

List of comments received to the draft LNRS consultation for the North of Tyne and Responses

PURPOSE AND AMBITION OF LNRS

Number	Respondent	Comments	Proposed Response
PUR001	Forestry England	Forestry England is pleased to have been consulted on for this LNRS throughout all stages of its design, and that many of the comments that we have made have been incorporated in order to provide a positive representation of modern forestry. As the largest land manager in the UK, Forestry England is committed to providing a sustainable source of home-grown timber and supporting the local economy, and in conjunction Forestry England has bold ambitions to be a leading force for nature recovery. The timber that we supply is independently assessed to ensure that it meets UKWAS and FSC standards, meeting a range of environmental, social and economic requirements for certificate holders to demonstrate credible and responsible woodland and forest management. When finalised, LNRS will be a useful guidance tool for Forestry England to use in future forest planning.	Thank you. Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.
PUR002	Bellway Homes	Our client supports the overarching priorities of the LNRS in seeking to halt and reverse biodiversity decline across the North of Tyne area. We recognise the value of a coordinated landscape-scale approach to nature recovery and broadly consider the strategic priorities and ambitions set out within the draft LNRS document to be beneficial.	Comment noted and welcomed.
PUR003	Biodiverse Consulting	We are not supportive of the use of the terms "stage 1" and "stage 5" in place of areas of particular importance for biodiversity (APIB) and areas that could become of importance for biodiversity (ACIB) as this introduces some inconsistency and potential confusion for developers and planning/ecological professionals working across the NECA. South of Tyne and Durham have used the standard acronyms in their maps, so for the sake of consistency we would urge North of Tyne to also adopt these.	We were reluctant to introduce new acronyms such as APIB and ACIB because we want the document to be as user friendly as possible, rather than for specialist ecologists working in this sphere. However we have made various changes to both the text and the online mapping as you suggest.

PUR004		<p>We would like the opportunity to suggest the introduction of a technical annex into the final LNRS which clarifies several important points for developers and landowners across the NECA. This would ideally utilise flowcharts and would be aimed at non-planning and ecological professionals who will utilise their LNRS once in a blue moon, but whose contribution to local nature recovery could be substantial. This would only need to be a page or two and would contain a jargon-free explanation of the LNRS's relationship to the following: Planning weight (with reference to the emerging December 2025 National Planning Policy Framework, which mentions Local Nature Recovery Strategies in relation to five separate policies, including climate change, site allocation and large scale residential/mixed use developments) Allocated sites and LNRS (we are aware of concerns elsewhere in England that allocated sites were considered for exclusion from LNRS due to the misapprehension that they may represent a planning constraint; it is quite the opposite and this should be made clear) Summary of how 'strategic significance' scores (low, medium and high) in the Statutory Biodiversity Metric are to be applied once the LNRS has been published (this is clarified in page 28 of the Metric User Guide published by Defra) Flowcharts depicting the interaction of developers/landowners with the LNRS. These interactions would occur during optioneering and when making a planning application, when establishing a habitat bank and when seeking ELM/Countryside Stewardship funding bids. We note that the recently published Kent LNRS (Making Space For Nature) explains on page 22 why sites allocated for development are highly important to delivering LNRS measures. This is because LNRS are to inform, not instruct, land use. Delivery of onsite Biodiversity Net Gain (particularly on major/allocated development sites) has the potential to dovetail with the strategy's priorities, but it should be made abundantly clear how this is achieved. It may be a good idea to give an example of an allocated site in North of Tyne, the specific LNRS measures which apply to it and suggestions as to how these may be delivered as part of the allocated development. This would bring the concept to life for a developer dealing with this issue.</p>	<p>Comment noted. Guidance and support in applying the LNRS will be considered as part of the delivery phase.</p>
PUR005	Coquet River Action Group (CRAG) and Felton Climate and	<p>The LNRS is described as a strategy document. To us, it is more an evidence base. The priorities and actions in the document only become relevant once they are attached to a particular local strategy – at a habitat level, they are too broad. Thus, a</p>	<p>Comment note.</p>

	Nature (Felton CAN)	landowner or SRA strategy group might choose their area, then use the LNRS and maps to identify the habitats within the area and the actions for those habitats and then create a strategy with objectives that could be monitored that describes how the actions will be implemented. The landowner or SRA strategy group would be using the LNRS as a useful evidence base or playbook from which a strategy could be developed. This is not to denigrate the LNRS, we just don't believe it should be described as a strategy.	
PUR006	Corsenside Parish Church	The UK is in the bottom 10% of countries in the world for their quality of nature and therefore, it is important to increase the awareness of this to those living in the North of Tyne area. The UK has been ranked as low as 59th out of 65 countries, or 55th out of 61 in other studies, for nature connectedness. This is due to factors such as lower biodiversity, increased technology use, urbanisation, and less access to wild spaces compared to other countries. While the British public are perceived as nature lovers, research indicates British adults feel less emotionally attached to nature, ranking poorly against many European and global counterparts. This is a huge barrier to nature recovery and would be useful to state within this section.	Comment noted.
PUR007		We would like to see more than 31% of the North of Tyne area identified and mapped for measures for nature recovery and efforts to encourage people to live alongside biodiversity.	Defra's statutory guidance on LNRS production is highly prescriptive about what can be included in mapping. The mapped area of 31% is consistent with other published LNRSs from other areas. The aim of the prioritisation process is to identify a focus for activity over the next 5-10 years for this first iteration of the LNRS. Prioritising too much is effectively not prioritising, and Natural England has the power to stop LNRSs moving forward to publication if too much has been mapped.
PUR008		A huge amount of time, hard work and effort has gone into creating this document. It feels that the strategy focuses on encouraging current work and activities to improve nature recovery. We would like to see the strategy with more bold and ambitious measures and priorities for restoring full functioning ecosystems.	Comment noted. We feel that the priorities and measures currently set out are ambitious but achievable, as a first step towards nature recovery. LNRSs will be reviewed and updated regularly at a timescale that will be set by Government which will offer an opportunity to reassess priorities and measures.
PUR009	Haydon Bridge Nature Club Committee	It could include a paragraph on how to increase awareness of the poor biodiversity in the UK to the public e.g., one in six species are at risk of extinction, the UK is in the bottom 10% for its quality of nature.	Text has been amended to say more about current biodiversity declines in the UK.

PUR010		We would like to see more than 31% of the North of Tyne area identified and mapped for measures for nature recovery.	Defra's statutory guidance on LNRS production is highly proscriptive about what can be included in mapping. The mapped area of 31% is consistent with other published LNRSs from other areas. The aim of the prioritisation process is to identify a focus for activity over the next 5-10 years for this first iteration of the LNRS. Prioritising too much is effectively not prioritising, and Natural England has the power to stop LNRSs moving forward to publication if too much has been mapped.
PUR011		The LNRS seems a very well-structured and detailed document, ideal as a point of reference. Lots of great detail on habitats has been provided. A lot of time, effort and hard work has clearly been put in to develop the draft strategy.	Comment welcomed.
PUR012		We would like to see the strategy with more bold and ambitious measures and priorities. For example, species reintroductions considered within each habitat short term, medium term and long term.	Comment noted
PUR013		The focus should be on restoring fully functioning ecosystems and include an equal focus on improving both habitats and wildlife.	Comment noted
PUR014		Some sections would benefit from plain English e.g. page 10 The relationship between the LNRS and BNG.	Comment noted. A more use-friendly version will be produced once this technical document is adopted.
PUR015	Port of Tyne	Do we consider that biodiversity net gain is being appropriately balanced with economic growth through the Environment Act and LNRS? Is there the provision for strategic solutions and the opportunity for stakeholder engagement on these?	Interesting questions that will doubtless be explored over time but any changes arising from that consideration would need to be enacted at a national level
PUR016	Rothbury Climate and Nature	Whilst this draft strategy recognises that nature exists in ecological mosaics, the recovery plan narrative could be seen as, unfortunately, siloed by the geo-politics of fragmented parcels of land.	Comment noted.
PUR017		We agree with the points originally made by the submission of Individual 11 to consider creating Bioregional Living Learning Hubs.	Comment noted.
PUR018	The Preston Tower Estate	If the Strategy is to target nature recovery aiming it at sites where food is produced will be essential: not to convert the land but to better manage it so it can produce food and Nature.	Comment noted.
PUR019	The Crown Estate	The Crown Estate is a unique business managing land across urban, rural, coastal and marine environments for the benefit of the nation, with the portfolio including land in England, Wales and Northern Ireland. As a major landowner we recognise our	Comment noted.

		responsibility to take a leading role in stewarding the UK's natural environment, as shown by the recent publication of our own Nature Recovery Ambition, which emphasises the importance of working in partnership with others and features three overarching goals for the business - i.e., deliver increased biodiversity, identify and tackle causes of water degradation and stress, and reconnect people with nature. More information on our Nature Recovery Ambition can be in our document "Stewarding the natural environment"	
PUR020		The Draft LNRS for the North of Tyne features a photograph of a farmer on a quad bike on page 13 (Picture 5), but it should be noted the farmer in this picture does not appear to be wearing a safety helmet. Whilst this is not a legal requirement, it is a practice that is strongly recommended by the Health & Safety Executive.	Comment noted.
PUR021	Individual 1 (line 3)	I agree with the proposal and think it is essential work	Comment welcomed.
PUR022	Individual 2 (line 5)	Impact on biodiversity weakens the resilience of these ecosystems to climate change.	Comment noted.
PUR023	Individual 6 (line 17)	What I want to know is how the LNRS will contribute to 30 by 30? The strategy doesn't even mention 30 by 30 except in the glossary. So I would expect you to define what you mean by "protect 30% of land and ocean to safeguard biodiversity and address climate change". You might define this as land where the primary management objective is to protect biodiversity and where other objectives are permissible only to the extent that there is no negative impact on biodiversity i.e. no trade-off between biodiversity and the other objective. There might also be an implicit requirement that biodiversity is monitored otherwise there is no knowing that the first requirement is being met. Then you need to estimate how much of the strategy area currently meets the 30x30 definition. Then the strategy needs some discussion about how the balance of the 30x30 requirement will be achieved.	<p>The LNRS will contribute towards the mapping of a national Nature Recovery Network. The Nature Recovery Network will be an important component in delivering the Government's commitments for 30x30.</p> <p>Government have said that initially 30x30 will be delivered through some of the designated sites. (https://naturalengland.blog.gov.uk/2023/12/11/30-by-30-a-boost-for-nature-recovery/).</p> <p>Essentially, 30 x 30 is the national target, and the 48 national LNRSs are among the local blueprints on how to achieve it. The monitoring chapter (chapter 12) mentions the data collection that will feed into the national target.</p> <p>Further clarity and a link to gov.uk document added to the Glossary.</p>
PUR024	Individual 7 (line 19)	Words and plans on paper are not enough - you must enforce all planning and legal guidelines. Too much Environmental Legislation and Plans and simply ignored by developers and landowners.	Comment noted.

PUR025	Individual 11 (line 23)	<p>ECOSYSTEM THINKING AS A BIOREGIONING PROCESS -</p> <p>Whilst this draft strategy recognises that nature exists in ecological mosaics, the management policy narrative risks being siloed by the geo-politics of fragmented parcels of land. Environmental partner organisations have critical knowledge which must operate harmoniously at the scale of interconnected living-systems. Yet holistic ecological thinking may conflict with economic commitments or diverse social missions. Ecological processes do not respect boundaries and climate pressures are reshaping every habitat faster than management plans can adapt. This plan would do well to focus on entire ecosystem-thinking as holistic bioregions - such as source to sea watersheds. Such ecological frameworks are gaining tractions across the world with UK examples in South Devon, Tayside and Clyde bioregions.</p>	<p>Comment noted. In producing the draft LNRS we have had to comply with the Government's guidance which does not easily lend itself to a bioregioning approach. This can potentially be looked at again at the next review of the LNRS.</p> <p>See comment for MAP021</p>
PUR026	Individual 12 (line 24)	Need to increase the awareness of the UK's poor biodiversity to people.	Comment noted. Text has been amended to say more about current biodiversity declines in the UK.
PUR027		For an ambitious, long-term strategy, I would like to see more than 31% of the North of Tyne area identified and mapped for measures.	Defra's statutory guidance on LNRS production is highly proscriptive about what can be included in mapping. The mapped area of 31% is consistent with other published LNRSs from other areas. The aim of the prioritisation process is to identify a focus for activity over the next 5-10 years for this first iteration of the LNRS. Prioritising too much is effectively not prioritising, and Natural England has the power to stop LNRSs moving forward to publication if too much has been mapped.
PUR028		<p>Lots of detail and it is clear a lot of work has gone into this. As a resident, I would like to see the strategy with more bold and ambitious measures and priorities, particularly as we are in a biodiversity crisis. Additionally, any potential contentious topics seem to have been avoided. Species recovery is intertwined with improving habitats and overall nature recovery. I would like to see more emphasis on the species that could be considered for short term, medium term and long term reintroductions.</p>	<p>Comment noted. We feel that the priorities and measures currently set out are ambitious but achievable, as a first step towards nature recovery. LNRSs will be reviewed and updated regularly at a timescale that will be set by Government which will offer an opportunity to reassess priorities and measures. With regard to species recovery, we believe that in the majority of instances the conservation of important species can be achieved through management of the underlying habitats which support them. This approach was supported by the community of technical experts we consulted with during the preparation of the LNRS. A small number of species were identified as requiring additional</p>

			actions and specific measures have been identified for these.
PUR029	Individual 16 (line 30)	We need to engender a sense of pride and investment in the high quality natural assets the North of Tyne area retains. They are part of our cultural capital as well as our natural capital, and they should be elemental to the North East identity and character, as much as Newcastle United, coalmining and ship building. u need to contextualise and extend this policy work overtly and explicitly within the One Health Approach as well as within the other UN Sustainable development Goals	Comment noted.
PUR030	Individual 17 (line 31)	Nature recovery and human wellbeing are linked, especially in urban areas.	Agree
PUR031	Individual 19 (line 35)	I think the 'why important' sections should take a more natural capital based approach to look at ecosystem service provision (of which biodiversity can be taken as one), to then include benefits to society such as water retention. studies have been done in Northern Ireland and Leeds Uni that suggest that (inferred to Northumberland catchment size) restoration of uplands areas could provide a benefit of >£5million per 10,000hectare. Better evidence local economic arguments would greatly help support action for delivery. Note this Ecosystem service based principal is valid for all habitat sections.	Comment noted.
PUR032		I think it's more about providing a framework to help priorities which measures are targeted first in key spatial areas. Again, using a wider community ecosystem service provision approach would help identify local priority action to champion/drive through other mechanisms.	Comment noted.
PUR033	Individual 23 (line 41)	Insensitive development is detrimental to nature recovery and wildlife areas. There must be more focus on eco-friendly building materials that works within the landscape.	Comment noted.
PUR034		For nature to fully recover, we need more wild spaces, not fewer - and more spaces that interconnect with other wild spaces so wildlife can thrive.	Comment noted.
PUR035	Individual 25 (line 45)	The chapter is entirely inadequate. the idea that there are " a small number of priorities and measures ' that should apply across the vast majority of the land in North of Tyne is quite frankly laughable. The scale of recovery in nature that is required will not result from the very limited number of protected sites but needs to extend in one way or another to the area as a whole. The protected 'island' or isolated sites are at dire risk and need to be embedded in networks and corridors so that nature can thrive and people given access to it. You have taken an entirely	Comment noted. We feel that the priorities and measures currently set out are ambitious but achievable, as a first step towards nature recovery. LNRSs will be reviewed and updated regularly at a timescale that will be set by Government which will offer an opportunity to reassess priorities and measures.

		<p>minimalist and rigid approach when a much more holistic approach is needed. There is a need to set the 'protected areas' in context to better understand possibilities and interactions. Instead, you should have started by asking what state do we want the ecology of North of Tyne to be in in 10, 20 or more years' time; what would Nature Recovery look like.</p>	
PUR036		<p>The approach as in all parts of the strategy is not holistic but seeks to act on disparate parts of the habitat and eco system. this is fundamentally antithetical to ecology. There is a fundamental issue of the boundary problem of this site-based approach; nature does not recognise boundaries in this sense.</p>	Comment noted
PUR037		<p>The question of resilience is not adequately addressed.</p>	Comment noted
PUR038	Individual 42 (line 79)	<p>The LNRS is an excellent document full of quality aspiration. However, as the LNRS is not proscriptive and does not:</p> <ul style="list-style-type: none"> • Require land managers or owners to make any changes to land use. • Place new restrictions on development 	Comment noted.
PUR039		<p>There will be NO nature recovery unless there is recognition nationwide of the huge negative impact that current agribusiness is having on all environments OUTSIDE of the private land management. Farmers welfare and the essential need to go forward with choices that measure productivity with nature recovery is at the very centre of this. I believe that the power of the LNRS lies in its details inclusivity, recognition of the enormity of the challenge. But unless it can radically impact on legislation, education and enhance major changes of land use, it has no power to recover nature. Thus applies too to the conflict of interest in encouraging tourism and conserving the natural world of the region and its biodiversity.</p>	
PUR040	Individual 45 (line 87)	<p>I was disappointed that the long list published in October 2024 didn't include the reintroduction of any locally extinct species of mammal (such as lynx and beaver), and I was hoping to see that they've since been added. Please consider adding them when you update the list! I'd also like to add that it would be very helpful if the links in the final LNRS opened in a new tab. Every time I clicked a link in the draft LNRS it took me out of it, and then back to the start of it when I used the back button.</p>	<p>A section of text about the limitations placed on us by the guidance on LNRSs has been added in the introductory chapter. The species list is made up of those that are on the IUCN list as threatened or near-threatened. Lynx is beyond scope because it is not part of the relocation code. Beaver is mentioned in the text.</p> <p>The website is set up to always open in the same tab or window as that is today's best practice for accessibility. It is something that is part of the way Northumberland County Council's website works and is beyond the control.</p>

PUR041	Individual 45 (line 89)	There are opportunities to be more ambitious and to take a more engaging approach as seen in some of the other LNRS in other parts of the country e.g. Dorset & W Yorkshire. There needs to be a shift away from the old BAPs more of a focus on restoring ecological function and natural processes at scale. Taking a functional, natural process-led approach should be clearly stated as a priority for the LNRS. In general the actions/measure map needs to be more ambitious, particularly for restoration/creation of scrub, woodland & wetland habitats and coastal grassland and saltmarsh habitats	Comment noted. We feel that the priorities and measures currently set out are ambitious but achievable, as a first step towards nature recovery. LNRSs will be reviewed and updated regularly at a timescale that will be set by Government which will offer an opportunity to reassess priorities and measures.
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ENGAGEMENT

ENG001	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	We are aware that the team attempted to engage with landowners and managers during the development of the LNRS, although our experience is that there are many that haven't heard of the LNRS.	Noted. Throughout the preparation of the LNRS we have attempted to engage with and seek views and comments from farmers and other land managers (page 15). We will continue to engage with land managers as fully as possible during the delivery phase of the LNRS.
ENG002		We describe elsewhere that the LNRS seriously lacks any concept of communities. There has been little community input to the creation of the LNRS, there is no recognition of the work that community groups are already doing towards the priorities and actions in the LNRS, and there is no mention of how the LNRS could be communicated with the communities. Just as large landowners are essential stakeholders, so are smaller landowners, businesses and communities.	<p>Comment noted. We see a potential role for everyone in supporting nature recovery. Guidance and support in applying the LNRS will be developed as part of the delivery phase.</p> <p>We have amended the text of Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS. These can be found in Box 2 of the revised document.</p>
ENG003	Wylam Parish Council	The LNRS has the feel of a big biodiversity action plan, and it has been prepared by the great and good in nature conservation for them. I feel as if it's not so much meant for me and all the many small groups and individuals who care for local nature areas and wildlife in and around where they live or work or visit. It's not the sort of dumbed down "create your own wildlife garden"! or "No mow May" that we need but good constructive advice and expert training. And help to engage landowners and join up our bits and pieces of habitats.	<p>Comment noted. We see a potential role for everyone in supporting nature recovery. Guidance and support in applying the LNRS will be considered as part of the delivery phase.</p> <p>We have amended the text of Chapter 1 to include more details about the</p>

			potential ways in which different sectors can use the LNRS. These can be found in Box 2 of the revised document.
ENG004	Haydon Bridge Nature Club Committee	A paragraph on how to reconnect people within the North of Tyne area to nature would be beneficial.	Comment noted. We have amended the text of Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS. These can be found in Box 2 of the revised document.
ENG005		We would like more information on where the online survey (that closed on 9th September 2025) was distributed. From the consultation details, there is an impression that local people were only marginally engaged in the process	The list of events where the survey was promoted is available as a download on our website. For a further 12 months it was promoted through emails and attracted additional responses, as detailed in our text. The thoughtful responses were mostly qualitative in nature, and fed into our thinking and our “voices from” sections. In addition, we held an in-person facilitation event with farm liaison officers during the consultation phase.
ENG006		Mentions stakeholders such as farming, landowning and forestry were initially engaged with. We would like to have seen local community groups included in this.	Comment noted. Through the process of ‘landscape-scale conversations’ undertaken during the production of the LNRS we attempted to reach as big a range of organisations and individuals as possible, including community groups. However, in an area the size of the North of Tyne we recognise that it has not been possible to reach everyone. We will continue to try and engage widely during the delivery phase of the LNRS and can use the consultation responses received to identify additional interested groups.
ENG007		Measures could include local communities to assist in achieving the priorities set. We think there is a lack of comment on the role of local communities and individuals in helping nature recovery.	We have amended the text of Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS. These can be found in Box 2 of the revised document.

			Text has been added to box 3 in Chapter 9 about local people and communities recording data on habitats and species. A new measure has also been added: OP 2.5 'Work with local people, community groups, citizen scientists, and everybody involved in managing the land or water or delivering nature recovery, to record baseline or monitoring data.'
ENG008	Upper Coquetdale Red Squirrel Group	I am sceptical about the purpose and ultimate use of this scheme when it has very obviously, for some reason, excluded a whole community of passionate conservationists and effectively dismissed them as irrelevant. Why this should be the case in Northumberland is a mystery, as neighbouring areas have encouraged collaboration and engagement. We can only surmise that there is personal ideology involved, which is not something that a science driven project should encompass and is to be deplored, if this is the case. We would like to offer the benefit of your expertise in relation to red squirrels and grey squirrel control.	Noted. Through the process of 'landscape-scale conversations' undertaken during the production of the LNRS we attempted to reach as big a range of organisations and individuals as possible, including community groups. However, in an area the size of the North of Tyne we recognise that it has not been possible to reach everyone. We will continue to try and engage widely during the delivery phase of the LNRS and can use the consultation responses received to identify additional interested groups.
ENG009	Individual 5 (line 16)	The general public have not been made fully aware of this draft. It has not had enough exposure via the local media, news, radio etc. How can people comment and give their opinions if it has not been brought to their attention sufficiently? It needs to be widely and locally advertised, in order to have fair representation, and transparency.	Noted. Through the process of 'landscape-scale conversations' undertaken during the production of the LNRS we attempted to reach as big a range of organisations and individuals as possible, including community groups. However, in an area the size of the North of Tyne we recognise that it has not been possible to reach everyone. We will continue to try and engage widely during the delivery phase of the LNRS and can use the consultation responses received to identify additional interested groups.

ENG010	Individual 12 (line 24)	Within priorities, include local communities and their involvement as well as raising awareness of these issues to the wider public.	Comment noted. We have amended the text of Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS. These can be found in Box 2 of the revised document.
ENG011	Individual 16 (line 30)	You are missing local residents, planners, pet suppliers, and vets as overarching agents of change within this chapter	Comment noted.
ENG012	Individual 42 (line 79)	Outline all options to liaise with local parish councils - forging links to small community networks to empower and encourage small areas of nature recovery. Talk at village halls. Dialogue with the Northumberland Green Hub.	Comment noted.

STATE OF OUR NATURE

STA001	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	Another question – what state is nature in? There is a lot of information about where habitats are or could be, but very little about the condition of the patches of habitats that have been mapped. For example, for my local patch of ancient woodland, is it in good shape and just need protection from encroachment of non-native species or has encroachment already occurred and thus more intensive nature recovery required. The document seems to imply that the 5-10 year monitoring will be mostly about whether there is a greater area of habitats rather than an improvement in the condition of existing habitats. We assume this is because, as the LNRS states, there is a lack of trained ecologists (or money to pay for them) to undertake baseline monitoring work and therefore monitoring will rely heavily on mapping.	Comment noted. A lack of up-to-date information about the current condition of priority habitats is identified as an issue in Chapter 9. Measure OP 2.1 aims to address this.
STA002	National Trails UK	The North of Tyne LNRS region is home to 107 km of the Pennine Way, 84 km of Hadrian's Wall Path and 178 km of the King Charles III England Coast Path, soon to be the longest managed coast path in the world at 2,700 miles. These are three of thirteen National Trails in England, designated from the same 1949 National Parks and Access to the Countryside Act as the National Parks and National Landscapes. As internationally recognised and publicly funded access routes they should be recognised in their ability to connect people with nature and the coast, and in their potential as ecological corridors. To better embed them in the LNRS, National Trails UK would ask in Chapter 2, page 16 where the Northumberland National Park and the North Pennines National Landscape are mentioned, that the three National Trails that cross the LNRS are also referred to: Pennine Way (107 km), Hadrian's Wall Path	Disagree. The mention of the Protected Landscapes and National Park are because of their position in the pattern of designated sites and nature protection. There are other plans / programmes being discussed regionally for access to green and blue spaces.

		(84 km), King Charles III England Coast Past (178km) National Trails UK requests the mention of 'Coastal Wildbelt'.	
STA003	Haydon Bridge Nature Club Committee	Page 21 - There could be much greater emphasis on the adverse impact of people on habitats and wildlife - the text is almost apologetic in tone (nothing, for example, about uncontrolled fires, footpath erosion, large scale events, verge-side parking etc etc) and the challenges posed in reducing these impacts. This could then lead on to later chapters dealing with mitigation, improvements etc.	Noted. Pressures on wildlife from people are flagged throughout the document. Specific actions to address these will be considered at the delivery stage.
STA004	Pennine National Trails Partnership	The North of Tyne LNRS region is home to 107 km of the Pennine Way, 84 km of Hadrian's Wall Path and 178 km of the King Charles III England Coast Past, soon to be the longest managed coast path in the world at 2,700 miles. These are three of thirteen National Trails in England, designated from the same 1949 National Parks and Access to the Countryside Act as the National Parks and National Landscapes. As internationally recognised and publicly funded access routes they should be recognised in their ability to connect people with nature and the coast, and in their potential as ecological corridors. To better embed them in the LNRS, alongside the suggestions made in this form, we would also ask in Chapter 2, page 16 where the Northumberland National Park and the North Pennines National Landscape are mentioned, that the three National Trails that cross the LNRS are also referred to: Pennine Way (107 km), Hadrian's Wall Path (84 km), England Coast Past (178km).	See response to STA002
ST005	Save Newcastle Wildlife	We would also expect to see measures in place to mitigate for the impact of recreational disturbance from increasing numbers of dogs in ecologically sensitive areas, as well as the importance of private gardens for supporting biodiversity.	Recreational disturbance is identified as a pressure in several section of the draft LNRS. Specific actions to address these will be considered at the delivery stage. Private gardens are mentioned in the 'Additional support for nature recovery in urban and urban edge areas' section of Chapter 8.
ST006		Road run off is briefly mentioned but the impact of forever chemicals and microplastics from tyre wear on soil and water quality is likely underestimated as a overarching issue.	Comment noted.
ST007	Individual 25 (line 45)	There is as in most of the chapters no sense of the gap between where we are now, what needs to change and how exactly the measures will be enacted.	Comment noted.

PEATLANDS AND HEATHLANDS

Number	Respondent	Comments	Proposed Response
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PH001	Forestry England	Measure 1.4 The scale of our landscape means that some development of tracks must be accommodated to enable management visions and objectives to be realised. Access tracks are essential to enable safe, effective management operations not only for timber production, but also for nature recovery actions, such as removal of low yield non-native trees in hard-to-reach location and for fire control.	Text amended
PH002		Measures 1.5 and 2.2 The Forestry Commission and Natural England Decision Support Framework for peatland protection includes a number of steps that require detailed consideration in order to identify where it is appropriate to undertake peatland restoration or forest to bog restoration. Forestry England are required to regularly provide revisions to forest plans as the harvesting cycle progresses, allows opportunities for the steps detailed in the framework to be implemented as appropriate. These will be available for public comment once they are available. It must be noted that the economics of restoring peatland from woodland far more expensive than restoring peatland from agriculture, and expectations need to be realistic around pace and location.	<p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p> <p>We are calling the relevant measure here “Restore to Bog” not “Forest to Bog”. Further clarity has been added to chapter 11. We believe these areas to be recognised in the Forest Design Plans, regardless of the felling timescales and the LNRS review timescale. There could be opportunities for restoration as yet envisioned, outside of the routine site location cycles and restoration funding mechanisms. See response to MAP002</p>
PH003		Measure 1.6 The removal of native species such as birch requires careful consideration, as this is an act of natural regeneration by native plant/tree species and is important for the development of wet woodland types. Wet woodland can play a very important role in carbon sequestration and storage.	Text amended
PH004		Measures 1.7 and 3.1 It is important to remember that grazing management regimes take in to account grazing undertaken by non-domestic species such as deer and goats. It should not be automatically assumed that introduced grazing is appropriate.	Noted
PH005	Northumberland National Park Authority	We welcome the inclusion and measures in this section. These habitats make up a large proportion of priority habitat in the Northumberland National Park. Regards the peatland restoration work, care should be taken regards language, specifically the tense in which work is referenced. Undertaking peatland restoration work does not, post ground	<p>Noted</p> <p>Text amended, including in glossary</p>

		work, lead to restored peat but peat that is 'under restoration'. The final desired outcome of a restored functioning wet peatland habitat is likely to take decades or even centuries to achieve.	
PH006		Measure PH 3.5 - Develop wildfire mitigation plans and wildfire response plans in association with the Northumberland Wildfire Group. This work should consider the establishment of accessible wildfire ponds in high wildfire risk locations where appropriate, aiding the ability of the fire service to suppress wildfires when they do occur.	Text amended
PH007	National Trails UK	National Trails UK asks that PH1.3 is expanded beyond just mitigating erosion to highlighting the opportunity that National Trails and public rights of way have in delivering corridors for people and nature via creation of contiguous linear habitat and stepping stones. Whilst not in the North of Tyne LNRS region, through National Trails UK's Test & Trial fund the National Trust at Marsden Moor is exemplifying this by restoring peatland along the Pennine Way to support the trail's long term sustainability and to showcase restoration work happening across the estate to trail users.	Noted
PH008	Corsenside Parish Council	It may be beneficial to include examples of specialist species already present and examples of specialist species absent and where efforts should be made for their return in the Peatlands and Heathlands within the North of Tyne area.	Addressed in 'Associated Species' section
PH009	Haydon Bridge Nature Club	Species that are currently absent and should return to the peatland and heathland areas.	Initial focus is on holding on to what we have
PH010	Committee	Examples of specialist species already present in the Peatlands and Heathlands within the North Tyne could be included. Examples of specialist species not present but should be present in the Peatlands and Heathlands within the North Tyne could be included.	Initial focus is on holding on to what we have
PH011	Pennine National Trails Partnership	The Pennine National Trails Partnership asks that PH1.3 is expanded beyond just mitigating erosion to highlighting the opportunity that National Trails and public rights of way have in delivering corridors for people and nature via creation of contiguous linear habitat and stepping stones. Whilst not in the North of Tyne LNRS region, through National Trails UK's Test & Trial fund the National Trust at Marsden Moor is exemplifying this by restoring peatland along the Pennine Way to support the trail's long term sustainability and to showcase restoration work happening across the estate to trail users.	Noted - for delivery stage
PH012	Rothbury Climate and Nature	We are concerned that there could be a risk that peatland and heathland recovery is framed too narrowly as a technical or engineering exercise, rather than a long-term land-use and governance issue. Successful recovery depends on sustained changes in management incentives, tenancy arrangements and expectations around grouse moor management, grazing regimes, and access. Also:	This is a level of detail beyond the LNRS, but some useful thoughts for implementation

