



Nottinghamshire and Nottingham Local Nature Recovery Strategy (LNRS)

NSDC Response to the public consultation on the draft LNRS

May 2025

1.0 Introduction

- 1.1. In February 2025 we commented on a pre-public consultation in our document titled *NSDC Response to consultation on initial draft mapping of “Areas that Could Become of Particular Importance for Biodiversity”* which, for context, should be read in conjunction with these comments. Many of the concerns we raised were subsequently addressed in advance of the public consultation. Where we still have concerns or matters requiring clarification these have been brought forward into this, our comments on the draft LNRS.
- 1.2. Sections 2.0 to 7.0 below reconsiders the points previously raised. In Section 8.0 we provide additional comments on the published draft LNRS.

2.0 Overlap with sites allocated for development in the relevant local plan

- 2.1. We previously raised concerns that the mapping process had not taken due account of allocated sites in Newark & Sherwood Local Development Framework Allocations & Development Management Development Plan Document¹ or the strategic growth areas.
- 2.2. Our earlier concerns have largely been addressed in the public consultation version of the Habitat Map. Where overlaps remain in the Newark Area Policy 2 (NAP2) area, this is considered acceptable and proportionate in respect of anticipated delivery of biodiversity enhancements within the strategic sites.

3.0 Overlap with existing built development

- 3.1. Again, mindful that a buffer approach had been taken with ‘rivers’ habitat, we noted that aside from this habitat, there were numerous instances where ‘Areas that Could Become of Particular Importance for Biodiversity’ (ACBs) had been mapped over existing built development. We had not examined the extent of these the same as we had done for allocated sites due to their frequency but considered this required further consideration as it seemed illogical to have ACBs that cover existing built development.
- 3.2. The extent to which this continues to occur is much reduced in the public consultation Habitat Map but still occurs frequently in relation to the mapped measures C/M6, C/M7 and C/M9:
 - *C/M6_ Establish a mix of shading conditions along watercourses to reduce water temperatures, through management of existing trees and establishment of new trees and woodland;*
 - *C/M7_ Undertake favourable management of the riparian zone, including by minimising the impacts of mechanical vegetation clearance and establishing marginal vegetation where absent, where appropriate; and*
 - *C/M9_ Renaturalise watercourses where appropriate, including by de-channelising, removing redundant hard engineering, reinstating meanders and braiding (if*

¹ Newark and Sherwood District Council. (2013). *Newark & Sherwood Local Development Framework Allocations & Development Management Development Plan Document – Adopted July 2013*.
<https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/supplementary-planning-information/allocations-and-development-management-dpd/Allocations-and-Development-Management-Development-Plan-Document.pdf>

feasible), and creating backwaters and allowing existing natural processes to continue.

- 3.3. This has arisen from the fact that a buffering approach has been taken in relation to watercourses, with a 50m buffer either side of a watercourse applied. Invariably, this process has likely been influenced by the fact that once a watercourse has been mapped, the process of applying such a buffer can be automated within the Geographic Information System (GIS) used for the mapping.
- 3.4. We still consider that it is illogical to have mapped measures covering existing built development, particularly when, as is the case here, that the mapped measures have no relevance in the context of existing built development. The exception might be C-M9 where future redevelopment might create opportunities to de-culvert watercourses, but this would be better considered as an overarching measure. However, we make this comment acknowledging that the process to refine the mapping for these mapped measures would likely be time-consuming.
- 3.5. This overlap also occurs with the overarching potential measure A/M2 '*Target habitat enhancement and creation in areas where this will reduce fragmentation and increase ecological connectivity, through the creation of linkages, corridors and stepping stones*'. This mapped measure covers several settlements. However, in this instance as this covers wide generic areas and has a more generic objective it is more intuitive for the mapping to be similar in nature and to incorporate settlements. Consequently, we are more comfortable when overlap occurs with this measure.

4.0 Overlap with the Laxton Conservation Area

- 4.1. This has been addressed prior to the public consultation by removal of the measures within the conservation area.

