil health priority and measures</p> <ul style="list-style-type: none"> • SL1.3: reduction of pesticide and fertiliser inputs is externally regulated and so any reduction should be in line • SL1.5 ensure support for farmers to make changes considers their financial sustainability. with the regulations. • SL1: mention sludge use in relation to microplastics 	<p>Our response:</p> <ul style="list-style-type: none"> • As noted, the control of pesticides and fertilisers is regulated under other legislation and is therefore out of the scope of the LNRS. Measure SL1.3 is therefore intended to encourage the use of alternatives to chemicals rather than to regulate it and to highlight the importance of considering the use of chemicals in sensitive areas. • In relation to sludge, the measures are intended to be positive actions that can be implemented rather than listing things that should not be done. However, we have added a reference to the use of sludge into the Pressures section. • We agree that where farmers are being encouraged to make quite significant changes, it's important that support and guidance is aligned to the financial sustainability of their business. <p>Actions:</p> <ul style="list-style-type: none"> • Wording in SL1.5 (EM) has been amended with: <i>“Provide advice and support for introduction of healthy soil management techniques that align with supporting financially viable and resilient farming businesses.”</i> • Part 1 Section 4.9 Pressures on nature has been updated to include a reference to <i>“sewage sludge as fertiliser in agriculture”</i> under Plastics.
<p>31. Species-rich grassland priorities and measures - comments</p> <ul style="list-style-type: none"> • Creating species-rich grassland within institutional estates • Help managers gain a better understanding of where grassland measures can be implemented by signposting to Soilscales and geological data. 	<p>Our response:</p> <ul style="list-style-type: none"> • Whilst the ambition is welcomed, it is unlikely that good quality species-rich grassland can be created within institutional estates. We consider that such areas can, however, make a significant contribution to other priorities and measures, e.g. Urban Nature and Nature Networks. <p>Actions:</p> <ul style="list-style-type: none"> • Regarding signposting, the following has been added to the definitions table at start of Part 2 Section 4: <i>“MAGIC maps includes a range of national data on habitats, geology and soil, flood zones etc which may be helpful in identifying areas for beneficial implementation of measures”</i>.