		<p>1.WATER is key to any nature recovery strategy. Amplify Hydrology knowledge. Mapping of hydrological dynamics - local water-sheds, cycles and systems; rainfall patterns; water table fluctuations; flooding impact.</p> <p>2.The role of diverse sphagnum species.</p> <p>3.Quality of Soil for regeneration - the monitoring of soil microbes; specialist beetles, spiders and moths; fungal networks.</p> <p>4.Fire Regimes - monitoring pressures and management of fires for ecological restoration vs destructive wildfires</p> <p>5.Monitoring of pollinators for heather reproduction.</p> <p>6.Monitoring nitrogen deposition from agriculture altering heathland species composition.</p> <p>7.Monitoring of invasive species - bracken and grasses.</p> <p>8. Monitoring of grazing / conservation grazing / over grazing / under grazing.</p>	
PH013	UK Squirrel Accord	Peatland restoration is very important, but there are major concerns about tree clear felling activities that detrimentally impact local red squirrel populations which are often already struggling for survival. Care and planning needs to be implemented to ensure that achieving one valid aim does not negatively impact another. Mitigation measures for protected species like red squirrels should be seriously considered.	Noted
PH014	National Trust	This may be more relevant to the woodland section but could you cite the GWCT best practice guidance. I could not find anything about placing release pens in or close to sensitive locations (within 500m of ancient semi-natural woodland) only that the number of bird release should be limited.	Wording clarified
PH015		Should the other mires around Hadrian's Wall within the Landscape Recovery area and Roman Wall Loughs area and Muckle Moss NNR be included in the peatland priority areas? It feels like an omission that they are not, when they are deep peat, the mires surrounding them are included and they are in designated and priority landscape areas.	To discuss with National Trust
PH016	Individual 3 (line 6)	Keep peat areas and headlands	Noted
PH017	Individual 11 (line 23)	<p>Mapping of drainage patterns: water fluctuations, hummocks, hollows and the role of sphagnum as a water engineer - water relationship restoration.</p> <p>1. Mapping of localised hydrological dynamics - local water-sheds, cycles and systems; rainfall patterns; water table fluctuations; flooding impact.</p> <p>WATER is key to any nature recovery strategy. Amplify Hydrology knowledge. 2. The role of diverse sphagnum species. 3. Quality of Soil for regeneration - the monitoring of soil microbes; specialist beetles, spiders and moths; fungal networks. 4. Fire Regimes - monitoring pressures and management of fires for ecological restoration vs destructive wildfires. 5. Monitoring of pollinators for heather reproduction.</p>	This is a level of detail beyond the LNRS, but some useful thoughts for implementation

		6. Monitoring nitrogen deposition from agriculture altering heathland species composition. 7. Monitoring of invasive species - bracken and grasses. 8. Monitoring of grazing / conservation grazing / over grazing / under grazing.	
PH018	Individual 12 (line 24)	Species we would like to see return to the peatland and heathland. Habitats and species are heavily interlinked for nature recovery.	Initial focus is on holding on to what we have
PH019		Examples of specialist species not present but should be present in the Peatlands and Heathlands within the North Tyne should be included.	Initial focus is on holding on to what we have
PH020		Rename the paragraph 'The Resource within the North Tyne area' as the word 'resource' infers that the habitat is only there for anthropogenic benefit.	Use of 'Resource' is consistent with its use in many natural environment contexts
PH022	Individual 16 (line 30)	Eroding peat from damaged peatlands also damages our rivers, through acidification and by darkening the waters which increases their temperatures. Both of these impact the animals and plants which would otherwise live in the rivers, in addition to increasing peak water flows and exacerbating flood risks. Peatlands are vitally important because when they are healthy they are one of humanity's very best ways of permanently recapturing the carbon which we have released since the industrial revolution. As the industrial revolution began in the NECA region, we have a moral duty to do our utmost to repair the damage this region unwittingly started.	Noted
PH023		Removing native trees from peatland gullies, as is practised on driven grouse estates, increases erosion and reduces biodiversity. When driven grouse estates burn heather, it releases large amounts of particulate smoke into the atmosphere severely affecting air quality in surrounding settlements, in addition to releasing ancient carbon stores and reducing the peatlands ability to sequester carbon. Permitting the release of large numbers of game birds onto these fragile habitats, decimates the bird, invertebrate and reptile populations, necessitating the predation of the game birds by predators. In addition they are a key agent of spread for avian flu and antibiotic resistance through medicated grit and feeding stations. The artificial control of these populations and the burning of the heather moorlands by driven grouse estates puts all life in peril for the sake of rich men's self-indulgent folly. Immediately halt all burning of the heather moorland and immediately prevent release of game birds. Remove: PH1.8 as this is worded to enable continued burning of heather moorland - alter to remove this loophole.	This beyond the scope of an LNRS
PH024		Seize the extraordinary natural advantage we have in this region to become a dynamic beacon of carbon recapturing by restoring our vast peatlands to thriving healthy ecosystems, and putting them more closely at the heart of our local economy.	Noted

PH025	Individual 19 (line 35)	Need to ensure that any coastal heaths of moderate/neutral conditions are not excluded (although admittedly rare in Northumberland.	Noted
PH026		As for swamps and fens, the LNRS and derivatives need to ensure that hydrology is fully considered. And that this includes considerations of naturalness in relation to how historical drainage, and the reversal thereof would benefit recovery objectives and should be supported where possible. this is particularly relevant to Fens that could and often would move from non peat generating to peat generating if hydrological integrity was restored - which would move then across the 'sections'.	Noted
PH027		I think the text relating to grouse moor management and impacts of pheasant rearing and release are just too bland. These practices are decimating native ecology at scale. In our tiny part on the northern edge of NNP, the installation of a a earing pen for 20,000 birds on 1km coincided with the last time we saw common lizard, slow-worm and adder approximately 9 years ago.	There are passionately held opinions on both sides of this debate. We have sought to maintain an evidence-based approach
PH028		Some sections seem to be a little rambling and unclear, such as mixing fire risk from revegetating with fire risk reduction from rewetting. The LNRS should start from the premise of restoring the 'conditions' required for restoration at scale. So this would be restoring hydrology, blocking grips, stopping burning and reducing grazing, ahead of (assisted) natural recovery. I mention 'assisted' as I am fearful that a rush to plant trees could be counter-productive and needs to be managed very carefully. There is NO natural tree-line in Northumberland.	Noted
PH029		Afforestation in not mentioned as an ongoing issue. There are areas where afforestation has destroyed a rich shallow peat area, has now been removed, but has not resulted in recovery (target area??). More mention of grazing and afforestation and issues that prevent recovery.	The chapter references the Forestry Commission and Natural England have produced a <i>Decision Support Framework for Peatland Protection, the Establishment of New Woodland and Re-establishment of Existing Woodland on Peatland in England</i>
PH030		Similarly NCC need to put their money where their mouth is. A small but rich fen area was destroyed last year. It was filled with 1000s of tonnes of aggregates/building waste and then capped with topsoil. This is disgraceful. When i reported to the council (as the dumping was going on) I received a reply within 2 hours saying my concerns were being dealt with - following which was a rapid acceleration of dumping for 4 weeks followed by the capping - not nature positive.	Noted
PH031		A number of key bird species are mentioned, but the pressure effecting these are not accurately presented (probably as a result of a report driven by large land managers). most of these species are suffering massive decline as a result of human land management pressures - habitats loss, drainage, agricultural intensification and game bird management. the	Noted. Regarding reintroductions, the focus at present is on holding on to what we have

		latter has knock on impacts of increasing upland predator numbers. there is not mention of what species could be re-introduced (at scale).	
PH032	Individual 24 (line 43)	The chapter correctly identifies peatlands and heathlands as strategic assets for biodiversity, carbon storage, hydrology, and climate resilience, and this emphasis is appropriate for North Northumberland. In Rothbury and Coquetdale, these habitats are not marginal or residual - they are foundational landscape elements that shape downstream systems, including rivers, grasslands, and floodplains. The strategy could be strengthened by stating more explicitly that degradation of peatlands and heathlands imposes costs elsewhere in the system, particularly through altered hydrology and sediment loading.	Addressed in 'Why Peatlands and Heathlands are Important' section
PH033		The chapter places strong emphasis on restoration, but does not sufficiently distinguish between active restoration, passive recovery, and damage avoidance.	Noted
PH034		In many upland settings, the highest return intervention is not further "enhancement" but stopping ongoing degradation - inappropriate burning, drainage maintenance, excessive grazing pressure, and vehicle damage. The LNRS should be clearer that prevention of further loss is often more cost-effective, less risky, and more defensible than complex restoration schemes with uncertain outcomes.	The habitat working group identified restoration as the priority. Just preventing degradation without restoration will not yield the required change
PH035		There is a risk that peatland and heathland recovery is framed too narrowly as a technical or engineering exercise, rather than a long-term land-use and governance issue. Successful recovery depends on sustained changes in management incentives, tenancy arrangements, and expectations around grouse moor management, grazing regimes, and access. Without acknowledging these structural constraints, the strategy risks overstating what can be achieved through short-term projects alone.	Noted – but we are required to focus on the next 3-10 years
PH036		The chapter would benefit from greater realism around timescales. Peat formation and heathland recovery operate on decades, not funding cycles. While early indicators (rewetting, vegetation change) are valuable, the LNRS should avoid language that implies rapid or easily measurable success. Over-promising here risks future disillusionment and undermines credibility.	Noted – but we are required to focus on the next 3-10 years
PH037		Interactions with other habitats are acknowledged, but not fully exploited. In Coquetdale, peatlands and heathlands exert strong control over river baseflows, flood peaks, and water quality downstream. The strategy should make this coupling explicit and treat peatland condition as a core component of catchment-scale river recovery, not a parallel concern.	Noted

PH038	Individual 25 (line 45)	There is insufficient assessment and emphasis on the relationship between these habitats and birds. In particular there is a need to assess this dynamic and the determine with more clarity how bird species will fare in response to the changing habitat. The measures about persecution of raptors and of the effect of release of game birds are totally inadequate to the scale and importance of the issue.	There are passionately held opinions on both sides of this debate. We have sought to maintain an evidence-based approach
PH039	Individual 35 (line 62)	<p>The chapter on Peatlands and Heathlands is well written and researched and gives insightful information and actions. The authors are to be commended. The Blanket Bog, Mires, Fens, Bogs, and Wet/Dry Heathland habitats found in Northumberland are generally in a poor condition. I think its important to highlight this fact within the LNRS. This is being objective and there are lots of peer reviewed papers/research (1) that would back this statement up. Issues highlighted include excessive sheep grazing, fire damage, poor or conflicting policy and governance, biodiversity loss (including from the impacts of climate change), poor ditch maintenance, invasive/non-native species and drainage issues. A good first step and a UK priority would be to return the SSSI in Northumberland to a favourable status. Currently SSSI vary in quality - Bewick and Beanley Moors (94% unfavourable), The Cheviot (60% unfavourable), Humbleton Hill and the Trows (100% Favourable), Simonside Hills (100% Unfavourable), Harbottle Moors (42.86% unfavourable, 42.88% unassessed), Otterburn Mires (100% unfavourable), Kielder head and Embleton Moors (Not assessed), Kielder Mires (Not assessed), Roman Wall Escarpments (100% Favourable), Hexhamshire Moors (83.3% unfavourable, 16.7% unassessed).</p> <p>The Heathlands and Peatlands in Northumberland if restored to a good condition would contribute massively towards nature recovery within the county. More research is required to better understand the mosaic of Wet Heath/Upland Scrub and Upland Woodland that would be best for Northumberland. A key driver for Biodiversity Loss is the destruction of ecosystem function. Prior to human habitation the landscape would have included much more woodland and scrub and have supported a far higher diversity of species and contributed much more value through increased value of natural capital. This research could better feed into an integrated sustainable land management programme (SLM) and link to your action PH 5.2. For nature to recover land managers would need to significantly change some of the current land management practices, which should be compensated through the Environmental Land Management Scheme. I appreciate this is difficult but a longer term plan is required.</p>	Noted – useful thoughts for the delivery phase
PH040		Adder (Vipera Berus) is classed as Vulnerable and UK Priority Species. Adder numbers have reduced across the UK and should be considered a species in this section given its local abundance.	Text amended, thank you

PH041	Individual 42 (line 79)	Observations form an individual of effects of game shooting on the peatland and heathens which integrate with moorlands. There isa marked increase in noisy vehicle access (quod bikes) on land creating creating and degrading tracks across peatland, heathland and moorland. They disturb recreational walking, create hazards wildlife. roads breaking the speed limit through villages, continued erosion and burning of habitat, fear of walking in areas affected by shooting, the sound of incessant gunshot throughout the whole week, and the illegal killing of ever declining numbers of raptors.	Partly out of scope, but we have sought to address those issues that are in scope
PH042	Individual 44 (line 87)	On page 35 a land manager voices their opinion that lynx should be reintroduced to the North of Tyne, but this point isn't picked up at any point in the LNRS	Reintroduction of species not currently licensed in England is out of scope for an LNRS
PH043	Individual 45 (line 89)	There needs to be a clear recognition that heathlands and shallow peatlands (when not degraded!) should include scattered scrub such as bog myrtle, juniper and several species of upland willows and trees including birch spp, aspen and native Scots Pine. These scrub and tree species add vital diversity to heathlands that has been lost through grazing and burning practices and should be seen as an important part of our healthland communities that we aim to restore in Northumberland to support the recovery of the many species of conservation concern including ring ouzel and black grouse as well as delivering multiple other ecosystem services. For inspiration look at parts of the Cairngorms and Norway. With the right management interacting with natural processes it is possible to have better heathlands without the loss of species such as curlew. Local examples include Hepple Estate & parts of Holystone and College Valley.	Text amended
PH044		Proactive, strategic wildfire risk management planning and implementation is needed, especially with climate change. Examples of proactive landscape scale Wildfire Risk Management with multiple local land managers, Northumberland Fire & Rescue Service and Natural England is taking place on the Simonside Hills. This is being led by members of the Simonside Connects Partnership.	Addressed in wildfire measures
PH045		We need BIG ambition to restore a diverse mosaic of native scrub and trees on our heathlands and shallow peatlands (in the right places of course in relation to waders etc), but not just limited to narrow riparian zones. Take inspiration from places like Mar Lodge & Glen Feshie in Scotland. Do NOT include the measure of removing birch from all peatlands. Yes remove alien conifers from all peatlands, but native trees and scrub should not be removed from all peatlands, just deep peat if they pose a threat. This section needs rewording. The pressing need to reduce the threat from non native conifers seeding onto peatlands and heathlands from adjacent plantations. The need for more and bolder	Text amended

		action to tackle non native conifers on all our peatlands, including on the publically owned and managed forest estate which should be leading the way. Some of the biggest opportunities are in Harwood Forest and Uswayford as well as Kidland Forest. The recent removal of Threestone Burn Forest should be mentioned.	
PH046		Greater ambition to restore missing species including dwarf birch and aspen, Black Grouse, Hen Harrier and Golden Eagle. Mention the really positive news of more hen harrier breeding in Northumberland, including on some grouse moors and former grouse moors. Golden Eagles and sometimes White-tailed Eagles are seen above the moors of Northumberland thanks to the success of reintroduction projects elsewhere. This is a real success story that can be built on. The provision of prey and carrion is crucial. Enabling some deer carcasses to be left out in appropriate places should be supported as part of restoring a healthy functioning ecosystem. Also missing seems to be need for structural diversity including really short and disturbed areas within heathlands (upland and lowland) for invertebrates and reptiles Patches of (untreated, chemical free) dung are also important. Large native herbivores such Exmoor Ponies and native cattle as well as deer have a role to play and should be encouraged at appropriate levels.	Noted – useful comments for delivery phase
PH047		Champion scrub and native woodland as an important part of the peatland habitat mosaic and be bolder about the recovery of these habitats in the uplands.	Noted
PH048	BASC	Amend PH3.6 to correct errors regarding GWCT guidance on pheasant release pens	Thank you – wording corrected
PH049		BASC supports <i>PH 3.7 Continue to take action to tackle the illegal persecution of birds of prey on grouse moors and identify ways to increase its effectiveness.</i>	Thank you, that is welcome support

IMPORTANT GRASSLANDS AND BREEDING WADERS

Number	Respondent	Comments	Proposed Response
IG001	Environment Agency	Page 38 + OMH topic in general – It is noted that OMH is particularly significant within the region, primarily due to the region’s historic past. Given the scrutiny this habitat type is currently undergoing, a recommended inclusion in the strategy would be to increase the evidence / knowledge base of this habitat. Professional judgement will always be a requirement when identifying OMH, but progressed definitions, which build on the set criteria and are informed by local examples would aid in identification, enhancement and creation. A list of local floral and faunal identifier species would be an invaluable source. The photo used in aiding	This is covered by IG 1.2

		the definition, would also not be considered an exemplary example of the habitat (this may be due to the grainy image (which I appreciate is for draft purposes). It presents abundant rubble and scrub components with few areas of the required criteria habitats. A more obviously OMH example may aid the definition.	
IG002	Northumberland National Park Authority	We welcome this section and the inclusion of the measures for various types of grassland that are specific to the North of Tyne including waxcap grassland, whin grassland, PMGRP and limestone grassland that are important in the National Park.	Noted
IG003		We are not sure if the buffer zones layer for important grasslands works, or whether the layer for important grasslands should say that these have a buffer incorporated too. The buffer seems to work better for North Pennines and areas in North Tyneside.	A matter to review for the next iteration of the LNRS
IG004	Bumblebee Conservation Trust	The Bumblebee Conservation Trust welcomes the recognition of the importance of bog and grassland habitats to the Bilberry bumblebee (<i>Bombus monticola</i>). There are recent records of three other rare bumblebee species within the North of Tyne LNRS area, all of which are priority species listed under Section 41 of the Natural Environment and Rural Communities Act (2006). These are: the Moss carder bumblebee (<i>Bombus muscorum</i>), the Red-shanked carder bumblebee (<i>Bombus ruderarius</i>) and the Ruderal bumblebee (<i>Bombus ruderatus</i>). (Source: datasets from the National Biodiversity Network (NBN) Atlas and the Bees, Wasps and Ants Recording Society (BWARS). We believe these should be identified as priority species within the strategy. This would align with statutory guidance for LNRSs, which asks responsible authorities to consider the species for which the strategy area is, or could feasibly be, of national importance, and to identify the species in the area that the strategy could make a particular contribution to enhancing or recovering (paragraphs 36 and 44). The Bumblebee Conservation Trust has prepared guidance for responsible authorities on developing Local Nature Recovery Strategies that are effective in helping our most threatened bumblebee species recover and supporting the populations of more common species. This includes prioritising rare bumblebees found within the LNRS area; integrating bumblebee monitoring into LNRS plans; and collaborating with conservation organisations to address specific habitat needs of priority bumblebee species.	Thank you – text amended
IG005	National Trails UK	When mentioning “roadside verges, parks, recreational grounds” on pages 40, National Trails UK requests the mention of the National Trails and Public Rights of Way corridors. National Trail & Public Rights of Way verges can be managed similarly if not more easily than road/rail verges, plus bring additional access to nature/health & wellbeing benefits, especially in areas with limited access to green space. Nature Recovery	Public Rights of Way are legal rights to pass and repass, in most cases over private land. Highway Authorities have powers to manage the surface of them, but the legal right isn’t connected with “verges”. It is not clear what is meant

		projects delivered on National Trails and PRow corridors can also provide a “shop window” for the public and land managers by virtue of their popularity and accessibility. Allowing individuals to see project interventions may both excite them to act similarly and remove potential doubts of their efficacy or perceived negative impacts. For examples of this, please see our National Trails Nature Recovery Toolkit or case study videos from the Pennine Way and Durham Heritage Coast.	by “National Trail and Public Rights of Way verges”. There is no “verge” to PROWs. Rights of Way other than highways do not have verges. This point is perhaps a broader one about the contribution about road verges to nature recovery – but that is a level of detail we haven’t gone into during our development of what was to be a Strategy. In the urban and urban edge area we are considering wagonways. See also response to STA002
IG006	Wylam Parish Council	Mention is made of local community efforts in managing amenity grassland. We need clearer information about how to improve local management and the grounds maintenance teams need to be better trained and actively involved. E.g. Avoiding mowing close to trees and hedges, over exposed tree roots and through areas of vulnerable woodland flora, meadow flora and scrub. More discussion is needed about how to tackle vigorous nettle, dock etc. Above all if there is an agreement to carry out differential mowing, make sure what is agreed is what is done - it needs communicating to the person seated on the mower and good supervision. If they fail, that is what causes public complaints and abandonment of a nature friendly initiative. The community can help out - e.g. raking verges areas, but need the material removed.	Useful thoughts for the delivery stage
IG007		Greater reference needs to be made in the priorities and measures to grounds maintenance involvement and training; and protection for ground-nesting species.	Useful thoughts for the delivery stage
IG008	Corsenside Parish Council	We would like to see more taxa covered in the ‘Associated species’ section.	More added
IG009		A lot of work is currently being undertaken on breeding waders and therefore it would be useful for other vulnerable species to be included.	As above
IG010	Haydon Bridge Nature Club Committee	It could include a ‘mammals’ paragraph in the ‘Associated species’ section.	We are not aware of mammals of especially high conservation concern especially associated with grasslands
IG011		Other threatened species to be included as well as breeding waders.	More added
IG012		Reducing livestock numbers in areas where necessary.	See IG 1.3
IG013	Pennine National Trails Partnership	When mentioning “roadside verges, parks, recreational grounds” on pages 40, the Pennine National Trails Partnership requests the mention of the National Trails and Public Rights of Way corridors. National Trail & Public Rights of Way verges can be managed similarly if not more easily than road/rail verges, plus bring additional access to nature/health &	See response to comment IG005 See response to STA002

		wellbeing benefits, especially in areas with limited access to green space. Nature Recovery projects delivered on National Trails and PRow corridors can also provide a “shop window” for the public and land managers by virtue of their popularity and accessibility. Allowing individuals to see project interventions may both excite them to act similarly and remove potential doubts of their efficacy or perceived negative impacts. For examples of this, please see our National Trails Nature Recovery Toolkit or case study videos from the Pennine Way and Durham Heritage Coast.	
IG014	Port of Tyne	It is considered that the land within the Port’s ownership is unlikely to support breeding waders. The mudflats along the Tyne are likely to be functional to the designated sites in the wider area, and they will be used predominantly in the winter.	This site will be assessed in accordance with environmental legislation, local plan policy, NPPF and best practice.
IG015		The land within the Port’s ownership falls within the category of important undesignated grasslands on the LNRS stage 5 measures map where measures IG1 and IG2 are relevant. The Port does support these priorities, however, it is considered that this has to be balanced with issues including economic growth. The quayside locations within the Port have been identified as part of the Mayor of the North East Combined Authority’s Mission to make the North East the Home of the Green Energy Revolution. This will create 25,000 skilled and well-paid jobs. The role the Port will play in developing the Off Shore Wind and Renewables Sectors supported by the creation of a Green Super Port is essential and specifically mentioned in the Mission Statement. To this end the Port welcomes the opportunity to engage with the authority to assist with understanding the extent and condition of habitats on Port land to ensure the data base is correct and consider how this may be reconciled with economic growth within the LNRS area.	This site will be assessed in accordance with environmental legislation, local plan policy, NPPF and best practice.
IG016	The Preston Tower Estate	Grazing cattle are essential for lapwings breeding on pastures and this need must be clearly defined with the LNRS Framework.	Addressed in Measure IG 1.9, but also important to bear in mind the breeding wader populations in the uplands on sheep-grazed pasture
IG017		Please be sure to confirm the link between carefully managed grazing plus water levels and successful breeding by wading birds, without cattle grazing and maintained water levels lapwing and redshank will never breed successfully.	Agree to some extent, but there are arable-nesting lapwing
IG018	Tyne Rivers Trust	When looking to maintain grassland it may be useful to consider the connectivity of adjacent habitats. Maintaining connectivity of one habitat should not negatively affect action to improve another habitat e.g. through measures like the creation of riparian buffer strips on flood plains.	Agreed
IG019	National Trust	The definition of Whin Grassland on page 37 needs to be checked. It should be Quartz Dolerite not dolomite and it is chemically basic, not	Whin grassland is generally classified as a form of dry acid grassland. The

		alkaline. I'm not sure if this paragraph has just been confused as the title also mentions Cheviot andesite which is different.	word dolomite has been corrected to dolorite.
IG020	Individual 4 (line 15)	Migratory geese need to continue to use arable fields along the River Tyne for recovery, shelter and food. Near me in Ovington NE42 the fields down by the River Tyne are used by a significant number (c200 regularly) Greylag Geese and many smaller flocks of Canada Geese and Pink Footed Geese. The river is a nature corridor for waders, ducks/geese, hirundines and freshwater species. Little Grebe and Goosander are regularly seen. The denes and ancient hedgerows leading down to the River Tyne are used as feeding corridors for bats. Surveys in Ovington have found Pippistrelle and Daubenton bats. Bats do down to the river to feed at night and return via the ancient hedgerows to roost higher up the valley. Some fields in Ovington parish have been designated 'wild flower' plantings and others hay meadows to increase biodiversity e.g. bumble bee mix. This has encouraged an increase in songbirds and grassland species.	Noted
IG021	Individual 6 (line 17)	The "Breeding Wader priority recovery areas" are too broad: they swamp too much of the landscape. You need to focus on those areas which are of the highest priority for breeding waders. I note that your comments say "The mapping for the breeding wader priority recovery areas in particular may look "blocky" – but for a mobile species it would not be possible, at a strategy level, to map to parcel level all the fields used by breeding and feeding waders. It is to be the starting point for actions for breeding waders." I can accept that you can't map to parcel level all fields used by breeding and feeding waders, but mapping all use by waders is not the purpose. You need to map the areas of highest priority for wader recovery - the focus needs to be much tighter if it is to have real effect.	The breeding wader priority areas have been defined using a range of information sources and focussing on the highest priority areas
IG022	Individual 11 (line 23)	The monitoring and restoration of soil health - not just soil loss. 1. Amplify focus on soil structures and below ground bio-diversity. 2. Attend to ecologically-intelligent grazing regimes and rest periods. 3. Define target grassland type by bioregion. 4. Plan plug planting to support rare species favouring local provenance. 5. A local plan must consider external pressures such as nitrogen deposition from agriculture; herbicide drift; runoff from fertilised fields; land use that degrades habitat and introduce measurement, monitoring and CONTROLS.	Helpful thoughts for the delivery stage
IG023	Individual 12 (line 24)	Associated species section is not complete e.g., a mammals section.	We are not aware of mammals of especially high conservation concern especially associated with grasslands
IG024		Seems to be a focus on breeding waders and it would be useful for other Species of Conservation Concern to be included.	Noted
IG025		Reducing livestock numbers in areas where necessary.	See measure IG 1.3

IG026	Individual 16 (line 30)	There's a real risk to nesting waders from the mowing regimes changing as the weather patterns shift.	Noted
IG027	Individual 19 (line 35)	Broadly speaking a good section. Reading British Wildlife recently (article about translocating meadow ant colonies), it struck me that I have not seen a meadow ant colony locally. Broader point - is there worth in mentioning invertebrate species translocation to increase the value of the habitats (and where these are ecosystem engineers (such as ants), introductions will fuel further ecosystem recovery.	Initial focus is on holding on to what we have
IG028	Individual 24 (line 43)	The chapter rightly recognises that species-rich grasslands and breeding waders are interdependent, and that their decline reflects systemic changes in land management rather than isolated failures. In Rothbury and Coquetdale, these grasslands are not relic habitats - they are working systems shaped by grazing, cutting, drainage, and nutrient inputs, and any credible recovery strategy must engage directly with those realities.	Noted – for delivery stage
IG029		The strategy risks treating grasslands as a static habitat type rather than a management outcome. Species richness and suitability for breeding waders arise from specific combinations of grazing pressure, timing, soil fertility, and hydrology. Without sustained attention to these interacting controls, area-based targets or generic prescriptions will deliver limited ecological benefit.	Noted – for delivery stage
IG030		There is insufficient emphasis on hydrology as a limiting factor for breeding waders. Drainage, grip maintenance, and field drying have often proceeded incrementally, with large cumulative effects. Wader recovery will remain elusive unless wet features, seasonally high water tables, and soft ground conditions are treated as core requirements rather than optional enhancements.	Text amended
IG031		The chapter understates the tension between production efficiency and ecological function. Many measures that benefit breeding waders - late mowing, lower stocking densities, tolerance of wet ground - impose real opportunity costs. If these trade-offs are not acknowledged explicitly, the strategy risks appearing naive or disengaged from farm economics.	Noted – for delivery stage
IG032	Environment Bank	It would be helpful to tighten the wording on Unimproved neutral grasslands: 'This definition does not include species-poor neutral grasslands, such as sites dominated by false oat-grass', e.g. if species-rich grassland was described as >10sp/m2.	Text amended
IG033	Individual 35 (line 62)	It would be very beneficial to establish more cattle grazing within the north of Tyne especially breeds such as Belted Galloway known to improve conservation grassland quality. Sheep are non-native and can cause substantial damage to native or rare grassland.	See measure IG 1.9
IG034	Individual 44 (line 87)	On page 50 there's a reference to justified and targeted predator control. I was disappointed that there was no reference to the fact that introducing apex predators would help with mesopredator control	Reintroduction of species not currently licensed in England is out of scope for an LNRS

IG035	Individual 45 (line 89)	Please recognise scrub as an important part of the grassland habitat mosaic as are areas of bare ground for a wide range of organisms, including many that are rare and threatened. The role of herbivores and also pigs/boar in providing disturbance needed, especially for annual species to persist in grasslands needs to be included.	Text amended
IG036		Woodcock need to be listed as one of our important waders. Cranes and corncrake should also be mentioned with an aspiration for their return through habitat restoration (including wetlands). Increasing tick burdens on wader chicks needs investigating as an issue as does the impacts of insecticide use.	Initial focus is on holding on to what we have
IG037		Current activity examples include Hepple Estate creating hundreds of acres of species-rich pastures and meadows as part of a kaleidoscope of scrub and wood pasture. Examples of grassland meadow and verge enhancement through seed collection and spreading by local farmer Kevin Wharf could be included and shown as an example of farm diversification	Noted and included in the mid-Northumberland Strategic Recovery Area
IG038		Aiming to increase scrub as an important part of the grassland habitat mosaic to benefit biodiversity. The role of herbivores and also pigs/boar in providing disturbance needed, especially for annual species to persist in grasslands needs to be included. Reducing and ideally ending the use of herbicides and insecticides on grasslands including parasite treatments on animals which pass onto the grasslands and severely deplete invertebrates which has implications for waders and other wildlife. Other management practices can be used to reduce and often eliminate the need to treat. Knowledge transfer needs to be resourced. The need for targeted 'predator' control in some circumstances is mentioned in the background info but is not included in any of the measures. If it is needed, it should be in the measures. In addition to controlling predators such foxes, where needed, the issue of dog owners not controlling their dogs (by keeping them on leads) needs addressing. The creation of dog free zones for waders and other ground nesting birds during the breeding season needs to be included in the measures. The issue of dog urine and faeces altering grassland composition negatively is not mentioned, nor any measures to address this issues.	For scrub and bare ground see IG 1.6. Some useful thoughts for the delivery stage
IG039	BASC	Box 1 (Predator Control) - recommends a change of wording to the Wales Curlew Partnership position: <i>Under normal circumstances, lethal predator control would only be considered only after non-lethal methods had been tried and found ineffective. However, the state of curlew decline in Wales is such that we might consider the need to control of foxes and crows as an emergency measure, and always in combination with other interventions, even where nonlethal methods have not been exhausted.</i>	On balance the Steering Group settled on the wording contained within the LNRS, however, we appreciate that some landowners will prefer the slightly stronger approach quoted here.