5.0 Grassland

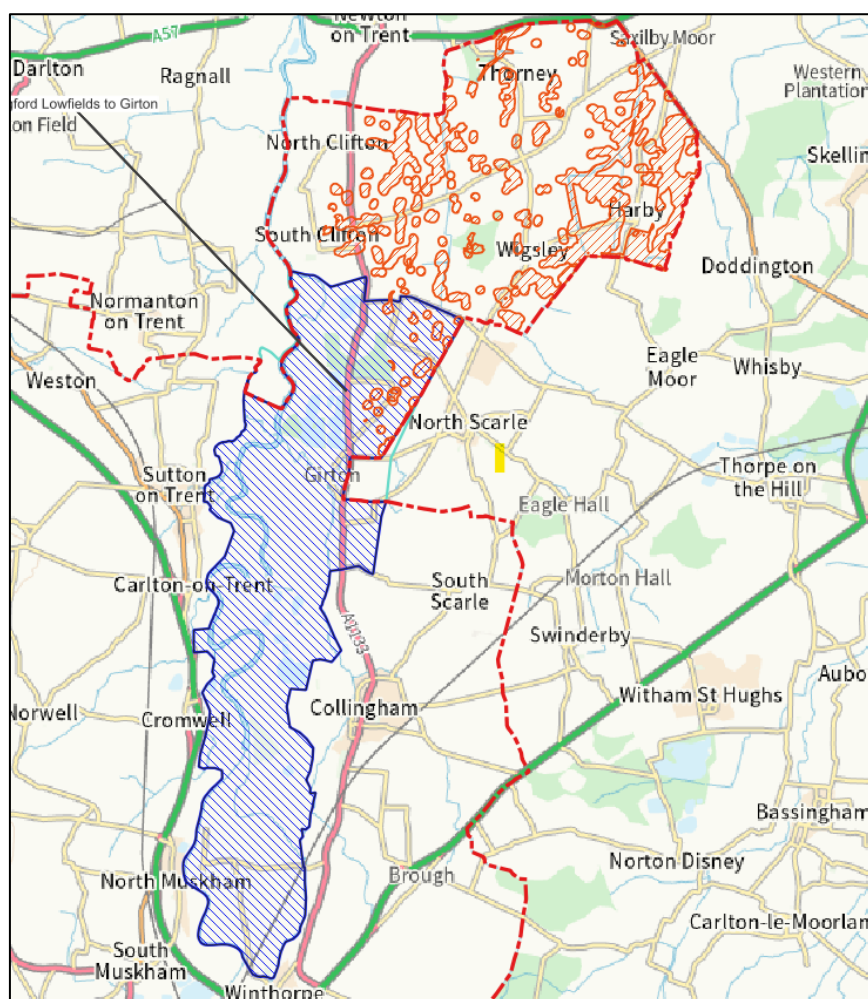
- 5.1. Following our concerns that grassland habitats appeared to be poorly represented in key areas of the Newark and Sherwood District, particularly in the Biodiversity Opportunity Mapping (BOM) 'Mercia Mudwoods Focal Area' and 'The Dumbles Focal Area', it was agreed that NSDC would propose additional areas to be mapped under the relevant grassland measures.
- 5.2. As part of the process leading to the consultation stage we had unsuccessfully tried to promote some grassland areas using the LNRS mapping methodology. So in this instance we have taken a simple, and we consider logical, method for selection of additional areas to be mapped. This is based on the designated Local Wildlife Site system. Where grassland habitat is noted as a feature of the designation, and there appears from aerial imagery to be the potential for expansion of the habitat on adjacent land, either through creation of new species-rich grassland or enhancement of existing grassland, we have mapped those areas. We will then leave it to the LNRS team to decide whether these are acceptable in terms of the methodology, but request that an explanation is provided for each area as to why it has not been carried forward to the final published Habitat Map.
- 5.3. These additional areas have been provided separately as a GIS layer.

6.0 Application of Mapping Methodology

- 6.1. We have previously raised concerns regarding the mapping methodology. The example we used to highlight this was associated with the mapped measures for wet woodland. It was consequently acknowledged by the LNRS team, that there were particular problems with an imported third-party data set used for that habitat. Whilst this provided a reasonable explanation to our specific query, this wet woodland layer continues to be of concern as discussed in the following section.

7.0 Wet Woodland Layer

- 7.1. In our previous comments we highlighted concerns regarding the ‘wet woodland layer’ provided as part of the early consultation stages with supporting authorities. As noted above, the LNRS team acknowledged that there were issues with the underlying dataset.
- 7.2. To illustrate our concerns, one of the areas we focussed on was a large area at the north of the district in the Clifton, Thorney, Harby area. This is shown as brown hatched areas on the extract below which we included in our comments. The blue hatched area is the BOM Langford Lowfields to Girton Focal Area.