<p>32. Woodland priorities and measures</p> <ul style="list-style-type: none"> • Change the word ‘enhance’ (used in W1 priority) to ‘favourable condition’ • Change the word ‘quality’ [of woodland habitats] in measure W1.1. • W1.1: Consider grey squirrel management as well as deer management. • W1.1 more evidence is needed to understand the landscape level variation of deer impacts. • Balance between planting new and protecting existing trees • Reference need for woodland management plan in relation to doo • PAWS restoration benefits from the use of heavy horses rather than conventional forestry machinery • Reference deadwood and include measures to maintain standing and fallen dead wood. 	<p>Our response:</p> <ul style="list-style-type: none"> • The wording of the priorities was agreed through a series of workshops with key delivery partners including Woodland Trust and Forestry Commission. The term ‘favourable condition’ was avoided as it is often associated with SSSIs and requires definition and the meeting of specific criteria. While we accept ‘enhance’ is subjective, W1 measures use more specific wording. • We agree that the word “<i>quality</i>” in Measure W1.1 can be replaced with “<i>ecological condition</i>”. • Landscape-scale deer management was considered the most important action for woodlands and thus has its own specific measure (W1.1). Though a measure specifically for the impacts of grey squirrels on woodland and native species has not been included, this is referenced in measures W1.2, W1.8, W1.9, W1.11, in W1’s outcome statements and within Part 1 Section 4.9 Pressures. • We agree that action on the ground to manage deer pressure (measure W1.1) needs to be guided by evidence and via coordinated collaboration across relevant stakeholders. We have added a link to best practice on this. The LNRS also includes enabling measures W1.14 (EM) and W1.15 (EM) which will be needed to support and inform W1.1. • In Sussex our woodland priorities and measures reflect that looking after and improving our existing woodland is more important for biodiversity than creating new woodland. New woodland does provide excellent opportunities to expand and connect existing woodland but is not prioritised over and above ‘looking after what we have’, the ethos of Principle 1. • W1 measures specifically reference the need for management plans. New wording has been added in some measures to stress the need to follow best practice with regards to protected species. • We agree that PAWS restoration should consider low impact extraction and have added this wording. • Deadwood is already mentioned in measures FL1.4, W1.2, W1.3, W1.5, W1.6, W1.8 and W3, but some references now include ‘<i>standing and falling</i>’ deadwood. <p>Actions:</p> <ul style="list-style-type: none"> • Wording of measure W1.1 has been changed to: “...to <i>reduce the impact of deer on woodland regeneration, recolonisation and ecological condition of woodland habitats</i>” • W1.1: Link added to Natural England Protected Sites Strategies Advisory Guidance 1.0. Reference to Sussex Woods Protected Site Strategies Project involving collaborative and landscape scale management of deer.
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	<ul style="list-style-type: none">• Wording added to W1.2, W1.6, W1.7 and W1.8: <i>“Management should follow best practice with regards to protected species”</i>• Wording added to W1.2 and W1.7 <i>“Consider low impact extraction, e.g. heavy horses, for sensitive sites”</i>• References to <i>“standing and fallen”</i> deadwood have been added to W1.2, W1.3 and W1.8.
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<p>33. Hedgerow and Scrub priorities and measures</p> <ul style="list-style-type: none"> • More emphasis on loss of hedgerows • Scrub: add priority bird species 	<p>Our response</p> <ul style="list-style-type: none"> • Hedgerow loss is referenced in Part 1 Section 4.9 Pressures on nature in West Sussex. While we acknowledge concerns raised about the loss of hedgerows, it is beyond the LNRS scope to protect them. <p>Actions</p> <ul style="list-style-type: none"> • Nightingale & turtle dove have been added to ‘<i>species that would benefit from</i>’ measure Scr1.1.
<p>34. Lowland Heath priorities and measures</p> <ul style="list-style-type: none"> • No mention of enhancing this habitat for rare reptiles 	<p>Our response</p> <ul style="list-style-type: none"> • Sand lizard and smooth snake are covered within the ‘dry heaths with sand & gravel exposures assemblage’ (detailed in Part 3) which is listed as benefiting from these measures at the end of the Lowland Heath measures section. <p>Action</p> <ul style="list-style-type: none"> • We appreciate this might not be obvious and will consider how to improve links between different parts of the LNRS in a future interactive version.
<p>35. Rivers and streams priorities and measures</p> <ul style="list-style-type: none"> • Champion chalk stream uniqueness. • Add surveys/assessments of chalk streams and bournes • R1.1 Species re-introductions need to be underpinned by a funded long-term management plan. • R1.12 ‘Adopt local plan policies wording too strong’ as the LNRS should not mandate land use • Include water company funded habitat restoration initiatives and case studies • Bats and otters benefit from restoration of riparian systems • Reference impact of litter. 	<p>Our response</p> <ul style="list-style-type: none"> • We agree that the rarity and fragility of our chalk streams could be better known. This will be considered further through delivery. In the meantime, many of our partners are already working to raise the importance of habitats such as chalk streams, including Sussex Wildlife Trust and Western Sussex Rivers Trust. • Undertaking chalk stream surveys is already covered by R2.4 (EM) “<i>develop more accurate mapping for location of chalk and greensand streams to support decision-making (including planning).</i>” • We agree that species reintroductions (such as beaver) should have long term achievable management plans and careful impact assessments – wording has been added to this effect. <p>Actions</p> <ul style="list-style-type: none"> • Wording added to R1.1 “<i>any future reintroduction of beaver must be underpinned by a funded long-term management plan and carried out under licence...</i>”. • R1.12 Wording changed from “<i>Adopt</i>” to “<i>Encourage</i>” • Bats and otters added to the list of priority species that will benefit from River measures. • We would like to provide more information on potential funding options including water company initiatives, in addition to more case studies. This is a consideration for the LNRS delivery phase. See A1 for more details.