		<i>Where this happens, we must not conceal that we are proposing lethal control in the absence of conclusive evidence of its benefits, and collection of that evidence must form a central part of any such project.</i>	
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RIVERS AND WETLAND

Number	Respondent	Comments	Proposed Response
FH001	Environment Agency	The Coquet has not been included as a significant river in Northumberland. This needs to be rectified.	The LNRS has identified the Coquet as a priority river catchment, as can be seen on the measures map. The text will be amended to make sure this is clear.
FH002		Any works within 8m of a Main River or Flood Risk Asset (16m if Tidal) will require a conversation with the Environment Agency with regards to a Flood Risk Activity Permits. This should cover that we wouldn't like to see trees, for example, planted on a flood embankment	Comment noted, but a level of technical detail beyond the scope of the LNRS
FH003		Fish would benefit from adding the following additional measures: <ul style="list-style-type: none"> • Retain and introduce woody material into the channel where possible. Woody material is vital for healthy fish populations providing, habitat, cover, and food, as well as other benefits including for river restoration. • Reduce excessive fine sediment inputs by, for example, increasing the amount of well vegetated and ungrazed buffer strips. Fine sediment continues to be one of the major issues affecting fish (and invertebrate) populations. • Continue to tackle ongoing water quality issues and push for increased standards on discharges. 	Measures FH 1.3 and FH 4.2 concern woody debris. Measures FH 2.1 - 2.5 address sediment and water quality issues
FH004		River Jelly Lichen section should be updated to reflect the more recent findings of this species as detailed in the report, 'Aquatic Lichen Surveys and Monitoring in the Lake District and Northumberland' by John Douglas, November 2018. The report was produced for a project under the Natural England's Species Recovery Programme and confirms presence of RJL on the North Tyne (where it has not been seen for over 20 years), provides results for the survey on the River Coquet, and includes recommended habitat improvements.	Thank you for the additional information. The text has been updated.
FH005		A brief description of what an ark site is would be beneficial to members of the public, explaining that these sites are chosen for their ecological suitability, isolation from invasive species, and ability to support healthy populations.	A brief explanation of what an Ark Site is has now been added to the text.
FH006	Northumberland National Park Authority	We welcome this section and the importance of these habitats across the National Park particularly in the Hadrian's Wall area where the Hadrian's Wall Wetlands Landscape recovery project is focused.	Comment welcomed.
FH007		In the examples section could there be a reference to FiPL projects carried out widely in the protected landscapes, many have been farmyard and water management projects that together have improved water	Comment noted. The examples of action are not intended to be comprehensive but to give an indication of the breadth of current delivery.

		quality. Most of the examples are organisational and partnership projects and this might be a good place to show individual actions can add up.	
FH008	Northumberland Wildlife Trust (Vole Recovery Project)	Whilst I agree with the priorities and measures given, I believe that there should be more mention of water voles. I understand that not all species can be included, but water voles are especially important considering that they are classed as endangered in Britain, are a keystone species, and are a focus of many conservation efforts. Certain measures to improve water vole habitat such as reducing livestock density along water courses are not mentioned.	Noted. Water vole is now mentioned within the key species section of the chapter.
FH009		Buffer strips and fencing are mentioned in Priority FH 2, but they are not mentioned under measures. There is no mention of ditches or ditch management. Many of these measures will also benefit other species.	Use of buffer strips is mentioned in measure FH 2.1 as is the promotion of regenerative agricultural practices. We have amended the wording of the measure slightly to refer back to the examples of regenerative agriculture given in the earlier narrative,
FH010		Riparian tree planting is given as a measure to increase habitat for beavers, reduce water temperature, and increase woody debris. Whilst riparian tree planting is greatly needed, I believe that it is important to mention that areas of dense tree cover are not suitable habitat for certain species such as water voles, and that a mosaic of vegetation types along water courses is essential for promoting biodiversity.	The text has been amended to reflect this.
FH011		I believe that water voles should be mentioned as an associated species.	The text has been amended to include mention of water vole.
FH012		I am unsure why the LNRS stage 5 map of proposed measures/actions only covers the Lindisfarne Streams, Coquet, Wansbeck, Pont & Upper Blyth, and Ouseburn catchments, and not the whole of the region.	The statutory guidance from Defra on LNRS production required us to prioritise. For this reason, it was not possible to map all river catchments.
FH013	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	It is interesting that you chose to mention the Aln, Blyth and Wansbeck as major river systems in Northumberland, but left out the Coquet which has almost double the catchment area of these rivers (page 54). This is despite including the River Coquet as a major river system elsewhere in the document (e.g. page 16). I assume this was just an oversight.	The LNRS has identified the Coquet as a priority river catchment, as can be seen on the measures map. The text will be amended to make sure this is clear.
FH014		There are many more examples of current activity that could have been included in this section. Clearly they can't all be included; however, two things surprised me: (1) the inclusion of the Northumberland Rivers Trust, which no longer exists and has merged with the Tyne Rivers Trust; and (2) the omission of Natural England and the Environment Agency who both are working with landowners to reduce nutrient inputs to our rivers as	Comment noted.

		well as running several other projects that impact water quality in the region.	
FH015		There is a statement in the current activities section 'Each river catchment has a catchment partnership, and a catchment action plan'. I think this statement is misleading in relation to Northumberland rivers. There are not catchment partnerships and action plans for individual river catchments, but only for Northumberland rivers as a whole. While the Northumberland Rivers partnership and action plans may work for government agencies and organisations, it is of little use for communities and landowners – it is just too broad and high level.	Text amended to reflect that Northumberland Rivers Catchment Action Plan covers more than one river catchment.
FH016		We think that the priorities and measures included in the LNRS are good. Our only concern is the emphasis given to some of the priorities. In the examples of current activity section, your two key examples are the Tweed Forum and the LIFEWADER project. Both these projects are working at landscape-scale. While landscape scale work is recommended in Priority FH5, we think that this needs greater emphasis. Some of the other priorities and actions will have relatively little impact unless they are delivered at landscape scale. If there were catchment partnerships and action plans for each of the individual larger river systems in Northumberland, then this would be the landscape scale priorities and actions that the LNRS needs. The Northumberland Rivers Catchment Management Plan describes sub-groups that could be these partnerships and action plans if they existed. We would like to see an extra priority (FH 5.4) Ensure the development of catchment partnerships and action plans for each of the individual larger river systems in Northumberland.	Comment noted.
FH017	Freshwaters Habitat Trust	It looks like subsidence wetlands are the only standing water habitat with a mapped measure. Whilst it's great to see the region's subsidence wetlands flagged prominently, it would be brilliant to see pond restoration/creation mapped more generally - as well as other freshwater interventions. As an example - in Oxfordshire, the LNP has mapped pond restoration for all existing waterbodies in the LERC's habitat inventory classified under UKHab as r1a (standing open water) smaller than 2ha in area, and pond creation for areas 250-500m from existing water habitats (lakes, ponds, canals, rivers). Whilst we appreciate that LNRSs have taken very different approaches with regard to the specificity of their mapped measures and priorities - and that this might stop you using the Oxon approach - it would be encouraging to see freshwaters mapped more generally where possible, as many of the terrestrial habitats are, so that they can benefit from the strategic significance multiplier.	Comment noted. Although our mapping focuses on subsidence ponds, measures FH 3.1, FH 3.2 and FH 3.3 consider ponds more generally.
FH018	Wylam Parish Council	More emphasis needed on reducing nutrient levels and other pollutants.	Comment noted. We believe that this is already adequately covered but can revisit when the LNRS is reviewed.

FH019		Invasives (H Balsam, Jap knotweed and Giant Hogweed are on the rise, particularly since covid. Need to identify "reservoir" areas for these plants and avoid seed dispersal downstream and into areas such as dense willow scrub on stones where they cannot be reached.	Comment note. This is an issue for the delivery stage and has clear linkages to the implementation to the current Regional Invasive Species Strategy for the North East.
FH020	Corsenside Parish Council	'Associated Species' section could include species that use to live in these habitat areas and that are now absent/extinct. It could include keystone species which are imperative to improving the condition and quality of rivers and could be considered for reintroduction.	Comment noted.
FH021		It could highlight how to increase biodiversity within these habitats.	Comment noted.
FH022	Haydon Bridge Nature Club Society	'Associated Species' section focuses on species already present, and it would be useful here to include species that are absent and that require measures to ensure their return. It could mention keystone species which are imperative to improving the condition and quality of water systems, such as beavers.	Comment noted.
FH023		It could highlight increasing biodiversity within freshwater / rivers and wetlands habitat.	Comment noted.
FH024	Port of Tyne	The Port recognises the importance of the River Tyne, with all appropriate measures to protect this feature undertaken with the Port's land holding, however the River is critical to the region's economic growth.	Comment noted
FH024		The Port acknowledges the importance of the river and wetland habitats and the protection and enhancement of these habitats. It is, however, considered that this has to be balanced with economic growth priorities for the area. The Port of Tyne is one of the UK's major deep seaports, and consequently is a vital trading gateway between six continents. In recent times, the Port have diversified, and currently operate five core business areas (car exports, conventional and bulk cargo, cruise/ferry, estates and logistics) into the offshore and renewables sector. The role that the Port has within economic growth within the local and wider regional economy is clearly acknowledged within Policy S2.1 of the adopted Local Plan with specific reference to its interests on the North Bank of the River Tyne. More specifically paragraph 5.16 reference the acceleration of development of large sites on the North Bank of the River, driven by the Port. Accordingly, the former 'Esso' is identified as site E050 for employment development. The quayside locations within the Port have been identified as part of the Mayor of the North East Combined Authority's Mission to make the North East the Home of the Green Energy Revolution. This will create 25,000 skilled and well paid jobs. The role the Port will play in developing the Off Shore Wind and Renewables Sectors supported by the creation of a Green Super Port is essential and specifically mentioned in the Mission Statement.	Comment noted.

FH025	Rothbury Climate and Nature	There is a statement in the current activities section, 'Each river catchment has a catchment partnership, and a catchment action plan'. We wonder if this statement is misleading in relation to Northumberland rivers. We know of no catchment partnerships and action plans for individual river catchments, but only for the Northumberland rivers as a whole.	Text amended to reflect that Northumberland Rivers Catchment Action Plan covers more than one river catchment.
FH026		Rivers Aln, Blyth and Wansbeck are mentioned as major river systems in Northumberland. We wonder why you leave out the Coquet, which has almost double the catchment area of these rivers? We also feel that rivers should not be considered as discrete corridors, but rather than expressions of whole-catchment areas.	The LNRS has identified the Coquet as a priority river catchment, as can be seen on the measures map. The text will be amended to make sure this is clear.
FH027		We think that the priorities and measures included in the LNRS are good. Our only concern is the emphasis given to some of the priorities. In the examples of current activity section, your two key examples are the Tweed Forum and the LIFEWADER project. Both these projects are working at landscape-scale. While landscape-scale work is recommended in Priority FH5, we think that this needs greater emphasis. If there were catchment partnerships and action plans for each of the individual larger river systems in Northumberland, then this would be the landscape-scale priorities and actions that the LNRS needs. The Northumberland Rivers Catchment Management Plan describes sub-groups that could be these partnerships and action plans if they existed. We would like to see an extra priority (FH 5.4): Ensure the development of catchment partnerships and action plans for each of the individual larger river systems.	Comment noted.
FH028		In Rothbury and Coquetdale, river condition is inseparable from upland management, valley floor land use, and historic modifications. Therefore, the LNRS should make clear that many downstream symptoms are consequences, not causes.	Comment noted.
FH029	Rothbury Parish Council	Rothbury Parish Council consider the Coquet to be a major river but note that it is not included within the consultation/categorised as a major river	The LNRS has identified the Coquet as a priority river catchment, as can be seen on the measures map. The text will be amended to make sure this is clear.
FH030	The Preston Tower Estate	Future management of riparian pastures for a range of wildlife is essential; making space for rivers and watercourses is essential.	Comment noted.
FH031	The Rivers Trust, member of Northumberland Rivers Catchment Partnership	The Chapter title here is "Rivers and Wetlands" and it goes on to define habitats within that, all of which is sound. However, on p53, it then calls out "Freshwater Wetlands" in the heading and this is the term that then continues throughout the document and into the maps, introducing confusion as it is very misleading term and not representative of the habitats you appear to be combining under this title. We recommend that	The text has been amended accordingly.

		Rivers and Streams do not default under the "Freshwater Wetland" term, but they are separated out as in the title. We recommend a new subheading of "Rivers and Streams" is included towards the bottom of page 53 where the paragraph begins "Our rivers and streams..." This also needs to be carried through to the maps, with a separate layer for Rivers and Streams.	
FH032		On p54, under the heading The Resource within North of Tyne, it states "The North of Tyne area contains five main river systems: the Tyne, the Blyth, the Wansbeck, the Aln, and the Tweed, together with many smaller streams and watercourses." This seems to be slightly at odds with the rivers which are mapped: the Coquet is not listed in this opening paragraph, and similarly the coastal streams aren't referenced, but they are included in the mapping, whilst the Aln and much of the Till and Tweed and Tyne is left out of the mapping. We recommend that you make reference to the main management catchments: Tweed, Till, Tyne and the Operational Catchments within the Northumberland Rivers management catchment: Aln, Pont and Blyth, Coquet, Wansbeck and coastal streams along the Berwick to Alnmouth Coast and Lyne and Druridge Bay Coast. Rivers and catchments appear to be under represented in the LNRS as a whole and this would help to provide a more accurate representation.	The text has been amended.
FH033		Regarding examples of current activity, on p55 where the examples are listed, it would be good to see all catchment partnerships in the region linked to (Till and Tweed, Tyne, and Northumberland Rivers) and a further sentence or two added to acknowledge the wide range of partners involved in river restoration projects across those partnerships? The information provided risks overlooking the substantial efforts across catchment partnerships as its currently drafted.	Noted. Examples of current activity by catchment partnerships and Rivers Trusts are already flagged in the wetland chapter, but we will see if further examples can be provided.
FH034		Whilst there is some mention of white-clawed crayfish within the LNRS, we recommend that you refer to the Northumberland Crayfish Partnership which is dedicated to protecting and restoring crayfish throughout the region, with habitat creation alongside ark sites as important activity, guided by a Northumberland Crayfish Strategy. It currently underrepresents breadth of activity taking place across the North of Tyne region.	Comment note. The text has been amended.
FH035	Tyne Rivers Trust	It would be useful if this section considered the importance of temporary/ephemeral waterbodies and their links to increased biodiversity e.g. as key habitat for wading birds and invertebrate species. Ephemeral waterbodies are now widely recognised as a key habitat/corridor to connect populations.	Comment noted. The importance of temporary ponds is already mentioned in the narrative for priorities FH 1 and FH 3.
FH036		FH2 - the focus is on agriculture; consideration should be given to other types of land management, commercial forestry for example makes up a significant percentage of land management in the North Tyne.	The text has been amended to reflect this.

FH037		FH4.5 – SUDS are only effective if connections are appropriate e.g. rainwater and overflow from roads to SUDS, waste to fowl drains. It might be useful to consider measures to influence policy and appropriate training for tradespeople. The presence of a SUDS system is not always recognised by tradespeople when making new connections.	Comment noted.
FH038		Page 53 – It is nice to see reference to management of coastal grazing marsh - it is important to recognise that we live in a landscape that was historically managed, cutting of reedbeds for thatch as a historic management tool.	Comment noted.
FH039		Page 54 – “Wetland and riparian habitats are a source of drinking water and wetland vegetation can help to remove pollutants and contaminants and can be used to address issues caused by diffuse or point source pollution”. Drinking water for who? Wildlife, livestock or people?	Comment noted.
FH040		FH1.2 - Advocating the removal of man-made structures to improve fish passage is a measure which needs careful consideration. Consideration must be given to the presence of invasive species and the impact on native species e.g. the impact of Signal crayfish on white clawed crayfish. Suggest re-wording to say, “prioritised removal of barriers”.	Comment noted
FH041		FH1.4 - Why are beavers mentioned specifically? There aren't any other measures that reference a specific species. Improving the riparian zone will have multiple benefits for many species. Specifying beavers specifically may give the reader the impression that no management is needed if beavers aren't present.	Noted. It is not our intention to imply that no other management is required if beaver are present and we will review the text to make sure that this is clear.
FH042		FH3 - For "clean water ponds", we wonder if this is the best term to describe ponds that are not connected to rivers or streams? A closed system pond (endorheic) is often described as an offline pond. Could we reference the importance of these features as corridors for wildlife? Offline ponds are a feature which is largely overlooked, and one which has disappeared from much of the landscape. Offline ponds (including ephemeral waterbodies) may act as either a permanent or temporary and corridor for wildlife depending on rainfall patterns.	Offline ponds are now mentioned in the narrative.
FH043		FH2.1 - “Reduce diffuse and point source pollution from agriculture through management of inputs, slurry and silage pits”. Could we re-word this to include other forms of land management, forestry is important to consider too.	Wording has now been amended.
FH044		FH4.1- “Increase the wildlife value of sustainable drainage systems through improved design and planting”. For some species e.g. Signal crayfish no effective control method exists. Could this be re-worded or another point made to say, " investigate or asses the effectiveness of methods to control for invasive species”.	Text amended to reflect that control might not be possible for all invasive species. Mention of signal crayfish removed from the measure.
FH045		FH 4.2 - Riparian tree planting should not only consider priority habitat but also endangered and vulnerable species that may benefit from or be	Comment noted. Text has been amended.

		negatively impacted by planting. Under recorded species are often missed from landscape assessments e.g. River Jelly Lichen. In addition, priority habitat should not be the limiting factor where we have critically endangered species present.	
FH046		FH 4.5 Increase the wildlife value of sustainable drainage systems through improved design and planting". Why is the focus on planting? Appropriate planting is important yes, but there are other things that are equally as important e.g. areas of open water.	Comment noted.
FH047		FH 5.2 - Greater consideration may be needed in relation to the functional linkages. Barrier removal in river systems for example needs careful consideration, some barriers may be essential to avoid the spread of INNS. Signal crayfish for example can have a widespread impact on smaller tributaries, reducing diversity and increasing sediment load because of burrowing.	Comment noted. The narrative of priority FH 5 has been amended to mention the need to consider INNS when planning works.
FH048		FH 5.3 - "Ensure that management measures encourage the development of transitional areas between habitat patches". Please consider the likelihood of increasing dispersal by invasive species.	Comment noted.
FH049		Streams, ponds and wetlands - It would be useful if the report considered more the importance of restoring habitats around river systems. We do not feel that river restoration is appropriately addressed or represented in Key Priority Areas	Comment noted.
FH050	UK Squirrel Accord	Riverine systems offer key routes for the movement of invasive species, including grey squirrels. These can be key targets for management activities.	Noted
FH051	Individual 1 (line 3)	This is very important water is going to be a major area of responsibility in years to come	Noted
FH052	Individual 3 (line 6)	Wetlands should be managed for sake of animals some rivers are polluted with waste keep animals healthy and away from humans	Noted
FH053		Rivers and fish are a source of food for birds and animals	Noted
FH054		Do not pollute rivers	Noted
FH055	Individual 11 (line 23)	<ol style="list-style-type: none"> 1. The monitoring and restoration of fish passage for keystone species such as salmon. 2. Reducing pollution of water quality before it enters the waterway system. 3. Monitor and stop agricultural runoff of pesticides. 4. Monitor, improve and control storm overflow and sewage treatment standards. 5. Monitor microplastics and contaminants in waterways. WATER QUALITY IS A LANDSCAPE ISSUE not a river issue. 6. Create and maintain healthy riverbanks as biodiversity highways. 7. Monitor and control invasive species such as Himalayan balsam. 	Comments noted.

		8. Identify, support and reintroduce keystone species through community education and engagement. 9. Restore floodplains to absorb extreme rainfall.	
FH056	Individual 12 (line 24)	'Associated Species' section focuses on species already present. Examples of species that we would like to see return should be included. No mention of keystone species which are also imperative to improving the condition and quality of rivers, such as beavers.	Comment noted.
FH057		A mention of increasing biodiversity within these habitats.	Comment noted.
FH058	Individual 19 (line 15)	The impact of heavy grazing and lack of riparian fencing is not mentioned. I live on the Bowmont water and unrestricted cattle access to the watercourse along most of its length is having significant negative impacts to riparian vegetation, bank stability, water nutrient level, success to gravel shoal bird nesting species etc . Riparian fencing and planting should be undertaken more widely with water for stock being provided by gravity feed or stock operated pumps (these have been successfully used in many places.	Riparian fencing and livestock is covered by priority FH 2 but we have amended the wording to make this clear.
FH059		Summer water quality is poor, with river eutrophication obvious with the presence of widespread filamentous algal mats, turbid water and anoxic pools. this is due to stock access, but more so agricultural run off and pollution from larger farms where the dtiches run into the main channel. This is clearly seen in tew parallel ditches close to me. One connected to the farm is dead, the other (draining a more remote field with a 20m margin is full of ranunculus, bogbean, mimulus, with darting trout. agricultural runoff (diffuse and point source pollution is mentioned, but not strongly enough in my view).	Comment noted.
FH060		Similarly the impact of catchment management, such as afforestation, is not mentioned. Again our little beck ran all year until forestry worked in the catchment - now we have seasonal beck for 9months a year with associated biodiversity loss.	The text has been amended to refer to other land use impacts on water quality not just agriculture.
FH061		Another habitat that has local disappeared is seasonal ponds in fields. 3 were present some 30years ago, but all have now disappeared as a result of drainage works. These were valuable for amphibia, invertebtates and birds in particular. Lidar surveys could easily identify local areas for seasonal pond restoration.	Comment noted.
FH062		with regard to current activities, I applaud the work of the TWEED Forum, BUT i have attempted to raised the issue of 'few-flowered leek' on a number of occasions, but with no success. this species is rife in the borders and i believe it poses a larger threat that many other species. It looks superficially like wild garlic but emerges earlier, it is extremely effective a killing other species through allelopathy, spreads relentlessly and can dominate riverbank and riparian understory completely. I have seen it destroy native bluebell and snowdrop woods in a few years.	Comment noted.

		Tackling this species (which incidentally is rife in the riparian woods next to the Tweed Forum office) needs to be a target species for eradication urgently.	
FH063	Individual 24 (line 43)	The chapter correctly identifies rivers and wetlands as connective systems, but it does not fully follow through on the implications of that framing. In Rothbury and Coquetdale, river condition is inseparable from upland management, valley-floor land use, and historic modification. Treating rivers as discrete corridors rather than expressions of whole-catchment processes risks repeating past failures.	Comment noted.
FH064		There is a tendency to emphasise visible, reach-scale interventions while underplaying upstream drivers. Measures such as fencing, bank re-profiling, and in-channel habitat creation may have local benefits, but will not compensate for altered flow regimes, sediment supply, or nutrient loading generated elsewhere in the catchment. The LNRS should be clearer that many downstream symptoms are consequences, not causes.	Comment noted.
FH065		Hydrological alteration is insufficiently confronted. Drainage, grip networks, floodplain disconnection, and land compaction have collectively changed flow timing and intensity. Without addressing these issues, ambitions around water quality, invertebrates, fish, and wetlands are likely to be constrained or frustrated.	Comment noted.
FH066		The chapter would benefit from greater realism about trade-offs on valley floors. Floodplain reconnection, wetland creation, and riparian buffers frequently conflict with productive agriculture and existing infrastructure. These tensions need to be acknowledged explicitly rather than implied away, if trust with land managers is to be maintained.	Comment noted.
FH067		Targets and priorities risk being area- or length-led, rather than condition-led. Ecological function - flow variability, sediment dynamics, thermal regime, and connectivity - matters more than the number of metres treated. The strategy should state clearly that poorly designed or isolated interventions can create the appearance of progress without delivering durable improvement.	Comment noted.
FH068		The role of beavers, natural flood management, and rewilding-adjacent approaches is touched on cautiously but not resolved. For Coquetdale, these approaches raise legitimate questions about control, liability, and cumulative impact. The LNRS should avoid ambiguity by stating how experimentation will be governed, monitored, and adapted if outcomes are undesirable. Monitoring is framed largely around compliance and reporting rather than learning.	Comment noted.
FH069		Given the complexity and variability of river systems, adaptive management should be central, with explicit acceptance that some interventions will underperform. A strategy that does not allow for course correction is unlikely to retain credibility over time.	Comment noted.

FH070		The chapter underplays the value of existing local initiatives and practitioner knowledge. River trusts, land managers, anglers, and local groups often hold detailed, longitudinal understanding of system behaviour. Treating this as supplementary rather than foundational knowledge would be a missed opportunity.	Comment noted.
FH071		Finally, the LNRS should be more explicit about prioritisation and sequencing. Not all river reaches can or should be “fixed” simultaneously. For Rothbury and Coquetdale, protecting relatively intact headwaters, restoring key floodplain nodes, and reducing upstream pressures will likely deliver far greater benefit than diffuse, small-scale works.	Comment noted.
FH072	Individual 25 (line45)	The measures should address the river catchment sclerosis and look in a systems way at their hydrology.	Comment noted.
FH073	Individual 42 (line 79)	Again observations especially to p43. The importance of looking at intensively managed land that may be adjacent to meadowland in private residencies, nature reserves and conservation areas. (nature knows no boundaries). Local strategies that are inclusive. Need agreed accountability for land management that impacts on areas marked for nature recovery. Example - From the local community perspective, the following are the result of intensive monocultural use of lands above our village of Whittingham - an area once notable for divers meadowland for grazing, now a monoculture of crop and intensive sheep grazing. A notable decrease in biodiversity, hedges removed and cut annually, pollutant run off into gardens and the river Aln, overall degradation in regional character, land 'flattening', loss of natural irrigation, loss of natural boundaries. No warning from the contract run management of harvest: highway degradation, the breaking of local speed limit, spillage and verge damage from heavy plant.	Comment noted.
FH074	Individual 43 (line 79)	Through Whittingham village, the banks of the Aln have been used as a dump for tree felling and other removed vegetation. I welcome, with the other comprehensive details on river banks, more open dialogue about these small unidentified potentially recoverable natural areas as mini reserves fro everyone's benefit. I guess that estate ownership prevents the LNRS from implicating such a strategy unless it is through support of local parish council. Emphasis here is no natural boundary between one bank are and another.	Comment noted.
FH075	Individual 43 (line 86)	The whole section relating to Priorities FH1-5 pays insufficient regard to the plight of migratory fish in the Tyne, Tweed and Coquet. The reduction in numbers of salmon and migratory trout (denied by Environment Agency) is an ecological disaster which is being largely ignored. The NTNRS is a prime example of this disregard for these species. Whilst the reasons for the decline in migratory fish numbers are complex, the role of	Comment noted.

		predators such as non-native cormorant, goosander, and seals entering the freshwater environment requires proper investigation and action later.	
FH076		Priority TK1 - my own view is that the presence of Kittiwake nests on the Tyne Bridge has reached a point where it is both visually unpleasant and a threat to the integrity of the listed structure, which is currently undergoing refurbishment at huge cost. I support the objective of ensuring that there is a sustainable population of this species within the Tyne Gorge but the time has come to encourage the birds to alternative nest sites in the area.	Comment noted.
FH077	Individual 45 (line 89)	The River Coquet is not referred to as part of the river resource! It is a major SSSI river prioritised for nature recovery by Natural England, not a tributary or small watercourse, so should be listed.	The LNRS has identified the Coquet as a priority river catchment, as can be seen on the measures map. The text will be amended to make sure this is clear.
FH078		Add in that beavers are already present in an enclosed site on the Wansbeck catchment. It is predicted that beavers could naturally recolonise catchments in Northumberland from Scotland in the next 20 years if they are not wild released in Northumberland before then. So we need to be beaver ready both in terms of enhancing the habitat to support them (which benefits other species) and preparing for proactive management to minimise any localised issues arising from beaver activity which will be mostly hugely beneficial to the ecosystem and nature recovery in Northumberland.	Comment noted.
FH079		Importance of reducing negative impacts of: agrochemicals including veterinary products that are highly toxic to aquatic life; negative impacts of forestry operations, particularly on clearfell sites.	Comment noted.
FH080		Examples of wetland restoration and restoring functioning wetlands include Hepple Estate working in partnership with Natural England & EA. Examples of INNS management: land managers in Coquetdale undertaking co-ordinated mink control. Examples of citizen science to monitor water quality eg CRAG.	Comment noted.
FH081		Reintroduction of beaver (wild release) into all catchments in Northumberland, starting with the Coquet. Eradication of mink in all catchments in Northumberland to enable water vole recovery. Resources for this and water vole reintroduction. More resources to tackle INNS including Himalayan Balsam before it gets completely out of control	Comment noted.
FH082		Restoration of natural hydrological processes through blocking artificial drainage channels and field drains. Undertaking 'state zero' restoration in appropriate locations.	Comment noted.
FH083	Tweed Forum	The 'Resource within North Tyne' section of the introduction notes there are five main river systems in the North Tyne area – Tyne, Blyth, Wansbeck, Aln and Tweed and further explores much of the current	We agree that excellent work is being done through the River Till Restoration Strategy. However, as noted by the

	<p>activity, mainly delivered within two of those key catchments. We note that the draft measures mapping only outlines five small catchments (Coquet, Wansbeck, Pont/Upper Blyth, Ouseburn and Lindisfarne) which have been determined as the priority areas and we are disappointed to note that Till/Tweed has been excluded from the priority area mapping and that there is no clear criteria or rationale to support the decision making process. Whilst the mapping itself does not, and should not, be the sole decision making tool, it is likely that future financial decisions can and will be made on the basis of this mapping and as such, we are concerned about the potential future implications for support of works in the River Till catchment. The River Till, and its main tributaries the Bowmont-Glen, Breamish and Wooler Water are of high conservation and ecological importance. About 130 km of these rivers is designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC) due to the presence of otter, Atlantic salmon, three species of lamprey (sea, river and brook), as well as the characteristic river morphology which supports floating vegetation often dominated by water-crowfoot. However, the 'condition' of these designated rivers is not as it should be. Using national criteria, the SSSI is classed as being in 'unfavourable condition'; in some areas the condition is 'declining'. The principal reason for the SSSI being in unfavourable condition is the physical state of the river channel with many of the key tributaries e.g Wooler Water, being classified as a heavily modified water body. As noted within the 'Current Activity to Conserve and Enhance these Habitats' section of the draft MNRS strategy, Tweed Forum are the key delivery agency in the three way partnership between Environment Agency, Natural England and Tweed Forum, who have developed the River Till Restoration Strategy. The RTRS is a long term plan designed to restore the river and its adjacent habitats with the ultimate goal of moving the SSSI to a favourable condition status.</p> <p>Since 2013, Tweed Forum and RTRS partners have surveyed, prioritised, developed and delivered a large number of projects designed to deliver on the measures agreed within the strategy. These projects range from barrier removal, floodbank removal, floodplain reconnection, introduction of large woody timber, control and management of INNS and, working closely with Great Northumberland Forest and other partners, creating new riparian woodland. These works clearly align with the proposed priorities and measures outlined within the LNRS strategy, primarily FH1, FH2, FH4 and FH5 and inclusion of the River Till as a priority area, will lead to greater and more efficient delivery of these measures in the North of Tyne area. Through the RTRS partnership, significant survey and research has been undertaken at a catchment scale to identify, prioritise</p>	<p>Tweed Forum '<i>the RTRS is a long term plan designed to restore the river and its adjacent habitats with the ultimate goal of moving the SSSI to a favourable condition status.</i>' The guidance produced by DEFRA concerning LNRS mapping specifically requires Responsible Authorities not to map measures designed to improve the condition of designated sites, as that process should be occurring through separate mechanisms.</p> <p>Regarding funding – where funding bodies want to assess whether a proposal will deliver LNRS priorities and measures, they should be looking at the text of the LNRS not just the map, because many important measures are not mappable or haven't been mapped because of the prioritisation process we have been required to go through for the mapping.</p>
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		and develop future projects and develop a network of supportive landowners and work to align these with government agricultural policy and support mechanisms. Furthermore, the RTRS partnership has a well-developed advisory panel, technical support and delivery mechanisms which mean projects can be delivered efficiently and effectively. However, the ongoing success of this work relies heavily on the prioritisation and funding of this work by a range of partners and we see this formal prioritisation of this catchment wide restoration programme within the LNRS as critical to the ongoing success RTRS partnership.	
FH084		When discussing importance of rivers and wetlands and future resilience, allied to climate change, we need to consider the impacts of agricultural demand on water resource. In arable areas such as the Till, water abstraction for irrigation is a large factor that needs consideration. and considering what the impacts are on freshwater habitats and how demand can be managed.	The text has been amended to reflect this.
FH085	Tyne Rivers Trust	There is no mention of the creation of riparian zones alongside river systems, this will be essential in key locations to protect the aquatic habitat and freshwater species	This is dealt with in priorities FH 1, FH 2 and FH4.
FH086	BASC	The shooting industry can contribute to the implementation of FH 3.1 (wetland creation) and FH 4.1 (control of invasive species) especially concerning mink	That is very welcome

WOODLANDS, TREES, AND SCRUB

Number	Respondent	Comments	Proposed Response
WTS001	Forestry England	Consideration needs to be given throughout the strategy in relation to how woodland is described. 'Forestry' has been used as a habitat description instead of using 'non-native tree species' or 'conifer species.'	Noted, we are changing this where it is helpful to refer to the habitat. However, sometimes it is useful to refer to forestry as a land use. In two of the peatland measures, the word "forestry" was replaced with "woodland". We have also edited text on the StoryMap.
WTS002		WTS2 New Native Woodland on PAWS Forestry England has a successful and publicly accessible approach to restoring PAWS on our landholdings. It is important to note that restoration can take time, and it is not always beneficial to implement immediate change. Restoration is undertaken at each harvesting cycle, which over time will shift the woodland to an increased level of semi-naturalness. This means that in	"Restoration" added to the glossary text with reference to long timescales. Text amended under WTS 2.