- 7.3. In the public consultation draft, these brown hatched areas are now mapped as B/M5 Strategic habitat creation as part of large-scale development, creating more habitat and better ecological connectivity at a landscape-scale. They also form part of B/M4

Installation and retrofitting of features to reduce fragmentation caused by roads and railways, including underpasses and green bridges at key locations.

- 7.4. From a strategic plan making process, the general location, geography and current land-use for this area is such that large-scale development is extremely unlikely in this area. The one exception might be solar array developments, but in that case the creation of woodland habitat as part of the development is usually very limited because of the need to avoid shading of the solar panels. Also, this is not an area where we would consider that there has been significant fragmentation caused by transport links. Consequently, the mapping of these measures in this area, on the basis that they have, seems illogical and counter-intuitive to the need for measures to be ‘...*practical, realistic and deliverable*’ as set out in the draft Statement of Biodiversity Priorities. Consequently, we continue to have concerns for how these measures have been mapped in this area, as it seems to be at odds with the key principles of the LNRS, which then has the potential to influence overall confidence in the mapping procedure.

8.0 Relationship with Biodiversity Net Gain

- 8.1. The draft Statement of Biodiversity Priorities outlines the relationship with the LNRS and Biodiversity Net Gain (BNG). The main effect will be that the published LNRS will, through legislation, determine how the ‘strategic significance’ multiplier must be set when undertaking BNG calculations using the Statutory Biodiversity Metric (SBM).
- 8.1. The Draft Statement of Biodiversity Priorities states how “...*a purpose of the LNRS is to help to influence the location of BNG that is delivered at off-site locations.*” However, the LNRS will also determine how the strategic significance multiplier must be used when calculating the baseline habitat assessment and the post-development onsite biodiversity values. How this should be done is set out in the relevance guidance² and is summarised in Table 7 of that guidance which is reproduced below.

² DEFRA. (2024). *The Statutory Biodiversity Metric User Guide – July 2024*.
https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide_23.07.24_.pdf

Table 7 Biodiversity metric strategic significance categories and score applied in the metric where an LNRS has been published

Category	Score	Description
High (Formally identified in local strategy)	1.15	<p>This category can be applied when:</p> <ul style="list-style-type: none"> the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and the intervention is consistent with the potential measure proposed for that location <p>If your project delivers the mapped potential measure set out in the LNRS you should:</p> <ul style="list-style-type: none"> record strategic significance as low in the baseline record strategic significance as high in post-intervention sheets record that you have applied the published LNRS in your gain plan
Medium	1.10	This category cannot be applied.
Low (Area / compensation not in local strategy)	1	<p>Where the definitions for high strategic significance are not met.</p> <p>Even if your project is an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.</p>

- 8.2. Consequently, this is where this aspect of the LNRS will be mostly used in terms of mandatory BNG. This is of particular importance and concern to us, as this will potentially have a major impact for the Local Planning Authority (LPA) who are now having to review many hundreds of submitted metric calculations annually, as opposed to a very small number of calculations (measured in single figures) for calculations associated with off-site habitat banks.
- 8.3. If a SBM calculation supporting a development proposal considers that something happening on site constitutes a mapped measure for that location they can then apply the 'high' category, which will then generate a higher value than would otherwise have been the case, thereby reducing the number of biodiversity units required to meet the mandatory minimum 10% measurable net gain. For this reason, it is inevitable that SBM calculations will, wherever possible, attempt to justify that what is being provided meets a mapped measure in that location. To ensure that the objectives of the LNRS are met, we consider it important that the LNRS guides the use of the mapped potential measures in SBM calculations with clarity and lack of ambiguity. This is also important to ensure that the LPA and applicants do not have to engage in protracted

discussions regarding whether the strategic significance multiplier has been applied appropriately or not.

- 8.4. On face value, application of the correct strategic significance multiplier should be straightforward; simply cross reference habitats being used in the SBM calculation with the LNRS Habitats Map, and then cross-reference the proposed habitat creation and/or enhancement being proposed with the relevant mapped potential measures for that habitat type. We consider it will be far from simple.
- 8.5. Each section of the broad habitat type and potential measures section starts with a statement of which priority habitats are covered, and which other habitats are covered as shown in the extract below for the Grassland Priorities and Potential Measures:

F - Grassland Priorities and Potential Measures	
Priority Habitats covered:	Lowland calcareous grassland, lowland meadows (lowland neutral grassland)
Other habitats covered:	Other semi-improved grassland
Related habitats:	N/A