<p>36. Aquifers priority and measures</p> <ul style="list-style-type: none"> • A1.1 SuDS not all solutions workable everywhere • Add enabling measure to reference role of planning policies in ensuring SuDS etc. support improvement to ground water quality. • A1.2 Stronger reference to impact of herbicides and pesticides on aquifers • Other measures overlap/support aquifer measures 	<p>Our response</p> <ul style="list-style-type: none"> • SuDS (Sustainable Drainage Systems) are ways to manage surface water that take account of water quantity, water quality, biodiversity and amenity. We appreciate that SuDS policy is constantly developing as our understanding and technology improves, so latest government guidance has been added. • Measure A1.2 refers to “<i>reduced use of chemical inputs</i>” to help aquifers; we accept that this could specifically reference herbicides and pesticides. • We acknowledge that measures FL1, U1, PS1, COR1 also support aquifer health in addition to those listed. <p>Actions</p> <ul style="list-style-type: none"> • A1.1 added link to SuDS national standards (2025) • A new enabling measure A1.4 EM added: “<i>Adopt planning policies for new developments to incorporate SuDS where possible and appropriate to support improvement of ground water quality</i>”. • A1.2 wording added under ‘How’ to specify herbicides and pesticides • Wording added to the end of the Aquifer section to reference other priorities that overlap/support it.
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<p>37. Urban Nature priorities and measures</p> <ul style="list-style-type: none"> • Not clear what ‘urban’ means • Playing fields for recreation and nature • Strengthening measures regarding Local Authority management of greenspaces e.g. flailing of hedges at the right time • Specific guidance on how to deliver green space in developments. • Add habitat creation for lepidoptera (butterflies/ moths) into U1. 	<p>Our response</p> <ul style="list-style-type: none"> • We agree that ‘urban’ can be interpreted in different ways. In this LNRS, it broadly means settlements and includes any hamlet, village, town or city. • We agree that introducing more nature into the corners and edges of playing fields without compromising their recreational uses, can only be implemented in some locations. This is already acknowledged in U1.1 in the ‘Where’ column which refers to opportunities. • Appropriate management of public greenspaces is encouraged through measure U2.1 and a range of enabling measures, U2.5 (EM)-U2.9 (EM) which are intended to develop and disseminate best practice for all Local Authorities. We acknowledge that a lack of capacity/knowledge can be a barrier to ideal management. The creation of additional advice and support will be considered further through delivery. • Whilst the LNRS encourages the adoption of planning policies for green infrastructure in new developments (U1.7 (EM)) and has links to guidance, enforcing this is out of scope. <p>Actions</p> <ul style="list-style-type: none"> • To clarify what is meant by urban, Priority U1 wording has been amended to: <i>“Create and connect new wildlife rich areas in our villages, towns and cities...”</i> • Through the delivery phase we will be helping Local Planning Authorities to embed the LNRS in their local plans and decision making. • U1’s second outcome statement: examples of interventions for nature now includes <i>“Butterfly banks and butterfly/moth gardens and meadows”</i>.
<p>38. Swift bricks and artificial nest cups</p> <ul style="list-style-type: none"> • Use specific wording • Encourage their use in new developments 	<p>Our response</p> <ul style="list-style-type: none"> • We received many requests to include text from NPPG Natural Environment 2025 paragraph 017 to ensure suitable numbers of swift bricks, a universal nest brick for a range of small bird species, are included in new developments. • Adopting planning policies that include installation of swift bricks was already mentioned in Part 2 Section 4 U2.6 (EM). While nesting boxes generally were featured in U2.2 and FL1.4, new wording has been added to highlight that swift bricks can be used by other bird species. <p>Actions</p> <p>Wording added to Measure U2.2 and FL1.4 <i>“Note: Swift bricks are considered a universal fix for small cavity-nesting bird species as they will also be used by house sparrows, starlings, great tits, blue tits and occasionally house martins and nuthatches.”</i></p>

<p>39. Protected sites priorities and measures</p> <ul style="list-style-type: none"> • Include private gardens to help connect green and blue spaces • Extend protections from already protected sites to those connecting them 	<p>Our response</p> <ul style="list-style-type: none"> • That private gardens can offer significant resources for wildlife is mentioned throughout Part 1, while in Part 2, measure Cor 2.3 specially mentions how they can be used to create corridors that connect habitats. • While we understand the desire to extend existing protections to buffer areas, this is beyond the statutory scope of the LNRS. <p>No action</p>
<p>40. Nature networks priorities and measures</p> <ul style="list-style-type: none"> • Wildlife-rich habitat has a specific meaning which was not intended • Expand on why Nature Networks priorities and measures needed • Build on the theme of connectivity through more technical language 	<p>Our response</p> <ul style="list-style-type: none"> • In the draft documents, we described Nature Networks as “<i>Protected sites, wildlife corridors & more wildlife-rich habitat</i>”. ‘Wildlife-rich habitat’ has a specific meaning in government guidance, but it was not our intention to use this terminology in that context. Wording has been changed to avoid this. • The Nature Networks’ priorities and measures aim to help achieve <i>Principle 2: Create a network of bigger, better, more and joined-up wildlife-rich places</i>. Introductory copy explains why Nature Networks priorities and measures are needed in addition to those developed for habitats. Some improvements have been made to this explanation. • Some responders requested more technical terms such as “<i>multi-functionality</i>” and “<i>stepping stone ecology</i>” to expand on the theme of connectivity and support practitioners developing Nature Networks on the ground. <p>Actions</p> <ul style="list-style-type: none"> • Nature Networks description changed to: “<i>Protected sites, wildlife corridors & more habitat for wildlife</i>”. • The introduction to Nature Networks has been changed so that it is more detailed and technical. • In the Nature Network measures, wording has been tightened to ensure that habitats created here are the types prioritised by this LNRS, so that implementing Nature Networks measures supports all other measures.