		<p>some locations there is the potential that conifer species may be replanted, but that there will be a great mix of species and a greater proportion of native species at each intervention. This means that there is not an immediate habitat loss or land use change, but instead a continuation of mixed woodland, but with larger semi-natural component. This allows the maintenance of some timber production – and therefore income, albeit decreasing – to help pay for the on-going management of the woodland and also allows time for associated species to adapt. Forestry England are required to regularly provide revisions to forest plans as the harvesting cycle progresses, allows opportunities for restoration opportunities to be implemented as appropriate. These will be available for public comment once they are available.</p>	<p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p>
WTS003		<p>The importance of conifer crops for red squirrel is recognised in Box 2 and detailed in Chapter 10, however as mixed and conifer woodlands are not included in this chapter their significance in supporting this species has been minimised.</p>	<p>We are limited in the “stage 1” mapping by the regulations and the guidance as to what we can show, which is (in summary), designated sites and irreplaceable habitats. Mixed woodland and coniferous plantations are dealt with in the wider countryside chapter. Text added about the benefits for red squirrel.</p>
WTS004	Northumberland National Park Authority	<p>We welcome the inclusion of this section and the opportunities to expand the woodland network since native woodland in the National Park is below national averages. Encouraging landowners to find places to plant while protecting other important habitats will be assisted by the LNRS mapping.</p>	<p>Noted</p>
WTS005		<p>We think perhaps there should be a mention of community orchards - this may be best in the urban trees?</p>	<p>Text added</p>
WTS006	National Trails UK	<p>When mentioning “provision of a path network that directs access away from sensitive areas” on pg. 73, National Trails UK requests the mention of the National Trails which can deliver dual benefits of a well-managed path that can sustain increased use and nature corridors bringing wildlife to trail users.</p>	<p>See response to STA002</p>
WTS007	Northumberland Badger Group	<p>Badgers, bring a protected species and are frequently found in these habitats, we would have concerns for future land management and arboricultural management. We are concerned that badgers are missing from the list of mammals that are affected by the priorities and measures cited.</p>	<p>Comment noted.</p>
WTS008	Wylam Parish Council	<p>It has been recognised that ancient and veteran trees need better protection but current tree protections (particularly TPOs, are not fit for this purpose. A Tree Preservation Order cannot be made for reasons of nature conservation value and an order cannot be made if the tree is in</p>	<p>Tree Preservation Orders tend to relate to trees, groups of trees, or woodlands for their public amenity value, not always (but often) their nature value.</p>

		"poor" health. Show me an old or ancient tree (or human) that is in perfect health!!! This needs addressing. Old trees are able to accommodate their infirmities better than young ones as we are seeing with ash dieback.	Noted, that TPOs are not fit for recognising ancient and veteran trees. Ancient and veteran trees are recognised in the LNRS and the National Planning Policy Framework as an irreplaceable habitat.
WTS009		Grey squirrel control is a major difficulty for community volunteers and would welcome better methods being available and affordable.	Text amended under WTS 2.3
WTS010		A major challenge in developing scrub and new woodland is the speed of colonisation by invasives: sycamore and Norway maple in particular, cotoneaster and other garden escapes.	Noted
WTS011		There should be more detail on fungi, mosses, liverworts, ferns, lichens - all essential parts of the woodland.	Text added
WTS012	Corsenside Parish Council	Most current forest cover consists of forestry plantations, which is known for its lack of biodiversity. Priorities could include how to improve the biodiversity within these areas. The UK is one of the least forested countries in Europe with approximately 13% tree cover. The EU average is approximately 38% tree cover. We would like to see efforts to increase forest cover within the North of Tyne area from 18%.	The "Great Northumberland Forest" and the "North East Community Forest" are two initiatives focused on just this – to increase tree cover in these areas – all in mind of "right tree, right place". Tree cover as a metric is different to woodland / forest cover (there is a minimum size and canopy cover for an area to count as woodland / forest)
WTS013		We would like to see the strategy to be bold and ambitious in improving biodiversity in forested areas. Fauna are integral to achieving full ecosystem recovery (Cross et al. 2020). We would like the strategy to be bold in restoring fully functioning ecosystems.	Noted – although working with nature is a much longer timescale than this LNRS can allow, especially in a tree / woodland habitat
WTS014	Haydon Bridge Nature Club	The priorities could include how to improve the biodiversity within these areas.	Noted
WTS015	Committee	We would like to see the strategy acknowledge other initiatives that are active in Northumberland that would benefit woodland habitat e.g., the missing lynx project.	Re lynx: see response to WTS039
WTS016	Pennine National Trails Partnership	When mentioning "provision of a path network that directs access away from sensitive areas" on pg. 73, the Pennine National Trails Partnership requests the mention of the National Trails which can deliver dual benefits of a well managed path that can sustain increased use and nature corridors bringing wildlife to trail users.	See response to STA002
WTS017	Red Squirrels Northern England	In measure WTS1.4 grey squirrel is listed as INNS management however in Box 2: Red Squirrels WTS 1.2 is listed as INNS management , is this a typo?	In box 2, the cross reference to the measure WTS 1.4 was updated, instead of referring to WTS 1.2

WTS018		Increasing woodland connectivity is vital for red squirrel conservation.	Text added to "Woodland and Forestry" paragraph of "Wider Countryside" chapter
WTS019	The Preston Tower Estate	Management of existing woodlands is vital, possibly more important than planting new woodlands - especially if it is done on productive farmland.	Text added to "Woodland and Forestry" paragraph of "Wider Countryside" chapter
WTS020	The Woodland Trust	<p>The definition of ancient and veteran trees included within the LNRS is not consistent with the Woodland Trust's or the Ancient Tree Forum's definition of ancient and veteran trees. The Woodland Trust considers a tree to be defined as ancient if it is:</p> <ul style="list-style-type: none"> • In the third or final stage of its life, which can go on for decades or even centuries; • Old relative to other trees of the same species; • Interesting biologically, aesthetically or culturally because of its great age. <p>Veteran trees are survivors that have developed some of the features found on ancient trees. However, veteran trees are usually only in their second or mature stage of life.</p>	<p>The text had been taken from the Woodland Trust website / Keepers of Time document.</p> <p>Text has been changed, including the glossary.</p>
WTS021		The Woodland Trust would also like to see long-established woodland referenced in the LNRS. In particular, we would like to see this definition included: "Long-established woodland is woodland that has been continuously present since at least 1893, as evidenced by historic mapping, but which does not meet the earlier cut-off date of 1600 to be classed as ancient woodland. Long-established woodland is ecologically important, however, because it has existed long enough to develop complex woodland structure, mature soils, and stable ecological conditions that support high levels of biodiversity, including species and habitat features often associated with much older woodlands, as well as providing valuable ecosystem services."	Text added
WTS022		In priority WTS 1, we would like to see this wording added on to the end: "Long-established woodland, whilst not ancient, should also be safeguarded through good management, reflecting their ecological importance."	Text added
WTS023		In priority WTS 3, we would recommend the following wording is added: "However, in some situations e.g. where the likelihood of natural colonisation establishing a resilient woodland edge is relatively low due to factors such as low or an inappropriate species-mix in the existing woodland, then actively planting an appropriate mix of native species within the buffer areas would be favoured to ensure the long-term protection and enhancement of ancient and long-established woodland." We would also like to see reference to the Woodland Trust's Woodland Creation Guide	<p>Text added</p> <p>Link to guide added.</p>

WTS024		In measure WTS 1.1, we would suggest the addition of the phrasing 'large diameter fallen' when referencing deadwood	Text added
WTS025		in measure WTS 2.1 we would note that the link to the Woodland Trust publication is outdated	Link updated
WTS026		In measure 2.2, we would recommend including a reference to the Woodland Condition Assessment criteria.	Reference added to the WTS 2 text
WTS027		In measure WTS 2.4, we would again suggest including reference to large diameter fallen deadwood and note that this is in accordance with Woodland Trust, as well as FC, best practice guidance.	Text amended
WTS028		In measure WTS 3.2, we would like to see reference to PAWS and long-established woodland alongside ancient semi-natural woodland.	This measure is about the best location for new native tree establishment, rather than restoration of PAWS and LEW.
WTS029		We would recommend that the wording 'Create native, locally species-appropriate woodland' is included on the proposal to create woodland on valley slopes. We would also like to add the more native, locally appropriate wording to the point around managing existing woodlands.	Text amended for WTS 4.1 and WTS 4.2
WTS030	Tweed Forum	Whilst riparian woodland is not considered a formal woodland type in its own right, given the habitat and species benefits gained directly from woodland creation itself, allied with the additional linkages to freshwater habitats and impacts on erosion control, flood management, temperature control as well creating habitat for ecosystem engineers (beaver), should there be direct targets and measures relating to riparian woodland - particularly as part of catchment and landscape scale projects ?	Addressed in the Freshwater habitats chapter – see FH 4.2
WTS031	Tyne Rivers Trust	WTS41. Using the word Ghyll might deter the creation of riparian zones on main river channels. Establishing riparian zones on the main river is essential to safeguard vulnerable species on the River Rede and North Tyne.	We have prioritised ghyll woodlands in this first LNRS and measure WTS 4.2 is for sites outside of ghylls (in the uplands). We think you mean riparian woodland opportunities in a lowland setting. We have had to prioritise upland areas. The reason for this is explained in Priority WTS4.
WTS032	UK Squirrel Accord	It is very positive to see grey squirrels highlighted as a key invasive species that must be collaboratively tackled at the landscape-scale to protect the future of native red squirrels and the health of young trees and woodland ecosystems. Royal Forestry Society members consider grey squirrels to be the greatest threat to UK trees and woods - beyond that of deer and diseases. Woodland creation efforts will not result in healthy mature trees that offer the ecosystem services we need without effective grey squirrel management across the county.	Noted

WTS033		Northumberland has a number of red squirrel conservation groups that actively manage grey squirrels and would benefit from increased support and engagement. Northern Red Squirrels Northumberland is the umbrella for groups in the county and a good route through which to engage them. Building on and expanding current structures could better deliver the aims of the LNRS and boost the work of those already dedicated to protecting red squirrels.	Noted, text added to box 2
WTS034	Upper Coquetdale Red Squirrel Group	The conservation of red squirrels is left entirely in the hands of community volunteer groups and the LNRS in this area has actively avoided any engagement with any of these groups, in contrast to neighbouring areas. Without engagement and consultation, misinformation has crept in that should have been avoided. As it stands, the draft report is incorrect as outlined below.	Noted
WTS035		The very poor response relating to red squirrels, which ignores the plight this species is suffering and also ignores and avoids the conservation work being done by community groups. This is a stark failure of this process and throws the entire scheme into disrepute.	See response to WTS009
WTS036		<p>In relation to red squirrels, the only relevant mention is on page 78: <i>“Effective action to conserve Red Squirrel requires coordinated action both locally and regionally. Coordination of activity across the north of England is provided by Red Squirrels Northern England (RSNE), a partnership operating across Cumbria, Northumberland, Tyne & Wear, County Durham, North Yorkshire, Lancashire & Merseyside. In 2023, the UK Squirrel Accord published the England Red Squirrel Action Plan (2023-2028) which provides a framework of strategic actions to guide the recovery of Red Squirrel nationally. RSNE and the England Action Plan together provide a full picture of priorities for Red Squirrel recovery.”</i></p> <p>RSNE does not coordinate anything. It is not a partnership, it is owned by the NWT. It employs 2 administrators and manages several field workers who are funded by agri environmental and stewardship grants. It has virtually no effect on the red squirrel population of Northumberland and is responsible for a tiny amount of land on which it carries out very little conservation work, despite claims to the contrary. The UKSA England Red Squirrel Action Plan (2023) has not been implemented. The four actions that are identified in the plan are:</p> <ol style="list-style-type: none"> 1. Protect, identify and strengthen red squirrel populations across the current range. 2. Expand the current range of red squirrels. 3. Support and improve collaborative action at all levels. 4. Promote better understanding and support for red squirrel conservation across England. 	Text amended to acknowledge the work of independent community red squirrel groups

		Halfway through the five-year lifespan, not one of these actions has been addressed. There are no plans for doing so and the ERSAP may safely be disregarded. The community volunteer groups are responsible for the continued existence of red squirrels in Northumberland. They carry out all the physical conservation work and are responsible for over 95% of the grey squirrel management efforts. They are not mentioned or acknowledged in the LNRS report. This is a serious omission, and the report fails to consider the monumental effort made by the volunteers. How or why this has happened is unknown and unexplained and should not have been allowed to reach the publication stage with this serious omission in place.	
WTS037		There are many actions that could be taken. Species control orders could be imposed on local councils and landowners who fail to take measures to control grey squirrels. A greater emphasis on education and outreach work from organisations such as the NHSN and council run environmental groups alongside support for the volunteers who work tirelessly to conserve the species. Less emphasis on introductions and more emphasis on conserving what we already have would be a good starting point. These issues would have been highlighted if engagement had taken place, but for reasons unknown the attempts to be included were all rebuffed, resulting in a flawed report. Please reference adjacent areas to see examples of good practice.	Comments noted.
WTS038	Individual 1 (line 3)	I would like to see Red Squirrels protected.	Noted
WTS039		I would also like to see the re-introduction of the Lynx	Species that aren't part of the <u>"Reintroductions and other conservations: code and guidance for England"</u> are out of scope of the LNRS
WTS040	Individual 3 (line 6)	Plant more native trees and shrubs instead of removing them, especially in the countryside, scrub land maybe a home for animals. Too many trees being cut down all over world creating desert.	Noted
WTS041		Introduced Grey Squirrels are taking over from British Red Squirrels, introduce more red Squirrels	Noted
WTS042	Individual 6 (line 17)	I think you misquote GWCT guidance on release pens - the guidance does NOT include "avoiding putting release pens on or near sensitive sites such as ancient woodland". What it does say is that in sensitive woods, for example ancient semi-natural woods, the maximum release should be 700 birds per hectare of pen.	Text clarified, noting that the guidance also says 'Avoid placing release pens directly onto or close to particularly sensitive locations eg patches of woodland that have a notable ground flora, insect fauna or reptile populations.
WTS043	Individual 11 (line 23)	<ol style="list-style-type: none"> 1. Management of grazing. 2. Restoration of hedgerows as ecological corridors. 3. Monitor and mitigate against monoculture and single-species blocks. 	Noted

		4. Monitor and mitigate against pests and diseases.	
WTS044	Individual 12 (line 24)	Increase the overall forest cover within the area to > 18 %.	The current tree cover is over 18%
WTS045		To aim for a fully functioning ecosystem that includes species from each trophic cascade level including a top carnivores such as lynx. Would like to see the strategy acknowledge other initiatives that are active in Northumberland and would benefit woodland habitat e.g., the missing lynx project.	Re lynx: see response to WTS039
WTS046	Individual 16 (line 30)	Need to expand the 'ancient and veteran trees' to include trees of important social, cultural and environmental value	See response to WTS020
WTS047		Need to include the social and cultural value, particularly of important trees outside of woodland - see the public response to Sycamore gap	Disagree. A nature recovery strategy's focus has to be on actions for nature. We consider wider environmental benefits. The social and cultural value are wider still.
WTS048		Need to include microbiomes - beyond just fungi within the soils, particularly ancient woodland soils	Text added
WTS049	Individual 19 (line 35)	You refer to North of T area being 18% wooded. When talking about local nature recovery this is extremely disingenuous as over 95% of this 18% in non native plantation forestry which is the antithesis of nature recovery in almost all instances and ecosystem services.	Text added. The 18% is true even if we use a dataset such as LIDAR Vegetation Object Model (VOM) - data.gov.uk which shows just trees. When you subtract the open spaces in the forestry blocks but add in all the Trees outside Woodland in the wider landscape, the result is still the same.
WTS050	Individual 24 (line 43)	The chapter correctly recognises the importance of woodlands, trees, and scrub for biodiversity, climate resilience, and landscape function. However, it risks presenting tree planting and scrub expansion as inherently positive, without sufficient attention to local ecological context. In Rothbury and Coquetdale, the value of trees and scrub is highly location- and scale-dependent, and inappropriate expansion can damage existing priority habitats.	We have referred to “right tree, right place” principles at the start of this chapter and also in the “Principles for nature recovery” near the start of the LNRS
WTS051		Species-rich grasslands, breeding wader areas, and open moorland systems are themselves internationally important and can be degraded by poorly sited woodland or scrub. The strategy should state clearly that tree cover is not a universal good, and that nature recovery depends on maintaining functional habitat mosaics, not maximising woodland extent.	Text added to the section “Interactions with other habitats”
WTS052		The chapter underplays the importance of active management, particularly in relation to scrub. Unmanaged scrub often leads to habitat homogenisation, shading, and the loss of open-habitat species, rather than biodiversity gain. In this landscape, scrub expansion has historically been a major driver of grassland and heathland degradation. Trees and	See response to WTS051

		scrub require ongoing management to deliver ecological benefits; abandonment should not be equated with recovery.	
WTS053		The ecological value of woodland depends on structure, age diversity, edge quality, and integration with adjacent habitats, not simply on area.	Text added to “Overview of the North of Tyne” section
WTS054		Long-term woodland creation commitments can be incompatible with short tenancies, policy uncertainty, and limited capital. Delivery constraints faced by land managers, especially tenant farmers and smaller upland holdings, are insufficiently addressed.	Agreed
WTS055		Agroforestry and hedgerow expansion are presented as flexible options, but still require clarity on eligibility, permanence requirements, and scheme compatibility. Without this clarity, the strategy risks promoting measures that are theoretically attractive but practically undeliverable.	Agreed. The support and the funding of agroforestry is currently a relatively fast-emerging area. The LNRS is not able to influence government policy, but we recognise these points. Agroforestry added to the “interactions with other habitats” section and to the “wider countryside” chapter.
WTS056		Woodland and tree-based measures will only be adopted at scale if they are financially viable, proportionate, and supported by trusted local advice, not prescriptive targets.	Agreed.
WTS057		Productive forestry and commercially managed woodlands are under-represented as contributors to nature recovery. Well-designed commercial forestry can deliver biodiversity, carbon, and landscape benefits without reliance on grant aid. Forestry operates on timescales that align with ecological recovery, yet this expertise is not fully reflected in the chapter.	Text about long timescales added.
WTS058		Tensions between woodland expansion and open-habitat conservation are real and risk undermining consensus if ignored. The LNRS should explicitly acknowledge these trade-offs and position itself as a decision-making framework, not an advocacy document for any single land use. A more honest treatment of complexity would strengthen trust and improve the likelihood of durable nature recovery outcomes in Rothbury and Coquetdale.	The LNRS is explicit about the need for the right tree in the right place
WTS059	Individual 25 (line 45)	Veteran trees are almost entirely without protection. We have lost a number in the Aln valley-Whittingham vale . This is totally absurd and should be addressed.	Noted – but formal protection requires action from Government
WTS060		The dynamics of change - loss and substitution are inadequately dealt with. Given the scale and urgency of the need to increase woodland cover the measures are entirely inadequate. The failure to mention agroforestry is a clear weakness.	Agroforestry added to the “interactions with other habitats” section and to the “wider countryside” chapter.

WTS061		<p>The approach to red squirrel protection and recovery is entirely inadequate. The most recent data shown a continued decline even in the Action Area. No sense of urgency comes through in this topic as in all other topics. The starting point -- ie where we are now will continue to go backwards rapidly unless action is taken urgently and at scale. 'Steady as she goes' is not an acceptable approach. People want to see progress.</p>	<p>Government have just updated the grey squirrel action plan. Actions include: encouraging landowners to take greater action through financial incentives and advice; backing conservation volunteers and landowners, by leading communication on the impacts of grey squirrel and providing support for training in grey squirrel management; and supporting research into novel forms of population management. Part of the work will include promoting the management of grey squirrel impacts such as LNRs and management plans for Protected Landscapes and National Parks.</p>
WTS062	Individual 35 (line 62)	<p>Afforestation is receiving growing criticism related to its impact on Biodiversity. My own observation as a Community Councillor in Seaton Valley would back this up. Your document references the NECF and GNF. I've been asked to highlight areas within my ward where trees could be planted. No consideration of the local ecology or other impacts were considered. Similar experience at a local school where we've written a Biodiversity Plan and the school received trees through the schemes. Once again there was no consideration of how the tree planting might affect local biodiversity. Also there are known issues from using imported stock or whips of unknown provenance that could potentially spread pathogens.</p> <p>I am a Biodiversity Manager for a large global corporation and have considerable experience planting woodland and forest as part of large landscape rehabilitation projects and can testify to the long term problems that arise from ill considered tree planting. Based on my experience the North Tyne area would be better to consider a long term (centuries) project that identifies areas of interconnected woodland and work on plans to allow the natural process of succession to take hold. This will almost definitely improve the ecosystem function of the climax plant community and support a much more diverse range of species. If you visit areas within the North Tyne area set aside for nature recovery you can see real examples of this in practice - East Cramlington Nature Reserve and Biodiversity Park (Silverlink) highlight examples of poor tree planting. Given that the UK is one of the most nature depleted countries in the world improving the quality of woodland ecosystems within the region</p>	<p>The Great Northumberland Forest and the North East Community Forest carry out ecological (and heritage and highways checks) with a variety of specialists before progressing with a project. Councillors may have been asked for their ideas for a location as a starting point for those checks. Only suitable sites following these checks would either be given grants to organise tree planting, or tree donations. A condition on these grants (or donated trees) is that they come from Plant Health Registered nurseries. In the case of GNF, projects are presented to a panel for consideration once through the first stage of ecological, heritage, highways (etc) checks. This panel includes an ecologist from Natural England and colleagues from Woodland Trust and Forestry Commission, so there is a full spectrum of experts in selecting and establishing trees woven into all GNF schemes. Direct feedback re the tree</p>

		<p>should be a top priority. A functioning ecosystem requires a food web that includes predators. The Missing Lynx Project and the recent spread of pine martens from Scotland into Northumberland are two examples of species reintroductions that would help start this process. I appreciate there are many who would disagree but this type of species reintroduction should be a consideration in the LNRS if nature recovery is your ultimate ambition.</p>	<p>planting sites you highlight as best practice would be welcome to those organisations.</p> <p>Additional text about “right tree right place” added to the LNRS.</p> <p>Re lynx: see response to WTS039</p>
WTS063	Individual 44 (line 87)	<p>I was pleased to read (on page 71) that deer numbers have increased due to the absence of lynx and wolf, but I was disappointed that there was no reference to the reintroduction of lynx or wolf in the measures under priority WTS 1.3 on page 75</p>	<p>Re lynx: see response to WTS039</p>
WTS064	Individual 45 (line 89)	<p>Definition of native woodland should include Scot's Pine (of the correct provenance and genetics) in the native species list. It is important for people in Northumberland to recognise this species is a key part of some of our woodland communities & landscapes and we should be aiming to restore the Northumbrian version of the Caledonian Forest with a heathland understorey. This would help the recovery of many of our priority species including black grouse.</p> <p>It would be helpful to refer to pasture-woodland and heath-woodland as priority habitats.</p>	<p>Scot's Pine added to the Definitions section</p> <p>We refer to wooded heath in the Heathland chapter. Cross reference added to the text.</p>
WTS065		<p>Mention regenerative forestry/woodland management and low impact silvicultural systems (sometimes known as ‘continuous cover forestry’) and the benefits for climate, nature and people which can be achieved by taking a whole system approach including increase species and structural diversity, improving resilience and provision of ecosystem services.</p> <p>Interactions with other habitats</p>	<p>Thank you - text amended in woodland section of wider countryside chapter to reflect these comments</p>
WTS066		<p>It is vitally important that dynamic mosaics of scrub, trees and native woodland are allowed to develop on a wide range of habitats, including those designated for what are often considered to be 'open' habitats eg dry heath to provide greater species and structural diversity to support nature recovery. The narrative around scrub (one of our rarest and hugely important habitats) is rather negative in the draft LNRS. Opportunity maps should not limit expansion of more scrubby and wooded habitats to narrow riparian zones, ghylls and cloughs, but indicate that there is scope for expansion (preferably mostly by natural colonisation, kick started where necessary by planting) over wider areas, including designated sites, provided management interventions are undertaken as necessary to retain the full mosaic of habitats. The importance of natural colonisation to create these habitats should be emphasised along with the importance of deer management. The potential role of large</p>	<p>Agreed. We feel the text does already reflect the points of a) preference for natural colonisation, b) positivity of scrub (albeit right tree, right place; and importance of management).</p> <p>Re species: see response to WTS039</p>

		herbivores and pigs / wild boar in establishing and managing scrub and woodland mosaics to maximise their value for nature recovery should be highlighted in the LNRS. A greater emphasis on returning willows, aspen and juniper to our landscape is needed.	
WTS067		Examples of current activity could also include Hepple Estate and College Valley Estate. The Williams Cleugh pine work could be referred to in relation to native Scot's Pine.	William's Cleugh pine and College Valley Estate added to the text in the "current activity" section. And Scot's Pine added to the "Definitions" section
WTS068		Technologies such as drones offer opportunities for establishing woodlands in remote areas. Hepple Estate are working in partnership with the Woodland Trust to trial this approach.	Noted, we are following the experimental seeding project
WTS069		Restore populations of missing keystone species including wood ants, beaver, boar, bison, elk & lynx to enable woodland ecosystems to function.	See response to WTS039
WTS070		Orchards & nutteries - both domestic and wild native fruit & nut trees are missing and should be included as they are extremely valuable habitat. Whilst Northumberland does not have the acreage of some counties, orchards and nutteries are present and many, particularly the older ones support priority species. Conserving existing orchards & nutteries and creating more in the right places should be included in the priorities and measures.	This wasn't selected as a priority for his first iteration by the woodland working group but may be something we can pick up in due course
WTS071		Opportunity mapping should be more ambitious for these habitats, it is still too tentative.	We had to prioritise for this, first LNRS
WTS072		Creation and expansion of scrub should not be limited to the unenclosed uplands as it has value in enclosed land and in the lowlands.	It is upland ghylls we have prioritised, scrub measures are not limited to the uplands, alongside consideration of "right tree, right place"
WTS073	BASC	The shooting community can contribute to the delivery of WTS 1.3 (deer management), WTS 1.4 (grey squirrel control) and WTS 2.3 (deer and grey squirrel control)	Noted – that is very welcome
WTS074		WTS 1.6 reference to GWCT guidance concerning release pens needs to be corrected	Thank you – text corrected

COASTAL AND MARINE

Number	Respondent	Comments	Proposed Response
CM001	Environment Agency	There is a lack of ambition in undertake the targeted restoration, enhancement, and long-term positive management of estuary habitats to achieve and maintain good ecological condition.	Our main priority for marine and coastal is to reduce the pressures on, and increase the quality and diversity of, our existing habitats thereby promoting passive recovery and increasing climate change resilience. Creation of habitat is addressed in measure CM4 and its associated narrative (page 96).
CM002		We would recommend this section refers to the Shoreline Management Plan and is in accordance with the policy for that unit.	Noted - text has been amended to include reference to the SMP
CM003	National Trails UK	In section 'Examples of current activity to conserve and enhance these habitats', National Trails UK requests the mention of 'Coastal Wildbelt'. National Trails UK are developing a new national initiative called 'Coastal Wildbelt', funded via the Protected Landscapes Partnership. This aims to unlock the potential of the land that stretches around our coastline linking our King Charles III England Coast Path, with the land down to the sea at low tide (coastal margin), and the spaces beyond – amplifying its importance and influence. This area is a living landscape—rich in wildlife, heritage, and opportunity—where people can connect with the coast, and where vital habitats, natural landscapes, and communities can thrive together. The Marine and Coastal Access Act 2009 designated the area which primarily falls between the coastal path and the seaward foreshore - 'coastal margin'. The coastal margin is designated open access land, accessible to the public for the purpose of enjoyment. Taken together, we have a once-in-a-generation opportunity unlock the potential of our National Trail and coastal margin to ensure our coastal environments are cherished, restored, and open for all to enjoy—as a place where people, nature, culture, and community are celebrated and supported. For example, with funding and support from Coastal Wildbelt, National Trails UK's Test & Trial fund is supporting the 'Empower her Wild' project delivered by the Northumberland Coast National Landscape which will support young women's connection with the coast and its habitats.	Noted – for delivery stage
CM004		National Trails UK recognises the impact of recreational disturbance on nature, especially at the coast, however would ask that more positive examples are shared beyond just 'active visitor management', where outcomes for people and nature are delivered. For example, National	Noted – for delivery stage

		Trails UK's Test & Trial fund is supporting the 'Empower her Wild' project delivered by the Northumberland Coast National Landscape which will support young women's connection with the coast and its habitats. Whilst not from your LNRS area, other examples from the wider National Trails include, e.g. the Brancaster board walk and the Species Survival Funded Coastal Grasslands Reconnected project on the Durham Heritage Coast which both allow people and nature to thrive at the coast.	
CM005	Northumberland Inshore Fisheries and Conservation Authority	P 99 - Suggest small changes to this section to incorporate the important Nephrops fishery and reliance of fishing industry on these species: "Migratory fish present in our area include Atlantic Salmon, in addition to commercially important shellfish such as lobster, brown crab and Nephrops. These species can be found within intertidal and subtidal areas and rely on healthy and productive marine waters. The overall aims set out in this Strategy will support their conservation and help sustain local fisheries that rely on these species".	Thank you for your comments – the text has been amended to mention Nephrops
CM006	Wylam Parish Council	More detail on the suggested 20 metres buffer strips to streams and rivers and how to achieve them. Some priorities are huge challenges and I suspect cannot be achieved through the LNRS - unless there are small and do-able measures at a local level.	Noted – for delivery stage
CM007	Corsenside Parish Council	Priorities could include more emphasis on improving biodiversity within the coastal and marine ecosystems.	Our main priority for marine and coastal is to reduce the pressures on, and increase the quality and diversity of, our existing habitats thereby promoting passive recovery and increasing climate change resilience. Creation of habitat is addressed in measure CM4 and its associated narrative (page 96).
CM008		It would be useful to include how local communities could be involved as well as raising awareness of these issues to the wider public.	Text added.
CM009	Haydon Bridge Nature Club Committee	There could be more emphasis on improving biodiversity.	Our main priority for marine and coastal is to reduce the pressures on, and increase the quality and diversity of, our existing habitats thereby promoting passive recovery and increasing climate change resilience. Creation of habitat is addressed in measure CM4 and its associated narrative (page 96).
CM010		Within priorities, it could include local communities and their involvement as well as raising awareness of these issues to the wider public.	Text added about how local people and communities might use the LNRS. Raising awareness is for the delivery stage.

CM011	Port of Tyne	It is considered that the land within the Port's ownership is unlikely to support breeding waders. The mudflats are narrower than those further inland, though are utilised by wintering waders and have the potential likely to be functional to the designated sites in the wider area	Noted
CM012		<p>The Port acknowledges the importance of the coastal and marine habitats and the protection and enhancement of these habitats. It is however considered that this has to be balanced with economic growth priorities for the area. The Port of Tyne is one of the UK's major deep seaports, and consequently is a vital trading gateway between six continents. In recent times, the Port have diversified, and currently operate five core business areas (car exports, conventional and bulk cargo, cruise/ferry, estates and logistics) into the offshore and renewables sector. The role that the Port has within economic growth within the local and wider regional economy is clearly acknowledged within Policy S2.1 of the adopted Local Plan with specific reference to its interests on the North Bank of the River Tyne. More specifically paragraph 5.16 reference the acceleration of development of large sites on the North Bank of the River, driven by the Port. Accordingly, the former 'Esso' is identified as site E050 for employment development.</p> <p>The quayside locations within the Port have been identified as part of the Mayor of the North East Combined Authority's Mission to make the North East the Home of the Green Energy Revolution. This will create 25,000 skilled and well paid jobs. The role the Port will play in developing the Off Shore Wind and Renewables Sectors supported by the creation of a Green Super Port is essential and specifically mentioned in the Mission Statement.</p>	Noted
CM013	St Mary's Island Wildlife Conservation Society	Wintering waders are dependent on subtidal habitats for feeding and resting, we feel they must be included in the Coastal and Marine section of the LNRS.	Comment noted.
CM014		Seals are also marine mammals, dependent on inshore waters, they must be included wherever there is a generic reference to marine mammals. E.g. in sub section page 90 "Disturbance from watercraft and from people is also an issue for marine mammals such as whales and dolphins and can reduce the quality of our inshore waters as a habitat which they can use".	Comment noted. Text amended to include seals within the examples of some of the marine mammals occurring within the area.
CM015		There is also no reference to porpoise which we get in this area.	Comment note. The marine mammals mentions are given as examples. The text is not intended to provide a comprehensive list of all marine mammals occurring in the area.