- 8.6. The SBM utilises the UKHab habitat classification system. Therefore, when undertaking a SBM calculation there is a need to translate the UKHab habitats being used within the calculation with the habitat types used within the LNRS. And it is here that there is potentially problem which we discuss below using Grassland habitat as an example.
- 8.7. The UK Biodiversity Action Plan (BAP) descriptions^{3,4} for lowland calcareous grassland highlight which National Vegetation Classification (NVC) communities the habitat encompasses and close associations with these NVC communities is considered a prerequisite for the UKHab g2a 'lowland calcareous grassland' habitat type⁵. However, there is also the UKHab g2c 'other calcareous grassland' habitat type, with the UKHab definition noting that this is "...calcareous grassland that does not meet the definition of either g2a or g2b..." and which also needs to meet other criteria.
- 8.8. The SBM has just two types of calcareous grassland 'lowland calcareous grassland' and 'upland calcareous grassland'. So, only one type (the former) would be applicable in the LNRS area. So if a development SBM calculation is dealing with g2c 'other calcareous grassland' is this a grassland type that the LNRS considers is applicable to the Grassland Mapped Measures? There is then a further complication in that it could be argued that this would need to be entered into the SBM as 'lowland calcareous grassland' but this is a high distinctiveness habitat, as it represents the lowland calcareous grassland priority habitat (i.e. Habitat of Principal Importance), which g2c isn't. Therefore, is g2c considered by the LNRS to be 'other semi-improved grassland'.

³ UK Biodiversity Group. (1998). *UK BAP Habitat Action Plan – Lowland Calcareous Grassland*. <https://webarchive.nationalarchives.gov.uk/ukgwa/20110303150119/http://www.ukbap.org.uk/UKPlans.aspx?ID=12>

⁴ BRIG, (Ed. Ant Maddock). (2008). *UK Biodiversity Action Plan Priority Habitat Descriptions – Updated December 2011*. <https://data.jncc.gov.uk/data/2728792c-c8c6-4b8c-9ccd-a908cb0f1432/UKBAP-PriorityHabitatDescriptions-Rev-2011.pdf>

⁵ UKHab Ltd. (2023). *UK Habitat Classification Version 2.0*. <https://www.ukhab.org/>

8.9. The term semi-improved grassland arose as part of the Phase 1 habitat classification and methodology published by the Nature Conservancy Council in 1990 with subsequent minor updates⁶. For calcareous grassland there were two categories for semi-improved; poor semi-improved and good semi-improved. Within the technical data sections of the SBM there is a table that translates the JNCC Phase 1 habitat types to the relevant SBM habitat types which for our example are:

- Semi-improved calcareous grassland (Good quality) > 'Grassland – lowland calcareous grassland' (which is a priority habitat of 'high' distinctiveness); and
- Semi-improved calcareous grassland (Poor quality) > 'Grassland – modified grassland' (which is a grassland of 'low' distinctiveness).

8.10. The LNRS only references 'other semi-improved grassland'. Because 'modified grassland' (which is g4 'modified grassland' in the UKHab classification system) is considered to include 'poor semi-improved' grassland, and species-poor regularly mown amenity grassland typical of public open space areas, it could be argued that the creation of 'modified grassland' represents a grassland habitat type that is covered by the potential measures for grassland. When one then looks at the potential measures it can be seen that it would have to include 'modified grassland' as this is a specific grassland type that measures F/M2⁷, F/M3⁸ and potentially H/M2⁹ appear to target given that 'modified grassland' includes amenity grassland.

8.11. We have used lowland calcareous grassland as the primary example here simply because it is the first habitat listed under Grassland. Within the LNRS area, most grassland habitat within SBM calculations will concern neutral grassland, but the same situation occurs with this.

8.12. We assume that 'lowland neutral grassland' has been provided in parenthesis after lowland meadows to ensure that the LNRS is an accessible document to all as without this the lay reader would not be aware that 'lowland meadow' priority habitat encompasses neutral grassland communities distinct from calcareous and acid grassland communities.

8.13. Lowland meadow priority habitat is similarly defined by NVC communities and is represented in the UKHab habitat classification system by g3a 'lowland meadows' and within the SBM by 'lowland meadows' habitat. So this should be clear and unambiguous. But the potential measures also cover 'other semi-improved grassland'.