C. Local Habitat Map

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

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

<p>4. Number of measures mapped</p> <ul style="list-style-type: none"> • Number of unmapped measures surprising/ concerning • Most farmland and urban measures not mapped 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 2 of the West Sussex LNRS contains 108 measures (actions for nature) that if undertaken, can deliver the strategy's priorities. Where possible, the Local Habitat Map shows where these measures can be implemented across the strategy area to deliver the greatest benefit for wildlife and the wider environment. • Many measures (approx. 60%) could not be mapped however. This is because: <ul style="list-style-type: none"> ○ they didn't meet criteria in the statutory guidance, ○ they couldn't be mapped accurately based on the best available data, or ○ a combination of both. • A restriction in the statutory guidance means many urban and all farmland and soil measures can't be mapped because they are beneficial over a wide area rather than specific locations. In the example of farmland measures, creating species-rich strips, planting new field trees, providing nesting boxes etc. could feasibly be implemented on any farmland. • An example of a measure that couldn't be mapped due to limitations in the available data is Scr1.1 '<i>Create and enhance successional and scrub habitats...</i>'. As there is no existing dataset for scrub in Sussex, it is not possible to map existing scrub for enhancement. • Where measures are not mapped, this doesn't make them any less useful or important to nature's recovery. <p>Actions:</p> <ul style="list-style-type: none"> • Improve signposting to Part 4 – Supporting technical detail which lists the measures that could not be mapped and why.
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<p>5. Mapping in urban areas</p> <ul style="list-style-type: none"> • Include school grounds • Not all allotments mapped 	<p>Our response:</p> <ul style="list-style-type: none"> • The importance of nature in urban areas in Sussex was flagged as a priority by many stakeholders. We acknowledge that many greenspaces in urban areas hold the potential to support more habitats and play an important role in nature’s recovery in Sussex. • The particular potential of schools/ school grounds was identified during the process, but a dataset is not available for school grounds only (excluding buildings and hard surfaces). Including the entire area of all school grounds would risk over-estimating their potential contribution to nature recovery. Other resources were not available to individually digitise every school greenspace. More information can be found about this in Part 4 – Supporting technical detail • We recognise that allotments can provide opportunities for improvements to nature. Green space datasets, for inclusion in the LNRS as important areas for biodiversity, were agreed with each district council individually to ensure they were locally accurate. Allotments have been included where this had been included in the local dataset. <p>Actions:</p> <ul style="list-style-type: none"> • Improving data on urban nature and how it can be used to help target measures will be considered for the next iteration of the LNRS.
<p>6. Access to datasets/layers</p> <ul style="list-style-type: none"> • Providing access to underlying datasets • Providing open access GIS layers. 	<p>Our response:</p> <ul style="list-style-type: none"> • A list of all data sources and how these were used to create the Local Habitat Map’s layers is contained in Part 4 – Supporting technical detail of this LNRS. • For users who want to see a collation of open source datasets available for Sussex, many of these are available on MAGIC and on other data viewers (Forestry Commission; data hub used by catchment partnerships). • Users can also contact the Sussex Biodiversity Record Centre to obtain available habitat and species data for a particular site. <p>Actions:</p> <ul style="list-style-type: none"> • Improve signposting to Part 4 – Supporting technical detail and the list of open source datasets available for Sussex for publication. • Once the LNRS has been published, mapped layers will be made available as open access GIS layers.