CM016	The Preston Tower Estate	Managing grasslands close to the coast or reverting tilled land close to the coast to pasture will be very valuable for wintering waders and perhaps breeding waders as well if the pastures are well managed.	Comment noted.
CM017		The streams which enter the Lindisfarne Basin and its multiple protective designations deserve "Target Status" to enhance water-quality and thus protect the protected sites.	Comment noted.
CM018	Tyne Rivers Trust	There are no links in LNRS to maritime law or policy i.e. The MARPOL Convention (International Convention for the Prevention of Pollution from Ships) or the Implementing the Ballast Water Management. For larger ships that take on ballast there is significant policy in place to mitigate against the spreading of invasive species. Merchant shipping regulation i.e. the Merchant Shipping (Anti-Fouling Systems) Regulations 2024 require ships to have an anti-fouling system in place and checks are made on these systems every 5 years. For larger ships taking on ballast, the biggest issue is the creation of ecosystems in the bottom of the ships ballast which isn't flushed when ballast is removed, it is virtually impossible to remove everything from the ballast of a ship. For smaller recreational vessels and ships travelling smaller distances (the ballast water management convention applies for 250 plus miles of transit) which are not the biggest issue is travel to areas where INNS are already present. In these cases, INNS could be transported on the hull (if anti-fouling isn't effective - tributyltin (TBT) have recently been internationally banned because of their danger to all species) or on equipment stored on the ship e.g. sails, mast, lifeboat etc. It would be sensible to look at influencing policy to establish a more regular cleaning process for smaller ships, as opposed to Check, Clean and Dry, which in some cases e.g. the Hull of a ship is impossible if the boat is still in water. It may be more effective to flag ports or estuaries where invasive species are known to be present and support the creation of a strict bio-security policy for boats travelling between sites. Another thing to consider is to support industry to develop more wildlife friendly alternatives to anti-fouling chemicals.	Comment noted. The LNRS in general makes few references to legislation or policy across any of the habitats found within the North of Tyne area as to do so would seem an unnecessary level of detail. This approach is shared by other published LNRSs in England. With regard to marine invasive non-native species and shipping regulations, details of relevant legislation and policy is contained within the Marine INNS Strategy for the Berwickshire, Northumberland and North Tyneside coast which is referenced within the main text on page 120.
CM019		CM2.1 - Reduce diffuse and point source pollution from agriculture through management of inputs, slurry and silage pits. Increase the proportion of farms that have nutrient management plans and that adhere to catchment sensitive farming guidance. Promote nature friendly farming regenerative agricultural techniques". This measure considers the impacts of agriculture but no other forms of pollution from other large land managers e.g. forestry.	Noted. Text will be amended to include other land uses.
CM020		"CM3.1- Manage coastal areas in a way which enables the creation of transitional areas between different habitat patches and which, where possible, retains the different successional stages found within habitats". Could this be reworded "where appropriate" we don't want to create	Comment noted.

		linkages that increase the spread of INNS e.g. through the removal of barriers.	
CM021		CM4.1 - Facilitate roll-back of dune systems in locations where this is ecologically appropriate and practically possible". The measures don't seem to address other forms of dune management to support a higher level of dynamism. While facilitated roll back is great, would this not happen naturally in areas where it is appropriate and practically possible. It is the areas where we have interfered and built coastal roads and towns that is largely affecting roll back. Could there be an opportunity here to have greater influence over planning policy and the impact of coastal developments and infrastructure?	Noted. Habitat dynamism and promotion of transition zones and different successional stages is addressed under measure CM 1.5 and under priority CM 3.
CM022	The Crown Estate	In terms of the coastal and marine environment, we manage approximately 50% of the intertidal area and the seabed out to 12 nautical miles around England, Wales and Northern Ireland. Within this territorial limit, The Crown Estate has responsibility for all maritime sectors except for fishing, navigation, defence, and oil and gas. This includes responsibility for any activity looking to restore or create habitat on the seabed or the intertidal area managed by The Crown Estate, including areas that are of relevance to this strategy. For any activity that interacts with the seabed, some form of permission is required from The Crown Estate.	Noted
CM023		We are incredibly supportive of local initiatives to enable nature recovery and are working with stakeholders across England, Wales and Northern Ireland to enable the enhancement of coastal and marine environments. For example, we are working with Natural England to evaluate the impact of sand dune restoration pilots that were delivered as part of the Dynamic Dunescapes project and to understand the need for continued intervention; Dynamic Dunescapes focused on sand dune sites within Wales as well as the South (Dorset), South West, North West and East of England (Lincolnshire), but the lessons learnt will help inform the delivery of sand dune restoration in other locations and could help support measures within this LNRS.	Noted
CM024	Individual 2 (line 5)	I think it is very telling, and very sad, that in the document "NCA 01 North Northumberland Coastal Plain" there is not a single mention of the dune systems.	Document NCA 01 sets out suggested measures for nature recovery in the wider countryside outside of priority habitats. Dune grasslands are not included here because they are identified as a priority habitat within Chapter 7.
CM025		The Bamburgh Dunes are currently so poorly managed that it is my firm opinion that this ecosystem has already gone past tipping point. I speak	Comment noted.

		as one with a B.Sc. Hons degree in Biological Sciences, who specialised in coastal ecology.	
CM026	Individual 3 (line 6)	All these measures are for future of planet.	Noted
CM027	Individual 11 (line 23)	1. Address climate-driven risks - plan for sea-level rise. 2. Restore river-estuary connectivity for migratory fish. 3. Protect nursery grounds for juvenile fish. 4. Monitor and set sustainable catch limits. 5. Monitor water quality, sediment, species and disturbance.	Noted. These issues will be addressed at the delivery phase of the LNRS.
CM028	Individual 12 (line 24)	More detail on how to improve biodiversity within this habitat type.	Noted. This will be addressed at the delivery phase of the LNRS.
CM029	Individual 19 (line 35)	Rocky reef should be prefaced with 'intertidal', littoral or infralittoral. Subtidal biogenic reef and subtidal mussel beds are not strictly synonymous. Blue mussel aggregation on subtidal hard substrate would constitute blue mussel reef, where subtidal mussel beds may colonise sediments, but are likely to be more ephemeral. Within sediment, i think it would be useful to incase habitat resolution, to look at biotopes that support, for example scallops, oysters, cockles.	Comment noted. We have tried to avoid technical terms such as 'littoral' or 'infralittoral' in the text to improve readability for non-expert readers. The definition of sub-tidal biogenic reefs treats mussel beds as only one possible example of the habitat.
CM030		CM1 - again removal of fishing pressure to promote recovery is not mentioned. whilst pressure around north Northumberland may not be as high as in other years, NN does have some extremely fragile and sensitive marine habitats such a sea pens and maerl beds that are impacted by lower levels and can only recover if abrasion is removed for decades	Fishing with mobile gear, such as trawling and dredging, are tightly regulated through local fisheries byelaws from the Northumberland Inshore Fisheries Conservation Authority. https://nifca.gov.uk/wp-content/uploads/2022/11/FULL-BYELAWS-October-2022.pdf There is currently little or no fishing with mobile gear in the inshore waters of the North of Tyne area.
CM031		Not sure why this document has avoided the elephant in the room which is demersal fishing and disturbance to the seabed. This activity has been compared to repeated ploughing of a crop field. There is no way that a climate community (often a target for recovery) can be reached with continual regular damage. Seafloor disturbance and extraction of target and non target species has to be managed sustainably (including banned in certain areas - creation of HPMA's) so that recovery can be achieved. The difference to terrestrial systems where we have ancient grassland, ancient woodland that exist in areas we know have never been farmed, the seafloor sediment have been ubiquitously trawled across for hundreds of years. Without HPMA's or refuges for recovery we will struggle to understand what the target for recovery should be.	Fishing with mobile gear, such as trawling and dredging, are tightly regulated through local fisheries byelaws from the Northumberland Inshore Fisheries Conservation Authority. https://nifca.gov.uk/wp-content/uploads/2022/11/FULL-BYELAWS-October-2022.pdf There is currently little or no fishing with mobile gear in the inshore waters of the North of Tyne area.

CM032		whilst control of marine INNS is much more difficult, monitoring, surveillance, and good practice is essential.	Agree, although we feel that this is already addressed in the current text of the document, for example on pages 65 and 117.
CM033		With regard to the priorities , is does read as if marine features have been insinuated into terrestrially derived statements. sometime this works. other times not so much. would be worth coming at this from the marine ecosystem/ system space first. wrt measures, these seem fine as far as they go, but no CM1's refer to marine habitats, and true 'marine' measures are largely absent. they could include recreational zoning, no fishing areas, HPMAs, regenerative aquaculture (kelp/ bluemussel), assisted passive restoration - kelp, oyster et	Comments noted.
CM034	Individual 24 (line 43)	The chapter appropriately highlights the ecological importance of coastal and marine habitats and their role in supporting internationally significant populations of wintering waders. It rightly recognises that these habitats deliver multiple public benefits, including biodiversity, carbon storage, and coastal protection. However, the chapter risks treating the coastal and marine environment as a largely self-contained system, insufficiently connected to upstream land management and catchment processes. For Northumberland, and particularly for inland areas such as Rothbury and Coquetdale, the health of coastal and estuarine habitats is inseparable from river, floodplain, and upland land use. Sediment supply, nutrient loading, hydrological regime, and water quality are strongly influenced by inland management decisions, yet these links are not sufficiently emphasised.	Comment noted. Chapter 6 of the LNRS discusses the need for a 'source to sea' approach when addressing coastal management. Measure CM 3.3 reflects this.
CM035		Wintering waders are presented primarily through the lens of site protection and disturbance management, which is necessary but incomplete. Many pressures affecting wintering waders originate outside designated coastal sites, including changes in agricultural practice, river morphology, and floodplain connectivity upstream. The chapter would benefit from stronger recognition that the condition of wintering wader habitat is influenced by processes operating across the whole catchment, not just at the coast. Focusing solely on access management and site-based protection risks overlooking opportunities for meaningful recovery through integrated land and water management. There is also a risk of reinforcing a narrative in which responsibility for wintering waders is implicitly placed on coastal managers alone, rather than shared across sectors and landscapes.	Comment noted. A wider consideration of the conservation of wading birds is covered in Chapter 4.
CM036		From a delivery perspective, the chapter places heavy emphasis on aspiration but offers limited clarity on mechanisms, incentives, or governance. Marine and coastal recovery often sits outside the direct	Comment noted. The document at present is an attempt to set out priorities and potential measures to address these. A more detailed

		<p>control of land managers, requiring coordination across agencies, regulators, and sectors with differing objectives and timescales. Where measures depend on changes in inland land use or water management, the strategy should be explicit about how these will be aligned with agri-environment schemes and local decision-making. Without clear pathways for coordination and funding, there is a risk that the chapter becomes symbolic rather than operational.</p>	<p>examination of implementation will follow in the delivery stage of the LNRS.</p> <p>The LNRS process does not have the power to require any changes in management by landowners or land manager(s). Any changes in land use or water management will remain at the discretion of landowner or land managers, and would still following appropriate existing decision-making frameworks, and any existing requirements for permits or licences. There is currently insufficient detail about the new Stewardship scheme(s) to comment on how agri-environment will align with LNRS in future but there are strong indications from DEFRA that there will be some alignment, in order to support farmers and landowners who do wish to help to implement LNRS measures.</p>
CM037		<p>The chapter would be strengthened by a more explicit discussion of climate change and system dynamism. Coastal habitats and wintering wader distributions are already shifting in response to sea-level rise, storm frequency, and changing sediment dynamics. Strategies that assume static coastlines or stable habitat configurations risk rapid obsolescence. The LNRS should therefore emphasise adaptive management, acceptance of change, and the need for flexible spatial planning. Monitoring and evidence-gathering should be framed to support learning and adaptation, rather than compliance reporting alone.</p>	<p>The need for system dynamism and the potential implications of climate change are both reflected in the narrative of the Coastal and Marine chapter. Practical management to address these will form part of the delivery stage.</p>
CM038		<p>Finally, the strategy should avoid presenting inland communities as peripheral to coastal outcomes; instead, it should articulate a shared responsibility for nature recovery from uplands to estuaries to coast, reinforcing the LNRS as a genuinely integrated, landscape-to-seascape framework.</p>	<p>Comment noted. As part of the strategy we are keen to promote 'source to sea' thinking and recognise the linkages between the coast and wider river catchments. Measure CM3.3 (p. 95) reflects this.</p>
CM039	Individual 25 (line 45)	<p>The treatment of bird habitat and the relationship with grasslands - both coastal and inland is inadequate. There are no measures of the loss by conversion of coastal grassland vital to feeding. The pressure on birds</p>	<p>Comment noted. Grassland as a habitat for wading birds is covered in Chapter 4. A number of initiatives, such as Space for Shorebirds, are currently</p>

		from human activity and dogs must be more thoroughly examined and effective steps considered to minimise or mitigate it.	underway to address disturbance to coastal wildlife and potential additional activities can be investigated as part of the delivery phase of the LNRS.
CM040	Individual 35 (line 62)	This section is very good and the authors and researchers are to be commended.	Comment noted and welcomed
CM041		Unlike terrestrial habitats the coastal and marine habitats in the North of Tyne area of functioning ecosystems and this is to be commended. To continue to protect and improve the habitat should rightly be a priority. I think its important to raise awareness of the protected status of the Northumberland Shore including - SSSI, SPA, RAMSAR, MCZ, AONB. The coast would benefit from conservation officers working in conjunction with NGOs to achieve this goal. I've experienced this in other parts of the UK and it works very well. The biggest risk to the habitats and rare species is recreational activity and certainly within Seaton Valley we would benefit from info boards and communications to highlight habitats and species. There is still a few who take advantage of the habitats with illegal fishing or foraging and there is a clear need for enforcement to prevent habitat damage.	Comment noted.
CM042	Individual 42 (line 79)	I have recently written to the NCC about dog disturbance of coastal areas: I received a positive response and await the proposed action of more notices regarding the responsibility of dog owners in coastal areas. Observations: increase in dogs overall, waste bags left on pathways (huge hazard to children) dogs out of control on cliff paths, in dunes and on the beaches. harassment by dogowners of other member of public. Dog faeces on the beaches. I would welcome active discussions about bigger dog free zones in areas for nesting seabirds and all year on certain beaches with as much expiatory signage as possible. Seashores for Birds is an excellent strategy by NCC.	Comment noted. A number of initiatives, such as Space for Shorebirds, are currently underway to address disturbance to coastal wildlife and potential additional activities can be investigated as part of the delivery phase of the LNRS.
CM043	Individual 45 (line 89)	Much more ambitious habitat restoration and creation given the level of coastal squeeze from people and climate change.	Our main priority for marine and coastal is to reduce the pressures on, and increase the quality and diversity of, our existing habitats thereby promoting passive recovery and increasing climate change resilience. Creation of habitat is addressed in measure CM4 and its associated narrative (page 96).
CM044	BASC	BASC works with Natural England at Lindisfarne NNR and has funded Spartina control there.	Noted

URBAN ENVIRONMENT AND URBAN EDGE

Number	Respondent	Comments	Proposed Response
URB001	Climate Action Wansbeck	Reference to swift bricks is welcome; however, it should be compliant with national planning policy; at least one swift brick per dwelling on average for new developments; (as per best practice guidance references ie CIEEM & BS42021). Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	Comment noted.
URB002	Gosforth Swifts	There should be reference to inserting on average 1 swift brick in every new dwelling in new housing developments as per CIEEM and BS42021 Guidance. There should be reference to protection of existing swift nest sites and if not possible, to ensure that adequate mitigation measures are made.	<p>All ecological requirements are at the planning level to ensure compliance with national and local planning policies. This ensures that appropriate mitigation is secured for all impacted species including all birds.</p> <p>Integrated features for urban bird species such as swifts are incorporated into all new build development. The Newcastle local plan dates from before swift boxes were an issue, so doesn't take them into account, however Newcastle and Gateshead are in the early stages of preparing a joint local plan and this could be a policy that is introduced into it, in line with guidance in the updated NPPF (which requires one swift brick in all new builds) and potentially the LNRS.</p> <p>The NPPF suggests incorporating features which support a range of priority or threatened species, of which there are many, and cites swifts, hedgehog and bats as an example. It is important to remember that there may be a number of bird species impacted by development which require mitigation measures to be secured and therefore decisions to provide swift bricks or other bird features should be determined by Local Authorities at</p>

			planning stage in accordance with planning policy.
URB003	Hazlerigg Parish Council	The heathland in Havannah and Three Hills Local Nature Reserve in Newcastle upon Tyne is important for Dingy Skipper and a variety of butterflies, moths, dragonflies and other important invertebrates. The mosaic of habitats in this reserve is unique in an urban setting and is deserving of greater protection. There are also rare plant species including Dyer's Greenweed <i>Genista tinctoria</i> , and Stag's-horn Club Moss <i>Lycopodium clavatum</i> . Regular scrub clearance to prevent succession of heathland habitats should be secured by condition. Connectivity of habitats in the nature reserve with wetland/woodland habitats at West Brunton Wetlands has been severely compromised by insensitive development.	Noted – useful comments for implementation phase
URB004		There is a lack of focus of these habitats in the urban fringe environment, which provide the opportunity to connect people with nature on their doorsteps.	Comments noted. Chapter 8 is intended to highlight the contribution which urban and urban fringe areas can play in delivering nature recovery priorities in the North of Tyne.
URB005		Urban fringe heathlands should be subject to measures that reduce recreational disturbance through increased awareness and education of the impacts of disturbance to species and habitats. Measures such as interpretation boards and fencing will promote awareness and limit access to ecologically sensitive areas.	Noted. The 'Additional support for nature recovery in urban and urban edge areas' section of Chapter 8 has been amended to include awareness raising as possible action to support urban habitats in the round.
URB006		Grassland in Havannah and Three Hills Local Nature Reserve supports a large number of Adder's-tongue Fern, which indicates historic meadows. These meadows have not been properly managed for a number of years, owing to excessive numbers of dogs off leads, which results in reluctance to graze livestock. The grassland in the nature reserve has potential if correctly managed, however, it is currently subject to flooding as a result of overdevelopment in the area.	Comment noted
URB007		There is a lack of focus on grasslands in peri-urban settings. More efforts should be made to raise awareness and influence behaviour change to accommodate relaxed mowing regimes to support pollinators.	Comment noted
URB008		The Gosforth Letch rises in our parish to the south-east of Havannah Nature Reserve. As a tributary of the Ouse Burn, this should be included as a priority area for improvements. Wetlands in Havannah Nature Reserve are of particular importance for amphibians and surrounding wetland at Woosington Ponds, Big Waters, West Brunton Wetlands all have potential for improvement.	The freshwater mapping includes this area, as part of the whole Ouseburn catchment.

URB009		Many established street trees in our parish are in poor condition and need replacing, however, we have been advised that utilities will prevent any restocking. Woodland in Havannah Nature Reserve needs to be managed more regularly. Woodland at the Dark and Letch plantations is rare in the urban environment and should be deserving of better protection in the strategy.	Comment noted.
URB010		Lack of focus on important trees and woodland in urban setting i.e Dark Plantation, Letch Plantation. Remaining hedgerows in our parish should be better protected as we have now lost hundreds of metres of historic hedgerows.	Comment noted.
URB011		We would like to see stronger measures and priorities for urban birds, particularly Swift, as houses in Hazlerigg support a relatively large Swift colony. We would like to see measures to include swift bricks in all new builds and in major refurbishments.	The National Planning Policy Framework (NPPF) suggests incorporating features which support a range of priority or threatened species of which there are many and cites swifts, hedgehog and bats as an example. It is important to remember that there may be a number of bird species impacted by development which require mitigation measures to be secured and therefore decisions to provide swift bricks or other bird features should be determined by Local Authorities at planning stage in accordance with planning policy.
URB012		We would also like to see hedgehog highways secured by condition and better management of hedgerows. Establishing toad crossings in urban areas should also be prioritised.	The National Planning Policy Framework (NPPF) suggests incorporating features which support a range of priority or threatened species of which there are many.
URB013		Woodland edges and glades in Havannah Nature support a large number of butterflies and in 2025 Silver-washed fritillary was recorded in the reserve, showing the importance of urban fringe sites for rare species. The alder woodland in the reserve also supports rare fungi and is one of the most northerly sites for the Alder Signaller moth.	Noted
URB014		We would like to see more focus on improving and linking urban habitats. We would like to see better connection of urban nature sites, for example Havannah Nature Reserve, Big Waters, Woosington Ponds, West Brunton Wetlands and greater protection and enhancement of wagon ways linking these sites.	Comment noted
URB015	Hexham Swift Heaven Project	Reference to swift boxes is welcome especially bearing in mind that the North East is the UK area where the greatest decline in swift numbers is	The National Planning Policy Framework (NPPF) suggests

		<p>taking place. As such the strategy should be including measures beyond the bare minimum as set out in national planning policy. That policy states at least one Swift Brick per dwelling on average for new developments. We would suggest that in the North Tyne area there is a need to deliver to a higher standard and require at least 2 swift bricks per dwelling on average and these should be installed in line with current best-practice guidance. Existing nest sites must be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.</p>	<p>incorporating features which support a range of priority or threatened species of which there are many and cites swifts, hedgehog and bats as an example. It is important to remember that there may be a number of bird species impacted by development which require mitigation measures to be secured and therefore decisions to provide swift bricks or other bird features should be determined by Local Authorities at planning stage in accordance with planning policy</p>
URB016	Homes England	<p>Newburn Riverside is a site in Homes England's ownership. It is an allocated housing site in the Core Strategy Urban Core Plan for Newcastle/Gateshead 2025 and development is being pursued. In our view, it would seem perverse for the LNRS to propose this allocated housing site as undesignated grassland sites for protection, restoration, and management. Can this be removed or have a further discussion about this? Furthermore, we have an updated habitat survey which shows significant parts of the site are scrubbing over.</p>	<p>The inclusion of Newburn Haugh in the 'Important grassland' priority measure mapping does not penalise in any way when it comes to development on the site but that it has been identified as an area where grassland enhancement would be beneficial. This is incentivised through the statutory BNG process, where any grassland enhancements undertaken to the site would be classified as 'Strategically Significant' and would benefit from a positive multiplier in the metric, which would give more subsequent biodiversity units for the same area of land if it was not classified as strategically significant.</p>
URB017	Natural History Society of Northumbria	<p>Is it possible to include the Ouse Burn Way vision?</p>	<p>Text amended to reference this</p>
URB018		<p>Gosforth Nature Reserve - good to see the importance of this site recognised, but the threats from urbanisation, within both NTC and NCC wildlife enhancement corridors is not reflected sufficiently. Also it feels as though the role that these sites, with proper buffer zones established could provide good scope for nature recovery. These areas are changing with land subsidence due to the historical mining activity. Local knowledge is proving that even in 30 year timeframes land that has been farmed is now more difficult to farm, such as fields south of Gosforth Nature Reserve. This land could be used as BNG for development in a</p>	<p>Comment noted.</p>

		more suitable location, fulfilling a proposal in the Ouse Burn Way vision that delivers flood mitigation, nature recovery and development in a more suitable location.	
URB019		It is widely recognised that urban areas provide a valuable biodiversity reservoir as they are not subject to modern farming practices and also can fulfil the vital social role of nature connection for people. The urban chapter feels very light in comparison to other chapters.	Comment noted.
URB020		It is not clear how the wildlife enhancement strategic corridor policies of both NCC and NTC have been used here. For example great to see waggonways mentioned but huge scope for local authorities to adjust land management and grounds maintenance practices which deliver nature recovery. Could Priority U1 not be widened to the wildlife enhancement corridors and not just the waggonways? NHSN are keen to discuss this with both local authorities - our membership and volunteers feel very strongly about this, and we would welcome a positive collaboration. This could then build on the recent collaboration of the Newcastle Nature Networks project.	Wildlife corridors are areas identified to support the dispersal and movement of species. While they often contain important areas of priority habitat, they also contain significant areas of wider countryside. The priority habitat components of wildlife corridors are covered by the relevant priority habitat measures.
URB021		Point out Gosforth Nature Reserve - we dropped the Park in the name a no of years ago to reinforce the nature importance of the reserve. Is this possible to amend please?	Noted. Text has been amended.
URB022	Wylam Parish Council	I very much welcome the recognition of the importance of the urban environment and its mosaic of habitats.	Noted
URB023		I also welcome the recognition and need to enhance the wagonways but would add all Public rights of way into the scene as they connect the town to the countryside. and they themselves need to be better connected.	The focus of the LNRS is on nature recovery. The wagonway network of North Tyneside is included as they are a recognised as an important local wildlife resource. Out with of the LNRS, there are other plans / programmes being discussed regionally for access to green and blue spaces more generally.
URB024		I also welcome the section on swifts but feel this also needs to include the swallows and sand/house martins that are fewer in number. They need nest sites, stop boxing in the gutters! But they need insect feed too.	See response to URB002
URB025	Save Newcastle Wildlife	We are aware that conservation work is ongoing at Prestwick Carr and would like to see more emphasis on ensuring this work continues with sufficient funding obtained through LNRS delivery to enhance peatland habitats close to urban settings. The airport expansion plans have the potential to adversely impact peatland at Prestwick Carr.	Noted
URB026		We are concerned that lack of appropriate management of grassland and a reluctance to graze, owing to large numbers of dogs, is leading to degradation of important grassland habitats in urban fringe areas,	Comment noted. Measure IG 1.1 (Chapter 4) deals with action to support the appropriate management of important grasslands.

	particularly Havannah Nature Reserve, and would like to see priorities and measures that aim to address these issues.	
URB027	We are also very concerned by the widespread loss of habitat for waders and farmland birds in the Newcastle/North Tyneside area and would like to see priorities and measures in place to protect these areas.	Measures for the conservation of wading birds are set out in Chapter 4.
URB028	There is lots of environmental improvement work taking place at Woosington Ponds at the source of the Ouse Burn, which will contribute towards the wider ecological enhancement of the river.	Noted
URB029	Wetlands in Havannah Nature Reserve are ecologically important yet they are currently omitted from the LNRS. There is potential to enhance these areas, along with nearby West Brunton Wetlands and surrounding ponds. The Upper Ouse Burn area is ecologically important and should be recognised in the LNRS, as well as the Gosforth Letch in Newcastle Great Park.	The ponds at Havannah Nature Reserve are included in the ponds layer of the LNRS map. The Ouseburn catchment is included on the Stage 5 map for the LNRS.
URB030	Older areas of woodland are rare in Newcastle and remaining areas of beech and oak woodland, such as the Dark Plantation and the Letch Plantation are being encroached by development in Newcastle Great Park. There is scope to better protect and enhance these wooded areas.	Noted.
URB031	Many veteran trees have already been lost to unsympathetic development and those that remain, as well as those trees that will soon be veteranised, should have suitable priorities and measures.	Measures for veteran and ancient trees are included in Chapter 6.
URB031	An alarming number of hedgerows have been removed in Newcastle in the last 20 years and measures to reverse this should be prioritised.	Comment noted.
URB032	We would like to see more emphasis given to the value that agroforestry can add to the landscape. Enhancement of existing hedgerows and the creation of more hedgerows around the Upper Ouse Burn should be prioritised to support biodiversity and reduce flooding.	Comment noted.
URB033	Newcastle lost its last breeding population of red squirrels in 2019 and efforts should be made to ensure this species can return to the area. We would like to highlight the importance of volunteer efforts in controlling grey squirrels and priorities and measures that facilitate better engagement, recruitment and retention of volunteers who have the capacity to make a tangible difference for red squirrel conservation in the North of Tyne area	Comment noted. Measures to control Grey Squirrel are covered by measure WTS 1.2 (Chapter 6)
URB034	We would also like to see more ecologically sensitive management of hedgerows in urban areas, through amending cutting regimes to benefit wildlife at key times of the year.	Comment noted.
URB035	We welcome the inclusion of wildlife-friendly features in new buildings and landscaping but feel that this should go further. Often new developments and associated landscaping contain non-native species that have little or no benefit to pollinators and other native wildlife. Furthermore, bat and bird boxes, are all too often promised and not delivered. More specific	The National Planning Policy Framework (NPPF) suggests incorporating features which support a range of priority or threatened species of which there are many and cites

	wording the LNRS would add more weight. In particular, we would like to see Swift bricks mandated in all new builds and developments across the LNRS area.	swifts, hedgehog and bats as an example. It is important to remember that there may be a number of bird species impacted by development which require mitigation measures to be secured and therefore decisions to provide swift bricks or other bird features should be determined by Local Authorities at planning stage in accordance with planning policy.
URB036	We would like to see stronger incentives to encourage behaviour change around relaxing mowing regimes to benefit pollinators and reference to initiatives such as Bee Lines, across the wider landscape.	Comment noted.
URB037	We would like to see more stringent measures to ensure opportunities for wildlife-friendly development are maximised in urban settings. There is a surprising lack of focus on Newcastle and North Tyneside in the LNRS and an overemphasis on urban settings. Whilst we recognise that urban settings can be challenging for effective nature recovery, urban efforts can contribute to landscape scale improvements. Urban green infrastructure supports biodiversity and provides access to nature and we would like to see more priorities and measures for initiatives such as community orchards, allotments, green roofs, living walls, swales and greater ambition for SuDS.	Comment noted.
URB038	We would also expect to see more reference to measures that preserve existing habitats, such as the inclusion of interpretation boards and fencing to raise awareness, promote engagement and preserve and enhance habitats.	Comment noted. The 'Additional support for nature recovery in urban and urban edge areas' section of Chapter 8 has been amended to include awareness raising as possible action to support urban habitats in the round.
URB039	Pesticides are referenced in the context of agriculture, but not in the context of urban settings. We would expect to see measures to reduce/eradicate the use of pesticides in urban environments, which are known to harm wildlife and humans.	Comment noted.
URB040	There is no mention of the largest housing development in the North East – Newcastle Great Park – which sits in the LNRS area and the potential for this to support wildlife-friendly measures and we would like to see inclusion of opportunities for more nature reserves and parks in urban development. Ecological mitigation in Cell C3 of Newcastle Great Park has the potential to become an urban nature reserve and should be included in the LNRS.	Comment noted.

URB041		We welcome the measure to maintain and improve the wildlife value and connectivity of the network of waggonways within North Tyneside and Newcastle and would particularly like to see those in Newcastle enhanced to link important wildlife sites.	Comment noted.
URB042	The Maling Street Management Company	While the urban and urban edge priorities and measures are generally strong, there are areas where greater clarity and emphasis would improve their effectiveness. In particular, the LNRS would benefit from clearer and more explicit measures for open mosaic habitat on previously developed land in urban areas, including stronger prioritisation of retention and positive management of existing sites rather than reliance on mitigation or replacement through habitat creation. This is especially important in constrained urban locations where such habitats are often small, fragmented and under significant development pressure.	Comment noted.
URB043		Urban river corridors such as the Ouseburn would also benefit from being more clearly identified as integrated nature recovery networks, linking freshwater habitats with adjacent brownfield land, grasslands, SuDS features and community green spaces to support ecological connectivity. This would help ensure that sites such as the Candle Flame (Ford Street) site are recognised as part of a wider functional corridor rather than considered in isolation.	The Ouseburn and adjacent areas are currently mapped as a priority area in the Stage 5 mapping. The text of Chapter 8 has been amended to further highlight the opportunities here.
URB044		Some measures, particularly those relating to habitat creation and tree or woodland expansion, would benefit from clearer guidance to ensure they are appropriately targeted and do not unintentionally impact high value open habitats, species rich grasslands or invertebrate rich brownfield sites. Overall, these points relate to refinement and strengthening of existing priorities rather than the removal of any elements from the LNRS.	Comment noted.
URB045		To further enhance its value, it would be helpful to ensure that measures explicitly include urban and peri-urban sites like the Candle Flame (Ford Street) site and corridors such as the Ouseburn Wildlife Corridor. Including these will better reflect the full range of habitats and the importance of integrating nature recovery within lived environments.	Comment noted.
URB046	UK Squirrel Accord	Urban areas are major reservoirs for invasive grey squirrels. Awareness and management efforts need to be increased in these areas to reduce grey squirrel numbers and the threats they pose to red squirrel survival and tree health.	Comment noted.
URB047	Upper Coquetdale Red Squirrel Group	Education relating to feeding of squirrels. Proposal of a programme of trapping and eradication of grey squirrels in publicly owned areas.	Comment noted.
URB048	The Crown Estate	Supporting nature in existing urban spaces and new developments is a key focus for The Crown Estate. We believe that increasing nature and biodiversity is essential for the sustainability of existing and new urban and built environments, enabling our resilience to climate change, supporting people's health and well-being and creating opportunities for	Comment noted.