8.14. Like calcareous grassland the SBM provides a suggested translation as follows:

⁶ JNCC. (2010). *Handbook for Phase 1 habitat survey – a technique for environmental audit*. <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>

⁷ F/M2 - *Bring unmanaged and neglected grasslands back into favourable management to increase species diversity, including field margins, buffer strips along watercourses, road verges, railways and amenity grasslands.*

⁸ F/M3 - *Increase the value of grasslands in public open space, and in other areas such as golf courses and cemeteries, including by relaxing mowing regimes and increasing species richness.*

⁹ H/M2 - *Carry out wildlife-friendly management of public green spaces (including parks, allotments, churchyards and cemeteries, road verges, walkways, watercourses, wetlands and woodlands), including by relaxing mowing regimes, establishing wildflower grasslands, planting native trees and shrubs, and creating ponds.*

- Semi-improved neutral grassland (Good quality) > 'Grassland – other neutral grassland' (which is a priority habitat of 'medium' distinctiveness); and
- Semi-improved neutral grassland (Poor quality) > 'Grassland – modified grassland' (which is a grassland of 'low' distinctiveness).

8.15. Also, the aforementioned mapped measures F/M2, F/M3 and H/M2 will apply to modified grassland that is neutral in nature.

8.16. This means that when LPA ecologists are reviewing submitted SBM calculations for **each habitat parcel** they will need to:

- a) Check each habitat parcel on the pre-development baseline, and for the post-development scenario to see if it is a habitat type that potentially correlates with an LNRS habitat type for which there are mapped measures at that location.
- b) If there are mapped measures for the habitat type, to then decide if proposed habitat creation and/or enhancement and the target habitat condition correlates with the relevant mapped measure. Here there is likely to be numerous differences of opinions between the reviewing LPA ecologist and whoever prepared the SBM arising from simple differences of professional opinion and the fact that it will be advantageous for the development to try and demonstrate that it is delivering mapped measures because this will then reduce the amount of BNG units needed.

8.17. This potential issue was taken into consideration by NSDC when it prepared and subsequently adopted its document¹⁰, and associate Focal Areas Plan¹¹, that sets out how it considered the strategic significance multiplier should be used in SBM calculations during the interim period before the LNRS was published. This provides a clear reference as to what UKHab habitats apply. Whilst there is probably little that can be done to alleviate the inevitable additional burden that will be placed on LPA ecologists reviewing SBM calculations in respect of whether proposed delivery of mapped measures are acceptable or not, we consider that there is potential to partially mitigate this burden by the addition of an Appendix to the LNRS linked to the Priority Habitats and Other Habitats, listed for each broad habitat type, similar to that used in the NSDC document, which provides a clear definition of which UKHab and SBM habitat are applicable.

8.18. This issue is then further compounded by the Overarching Priorities and Potential Measures which are stated to cover all Priority Habitats and all Other Habitats, which could reasonably be interpreted as being any habitat. Whilst there are fewer potential measures than for the broad habitat types, we anticipate that A/M2 *"Target habitat enhancement and creation in areas where this will reduce fragmentation and increase ecological connectivity, through the creation of linkages, corridors and stepping stones"* is likely to become a particular focus of attention, with habitat creation and enhancement measures proposed in a way that it was most likely not intended by the

¹⁰ <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/other-planning-policy-information/biodiversity-and-landscape/Mandatory-Biodiversity-Net-Gain---Strategic-Significance-Policy.pdf>

¹¹ <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/other-planning-policy-information/biodiversity-and-landscape/Mandatory-Biodiversity-Net-Gain---Strategic-Significance---Focal-Areas-Plan.pdf>

LNRS, and which are no more than 'token gestures', but which LPA ecologists will find difficult to argue against.

8.19. Therefore, in summary. We consider that the lack of correlation in the terminology for habitats used in the Priorities and Potential Measures with the Statutory Biodiversity Metric and the UKHab habitat classification system will result in additional burdens for ecologists preparing BNG calculations, and for the local planning authority when reviewing calculations. We also consider that this will lead to developments being able to include 'token measures' towards the delivery of mapped measures with the benefit of a reduced number of BNG units being needed by the development.

8.20. Section 2.3 of the draft Statement of Biodiversity Priorities states that:

"This effectively means that less BNG needs to be provided if off-site provision is on a site identified in the LNRS (where the relevant habitat is being created or enhanced) and will incentivise developers to focus their off-site BNG in the places where it will have the biggest impact for nature recovery.

We consider this is misleading. The effect for offsite habitat banks is that this means more BNG units can be delivered per unit of area. It has no effect on the amount of BNG units required offsite by a development proposal.