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

D. Prioritised Species list and species measures

Summary of key feedback	Our response or actions
<p>1. Priority Species list development</p> <ul style="list-style-type: none"> • Confusion about how the list was developed • Access to the longlist. • Some species are not present in the area. • Update list in line with latest Natural England’s Threatened Species Recovery Actions baseline 2025. 	<p>Our response:</p> <ul style="list-style-type: none"> • The creation of a longlist of 899 species for West Sussex, and subsequent prioritisation to just 163 individual species, is set out in Part 3 Section 4. This followed guidance set out by Defra called ‘<i>Species Recovery within Local Nature Recovery Strategies Advice for Responsible Authorities</i>’ (hereafter referred to as ‘Species Advice’) and was based on an assessment of local records and the requirements of individual species, with input from local experts. • There was some confusion over why some species, which are rare, legally protected and/or for which Sussex is known to be important, had not been prioritised. In many cases, the measures for habitats set out in Part 2 were considered sufficient to support them, and as such, 339 species were assigned to ‘category A’ as per the ‘Species Advice’. Category A applies to species that are likely to markedly benefit from the general creation, expansion and improved connectivity of good quality habitats in the strategy area and do not need to be singled out for specific LNRS measures, and to species with high recovery potential that do not require specific or targeted recovery measures. • With the exception of beaver and pine marten, all species on the list are present in West Sussex, and this was a fundamental consideration for their prioritisation. • Natural England published their Threatened Species Recovery Actions 2025 baseline in August 2025, which was taken into account prior to the public consultation. <p>Actions</p> <ul style="list-style-type: none"> • Part 3 Appendix 3A has a list of all 899 species that were considered (longlisted), whether they were shortlisted, and which measures will support those assigned ‘category A’. We are considering how this can be better signposted and/or provided in a more accessible format for publication.

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

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

Our response

- While we acknowledge that the list of Priority Species is long, the fact that it comprised 163 species (from a longlist of 899) reflects the richness of biodiversity found in West Sussex.
- A list of Priority Species that comprised 18% of the longlist was achieved by following the Species Advice with input from local experts. A further 38% of species found on the longlist are supported by habitat measures. It was not possible to prioritise further without giving the impression that some species are potentially more important than others.
- Some species of spider, wasp and lichen do not have common names and so only their scientific names have been provided.
- We have not mapped species as this would more likely reflect recorder effort, rather than the most important places for them. However, Part 3 includes notable locations for each priority species where known, and Part 2 includes tables of all those priority species and priority species assemblages that would benefit from the priorities and measures.

No action

3. Requests to add species to the Priority Species list

Our response

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

Actions:

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

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| | <ul style="list-style-type: none">• Brilliant emerald. There were several requests for additional dragonfly and damselfly species to be added to the shortlist. As a result, further discussions were held with the County Recorder for dragonflies and damselflies. It was considered that black darter and small red damselfly are likely to be supported by habitat measures for heathland, but it was requested that the habitat measures should be amended to make specific reference to heathland ponds; the habitat measures have been amended accordingly. Brilliant emerald is a national rarity with West (and East) Sussex being key areas. It was also felt that additional bespoke measures were required for this species over and above habitat measures. Brilliant emerald has therefore been added to the shortlist. |
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<p>4. Requests to remove species from the Priority Species list</p>	<p>Our response</p> <ul style="list-style-type: none"> • A smaller number of comments requested that species be removed from the Priority Species list. This was because responders felt the species in question was either too common in the LNRS area, or too rare, or because they felt the species could not or should not be conserved. • Glistening Waxcap, Jubilee Waxcap and Golden-gilled Bolete (felt to be too rare and not able to be conserved) - Sussex is known to be important for waxcap grasslands, and we have seen from experience that sensitive management of sites can support their recovery. Golden-gilled bolete is a species of wood pasture and parkland, and again, sensitive management of its habitat can support its recovery. • Starling (felt to be too common) - shortlisted because it is a common but declining resident and Sussex holds c. 21% of the GB population, with the murmurations they form considered to be iconic, especially in urban locations. Breeding pairs of Redshank (too common) meanwhile have declined more steeply in Sussex than nationally, and wintering numbers are also declining. • Beaver and pine marten (should not be conserved) - We acknowledge that species reintroductions must be carefully considered. However, there is a lot of interest in the potential for both beaver and pine marten reintroduction in Sussex, with active partnerships looking into the feasibility. Their reintroduction could help deliver and/or support many of our habitat measures and so have been prioritised within the LNRS. <p>No action</p>
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5. Amphibians and reptiles

- Representation in the list.
- Representation in the strategy
- Changes to measures

Our response:

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

Actions:

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

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

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

10. Species re-introductions

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

Our response:

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

No action

<p>11. Wildlife rescue and rehabilitation organisations</p>	<p>Our response:</p> <ul style="list-style-type: none">• We are very grateful to the work of wildlife rescue and rehabilitation organisations who play a vital role on the frontline of nature recovery. <p>Actions:</p> <ul style="list-style-type: none">• An additional paragraph has been added to Part 3, Section 3 Species Recovery, to recognise the work of these organisations.
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E. Delivery and implementation

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

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

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

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