		<p>local economies. We recognise that strategic development sites, such as our landholding in Ashington, provide strong opportunities to ensure the identified priorities and actions in the North of Tyne LNRS are ultimately met, through the ability to design development proposals holistically and sustainably, alongside key local stakeholders and partners. At Ashington West, also known as Wansbeck Fields, The Crown Estate is bringing forward a vision for a climate-resilient, sustainable community that both respects and celebrates its natural setting. The development proposes around 2,000 new homes, significant employment and innovation space, a local centre, a primary school, and a new nature reserve, all set within more than 74 hectares of publicly accessible green space. The masterplan is designed to promote healthy living, with walkable neighbourhoods, active travel routes, and productive landscapes such as allotments and orchards woven throughout the site. Biodiversity is a core priority, with a target of achieving a 10% net gain through the creation of new habitats, woodland networks, and a strong nature recovery strategy that aligns with local and regional objectives. The scheme also places a strong emphasis on climate resilience, incorporating sustainable drainage systems, renewable energy, and a “fabric first” approach to building design. Ashington West is strategically located to benefit from its proximity to the new Ashington Train Station and the Northumberland Line, supporting sustainable transport and reducing reliance on cars. The Crown Estate is committed to working closely with local stakeholders and the community to ensure that the development delivers lasting social, economic, and environmental value, setting a new benchmark for sustainable growth in the region.</p>	
URB049	Individual 3 (line 6)	We need grassed areas for example parks and open spaces now and in future shrubberies trees for population to enjoy	Comment noted.
URB050	Individual 4 (line 7)	If you are in habitat, please provide food for animals and birds who will not be able to obtain food through snow	Comment noted.
URB051	Individual 7 (line 19)	At least one Swift brick should be included in each new house built. This would be compliant with national planning policy and best practice. You should also be taking steps to protect existing sites and if this can't be done then Swift 'bird boxes' should be erected to compensate for all losses.	See response to URB002
URB052	Individual 8 (line 20)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002

URB053	Individual 9 (line 21)	The reference to swift bricks is great, but it should be more specific and should agree with national planning policy. The policy states at least one swift brick per dwelling on average for new developments. Existing nest sites should be strongly protected and retained, if not possible mitigation measure should be implemented equal to any loss.	See response to URB002
URB054	Individual 10 (line 22)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB055	Individual 11 (line 23)	<ol style="list-style-type: none"> 1. Focus on soil health. 2. Increase permeable surfaces. 3. Monitor and reduce herbicidal and pesticide use. 4. Introduce biodiversity net gain into planning criteria. 5. Protect ecological corridors in planning decisions. 6. Make ecological recovery non-negotiable urban planning policy. 	Comments noted
URB056	Individual 12 (line 24)	Increase biodiversity within and around towns.	Comments noted
URB057	Individual 13 (line 25)	I am very concerned about the sharp decline in swift populations. They are now a red listed species. We can easily help restore and enhance their breeding success by mandating at least one swift brick in all suitable new buildings. If not able to then such loss must be mitigated through other means. Swifts were part of our urban landscape and adapted their nesting behaviour to the way we live. We can make them part of our lives again by these simple measures. I use to see and hear a lot more swifts, but now I see the odd one locally where I live on the border between North Tyneside and Newcastle. I want our children and grandchildren to hear and wonder at the aerial acrobatics of these wonderful birds	See response to URB002
URB058	Individual 14 (line 26)	Reference to Swift Bricks is welcome but at least one Swift Brick per dwelling on average for new developments should be required (CIEEM & BS42021). Existing nest sites should be protected, where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB059	Individual 15 (line 28)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB060	Individual 16 (line 30)	Support the Wild Ouseburn project and replicate elsewhere	Comment noted
URB061		Churchyards - these are community owned (by the individual PCCs) and managed greenspaces in the heart of almost every community, with a	Comment noted.

		collective and overarching management structure (with newcastle Diocese and the CofE more generally). They have a commitment to caring for all of 'god's creation'. They are a missed opportunity for nature connectedness, wildlife corridors, local nature reserves, and biodiversity banks. They often host ancient and veteran trees, particularly Yews, and their ground is largely uncultivated and little disturbed for centuries, so is likely to have well established and microbiomes, including fungi, mosses and lichens etc.	
URB062	Individual 17 (line 31)	The Ouseburn Valley has significant potential for nature recovery in a once major industrial area of Newcastle City. Current project work by Wildlife Ouseburn and the Reece Found is establishing the nature recovery potential of a 7 mile Wildlife Corridor, which would stretch from the Weetslade Counrty Park down to the Mouth of the Ouseburn, adjacent to Ford Street. At the Mouth of the Ouseburn exists an area of land which is locally named 'Candle Flame' due to its shape, which physically links the Wildlife Corridoe to the Ouseburn river. This area of land, which has been dormant for two decades, is now subject to planning development, which if approved would destroy the existing biodiversity, along with the major nature recovery priorities and break the structure of the Wildlife Corridor.	Comment noted. The Ouseburn and adjacent areas are currently mapped as a priority area in the Stage 5 mapping. The text of Chapter 8 has been amended to further highlight the opportunities here.
URB063		The Urban edge environment is not only vital for enhancing nature recovery, but also important to increasing the potential to improve human wellbeing for those that live, work and visit such areas.	Agree.
URB064	Individual 18 (line 33)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB065	Individual 20 (line 37)	Reference to Swift Bricks is welcome. However, there should be compliance with national planning policy: "at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) and equally importantly existing nest sites should be protected and retained if at all possible; where this is not possible, mitigation measures should be implemented equivalent to any loss. Due to badly thought out & executed building improvements in my area we have lost a thriving swift population over the last 2 years. This cannot be allowed to continue unchecked- developers need to be made aware & accountable for the wellbeing of nesting birds in our urban communities.	See response to URB002
URB066	Individual 21 (line 38)	Mention of Swift Bricks is appreciated; however, it should follow the national planning policy, meaning at least one Swift Brick per dwelling on	See response to URB002

		average for new developments. (as per best-practice guidance references ie CIEEM & BS42021) Existing nesting sites should be protected and maintained where possible. Where it is not possible, mitigation measures should be implemented equal to any loss.	
URB067	Individual 22 (line 39)	Reference to Swift Bricks is welcome; however at least one Swift Brick per dwelling on average for new developments as outlined in national planning policy. Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss and where possible should provide additional nest sites for swifts and other cavity nesting birds.	See response to URB002
URB068	Individual 23 (line 41)	Inclusion of Swift bricks should be compliant with national planning policy and secured by condition, with at least one Swift brick per dwelling on average for new developments. Existing nest sites should be protected and retained wherever possible; where not possible, mitigation measures should be implemented equivalent to any loss. All refurbishment of Council-owned property should fully consider cavity-nesting birds and provide alternative nesting sites in the event of any losses.	See response to URB002
URB069	Individual 24 (line 43)	The chapter rightly recognises the growing importance of urban and urban-edge areas in contributing to nature recovery, particularly in terms of connectivity, public engagement, and ecosystem services. In the Rothbury and Coquetdale context, however, “urban” largely means small towns, villages, and dispersed settlement edges, not dense metropolitan environments. The strategy would benefit from making this distinction explicit, as delivery mechanisms, pressures, and opportunities differ substantially from larger urban centres. Without this clarification, there is a risk that priorities and measures are perceived as poorly matched to local reality, undermining engagement.	Noted – text amended
URB070		Urban and urban-edge land is often presented as an underutilised opportunity for habitat creation, but the chapter underplays the fragmented ownership and management typical of these areas. Village greens, riparian strips, road verges, school grounds, allotments, churchyards, and small paddocks collectively offer significant ecological potential, but individually they are small, constrained, and often informally managed. Expecting coordinated delivery without facilitation, advice, and modest funding is unrealistic. The strategy should place greater emphasis on enabling mechanisms - trusted intermediaries, simple guidance, and low-burden incentives - rather than assuming voluntary uptake.	Comment noted.
URB071		There is a tendency to frame urban nature recovery primarily through amenity planting and visual greening, which risks privileging appearance over ecological function. Measures should prioritise connectivity, habitat quality, and seasonal value for species, rather than ornamental outcomes.	Comment noted.

		Pollinator-friendly management, riparian buffers, wet features, scrub mosaics, and reduced mowing regimes are likely to deliver greater benefits than tree planting alone. The chapter should be clearer that urban nature recovery is about making space for ecological processes, not just adding features.	
URB072		Finally, the chapter would benefit from stronger integration with surrounding rural landscapes. Urban and urban-edge areas in Rothbury and Coquetdale function as transitional zones between intensively managed land and semi-natural habitats. Their greatest value lies in acting as stepping stones and corridors, linking rivers, grasslands, woodlands, and uplands. This requires alignment with wider countryside measures and avoidance of isolated, site-by-site interventions. The LNRS should explicitly position urban and urban-edge recovery as part of a continuous landscape network, rather than a standalone strand. If framed in this way, urban and urban-edge actions can contribute meaningfully to biodiversity, climate resilience, and public engagement, without overstating their capacity to compensate for losses	Comment noted.
URB073	Individual 25 (line 45)	This chapter is wholly inadequate. You do not define urban, nor do you provide a typology, this is a serious omission. The issue or challenge of the urban fringe (let us say settlements over 1000 people) does not lend itself to this kind of habitat-based approach neither in the existing urban fringe nor in future urban extensions. The question is more one of absence than of presence. The Strategy should have put forwards a methodology for creating natural networks around urban areas and incorporating them in the most effective way in extensions. Such an approach would inform the forthcoming Local Plan in Northumberland and provide clear guidance for the application of BNG- something that is specifically required of the LNRS.	Comments noted.
URB074	Individual 26 (line 47)	The Ouseburn Wildlife corridor in Newcastle should be classified as a Local Nature Reserve LNR. The importance of the 7mile Ouseburn wildlife corridor has been recognised with major funding from the Reece Foundation to support rewinding and nature restoration. The long term ecological importance of this area to nature recovery would be further strengthened by classifying the area as an LNR.	Noted. The LNRS does not have the power to designate new areas for nature conservation. The Ouseburn and adjacent areas are currently mapped as a priority area in the Stage 5 mapping. The text of Chapter 8 has been amended to further highlight the opportunities here.
URB075	Individual 27 (line 48)	Reference to Swift Bricks is welcome; however, it should be compliant with national planning policy and at least one Swift Brick per dwelling on average for new developments (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and	See response to URB002

		retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	
URB076	Individual 28 (line 49)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB077	Individual 29 (line 50)	The reference to Swift Bricks is very positive but more is needed. Swifts live in colonies and we cannot take a piecemeal approach to safeguarding them. It is vital we offer the type of habitat they require and crucial that we preserve existing colonies (however small – some have declined massively) as these groups will attract more birds. To comply with national planning policy; At least ONE Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021(2022)) EXISTING nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB078	Individual 30 (line 53)	The LNRS lacks consideration of condition, enhancement and protection of urban street trees, 'pocket' urban woodland and their contribution to wider urban ecological health.	Comment noted. Urban street trees and woodland are now mentioned in the “Additional support for nature recovery in urban and urban edge areas” section of Chapter 8.
URB079		Urban habitat/wildlife stepping stones, edge transitions and corridors that are composed of habitats not considered or prioritised in the LNRS should be integrated into the strategy as they contribute to the wider ecological functioning and wellbeing of the areas that are considered.	Comment noted.
URB080		The urban environment is a strategic landscape scale unit desperate for 'nature recovery' that is not really considered in this LNRS, aside from larger established areas of greenspace with heritage or conservation value, or the value of urban edge habitats to specific species. The LNRS doesn't seem to take account of the cumulative contributions of micro- and everyday habitats/greenspaces within the urban landscape, that are not designated or protected, to landscape scale nature recovery.	Comment noted.
URB081	Individual 31 (line 55)	Mandatory swift bricks should be installed on new builds automatically as new houses do not provide nesting habitats. Need to be compliant with national policy.	See response to URB002
URB082		Nature recovery is going to be a difficult task but if our leaders show planning, passion and commitment to improve the countryside, the population will begin to reap benefits. I live on a new housing estate and was refused swift bricks by the building company. I put up two RSPB Swift boxes and have attracted breeding swifts and the endangered tree	See response to URB002

		<p>sparrows. Not everyone has the time or resources to do this given the economic pressures on our lives however, if you could mitigate the loss of nesting sites due to the building practices of big house builders through mandatory inclusion of a couple of Swift bricks, it would not actually cost them that much more. Focus of house builders should also include mental health awareness of their buyers so, although plots may need to be small, swift bricks will not take up any more land. Swifts return to breed to the same site every year, are faithful to their partners, don't make any mess, only land to breed, are only in this country to breed for three months a year. Surely by introducing swift housing, we will be helping both the animal world and enriching ours too rather than bring hellbent on destroying habitats and our only focus being on capitalism and paying bigger dividends to shareholders.</p>	
URB083	Individual 32 (line 57)	<p>Wildlife corridors in urban areas should be made mandatory for new developments and that areas which have re-wilded, such as brownland or neglected land, should be accessed as valuable wildlife corridors in urban areas. We should be maintaining and improving of existing grassland/water ways and forests in urban areas. Which as Jesmond dean, Ouseburn and city parks. Urban wildlife corridors should be made mandatory in all new developments because cities are not isolated from nature; they are ecosystems in their own right. As urban areas expand, habitat fragmentation becomes one of the greatest threats to biodiversity. Wildlife corridors—continuous or connected areas of green and blue infrastructure—allow animals and plants to move, feed, breed, and adapt, helping urban ecosystems remain resilient in the face of climate change and human pressure.</p>	<p>The Local Nature Recovery Strategy does not have the power to mandate action. The identification of new wildlife corridors would be a matter for relevant Local Planning Authorities to address through their Local Development Plans.</p>
URB084		<p>Here is a clear, polished rewording that improves flow, avoids repetition, and strengthens the argument while keeping your original meaning and tone: Newcastle has a significant opportunity to establish itself as a truly green city and an urban wildlife oasis. As noted previously, making wildlife corridors mandatory within new developments would ensure that urban growth does not come at the expense of biodiversity or ecological function. Re-wilded brownfield sites and neglected land should be recognised and assessed as valuable wildlife assets rather than viewed as vacant space for development. By protecting and enhancing existing grasslands, waterways, and woodland—such as Jesmond Dene, the Ouseburn, and the city's parks—Newcastle can create a connected and resilient network of habitats that supports both wildlife and human well-being. Urban planning that prioritises ecological connectivity is essential for creating sustainable, liveable cities now and in the future. For many people in Newcastle, access to the countryside of Northumberland is limited. Expanding urban wildlife corridors would provide opportunities for</p>	<p>Comment noted.</p>

		residents to experience nature locally, delivering both physical and psychological health benefits. Regular contact with wildlife also helps to raise awareness and understanding of its importance, fostering a stronger culture of environmental responsibility within the city.	
URB085	Individual 33 (line 59)	Reference to Swift Bricks is welcome; however, should be compliant with national planning policy; at least one Swift Brick per dwelling on average for new developments; (as per best-practice guidance references ie CIEEM & BS42021) Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss.	See response to URB002
URB086	Individual 34 (line 60)	While one mention of swift bricks and one mention of swift bird boxes is welcome, this is really not enough, and there is no mention of enforcement or compulsion in the statements, just "potential". Swifts are in severe decline and need more than "potential" assistance to recover. The LNRS and the constituent Councils must *require* in their planning policies the installation of 1 new swift box in all new housing units, which must be enforceable. The cost is absolutely trivial in relation to the cost of a new home, and it's very hard to see why this should be an issue for Councils to require from housebuilders. Meanwhile there must be a statement about protection of existing swift nests in both urban and rural areas, or where this is not possible, an equivalent provision to be installed elsewhere.	See response to URB002
URB087	Individual 35 (line 62)	The area from St Mary's Lighthouse to South Blyth and inland to include the Seaton Burn Estuary, Holywell Dene, Holywell and New Hartley Ponds includes several priority habitats and protected areas - Northumberland Shore SSSI & SPA, RAMSAR designation, Coquet to St Mary's MCZ, Holywell & New Hartley Pond SSSI's, Holywell Dene LNR, St Mary's LNR. The area supports rocky shore, hard cliff, soft cliff, coastal dunes, sandy beaches, lowland deciduous woodland, salt marsh, mixed scrub and various neutral grasslands. The surrounding farmland includes patches of woodland and many miles of hedgerow. Species of note include Purple Sandpiper and Ruddy Turnstone. The Grey Seal haul out at St Mary's Lighthouse is very popular with residents and visitors. There are local NGO's working to protect St Mary's Lighthouse and also the Friends of Holywell Dene.	Comments noted.
URB088	Individual 36 (line 66)	Swift bricks in all new buildings. Swift surveys if new roof works are taking place. Responsibilities to protect nesting sights & mitigation measures if not possible. Encourage local residents community groups or building owners to add measures to help swifts.	See response to URB002
URB089		Gardens especially front gardens are being paved over or built mainly without planning permission & without measures to ensure drainage. It should include measure to enforce planning laws and also positive	Comments noted.

		awareness of creating green spaces gardens can help build diversity protect areas from flooding and create a better environment for residents.	
URB090	Individual 37 (line 68)	I strongly support the strategy's recognition that nature recovery must extend into urban and urban-edge areas, not just rural landscapes. Towns and cities are where many people experience nature daily, and where small but well-connected green spaces can have a disproportionately positive impact on biodiversity, climate resilience, and wellbeing. The emphasis in Chapter 8 on urban nature recovery is particularly welcome, but I would encourage the final strategy to be more explicit about protecting existing green spaces before focusing solely on enhancement or creation of new ones.	Comment noted.
URB091		A key opportunity is the protection and strengthening of connected corridors through urban areas, such as the Ouseburn Wildlife Corridor. This corridor links habitats from the river mouth through the valley and up to Weetslade Country Park, providing a continuous route for wildlife movement and ecological resilience. Ensuring these corridors are recognised, funded, and protected as coherent systems would significantly improve the effectiveness of the strategy. Fragmentation through piecemeal development risks undermining many of the strategy's broader ambitions.	Comment noted. The Ouseburn and adjacent areas are currently mapped as a priority area in the Stage 5 mapping. The text of Chapter 8 has been amended to further highlight the opportunities here.
URB092		The strategy would also benefit from placing stronger emphasis on community-supported sites that are not yet formally designated. Local people often have deep knowledge of how spaces are used by wildlife and valued by communities, and this insight should be treated as an asset rather than an afterthought. Explicitly recognising community-backed sites would help avoid situations where valuable habitats are lost simply because they fall outside existing designation frameworks.	Comment noted. We have amended the Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS.
URB093		I would like to propose the explicit inclusion of the Ouseburn Wildlife Corridor. This corridor represents a significant opportunity for landscape-scale nature recovery within an urban context, linking multiple habitats and communities while supporting a wide range of species. Within this corridor, the Candle Flame (Ford Street) site is a particularly important location at the lower end of the valley. It provides valuable grassland habitat and forms part of a continuous green route used by wildlife moving through the area. Local residents have already voted to protect this site, demonstrating clear community support for its preservation and recognition of its environmental value. Protecting and enhancing this corridor would deliver multiple benefits: safeguarding biodiversity, improving flood resilience, supporting climate adaptation, and maintaining accessible green space for local people - in an area that is already becoming gentrified and has big plans in the future. Importantly, it would also demonstrate that the strategy takes urban nature recovery seriously	The Ouseburn and adjacent areas are currently mapped as a priority area in the Stage 5 mapping. The text of Chapter 8 has been amended to further highlight the opportunities here. We have also now mentioned the Ouseburn Vision.

		and values places that matter to communities, even where they are not yet formally designated. This proposal reflects not only ecological logic but lived experience. As a local resident, I see daily how these spaces are used by wildlife and people alike. Ensuring they are recognised within the strategy would help prevent irreversible loss and support a more inclusive, effective approach to nature recovery across Northumberland.	
URB094	Individual 38 (line 69)	Over building of houses and too much traffic are a big challenge to nature and to create something lasting - there is also constant issues with litter due to there not been enough bins in ouseburn and there been a lot of visitors. The candle flame and malmo quay sites in particular create big challenges that could totally change the area - I think moving ahead on candle flame at least with plant of trees or other things , making this into a real site of nature that can't be destroyed be forcing buildings onto it (With no regard to the area) is a great way forwards and should be done ASAP.	Comment noted.
URB095		I think this is a great initiative and in particular to the funding to create a wildlife corridor in the Ouseburn valley. I think the only way this will be feasible will be to curb the over use of cars etc in the area and make a permanent wildlife area on the candle flame site - for example trees or other things to support wildlife could be added there and make this a permanent place for wildlife - This pushes back future developments and allows people to enjoy the space going forwards. I think it is also important to get regular updates on progress in these spaces and across the region to get continual buy in from various stakeholders. It would be amazing if sites like the candle flame and the site next to the Tyne bar get regular visitors or have points of interest that share the best of Ouseburn.	Comment noted.
URB096	Individual 39 (line 70)	Reference to Swift Bricks is welcome in principle; however, please include text from national planning guidance NPPG Natural Environment 2025 paragraph 017; to clarify that all nest boxes on new build developments should be Swift Bricks; at least one Swift Brick per dwelling on average for new developments; a universal nest brick for a range of small bird species; swift boxes are also a universal nest box for small bird species; include best-practice guidance referenced in the NPPG. Note that recently published LNRS for Berkshire, Cumbria, Hertfordshire, Norfolk, Oxfordshire, Suffolk, and Wiltshire (amongst others) state specific numbers for Swift Bricks -Norfolk and Suffolk (Table 38b in both) use text copied directly from the NPPG. The Isle of Wight exemplar LNRS also includes numbers of Swift Bricks, following the more onerous Brighton & Hove planning requirements. Include artificial nest cups for House Martins where recommended by an ecologist; in line with the "exemplar" published Isle of Wight LNRS (UGG1.6 (part 2, page 90)).	See response to URB002
URB097	Individual 40 (line 74)	In line with other published LNRS such as Norfolk/ Suffolk (both Table 38b), please include the text from NPPG Natural Environment paragraph	See response to URB002

		017; especially with regard to at least one swift brick per dwelling on average being installed in each new development; and swift bricks being a universal nest brick for small bird species; and include the best-practice guidance references from the NPPG. Here is the key text: "New developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."	
URB098	Individual 41(line 78)	Reference to swift bricks is welcome; however, it should be compliant with national planning policy; at least one swift brick per dwelling on average for new developments; (as per best practice guidance references ie CIEEM & BS42021). Existing nest sites should be protected and retained where possible; where not possible, mitigation measures should be implemented equivalent to any loss. There are large swift colonies in North Tyneside, Newcastle and Northumberland that are currently being destroyed unknowingly during roof repairs and alterations. These often fall under the radar because planning permission isn't required so ecologists are not informed.	See response to URB002
URB099	Individual 42 (line 79)	I come much more focus on local council open spaces maintenance. I welcome all advances as described in the natural recovery of open spaces in urban areas for wellbeing, reduction of pollution and overall recreation. I witness a lack of training that contract workers receive for grass cutting and use of chemicals: messy, heavy vehicle damage to areas, coarse deep cutting that degrades the edges of the grass areas, blanket chemical spraying of public areas, cutting back of tree and foliage that is in private property without warning or consultation and significant amounts of cut waste left on the road and paths that clogs drainage and creates hazards on the walkways. Signage to encourage people to understand nature recovery. positive encouragement.	Comments noted.
URB100		Greater emphasis on potentially 'forgotten' recovery areas of wildlife and their enhancement. Road verges, access points, by bridges, ruined buildings, churchyards, lane and sites between developments.	Comment noted
URB101	Individual 45 (line 89)	Opportunities for nature recovery through grasslands on golf courses and other amenity areas including school playing fields, parks, road verges, roundabouts etc needs to be included both here and in the Improved Grasslands section.	Comment noted
URB102		More actions/measures with urban environment to engage people	Comment noted.

OVERARCHING ISSUES

Number	Respondent	Comments	Proposed Response
OVER001	Northumberland National Park Authority	We think that there should be a mention of the importance of dark skies measures here. Artificial light can have a detrimental effect on wildlife and particularly near protected areas and priority habitat. Seeing both a reduction in artificial lighting and colour of this (warm white rather than blue white) across the North of Tyne should be target.	Noted. We will reflect this in the final document.
OVER002	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	Funding for landowners, or the current lack of it through the SFI scheme, is a real problem for LNRS actions. This needs to be sorted rapidly.	Comment noted.
OVER003	Hazlerigg Parish Council	There is no mention of the adverse effects of light pollution on wildlife species and habitats and how this will be mitigated.	Noted. We will reflect this in the final document.
OVER004	Natural History Society of Northumbria	NHSN has done a lot of work over the last three years to help early career individuals to develop field skills, utilising traditional field skills and modern technology. This is a huge issue for the sector and NHSN would welcome further discussion as is in an excellent position to develop this further. Over the last few years we have held training for staff and volunteers for statutory agencies, conservation charities and ecological consultants	Comment welcomed. We anticipate that consideration of skills development and capacity building will form part of the delivery phase of the LNRS.
OVER005		Why does OP 1 not include any efforts to influence political support for nature recovery? A read of Our Place by Mark Cocker is essential for anyone involved in LNRS - he evidences brilliantly that despite huge passion from individuals in the conservation sector, really with reflection and stats - how ineffective we have all been! For this LNRS to have any impact at all please do all read this excellent book and hopefully be motivated so that this new LNRS can really make a difference.	Comment noted.
OVER006	Wylam Parish Council	Is there a definition (or species list) of incoming and now resident species that are not considered "invasive" - collared dove, ivy bee, little egret, Canada goose etc?	There are estimated to be around 2000 non-native species established in the UK but only around 10-15% of these are believed to be invasive. Up-to-date information about invasive non-native species can be found at https://www.nonnativespecies.org/
OVER007	Corsenside Parish Council	It feels that fauna has been overlooked in the process of recovering functioning ecosystems and nature recovery. A list of species for potential recovery could be included.	We believe that in the majority of instances the conservation of important species can be achieved through management of the underlying habitats which support them. This approach was supported by the community of

			technical experts we consulted with during the preparation of the LNRS. A small number of species were identified as requiring additional actions and specific measures have been identified for these.	
OVER008	Save Newcastle Wildlife	Light pollution and air pollution, both of which adversely affect biodiversity, are missing from the draft strategy so we would expect to see measures that incorporate reducing the impact of both on important species and habitats.	Noted. We will reflect this in the final document.	
OVER009		We would like to see greater emphasis on measures to improve soil health across the wider countryside and in urban areas, including integrated pest management to reduce pesticide use, as well as an ambition to reduce the use of plastics in farming, forestry and urban planting schemes.	Comments noted	
OVER010		We would also like to see greater weight given to the importance of community groups and citizen in relation to gathering ecological evidence and delivering engagement/activity, as well as better investment in local planning authority resources to secure effective monitoring and enforcement of ecological enhancements across the strategy area.	Comment noted. The text of Chapter 9 has been amended to give additional mention of community groups.	
OVER011		Ring-necked parakeets are increasing in number in the North of Tyne strategy area and efforts should be made to control their numbers until it can be established that there is no adverse effect on native wildlife.	Comment noted.	
OVER012		We would like to see more emphasis on keystone species and the importance of these for nature recovery.	We believe that in the majority of instances the conservation of important species can be achieved through management of the underlying habitats which support them. This approach was supported by the community of technical experts we consulted with during the preparation of the LNRS. A small number of species were identified as requiring additional actions and specific measures have been identified for these.	
OVER013		The North of Tyne area is currently being considered as a potential location for the reintroduction of lynx and we would expect this to be reflected in the LNRS.	Out of scope for the LNRS as lynx reintroduction is not licensed in the UK.	
OVER014		The Maling Street Management Company	The Overarching Issues, Opportunities, and Priorities chapter successfully sets the strategic tone for the Local Nature Recovery Strategy by recognising the complexity and scale of challenges facing nature recovery in the North of Tyne area. It rightly highlights the need for	Comments noted.

		integrated, landscape-scale approaches that connect habitats and communities, echoing the emphasis on connectivity seen in Chapter 8 regarding urban and urban edge environments. A particular strength is the focus on multi-functionality of habitats, the importance of addressing habitat fragmentation, and the recognition that nature recovery must deliver multiple benefits, including climate resilience, community well-being, and improved ecosystem services. These ambitions provide a solid foundation for prioritising actions that can achieve maximum positive impact across the urban-rural gradient. However, to fully reflect the realities on the ground, the chapter could more explicitly incorporate the role of urban nature corridors and locally significant sites as vital components of the strategic vision. Chapter 8's discussion of sites like the Candle Flame (Ford Street) site and the Ouseburn Wildlife Corridor demonstrates how urban spaces contribute substantially to regional ecological networks and biodiversity goals. Ensuring urban green spaces and brownfield habitats are integrated into the overarching priorities would reinforce the importance of inclusive nature recovery across the entire landscape, not only rural or formally designated areas.	
OVER015		Additionally, the chapter might more strongly emphasise the critical role of community-led stewardship, partnerships, and local governance in delivering the strategy. Many nature recovery successes depend on empowered local groups, voluntary organisations, and businesses who manage or influence urban and peri-urban habitats. Embedding this participatory approach into the overarching priorities can help ensure the LNRS remains connected to the diverse stakeholders it must engage and support for long-term impact.	Comment noted. We have amended the Chapter 1 to include more details about the potential ways in which different sectors can use the LNRS.
OVER016		The chapter would benefit from greater integration of urban nature recovery, explicit recognition of smaller but ecologically significant sites, and a stronger focus on community engagement as a core delivery mechanism.	Comment noted.
OVER017	Tyne Rivers Trust	If funding is creating a barrier to effective conservation action, could we include a priority measure to better engage with funders.	This is included within measure OP 1.2
OVER018		Measure OP 2.2 Build a robust Local sites system for the North of Tyne". It might be useful to consider the overall goal before committing to design monitoring programmes. There is a clearly established system for condition monitoring of designated sites, yet these sites continue to deteriorate or remains unfavourable. Any new system must consider the desired outcome and action need to achieve this.	Comment noted
OVER019	Historic England	Countryside, landscaped parks and the open spaces in and around our cities, towns and villages often have heritage interest, and it would be helpful to highlight this in the Strategy. Nature recovery should be considered not only in terms of the natural environment, health and	Noted. We have amended the text to reflect this.

		recreation but also how the historic environment can contribute to and work alongside these aims.	
OVER020		It is important to recognise that the historic environment, like the natural environment, is irreplaceable and includes designated heritage assets that are protected by legislation. It can be helpful to understand the nature and significance of the historic environment within your plan area or scheme at an early stage so as to avoid any potential conflicts with its conservation. Indeed, many sites designated and protected for their ecological importance also include, or coincide with, designated heritage assets (such as World Heritage Sites, Registered Parks and Gardens, Scheduled Monuments and Conservation Areas). At such sites, past human activity, specific design or functional considerations, and long periods of sustained and targeted management have led to a concentration of habitats and features supporting protected species. Such sites often preserve ancient and veteran trees and cultivate both native and introduced specimens which serve as important natural resources for foraging opportunities and associated habitats, supporting impressive amounts of wildlife: • Moats, canals, lakes and other defensive or ornamental water bodies as well as ditches, mill race and other modified watercourses provide ranges of aquatic habitats. • Long established woodland and grassland communities support an array of plants, fungi and invertebrates associated with undisturbed soils and aid in carbon sequestration. • Historic ornamental and functional structures provide shelter and breeding opportunities for protected species	Comments noted. We have amended the text to reflect this.
OVER021		It may therefore be useful for the Strategy to refer to the role that the natural environment can play in delivering positive, and often mutually beneficial, outcomes for the historic environment. It can be used to: 1. Conserve and enhance heritage assets; 2. Improve the setting of heritage assets; 3. Improve access to heritage assets; 4. Create a sense of place and tangible link with local history; and 5. Create linkages between heritage assets and local nature recovery sites. Likewise, the historic environment can contribute towards the quality, character and distinctiveness of green spaces and the natural environment by helping to create a sense of place and a tangible link with local history and human activity. Opportunities can be taken to link new networks into already existing green spaces in towns or existing historic spaces, such as churchyards, to improve the setting of historic buildings or historic townscape.	Comments noted. We have amended the text to reflect this.
OVER022		Maintenance of the wider nature network and individual spaces should also be carefully considered so that it continues to aid nature recovery and create high quality places which thrive in the long term, whilst conserving heritage assets. Including heritage assets within habitat	Comments noted.

		creation proposals and seeking to manage them effectively with policies and actions that are appropriate for the assets involved can, as already highlighted, deliver a host of additional benefits for society.	
OVER023		The Strategy should: Acknowledge links between the nature network and heritage assets in the area and set an appropriate methodology for considering prospective nature recovery opportunity areas We note that the current draft does not attempt to promote particular sites for nature recovery. Nevertheless, there is still an important role for the strategy in setting out an appropriate for considering such sites. This process needs to consider whether new areas for habitat creation or restoration, or proposals for enhancements to existing nature conservation sites, will affect the significance of heritage assets in the area either directly, or through changes to their setting.	Comment noted.
OVER024		Historic England also advises that this process should include the need to engage the specialist conservation and archaeology advisers in each of the local authorities covered by the strategy. The aim being to ensure you are aware of all the relevant features of the historic environment and that heritage assets are effectively considered as part of plans for habitat creation or enhancement. These advisers are also best placed to advise on local historic environment issues, priorities and evidence, including access to data held in the Historic Environment Record. 2. Consider the extent to which the historic environment will be affected, both positively and negatively, by habitat creation proposals. 3. Consider how, if at all, recent and ongoing Biodiversity Net Gain or similar projects considered the historic environment in developing habitat enhancing land management plans. 4. Determine whether there are any potential conflicts between the Strategy's proposals for nature recovery or enhancement and the historic environment at a strategic level. For example, proposals: a. within designated areas that would impact on the significance of a heritage asset or Outstanding Universal Value of a World Heritage Site, such as nature recovery or habitat creation that does not sufficiently take heritage impacts into account, including historic character and setting. b. that include afforestation on 'open' landscapes, which could interrupt the relationships and inter-visibility between heritage assets. c. that will alter the condition of soils or the water environment which could impact on below ground archaeology. d. to change land management practices which could affect the character of historic landscapes. 5. Identify where there are opportunities for biodiversity enhancements that would benefit both the natural and historic environments. For example: a. restoring historic hedgerows b. restoring priority habitats that support both nature recovery and historic character of particular landscapes e.g. wood pasture and parkland, traditional	Comment noted.

		orchards, open water, meadows etc. c. changes to land management practices that protect archaeological features, such as the reversion of arable land to meadow or pasture where appropriate. d. measures that improve the water quality of historic lakes, ponds, and canals, or that restore historic water management features. e. improving public access and interpretation of both natural and historic features f. restoring historic structures or landscape features that could also support wildlife, e.g. icehouses, follies, ha-ha etc. 6. Set out how landowners and land managers can best look after known and unknown historic environment features and the wider historic landscape on BNG offsite settings.	
OVER025		The document "Nature recovery and the historic environment, Natural England, 2023" may provide some helpful guidance in relation to LNRS and the historic environment.	Comment noted.
OVER026	Individual 2 (line 5)	The impact of ALAN (Artificial Light at Night) which acts as a chronic stressor that degrades the quality of ecosystems; has significant negative impact on biodiversity; and weakens the resilience of these ecosystems to climate change.	Comment noted. We have amended the text to reflect this.
OVER027	Individual 3 (line 6)	Do not destroy environment by using chemicals eg weedkiller	Comment noted.
OVER028		Do not import foreign species trees, animals they are invasive	Comment noted.
OVER029		Promote being environmentally friendly no litter, dumped rubbish	Comment noted.
OVER030	Individual 4 (line 15)	There is a need to improve sewer/drain infrastructure to reduce pollution into the river Tyne. Tributaries to the River Tyne in Ovington parish have been threatened by overwhelmed sewers leaking into fields and draining in to burns and the Tyne. This has been flagged with the Environment Agency and Northumbrian Water. Issues have also been raised with Tyne Rivers Trust.	Comment noted.
OVER031	Individual 11 (line 23)	ECOLOGICAL LITERACY THROUGH EDUCATION IN PLACE - There is a loss of ecological literacy and cultural connection with nature at the human level in all communities - this is fundamental to the success of a Nature Recovery Strategy. A 'local' recovery must be underpinned by understanding at all levels of society of the human relationship with our own local bioregions. Our citizenship role as individual stewards of nature is critical - but this has been omitted from the plan. Where is the strategy for local community education, co-design and guardianship of nature? The success of the local plan relies on behaviour change at the human level in place through increased understanding of our human impacts and increased emotional connection to our natural surroundings. What is the strategy to promote ecological literacy through education in place?	Thank you – interesting thoughts for the implementation phase
OVER032		Create BIOREGIONAL LIVING-LEARNING HUBS: 1. Foster learning communities where bioregions become shared classrooms (or living learning labs) where people experiment, reflect, and regenerate nature together. 2. Use bioregional mapping to reveal water flows and	Thank you – interesting thoughts for the implementation phase

		<p>biodiversity; communicate risks and highlight positive actions taking place as they evolve within bioregions. 3. Build community-led stewardship through sharing ideas - residents, farmers, educators, artists, poets, local organisations - shifting consultation to collaboration. 4. Blend ecological knowledge with cultural imagination - storytelling, arts science, community memory and value local knowledge sharing as place-based learning. 5. See the bioregion as a living-system. Bioregioning shows that nature recovery is most effective when we plan at the scale of watersheds and ecological flows and employ ecosystems thinking as demonstrated in South Devon, Tayside, and the Clyde where catchment-based action has improved water quality, restored habitat networks, and reduced long-term costs for local authorities. These bioregions also prove that when education, community learning, and ecological literacy are embedded into recovery work, councils gain durable public support and unlock the collective capacity needed for resilient, landscape-scale change.</p>	
OVER033		<p>1. What capacities do people, organisations and places need to develop to deliver nature recovery at scale? 2. How will we build ecological literacy across communities, schools and organisations so recovery becomes culturally normal? 3. What governance structures are needed to sustain long term collaborative success? 4. How will we measure success in terms of ecological processes not site-based outputs? 5. What future habitats and ecological scenarios are we planning towards? Answers should be co-created in our communities.</p>	<p>Thank you – interesting thoughts for the implementation phase</p>
OVER034	Individual 16 (line 30)	<p>Use of antibiotics and pesticides (wormers in particular) in livestock (including game birds) needs minimising via fecal egg counts. Prevent the use of wormers and other insecticides in livestock as well as for pets. This is not only for freshwater, but also for grasslands. Protecting water courses from dogs isn't enough- there is an opportunity here to educate pet and livestock owners, gamekeepers, local pet and farm supply shop workers and vets about the danger of pesticides (spot on and wormers) to watercourses, woodlands and grasslands. It's not about singling out one group (dog owners), but addressing the systemic over introduction of pesticides and antibiotics into the natural environment.</p>	<p>Comment noted.</p>
OVER035	Individual 19 (line 35)	<p>Removing pressure to enable recovery will bring back wind-dispersed species first, then berried species spread by birds, but other species such as oaks will need to be planted. To this end (and relevant to all sections) the LNRS should enable support for the collection, propagation and or planting of non native species, for example support small nurseries using schools to collect acorns/seeds/mast from target trees etc. I don't understand why grazing pressure is not mentioned as a major detractor - why is this? Certainly on the lower 'fells' where heather and bilberry</p>	<p>Comment noted.</p>

		existed 20year ago, but where areas have been drained and high densities of sheep introduced - this is the single biggest factor. Mapping these areas would be beneficial.	
OVER036	Individual 25 (line 45)	Any context or metrics for assessing the nature of the challenge of bird recovery is totally lacking. This is a generic weakness in the Strategy. It is impossible to know if progress is being made if we do not establish a baseline.	Comment noted.
OVER037	Individual 44 (line 87)	We're not told what OP stands for until page 136. I had assumed that it was Overarching Priorities, but it seems that its actually Overarching Principles	Comment noted
OVER038		I was hoping that the draft LNRS would have come with an updated species priority list for me to comment on. I was disappointed that the long list published in October 2024 didn't include the reintroduction of any locally extinct species of mammal (such as lynx and beaver), and I was hoping to see that they've since been added.	Comments noted. Lynx is beyond the scope of this LNRS because it is not part of the Defra relocation code. Beaver is mentioned in the text.
OVER039	Individual 45 (line 89)	No mention of increasing issues with ticks (associated with climate change and other factors) and the diseases they carry which threaten both wildlife, livestock and humans. Sadly this is resulting in some land managers using more insecticide treatments, all of which also impact negatively on other invertebrates in the ecosystem which has implications for the whole food web. Less use of insecticides, especially broad spectrum, highly persistent ones, on moorland and all habitats. More research is needed.	Comment noted
OVER040		There needs to an LNRS species recovery plan with priority species identified for action.	Comment noted

STRATEGIC RECOVERY AREAS

Number	Respondent	Comments	Proposed Response
SRA001	Forestry England	Forestry England would encourage the consideration of the Border Mires to be included as a Strategic Recovery Area. As detailed in the LNRS, complex of many peat bogs and raised mires on the Northumberland and Cumbria border, nationally and internationally important ecosystems. Recently, Forestry England has worked alongside partner organisations to lead the redefinition of the boundaries of the mires to include hydrological connections, as detailed in their updated Management Plan. Whilst the redefined boundaries are not subject to the same legal protection as the designated sites, they are being treated as such within Forest Plans and Land Management.	The importance of the Border Mires and the excellent work being done to conserve and restore them by FE and the wider Border Mires Partnership is set out in the LNRS. However, as they comprise a large number of separate sites that FE would not wish to unite through removal of productive forestry they aren't suitable for inclusion as an SRA.

			Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.
SRA002	Northumberland National Park Authority	We welcome the inclusion of the Strategic Recovery Areas to highlight areas where landscape scale networks can be established. The Hadrian's Wall area is well placed as the Hadrian's Wall Wetlands Landscape Recovery project aims to reconnect habitats in the area bringing land managers together.	Comment noted.
SRA003		It is disappointing that the mid-Northumberland area does not include Harwood forest as there are many opportunities for habitat connectivity and water quality improvement there linking with the designated sites.	This has been discussed with FE, Harwood Forest now included
SRA004	Bellway Homes	It is welcomed that specific Strategic Recovery Areas are identified, however, within these areas given the broad scale of the land identified there is likely to be a need for development. It is important that, as LNRS do not place new restrictions on development or designate new wildlife sites and, therefore, it is appropriate that it is made clear that development can come forward. Especially when land is identified as a zone or wash of a colour, it gives the impression that it is reserved for recovery rather than it is an opportunity area for recovery that could be delivered alongside development or independently. Particularly, in terms of LNRS informing the local plan making process, it needs to be made clear that these SRAs do not place restrictions on development, so that appropriate opportunities to deliver growth and meet arising needs of communities.	Comments noted – this will be addressed in the new NPPF
SR005	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	We agree that SRAs are a good thing – it helps focus the mind. We believe each SRA needs a strategy and action plan to set directions for the actions and to set objectives that can be monitored to demonstrate success.	Comment noted.
SR006		We are concerned that creating a straight line boundary to SRAs will have unintended consequences. If a landowner sees that they are not in an SRA, they might consider that they don't need to do anything. This will be exacerbated if payments (e.g. SFI or ELMs) of any kind become linked with being in an SRA. We believe the boundaries should be fuzzy. This could be done by inviting landowners to join an existing SRA or to set up their own (assuming the nature recovery that they wish to undertake warrants SRA status).	It would not be possible in a GIS map to allow for a blurred line that could also be zoomed in and out of. Where neighbouring landowners wish to support SRA activities, we will work to a fuzzy boundary. We will amend the text accordingly.

SR007		<p>We believe that there should be many more SRAs and that these SRAs should be allowed to overlap. So, for example, there might be an Upper Coquet SRA that covers the River Coquet catchment from Pauperhaugh upstream. This would include land managed by the MOD and Northumberland National Parks, and include the Harbottle Moors SAC (amongst many other designated areas). This SRA would learn from and sit alongside the Revitalise Redesdale Partnership (which, by the way, surely should be another SRA). The Upper Coquet SRA would overlap with the Mid Northumberland SRA in the LNRS and some of the partners (Hepple Estate and NWT) and some of the priorities (heathland, woodland, grassland) would be the same. However, it would have a different focus, with flood resilience, INNS and wetland creation becoming more prominent. We also believe that there should be another SRA to the north of Rothbury incorporating The Cheviots and reaching into the College Valley. And there seems no reason why there shouldn't be another coastal dunes SRA (similar to the Ashington to Amble SRA) north of Amble stretching to Berwick, incorporating the land managed by Natural England and the Northumberland Wildlife Trust and the landowners around Lindisfarne that are already part of the LIFEWADER project.</p>	<p>Comment noted.</p>
SRA008		<p>As we state in other section of this consultation, there are not enough SRAs in the LNRS. However, here, we wish to focus on the Mid Northumberland SRA. It is a nonsense that Harwood Forest is excluded from this SRA – Harwood Forest is at the core of this landscape scale area. It occupies a strategically important location which has massive influence on the connectivity and quality of habitats within the SRA area as well as peatland function and hydrological processes in the surrounding catchments. Wildlife corridors between habitats should criss-cross the forest. There is no reason why a forest managed by a public body should be excluded from the SRA. We are aware that nature recovery work is already occurring within Harwood Forest and that its existing Forest Design Plan will deliver more. It would seem that, with the Harwood Forest Design Plan approaching its next review, this would provide an ideal opportunity to deliver LNRS priorities. The proposed SRA already includes areas of 'productive' farmland so there should be no reason for excluding a 'productive' forest from the SRA.</p>	<p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p> <p>Harwood and Mid Northumberland SRA under discussion with Forestry England. See response SRA003</p>
SRA009	National Trails UK	<p>When mentioning 'Hadrian's Wall Strategic Recovery Area', please mention the Hadrian's Wall National Trail, a vital link for providing people access to the wall and nature recovery initiative and has the potential to be the golden thread that links the projects to other sites.</p>	<p>See response to STA002</p>

SRA010	Natural History Society of Northumbria	An urban recovery area should be included - whilst this is not of landscape scale there is huge potential to showcase nature recovery close to where people live in urban areas.	Nature recovery in urban areas is important, as set out in the Urban chapter. However, urban areas are not really amenable to the SRA approach because of the limited available land.
SRA011		NHSN would like to propose the Ouse Burn Way and Gosforth Nature Park as another Strategic Recovery Area - whilst not landscape scale it could provide an example of best practice for other urban areas throughout the whole LNRS area. There is huge support for this from NHSN volunteers and members who are deeply concerned about the increasing urbanisation of the 'wildlife corridor' which has resulted in loss of species and habitat already.	Nature recovery in urban areas is important, as set out in the Urban chapter. However, urban areas are not really amenable to the SRA approach because of the limited available land. The Ouseburn and adjacent wetland areas are included as priorities on the Stage 5 map and are important areas for delivery. It should be noted that, unlike the Stage 5 mapping, SRAs do not form a statutory part of the LNRS mapping.
SRA012	Wylam Parish Council	Looking at the Strategic Recovery Areas, I would strongly urge a 5th one that should be the Tyne Valley. Possibly with the north and south Tyne. Its complicated because it straddles three LNRS - but there are major players already involved (Tyne Rivers Trust and EA) so I think its something to look at.	The Strategic Recovery Areas were identified because they contain projects that are at a stage to deliver nature recovery at scale in the next 5-10 years. The next iteration of the LNRS will be able to focus on further areas which are similarly ready to deliver at that time.
SRA013	Pennine National Trails Partnership	When mentioning 'Hadrian's Wall Strategic Recovery Area', please mention the Hadrian's Wall National Trail, a vital link for providing people access to the wall and nature recovery initiative and has the potential to be the golden thread that links the projects to other sites.	See response to STA002
SRA014	Rothbury Climate and Nature	We are concerned that creating a straight-line boundary to SRAs may have unintended consequences. If a landowner realises they are not in an SRA, they may consider that they don't need to take any action. (This will be exacerbated if payments of any kind become linked with being in an SRA). The boundaries could be 'fuzzy'. Such 'fuzziness' would allow the inviting of landowners to join an existing SRA, or to set up their own.	See response to SR006
SRA015		We are delighted that the LNRS recognises the huge opportunities to deliver nature recovery at scale on and around the Simonside Hills. We fully support this area being included in the LNRS as a Strategic Recovery Area (SRA). However, it is surprising, and very disappointing, that Harwood Forest is not included in the SRA at the request of FE/FC. We believe it is vital that all of Harwood Forest is included within the SRA for	See response SRA003

	<p>Simonside, to deliver meaningful positive restoration of habitats and species across the SRA. We consider that this can be done in harmony with timber production. Harwood Forest is a huge area within the core of the proposed SRA and therefore occupies a strategically important location which has a massive influence on the connectivity and quality of habitats, as well as peatland function and hydrological processes in the surrounding catchments. Thus influencing water quality in Fontburn Reservoir as well as the Rivers Coquet, Wansbeck and Rede. The land on which Harwood Forest grows is owned by the surrounding estates, all of which are part of the proposed SRA. The long-term lease to the Forestry Commission - a public body run on behalf of the nation to deliver environmental benefits and access, in addition to timber production - should surely mean that Harwood Forest is included in the SRA. We recognise and welcome the conservation work that is already undertaken within Harwood Forest and see the potential to properly fulfil existing Forest Design Plan commitments and deliver considerably more. There are many opportunities to deliver Forestry England's own policies, including the recently published 'Our Forests Resilience Strategy & Action Plan', to transition to a more resilient, economically and environmentally sustainable forest. The Harwood Forest Design Plan is approaching its next review, which provides the ideal opportunity to deliver LNRS priorities. Including Harwood Forest within the SRA is therefore appropriate and timely. It would facilitate habitat restoration and creation for LNRS priority species, including Black Grouse, for which the area was once known, and many of us remember and lament the loss of. The proposed SRA already includes areas of 'productive' farmland, so there should be no reason for 'productive' forest to be excluded from the SRA. In other counties in England, e.g. Dorset, we are aware that landowners are given the opportunity to become part of a nature recovery area. We would welcome this approach being adopted by NCC as part of the LNRS.</p>	<p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p>
SRA016	<p>In addition to the inclusion of Harwood Forest, we would like to see the proposed SRA extended to include more of the MOD land on the Otterburn Training Area. We welcome the inclusion of Grasslees and would like land to the north, including the area around Holystone and Harbottle, to be included. Land owned/managed by NWT in this area should also be part of the SRA, as it provides the opportunity to link the Harbottle Moors SAC with the Simonside Hills SAC, ideally also incorporating the privately owned land adjacent to the River Coquet between Sharperton and Hepple. We welcome the inclusion of land at Castron in the SRA and would like to suggest that additional land, including the National Trust-owned farms at Warton and Low Trewhitt, as</p>	<p>Comment noted.</p>

		well as privately owned Burradon Windyside are allowed to be included in the SRA.	
SRA017		Thinking about the habitats and wildlife present, and large-scale positive management for nature, in big areas of the Cheviots, including land owned by College Valley Estate, we would like to suggest that an additional SRA be considered in the Cheviots.	The Strategic Recovery Areas were identified because they contain projects that are at a stage to deliver nature recovery at scale in the next 5-10 years. The next iteration of the LNRS will be able to focus on further areas which are similarly ready to deliver at that time.
SRA018		We also believe that there should be many more SRAs and that these SRAs should be allowed to overlap. So, for example, there might be an Upper Coquet SRA that covers the River Coquet catchment from Pauperhaugh upstream. This would overlap with the Mid Northumberland SRA in the LNRS and some of the partners (Hepple Estate and NWT) ad some of the priorities (heathland, woodland, grassland) would be the same. (However, it would have a different focus, with flood resilience, INNS and wetland creation becoming more prominent). We also like the idea of a Coquet Headwaters Strategic Recovery Area.	Comment noted.
SRA019	Save Newcastle Wildlife	All the proposed Strategic Recovery Areas appear to be in Northumberland. We would expect to see these more appropriately distributed across the strategy area, with some in Newcastle and North Tyneside. While Northumberland provides more scope for habitat creation at large scale, urban areas should not be neglected and we have provided examples of how urban green infrastructure can support this. For example, the Ouse Burn Way could form the basis of landscape scale nature recovery in an urban setting and a national river walk, while ex mining sites that are now nature reserves could be better connected.	Nature recovery in urban areas is important, as set out in the Urban chapter. Hower, urban areas are not really amenable to the SRA approach because of the limited available land. The Ouseburn and adjacent wetland areas are included as priorities on the Stage 5 map and are important areas for delivery. It should be noted that, unlike the Stage 5 mapping, SRAs do not form a statutory part of the LNRS mapping.
SRA20	Taylor Wimpey UK Ltd	It is welcomed that specific Strategic Recovery Areas are identified, however, within these areas given the broad scale of the land identified there is likely to be a need for development. It is important that, as LNRS do not place new restrictions on development or designate new wildlife sites and, therefore, it is appropriate that it is made clear that development can come forward. Especially when land is identified as a zone or wash of a colour, it gives the impression that it is reserved for recovery rather that it is an opportunity area for recovery that could be delivered alongside development or independently. Particularly, in terms of LNRS informing the local plan making process, it needs to be made clear that these SRAs do not place restrictions on development, so that	Comments noted.

		appropriate opportunities to deliver growth and meet arising needs of communities.	
SRA021	The Maling Street Management Company	In line with Chapter 8's insights, there should be explicit recognition that SRAs must also encompass or connect with important urban nature spaces that form critical ecological stepping stones or corridors within the wider landscape. Urban river valleys such as the Ouseburn form natural axes for wildlife movement and habitat continuity and should be acknowledged as integral to SRAs or as linked buffers and corridors.	Comment noted. SRA's have a very specific rationale. Urban areas are not really amenable to the SRA approach because of the limited available land. The Ouseburn and adjacent wetland areas are included as priorities on the Stage 5 map and are important areas for delivery of nature recovery actions. It should be noted that, unlike the Stage 5 mapping, SRAs do not form a statutory part of the LNRS mapping.
SRA022		Furthermore, the LNRS might also emphasise how SRAs can be delivery focus for multiple benefits beyond biodiversity including climate adaptation, water quality improvement, and community health. This aligns with overarching priorities and can help attract broader partnership and funding support.	Comment noted.
SRA023		Finally, effective governance and collaborative frameworks will be essential to realise the potential of SRAs. Encouraging and supporting local community groups, organisations and public bodies to work together within these areas will maximise restoration success and ensure that strategic aims translate into tangible outcomes on the ground.	Comment noted
SRA024	Tyne Rivers Trust	While we agree that large scale projects are most likely to emerge in areas where land is owned by public bodies, or where sympathetic landowners are present (FYI there is no clear explanation as to how 'sympathetic landowners' have been mapped), this should not be confused with strategic planning for species conservation. It is important to recognise that there are many sites across the UK with critically endangered, endangered or vulnerable species and these sites are not always recognised through statutory or local designations. The Tyne catchment is underrepresented in the LNRS, with the exception of the Hadrian's Wall Strategic Recovery Area.	Comment noted.
SR025		The strategy does not appear to consider measures for landscape scale restoration in the riparian zone around main river channels e.g. the North Tyne and the River Rede which could also provide significant landscape scale restoration opportunities.	Comment noted.
SR026		Large scale river restoration projects are not included as priorities in any of the strategic recovery areas. As such we don't think that our waterways (river and streams) and freshwater species are well recognised and represented in strategic recovery areas.	Strategic Recovery Areas (SRAs) have a very specific rationale set out in Chapter 9. They are not intended to be the only locations where large-scale delivery is possible and the LNRS

			mapping and measures need to be considered as a whole. Following consultation we have now included the Rede catchment on the Stage 5 map.
SR027		There is no proposal to consider opportunities for restoration across Redesdale and the North Tyne. River restoration will secure habitat for a wide range of freshwater species including freshwater pearl mussel, white clawed crayfish, Atlantic salmon and Brown trout. Reconnecting the river to its historic floodplain will create seasonal wetlands and provide habitat for wading birds, amphibians and invertebrates.	Following consultation we have now included the Rede catchment on the Stage 5 map.
SR028	The Crown Estate	The majority of the Ellington estate is within the Ashington to Amble Strategic Recovery Area.	Comment noted.
SR029	Individual 11 (line 23)	Reframe the proposed recovery areas as living bioregional watershed systems from source to sea. Watershed thinking. Organise action around watersheds, soils, climate patterns and ecological flows. For example instead of a 'Strategic Recovery Area', rather the 'Coquet Valley Bioregion': The Coquet River - from headwater to estuary = one bioregion at landscape level that integrates the interconnectivity of ecological systems.	Comment noted.
SR030	Individual 16 (line 30)	The North Pennines Peatlands is missing as a strategic recovery area - the headwaters of the Tyne and Derwent have huge areas of peatlands which are actively being damaged - they are on fire just now - and these should be a priority for recovery.	Comment noted. Peatland restoration priorities in Northumberland section of the North Pennines Natural Landscape form part of the Phase 5 map.
SR031	Individual 17 (line 31)	Ouseburn Valley Wildlife Corridor should be included with the Strategic Recovery Area.	Nature recovery in urban areas is important, as set out in the Urban chapter. However, urban areas are not really amenable to the SRA approach because of the limited available land. The Ouseburn and adjacent wetland areas are included as priorities on the Stage 5 map and are important areas for delivery. It should be noted that, unlike the Stage 5 mapping, SRAs do not form a statutory part of the LNRS mapping.
SRA032	Individual 24 (line 43)	For the Tyne, North Tyne, Wansbeck, Coquet, Aln and other river systems I'd like to see source-to-sea strategic nature recovery areas. The Coquet might make a useful pilot study. The goal would be to establish healthy populations of indicator species - salmon and trout, kingfisher, dipper, bats - along the length of these river systems giving rise to flagship species - otter, osprey even, and others. Similarly moorland birds - black grouse - might be a catalyst for more active habitat management?	Comment noted. This would be for the delivery phase of the LNRS. Work is currently underway through Natural England to produce a Protected Sites Strategy for the Coquet catchment.

SRA033		There are large areas noticeably absent from the current plan. Rothbury Hills and Harwood Forest to name just two. Any additional SRAs should be justified by functional connectivity, not administrative convenience. Boundaries should reflect catchments, landform, and management coherence rather than parish or ownership lines. There is no mechanism proposed by which landowners might opt in to become designated Strategic Areas for Nature Recovery.	See response SRA003. SRAs were selected on the basis that there is a realistic prospect of significant delivery of nature recovery at scale within the lifetime of this iteration of the LNRS
SRA034		A Coquet Headwaters Strategic Recovery Area should be explicitly identified. The upper Coquet catchment contains a rare concentration of relatively intact upland habitats, including blanket bog, heathland, rough grassland, and semi-natural woodland. This area represents a prevention opportunity, where protecting existing function is likely to be more cost-effective and ecologically robust than downstream remediation. The headwaters are critical for hydrological regulation, influencing flood risk, sediment transport, water quality, and downstream habitat condition. Strategic intervention here, for example trialling the introduction of beavers, could deliver cascading benefits for rivers, wetlands, grasslands, and floodplain systems lower in the catchment. This area is well suited to integrated peatland restoration, grazing management, and low-intensity woodland expansion.	Comment noted.
SRA035		A Coquetdale Valley Floor and Floodplain SRA should be considered as a distinct landscape unit. Targeted recovery here could focus on reconnecting floodplains where feasible, enhancing riparian habitat continuity, and improving wet grassland condition for breeding waders. Any valley-floor SRA must be framed around selective opportunity, not blanket change. Land capability, tenure, and farm viability vary sharply over short distances in Coquetdale. Strategic designation should signal priority and coordination, not impose uniform prescriptions.	Comment noted.
SRA036		A Woodland–Open Habitat Interface SRA merits consideration in the Rothbury hinterland eg. sitka spread. Much of the tension locally arises not from woodland per se, but from poorly planned transitions between woodland, scrub, and open habitats. Managing edges deliberately - rather than allowing unstructured expansion or rigid exclusion - would support birds, invertebrates, and structural diversity. This SRA could help defuse unproductive polarisation between woodland advocates and open-habitat specialists.	Comment noted.
SRA037		A Non-Farmed Land Network SRA should be proposed, spanning: road and rail corridors, settlements and urban edges, large gardens and estates, former industrial or landfill sites. While individually small, these areas collectively represent a significant and underused spatial resource for connectivity. Current agri-environment mechanisms largely exclude these parcels, creating a structural gap in delivery. An SRA designation	Comment noted. SRA's have a very specific rationale which is set out in Chapter 9.

		could help attract alternative funding, coordination, and governance models to mobilise this land.	
SRA038		Finally, SRAs must be explicitly linked to delivery mechanisms. Without clarity on funding routes, advisory support, and governance, additional SRAs risk becoming symbolic rather than operational. Fewer, well-defined SRAs with credible delivery pathways would be preferable to a proliferation of aspirational designations.	Comment noted.
SRA039	Individual 25 (line 45)	The criteria used for selecting SRAs are opaque and generalised with no convincing and transparent evidence on which to base the designation. The boundary of the Mid northumberland SRA is irrational and on the face of it indefensible. The boundary problem that I have already referred to is especially acute with this concept. There are quite clearly too few SRAs. This element of the strategy thus may well be counterproductive.	Comment noted.
SRA040	Individual 37 (line 68)	The proposed Strategic Recovery Areas are a positive step toward taking a landscape-scale approach to nature recovery. However, I am concerned that urban and peri-urban corridors may still be underrepresented compared to larger rural areas. While large habitats are essential, the strategy risks overlooking how smaller urban sites function collectively as part of wider ecological networks.	Strategic Recovery Areas (SRAs) have a very specific rationale set out in Chapter 9. They are not intended to be the only locations where large-scale delivery is possible and the LNRS mapping and measures need to be considered as a whole. Urban and urban fringe areas contain a number of opportunities work to support wider ecological networks, for example the waggonways of North Tyneside and the Ouseburn catchment.
SRA041	Individual 45 (line 89)	Delighted that the opportunities in the Simonside Hills proposed SRA are recognised and urge more resources to be made available to enable these opportunities to be realised. Worth highlighting the formation and role of the Simonside Connects Partnership which will need ongoing support to achieve the full potential this area offers.	Comment noted.
SRA042		As a nature lover living and working in Coquetdale, I am delighted that the LNRS recognises the huge opportunities to deliver nature recovery at scale on and around the Simonside Hills and fully support this area being included in the LNRS as a Strategic Recovery Area (SRA). I hope this LNRS designation does result in more resources for nature coming into this area. I am hugely disappointed by Harwood Forest not being included in the SRA at the request of FE/FC. I feel it is vital that all of Harwood Forest is included within the SRA for Simonside in order to deliver meaningful positive restoration of habitats and species across the SRA. I believe that this can be done in harmony with timber production. Harwood Forest is a huge area within the core of the proposed SRA and therefore occupies a strategically important location which has massive influence	See response SRA003

	<p>on the connectivity and quality of habitats as well as peatland function and hydrological processes in the surrounding catchments. Thus influencing water quality in Fontburn Reservoir as well as the Rivers Coquet, Wansbeck and Rede. The land on which Harwood Forest grows is owned by the surrounding estates, all of which are part of the proposed SRA. The long term lease to the Forestry Commission - a public body run on behalf of the nation to deliver environmental benefits and access, in addition to timber production - should surely mean that Harwood Forest is included in the SRA. I recognise and welcome the conservation work that is already undertaken within Harwood Forest and see the potential to properly fulfil existing Forest Design Plan commitments and deliver considerably more. There are many opportunities to deliver Forestry England's own policies including the recently published 'Our Forests Resilience Strategy & Action Plan' to transition to a more resilient, economically and environmentally sustainable forest. The Harwood Forest Design Plan is approaching its next review which provides the ideal opportunity to deliver LNRS priorities. Including Harwood Forest within the SRA is therefore appropriate and timely. It would facilitate habitat restoration and creation for LNRS priority species including Black Grouse for which the area was once known and many of us remember and lament the loss of. The proposed SRA already includes areas of 'productive' farmland so there should be no reason for 'productive' forest to be excluded from the SRA. In addition to the inclusion of Harwood Forest, we would like to see the proposed SRA extended to include more of the MOD land on the Otterburn Training Area. We welcome the inclusion of Grasslees and would like land to the north including the area around Holystone and Harbottle to be included. Land owned/managed by NWT in this area should also be part of the SRA as it provides the opportunity to link the Harbottle Moors SAC with the Simonside Hills SAC, ideally also incorporating the privately owned land adjacent to the River Coquet between Sharpeton and Hepple. We welcome the inclusion of land at Caistron in the SRA and would like to suggest that additional land, including the National Trust owned farms at Warton and Low Trehwhitt as well as privately owned Burradon Windyside are given the opportunity to be included in the SRA.</p>	<p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p>
SRA043	<p>In other counties in England e.g. Dorset, we are aware that landowners are given the opportunity to become part of a nature recovery area. We would welcome this approach being adopted by NCC as part of the LNRS.</p>	<p>Comment noted. We welcome and support the involvement of landowners in the delivery of the LNRS.</p>
SRA044	<p>I would like to propose that an SRA is considered for the Cheviots given the habitats and species present and the potential offered by the large scale positive management for nature in big areas of the Cheviots,</p>	<p>Comment noted.</p>

		including land owned by College Valley Estate, Lilburn Estate and Linhope Estate, Ilderton Dod as well as holdings on the MOD's OTA 'Dry Training Area' such as Blindburn and Barrowburn. There are opportunities to remodel Uswayford and parts of Kidland Forest so these areas and some of the adjacent areas could form an SRA. Adding this SRA to those already proposed (and hopefully expanded) would create a strong network to drive more, bigger, better, more joined up approaches for nature recovery across Northumberland and linking up with Scotland. This is key for so many species, including black grouse, especially with climate change impacts accelerating.	
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WIDER COUNTRYSIDE

Number	Respondent	Comments	Proposed Response
COU001	Northumberland National Park Authority	We welcome the options for the wider countryside as landowners outwith the priority areas still have a lot to contribute to networks and will be interested in managing for nature. Having measures arranged by character area seems a good way to suggest options and will help advisors and land managers.	Comment noted.
COU002	Biodiverse Consulting	We are unsure if "wider countryside" measures are equivalent to unmapped measures/'Overarching Priorities' and if these are to be considered of 'high' strategic significance in Biodiversity Net Gain (BNG) assessments? We would urge North of Tyne to specify whether these are what are typically referred to as "unmapped measures" and clarify their relationship with strategic significance/BNG.	These are not of high strategic significance – text concerning the relationship between the LNRS and BNG modified to clarify this.
COU003	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	We believe that the wider countryside environments (hedgerows, trees and woodland; streams, ponds and wetlands; and shelter for birds and insects) are useful. But we don't believe the Wider Countryside areas are useful – they are just too large and the additional measures pop-ups too broad. They may be useful for planning but are not useful for implementing nature recovery. It would perhaps be useful to better define how this chapter should be used.	Comment noted.
COU004	Corsenside Parish Council	It could include how to increase biodiversity within and around towns and villages with an emphasis on involving local communities, schools, and community groups.	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase.
COU005	Haydon Bridge Nature Club Society	It could mention how to increase biodiversity in and around villages and towns.	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will

			keep our webpages up to date during the delivery phase.
COU006		Additionally, it could include more emphasis on involving local community groups.	Comment noted.
COU007	Port of Tyne	It is acknowledged that the focus for this section is on the farmed landscape and forestry. We would however query whether there also needs to be consideration to a strategic solution for coastal habitats and how this can be balanced with the economic priorities for the region. To this end the Port welcomes the opportunity to engage with the authority to consider how this may be reconciled with economic growth within the LNRS area.	Comment noted.
COU008	Solidarity Farm CIC	Organic, agroecological and other low-input livestock systems offer significant opportunities for nature recovery within productive farmland. These systems typically operate with reduced nutrient inputs, longer sward retention, greater plant diversity and improved soil structure, benefiting invertebrates, birds and water quality. Supporting the uptake and continuation of such systems can deliver nature recovery outcomes without removing land from food production.	Comment noted.
COU009		Actions proposed within the wider countryside should be achievable within the operational realities of working farms. Measures that require high administrative burden, long lead-in times or specialist consultancy may present barriers to smaller holdings.	Comment noted.
COU010	The Maling Street Management Company	The text should more explicitly recognise the value of locally important but less formally designated habitats, especially in urban areas. Sites like the Candle Flame (Ford Street) site, with open mosaic habitat and proximity to freshwater corridors, often fall below coarse mapping thresholds but are vital for connectivity and biodiversity.	The LNRS can only give examples of valuable sites, not comprehensive lists
COU011		Finally, explaining how the maps will be practically used to guide investment, planning, and monitoring would improve understanding.	Noted
COU012	The Preston Tower Estate	It would be tremendous if the LNRS could shine a light on more "ordinary" Nature that is inter-twined with the production of food such as the value of over-winter stubbles for farmland birds such as yellowhammers. North of Tyne is clearly blessed with a range of designations but that is not a reason to overlook "ordinary" Nature.	Comment noted – we have sought to do this in the Wider Countryside chapter and will certainly do so in the implementation phase
COU013	Tyne Rivers Trust	The previous sections of the Nature Recovery Strategy have identified and mapped measures covering around around 165,600ha ²⁰ or 31% of the North of Tyne area. These represent our highest priorities for action and represent the core of the strategy. However, it is important to recognise that actions to benefit wildlife can and are being undertaken outside of these priority areas. Such actions, although not an immediate priority in terms of this Strategy, can still represent a meaningful and	Thank you for this point. We have stressed this in the text every time the mapped area is mentioned. We have strengthened the link between the mapped measures by showing these as an icon (to make it clearer) but at the same time added a paragraph

		necessary contribution to nature recovery and to the environment more widely". This paragraph could be misleading and may encourage the reader to conclude that habitats and species outside of these key areas are not as high a priority. In our opinion, we feel this could lead to could this lead to a lack of funding for habitats or species outside these areas. There are for example, populations of critically endangered species e.g. freshwater pearl mussel present on the North Tyne and River Rede, neither river system is included as a priority area.	immediately before each "measures" section to stress this point too.
COU14	Individual 16 (line 30)	Needs a section on moorland and peatscapes - our vast driven grouse moors are in dire need of nature recovery	Comment noted. Moorland management is picked up in Chapter 3.
COU15		Needs an explicit section on soils - fertility, erosion prevention, microbial health, and carbon sequestration	Comment noted
COU16		Need to reference the Land Use Framework when it is published	Comment noted
COU17	Individual 24 (line 43)	The strategy risks underestimating the economic and operational constraints faced by farm businesses. In this area, viability is often finely balanced, particularly for upland and mixed farms. Measures that assume spare capacity, capital, or management flexibility will struggle to gain traction. There is an implicit expectation that biodiversity gains can be layered onto existing systems without trade-offs. In reality, changes to grazing pressure, cropping, drainage, or input use often involve real opportunity costs. A credible LNRS needs to acknowledge these costs explicitly rather than treating them as transitional inconveniences.	Comment noted
COU18		A clearer differentiation between where change is realistic and where it is not would be useful. Some land parcels are already delivering multiple public goods efficiently; others are constrained by soil, climate, access, or tenure. Strategic focus should follow this heterogeneity rather than assuming uniform potential.	Comment noted
COU19		The emphasis on voluntary uptake is appropriate, but it must be matched by predictable, long-term incentives. Short funding cycles and shifting scheme rules are particularly damaging in the wider countryside, where ecological response times are long. Without stability, risk-averse behaviour is rational and should be expected.	Comment noted
COU20		Collaboration at landscape scale is repeatedly encouraged, but the transaction costs of collaboration are largely ignored. Time, coordination, trust-building, and facilitation are not free. If collaboration is central to delivery, then facilitation must be treated as core infrastructure, not an optional add-on.	Comment noted
COU21		The importance of existing informal good practice is underestimated. Many farmers already deliver wildlife benefits through stock management, boundary maintenance, and rotational decisions that are not scheme-driven. Failure to recognise this risks alienating those already contributing most.	Comment noted

COU22		Climate change is referenced but not fully integrated. Increased weather variability will constrain what is ecologically and economically viable on much of the wider countryside. Recovery priorities need to be stress-tested against likely future conditions, not historical baselines.	Comment noted.
COU23		Finally, the chapter would benefit from a clearer distinction between aspiration and obligation. The wider countryside can deliver significant nature recovery, but only if participation is perceived as legitimate, fair, and worthwhile. Over-reaching ambition without delivery realism risks undermining confidence in the LNRS as a whole.	Comment noted.
COU024	Individual 25 (line 45)	This chapter is entirely inadequate and represents a total failure to grasp what nature recovery entails. People want to see the resurgence of nature and the cessation of its destruction directly or indirectly through wholly inappropriate agricultural practice , pollution , insensitive development and climate change. They want access to nature near their homes as well as in the wider countryside and this cannot be satisfied by existing 'protected sites' however important and precious those are. If as is stated in the guidance LNRS is to provide guidance cross a whole spectrum of interventions and polices then it needs to be fit for purpose or it will be rendered irrelevant. As things stand this is not a strategy but a 'position statement' both in term of the resource and the measures that are needed to maintain or improve that resource - most of which must surely have been known already.	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase.
COU026	Individual 45 (line 89)	It is really important that everyone feels they have a role to play in nature recovery, even if they aren't in one of the areas mapped as having the greatest opportunities. As sites like Knepp Estate in Sussex show, some of the biggest gains for nature in terms of abundance and diversity can be gained on sites with a low baseline. The wider countryside also offers opportunities for people to engage with nature on areas which are sometimes less sensitive than those prioritised for actions.	Comment noted. We have amended the text of Chapter 1 to include more details about the potential ways in which different sectors (including individuals) can use the LNRS.

MAPPING AND DATA

Number	Respondent	Comments	Proposed Response
MAP001	Forestry England	The LNRS stage 1 map includes SSSIs, Border Mires, Kielder Western Moor, LWS and ASNW. It also includes additional areas of forest which are identified as irreplaceable but have no formal or informal designation. Forestry England would like clarification on why these areas have been included if they are not designated, and how they have been mapped.	The StoryMap explains all the data sources for the “stage1” mapping. These areas are irreplaceable habitat, taken from the Priority Habitat Inventory and from Living England
MAP002		Restore to Bog: Low Yield Sitka on deep peat on the Public Forest Estate The Forestry Commission and Natural England Decision Support Framework for peatland protection includes a number of steps that require detailed consideration in order to identify where it is appropriate to undertake peatland restoration or forest to bog restoration. As such, there is the potential that the mapping shown may overestimate where restoration is required or is possible. Forestry England are required to regularly provide revisions to forest plans as the harvesting cycle progresses, and this allows opportunities for the steps detailed in the framework to be implemented as required. Expectations do need to be realistic around the speed of change and of where there are suitable locations for work.	<p>It is correct to say this LNRS is focused on a 5–10-year timescale, without knowing exactly when they will be reviewed.</p> <p>Re “Restore to Bog” The detail about which deep peat areas under low yield Sitka are due for felling in a 5–10-year timescale would normally be found (for the Public Forest Estate) in Forest Plans. These were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p> <p>We believe these areas to be recognised in the Forest Design Plans, regardless of the felling timescales and the LNRS review timescale. There could be opportunities for restoration as yet envisioned, outside of the routine site location cycles and restoration funding mechanisms.</p>
MAP003	Northumberland National Park Authority	Gowk bank is listed in the text as an NNR, is it in Northumberland? Thought it was Cumbria side of the Irthing? Not shown on the map though.	The StoryMap text will be corrected
MAP004		It would be good if the pop-up boxes could be re-sized and you could move them so you can see parts of the map underneath.	The Arc GIS online “web experience” doesn’t allow the pop-up boxes to be configured like that, but it is easy to close them using the “x” in the top corner, or by clicking away. We are investigating if the pop ups widget is configurable.
MAP005		It would be useful to know how the data set was formed, maybe in the same box as an information note?	Chapter 13 of the LNRS could become a separate document, and some of its detail could be added to the pop-up boxes as well.
MAP006		Where there is a pull-down box for several things under a top layer it is slightly confusing that the top-	Agreed, this will be done. The final LNRS mapping will also be improved by also having one layer for all the “stage1”, one

		level box can be clicked so it looks on but actually nothing is selected; you have to pull down and select. Could it be made that the default is all the sub layers are on when you click the top layer?	layer for all the "stage5", and we will send to Natural England one layer for all the stage5 minus the stage1.
MAP007	Bellway Homes	Understandably, given the scale of the area, it is understood that geographical information systems have been used to identify ecological opportunities. This, however, is likely to be less accurate when compared to site specific information identified on individual sites. It is important that these LNRS acknowledge that in circumstances whereby there are additional opportunities for ecological enhancement can be demonstrated, appropriate benefits in uplifting BNG can apply, for example, if agreed with the relevant Ecology advisor for the administrative area. Conversely, in circumstances whereby an ecological enhancement may be inappropriate, due to the particular habitats of the site potentially not being present or otherwise, similarly there should not be a requirement for the specific ecological enhancement. Such flexibility should be included to allow for potential inaccuracies in mapping and changing circumstances.	Wherever possible, ecological data should be shared with the Environmental Records Information Centre The rules concerning strategic significance are set by DEFRA, so site specific evidence will need to be considered within the context of those rules
MAP008		Bellway Homes looks forward to working with the North of Tyne Authorities in due course to share site specific ecological information already collected on their development portfolio to inform the LNRS and improve its accuracy in implementation.	Wherever possible, ecological data should be shared with the Environmental Records Information Centre
MAP009		Whilst it is acknowledged that Bellway Homes who have interest in a number of land parcels in North of Tyne are in broad agreement with the general measures identified, there is concern as highlighted previously that due to the generic mapping used to identify ecological areas of opportunity, that it may be inaccurate when compared to site-specific technical assessment information. The site specific information will provide more precision in terms of habitat, boundaries of the habitat and mitigation/ enhancement measures and should therefore take priority and be the principle source as of information in relation to existing ecology and appropriate	The rules concerning strategic significance are set by DEFRA, so site specific evidence will need to be considered within the context of those rules.

		<p>enhancement as part of considering development proposals. In light of this, reference should be made within the LNRS to the site specific information taking priority should any discrepancies be identified with the LNRS. The NPPF at paragraph 159 outlines that “Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.” There is concern, however, that in some circumstances this could mean contributing to outcomes, which may not be consistent with more detailed site specific information and could result in inappropriate proposals being presented and consented. As highlighted above, more detailed site specific information should take precedent over LNRS mapping in such circumstances.</p>	
MAP010		<p>It is understood that LNRSs can be a material consideration in decision making, however, they are not determinative. Whilst identifying opportunities for ecological enhancement can be beneficial to focus improvements on locations where there is likely to be greater ecological benefit. There is concern that LNRS may be used as a tool to prevent development by stakeholders less close to or informed of the planning system and, therefore, having clarity in the LNRS about its purpose and what it can be used for is key. Whilst a LNRS can be a material consideration, there are other material considerations such as site specific survey work that is likely to be more recently prepared that will need to be taken into account, which may compliment or provide an alternative conclusion. It is important therefore a balanced position is arrived at when decision making, ensuring that the more robust intelligence takes priority. It is noted that other LNRS have statements setting out that ‘the LNRS will not stop planning and does not carry a legal status in the planning process’ and accordingly taking into account the above comments, similar statements should be included. It is unclear how frequently the LNRS is going to be monitored and</p>	<p>The relationship between LNRS, local plans and planning decisions will be set out in the forthcoming revised NPPF.</p>

		updated. This is an important consideration it would be useful to understand if the strategy is being effective and it also needs to be able to be responsive as opportunities may change over time. Commentary on this would be helpful within the LNRS.	
MAP011	Coquet River Action Group (CRAG) and	We believe the maps are excellent, and we like the link back to the priorities. In our opinion they are the best part of the LNRS.	Thank you for your feedback
MAP012	Felton Climate and Nature (Felton CAN)	It would be excellent if landowners who are getting funding for nature (e.g. Countryside Stewardship, ELM and SFI schemes) could be mapped. This would help groups looking at landscape scale nature recovery understand what is already being done in their area, and who to approach to ask about sharing best practice with other landowners.	We agree. Data.gov.uk already makes maps available of where Countryside Stewardship schemes are. However, the same datasets for SFI, EWCO (etc) are not published.
MAP013	National Trails UK	NTUK would ask that the National Trails and the King Charles III England Coast path's associated coastal margin are added to the Habitat Map so that they can more easily be related to opportunities for nature recovery.	We do not agree, for 4 reasons. A) at the coast, some of the pressures on the habitats and species are associated with recreation and honeypot areas; b) elsewhere, the National Trails are mostly remote, and are covered by our priorities e.g., grassland or peatland; c) this is a nature recovery strategy and we have had to prioritise nature, although any action which delivers against our priorities <u>as written in the text</u> also delivers against the LNRS (we are concerned the map is going to be used rather than people reading the text); d) the mapping will be provided to Natural England who will merge together all 48 LNRSs, we believe they can show in conjunction with the National Trails and Coast Path / coastal margin. See response to STA002
MAP014	Natural History Society of	Is it possible to include a map of the Strategic Recovery Areas at start of Chapter 9?	Agreed, a picture map of the areas has been inserted into the text.
MAP015	Northumbria	It is really difficult comment on the mapping as not clear to the reader what you are asking / consequences of not responding	Noted.
MAP016	Haydon Bridge Nature Club Society	Page 125 - This section feels quite patronising. It could address the need to raise awareness, and provide more information for all types of countryside users. And then perhaps give better, or more, examples of ways in which people and groups can	We think this is the section where we wrote a few paragraphs to explain about the LNRS for residents and communities. We tried to write in a plain English way which is perhaps why it comes across as patronising. We don't think there is a list of local conservation / natural history groups for the N of Tyne

		play a positive role in nature recovery. Maybe even list, or have a link to, local conservation / natural history groups. Is there such a list in Northumberland? It would be useful.	available to link to. We have asked the Environmental Records Information Centre if it is something they can work on.
MAP017	Pennine National Trails Partnership	We would ask that the National Trails are added to the Habitat Map so that they can more easily be related to opportunities for nature recovery.	See response to MAP013 See response to STA002
MAP018	Port of Tyne	The Port owns large areas of land along the north and south banks of the River Tyne, and as such is a key stakeholder and has a warranted interest in the outcome of the LNRS. The Port of Tyne is one of the UK's major deep seaports, and consequently is a vital trading gateway between six continents. In recent times, the Port have diversified, and currently operate five core business areas (car exports, conventional and bulk cargo, cruise/ferry, estates and logistics) into the offshore and renewables sector. The role that the Port has within economic growth within the local and wider regional economy is clearly acknowledged within Policy S2.1 of the adopted Local Plan with specific reference to its interests on the North Bank of the River Tyne. More specifically paragraph 5.16 reference the acceleration of development of large sites on the North Bank of the River, driven by the Port. Accordingly, the former 'Esso' is identified as site E050 for employment development. Therefore, whilst the Port does support Priority OP2 in terms of growing the evidence base available on the location, extent and condition of priority habitats it suggests that this has to be balanced with issues including economic growth. The quayside locations within the Port have been identified as part of the Mayor of the North East Combined Authority's Mission to make the North East the Home of the Green Energy Revolution. This will create 25,000 skilled and well paid jobs. The role the Port will play in developing the Off Shore Wind and Renewables Sectors supported by the creation of a Green Super Port is essential and specifically mentioned in the Mission Statement. To this end the Port welcomes the opportunity to engage with the authority to assist	This site will be assessed in accordance with environmental legislation, local plan policy, NPPF and best practice.

		with understanding the extent and condition of habitats on Port land to ensure the data base is correct and consider how this may be reconciled with economic growth within the LNRS area.	
MAP019		Whilst not shown on the North of the Tyne Habitat Map, it is noted that the Magic Maps associated with the South of the Tyne LNRS incorrectly identifies some habitats. There is an area south of Hayhole Road which is identified as mudflats however, they are not known to exist in this location. To this end the Port welcomes the opportunity to engage with the authority to assist with understanding the extent and condition of habitats on Port land to ensure the data base is correct and consider how this may be reconciled with economic growth within the LNRS area.	<p>We presume you mean Hayhole Road, North Shields. We don't show any mudflat mapping, either in the stage1 or in the stage 5. What is shown to the west of Hayhole Road is potentially Open Mosaic Habitat on Previously Developed Land.</p> <p>This site and all habitats within and surrounding it will be assessed in accordance with environmental legislation, local plan policy, NPPF and best practice.</p>
MAP020	Red Squirrels Northern England	With regard to woodland creation and decision making, peatland and breeding wader map layers are used to aid decision making. Designated red squirrel strong holds or red squirrel distribution maps are not included. These should be to ensure that planting of some broad leaf species does not have a detrimental impact on red squirrels.	The red squirrel stronghold mapping is at least 13 years old and is due to be reviewed. You are right to say that red squirrel distribution data would be more up to date, however, within the lifetime of the LNRS, it would become out of date. All the tree planting grants that we are aware of go through rigorous checks, both for natural and historic environment, along the principle of, "right tree, right place". Please alert us to any tree planting schemes that are not operating to such due diligence.
MAP021	Rothbury Climate and Nature	<p>We believe the maps are great, and we like the link back to the priorities. Another way to look at it would be to consider Bioregional mapping.</p> <p>The bioregional mapping approaches that consistently lead to real, on-the-ground change are those built around watershed logic, ecological processes, and community co-creation. Watershed-based maps are especially powerful because they align with how councils already manage flooding, water quality, and land-use decisions, making them immediately actionable. Maps that integrate habitats with hydrology, soils, and species movement help target interventions where they will actually work, reducing wasted effort and strengthening ecological networks. When mapping includes local knowledge, cultural assets, and community priorities, it generates public</p>	<p>Thank you for your feedback.</p> <p>We are unable, with the current timescale pressures to publish the LNRS, to accommodate such a fundamental change in approach to the mapping. However, this could be considered when the LNRS is reviewed (we anticipate in 5 years' time).</p>

		ownership and long-term stewardship — one of the strongest predictors of durable action.	
MAP021		It would be excellent if landowners who are getting funding for nature could be mapped. This would help an SRA understand what is already being done, and who to approach to ask about sharing best practices with other landowners.	See response to MAP012
MAP022	St Mary's Island Wildlife Conservation Society	Stage 5 mapping - Wader Roost Sites. St. Mary's Island is an important high tide roost. Regular counts of birds using this high tide roost are available from St. Mary's Island Wildlife Conservation Society	We don't have counts of the bird data as the Space for Shorebirds project doesn't (yet) cover North Tyneside. Wherever possible, ecological data should be shared with the Environmental Records Information Centre. The area all around St Mary's Island is mapped under "Seal haul outs". Fields behind St Mary's island were added to the "potential wet grassland and wader roost sites" dataset.
MAP023	Taylor Wimpey UK Ltd	Our client supports the overarching priorities of the LNRS in seeking to halt and reverse biodiversity decline across the North of Tyne area. We recognise the value of a coordinated landscape-scale approach to nature recovery and broadly consider the strategic priorities and ambitions set out within the draft LNRS document to be beneficial. Understandably, given the scale of the area, it is understood that geographical information systems have been used to identify ecological opportunities. This, however, is likely to be less accurate when compared to site specific information identified on individual sites. It is important that these LNRS acknowledge that in circumstances whereby there are additional opportunities for ecological enhancement can be demonstrated, appropriate benefits in uplifting BNG can apply, for example, if agreed with the relevant Ecology advisor for the administrative area. Conversely, in circumstances whereby an ecological enhancement may be inappropriate, due to the particular habitats of the site potentially not being present or otherwise, similarly there should not be a requirement for the specific ecological enhancement. Such flexibility should be included to allow for potential inaccuracies in mapping and changing circumstances. Taylor Wimpey looks forward to working with the North of Tyne Authorities in due	The rules concerning strategic significance are set by DEFRA, so site specific evidence will need to be considered within the context of those rules.

		course to share site specific ecological information already collected on their development portfolio to inform the LNRS and improve its accuracy in implementation.	
MAP024	The Maling Street Management Company	The chapter should emphasise the need to integrate fine-scale, ground-verified data alongside broad mapping to ensure small, fragmented, or community-managed habitats aren't overlooked.	The "stage1" mapping we are constrained to what we can include by the national regulations and guidance. The "stage2" mapping we have included some very fine-scale mapping, for example the freshwater layers in the Ouseburn. Noted the need for more ground-verified (there are measures about improving the baseline). The text under Chapter 9 entitled "maintaining a robust evidence base for nature recovery" addresses this point.
MAP025		It should also clarify how habitat maps will be regularly updated using community input and new data sources.	The maps are not able to be updated. Once published, they remain static, until the LNRS is reviewed. We will add this point to the text.
MAP026		It currently omits locally important urban habitats such as open mosaic and post-industrial grasslands. The Candle Flame (Ford Street) site, for example, isn't shown as priority habitat despite its ecological significance within the Ouseburn Wildlife Corridor. Later mapping stages should incorporate these vital urban and community-valued sites.	Legislation dictates to us what we can and cannot include in the "stage1" map of designated sites and irreplaceable habitat. Alongside the LNRS text, our StoryMap explained this. The open mosaic grasslands, as best as we know them, are included in the "stage5" as important undesignated grasslands – for protection, restoration, and management. If you have evidence about this site, wherever possible, ecological data should be shared with the Environmental Records Information Centre. We can ensure its value is properly mapped and recognised when LNRSs are reviewed. If you are aware of a field that is missing, please let us know. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea.
MAP027		Also, the map could better represent linear features like rivers and hedgerows which are crucial for habitat connectivity but often underrepresented.	We feel we have carefully mapped measures relating to rivers in the catchments we have prioritised. We considered hedgerows at an earlier stage of this process, but this goes down to a level of detail which goes beyond what a "strategy" (meant to be overarching and a general approach) should cover. Rivers can be seen on the base map. Remember that any action that delivers against the text of the LNRS, regardless of whether it is on the map or not, still

			delivers against the LNRS. The map shouldn't be a used shortcut to reading the text.
MAP028		Clearer guidance on how community groups and scientists/researchers can contribute data would encourage ongoing improvements and shared ownership of the habitat information.	Wherever possible, ecological data should be shared with the Environmental Records Information Centre. We will add information about this to the text (Box 3).
MAP029	The Rivers Trust, member of Northumberland Rivers Catchment Partnership	It is concerning that many of the rivers across the Tyne and Northumberland catchments have not been included in the map. This risks rivers being overlooked for nature-recovery opportunities, despite opportunities existing in these areas and much work already delivered or planned. Given the prominence of the LNRS in decision-making, and the significant use-cases by regional and national stakeholders, and the potential for this to be in place without review and update for an extended period / up to 10 years, we feel it is important to include the data for all rivers in the region.	<p>We felt we had to prioritise catchments. We have added in a further catchment, the River Rede.</p> <p>We will encourage the mapping approach to mapping catchment opportunities to be carried out for all the rivers in the N of Tyne area, which could be hosted on the Environmental Records Information Centre. This might be in the first year of the LNRS. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea.</p>
MAP030		Regarding the maps themselves. when you expand the legend all the way, it could easily be interpreted that the only measures really being considered are wetlands or those fringing wetlands. This doesn't align with the text in the main body, but the maps must reflect the narrative as for many they will be the first (and potentially only) part of the LNRS that is reviewed. This is a serious matter that we consider needs addressing as a priority. As we've stated elsewhere, LNRS priorities will influence funding decisions both regionally and nationally and there is a significant risk that the regions rivers will be left behind if this narrative prevails.	<p>We agree this is a serious matter. We have tried to stress the caution re the mapping a number of times in the document. We applied the approach from the "Water and nature recovery" supplementary advice that was prepared by Natural England. We also had to decide what elements of the text were "mappable".</p> <p>We will add further cautionary statements in the text and the map. We will add further text to the document to explain the criteria for selecting the catchments.</p> <p>We are bound by the guidance to produce the text and the map side by side, but at the same time, if too much of the N of Tyne area is mapped as potential measures, then we will not have permission to publish, because it means that nothing has been prioritised.</p> <p>Remember that any action that delivers against the text of the LNRS, regardless of whether it is on the map or not, still delivers against the LNRS. The map shouldn't be a used shortcut to reading the text.</p>
MAP031	The Woodland Trust	The Woodland Trust supports the inclusion of a requirement for the full mapping of long-established woodland alongside existing ancient woodland	We agree.

		<p>mapping within the North of Tyne LNRS. While ancient woodland is rightly afforded strong recognition and protection, long-established woodland often shares many of the same ecological characteristics, including complex soils, stable microclimates, and assemblages of woodland-associated species, without the same protections. Comprehensive mapping of long-established woodland would provide a more complete and accurate evidence base for the LNRS, enabling better-informed decisions on habitat protection, restoration, and nature recovery priorities. It would help identify opportunities to buffer and connect ancient woodland and support effective delivery of targets for nature recovery. The Woodland Trust therefore considers that full mapping of long-established woodland is essential to ensure the LNRS is robust and capable of safeguarding and enhancing the North of Tyne's woodland habitats</p>	<p>Unfortunately, the Long Established Woodland (LEW) dataset is not yet published by Natural England at the time of writing.</p>
MAP032	Tyne Rivers Trust	<p>Figure 4 is not clear, could you add a higher resolution image.</p>	<p>Figure 4 relates to the flow chart table taken from the DEFRA guidance (page 120 in the consultation draft). The flow chart will be replaced with one similar to figure 1, page 11</p>
		<p>Page 124 - Farmers and Land Managers - "Farmers and land managers can use the mapping as a guide to where the partners who work in nature conservation in the North of Tyne area feel the top priorities are". In its current state, this text is misleading, there are key priorities for nature conservation that are not considered within the LNRS. The LNRS does not consider in river restoration or the safeguarding of freshwater species through in river habitat improvements. Could this lead farmers outside of LNRS priority areas to feel as though their land has little or no conservation value?</p>	<p>Thank you for your feedback – text amended.</p>
MAP033		<p>Page 124 - "At the end of our draft mapping, we reviewed how it overlapped with the best and most valuable land". Is it sensible to identify land 'the best' or 'most valuable'? This could be derogatory to landowners and have a negative effect on how they value the countryside.</p>	<p>The dataset of "Likelihood of Best and Most Valuable Agricultural Land" is a Natural England dataset, which is connected to the Agricultural Land Classification</p> <p>https://publications.naturalengland.org.uk/category/5208993007403008</p> <p>https://www.data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc2</p>

			<p>Farmers and land managers are often used to this sort of approach, which assesses the land based on its capacity for crop production, mostly influenced by soil, climate, topography, and drainage. It was developed by MAFF in the 1960s, with revisions in the 1970s and late 1980s.</p> <p>We wanted to carry out a check to compare the proposed measures against the land that is most productive for both farming (and separately forestry, using a different dataset).</p>
MAP034		<p>Is there a reason why Priority River Habitat is not included in the mapping? Priority river habitat is at present the only designation to identify the importance of the site for wildlife on the rivers North Tyne and Rede.</p>	<p>We applied the approach from the “Water and nature recovery” supplementary advice that was prepared by Natural England.</p> <p>We will add in a further catchment, the River Rede.</p>
MAP035		<p>There are no statutory designations for river habitat in the Tyne catchment, even though the Tyne is home to a critically endangered species (freshwater pearl mussel).</p>	<p>We are aware that none of the Tyne rivers have the statutory designations.</p> <p>In relation to species, the approach was to consider all the species that are present, and then consider which ones would not be catered for by the proposed measures.</p> <p>We will add in a further catchment, the River Rede.</p>
MAP036		<p>The mapping section is the most important from a presentation, communication and funding perspective. Indeed, we are already aware that some funding decisions have been made on the mapping alone with no reference to the text. Therefore, we would strongly advocate for expansion of the mapping for river and freshwater options to better represent ALL of the opportunities across the North of Tyne region, not just those already shown. Otherwise, key priority areas will be missed. This could have significant implications for species like salmon, white clawed crayfish and freshwater pearl mussels.</p>	<p>See response to MAP030</p>
MAP037		<p>Page 121 – <i>“Advice from Natural England is that we had to work hard to prioritise the top actions and places to do those actions, for nature. About one-third of the North of Tyne area has suggested mapped actions on it. We know that nature recovery can happen almost everywhere. With that in mind,</i></p>	<p>Noted.</p>

		<p><i>we have written a “wider countryside” chapter, which is focused on the areas that aren’t shown on the map, but are still important. We would like it if every land manager had ideas about what they can do for nature. We can all act, including local communities”.</i></p> <p>Land managers are traditionally focused on the land; they do not receive subsidies to support in-river work that is needed to restore degraded river systems. Despite funding to protect waterways in their current condition, widespread degradation from dredging, canalisation, and hard engineering means active in-river restoration is often necessary.</p>	
MAP038		<p>Wider countryside options - available on the interactive map are not clear – the colour scheme is a transparent white making it difficult to see what is included in the map.</p>	<p>The colour scheme was transparent on purpose, following feedback at an earlier stage of the draft’s preparation. This is to make sure that the map pop-ups with advice for all farmers in the area works, whilst at the same time not suggesting that these areas contribute to the mapped % of the North of Tyne area covered by a mapped measure.</p>
MAP039	The Crown Estate	<p>The Crown Estate has been working in collaboration with the North East Combined Authority to support the development of their Local Growth Plan and Sector Growth Plans, where nature and landscape are recognised as a strong foundation for the region. We are committed to supporting joined-up nature recovery ambitions across the North East and would be pleased to share relevant cross-boundary data and insights to help inform the LNRS and ensure alignment with broader regional priorities.</p>	<p>Noted.</p>
MAP040		<p>Your LNRS contains a number of exciting measures that could help enable nature’s recovery. Once the LNRS is finalised, we would welcome a copy of the GIS Shapefiles so that we can better understand overlap between potential measures and The Crown Estate’s portfolio.</p>	<p>The final LNRS will include information on accessing the GIS files, as did the draft.</p>
MAP041		<p>Some of the Local Wildlife and Geological Site polygons on the Stage 1 map appear to be slightly misplaced – typically a few tens of metres to the south-west (e.g. the LWS between Pegswood and Choppington).</p>	<p>Thank you, have corrected this co-ordinate reference issue (CRS) in the final mapping. Please alert us if this problem is still happening.</p>
MAP042		<p>In managing our portfolio, we have to balance competing demands for coastal and marine space,</p>	<p>Noted.</p>

		working to not only protect our environment but to enable green energy, economic growth and jobs. When taking decisions, we must consider existing infrastructure, agreements and rights, as well as the future demand of different sectors (e.g., offshore wind, minerals and cables). To do this, we hold a wide range of data on the spatial extent of maritime sectors around England, and we evaluate the potential overlaps of any proposal with existing agreements and future demands.	
MAP043	Individual 4 (line 15)	Many farmers have designated fields as 'hay meadows' and encourage natural native species to thrive. These fields do not appear to have been mapped. They are valuable for insects which in turn improve biodiversity.	<p>The stage1 mapping was highly constrained by the national guidance, to cover only designated sites and irreplaceable habitat, as explained by the StoryMap.</p> <p>https://storymaps.arcgis.com/collections/cbca40040ab64bb283480b749f14d1f9</p> <p>The stage5 mapping, in relation to hay meadows brought together datasets from partners such as the National Park Authority and the North Pennines National Landscape. Over years of survey work, the sites have all been scored, using a consistent methodology. The higher quality sites of this portfolio were then fed into the mapping. The grassland actions here relate to important undesignated grasslands are protected, restored, and managed appropriately.</p> <p>If you are aware of a field that is missing, please let us know. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea.</p>
MAP044		There are many small scale wood/tree/scrub projects in the South Tyne valley that have not been included. Examples include Wylam Haughs Nature Reserve, Ovingham Community Orchard (where native flora has been increased), Ovington Linear Native Tree. It would be good to map these small scale areas as including them would identify longer potential nature corridors. We could then look to 'fill in the gaps'. This has been raised by Northumberland CC Tree Officers in each parish of Wylam, Ovingham, Ovington, Stocksfield, Prudhoe and even Ponteland RS.	<p>The LNRS is a strategy over a very large area. Unfortunately, we are not able to work at such a local scale.</p> <p>The stage1 mapping was highly constrained by the national guidance, to cover only designated sites and irreplaceable habitat, as explained by the StoryMap.</p> <p>https://storymaps.arcgis.com/collections/cbca40040ab64bb283480b749f14d1f9</p>
MAP045	Individual 5 (line 16)	Your new peat map that taxpayers will have paid for, appears to be very inaccurate. AI modelling should	The alternative to the England Peat Map is the “Peaty Soils Location” dataset.

		not be included in the new, inaccurate peat map. Use real world data only. Remove the England Peat Map altogether. It must be robust and accurate, and so far, it does not stand up to even the most basic scrutiny.	The only measure mapped that included input from the England Peat Map was the layer called “Restore to bog – low yield Sitka on deep peat in Public Forest Estate”. We do not believe this is an inaccurate map, but would welcome any specific areas to look at further / any specific evidence that a site doesn’t have deep peat and low yield Sitka.
MAP046		On the SSSI map there is a thin blue line that crosses right across the region (just north of Cramlington). This blue area is marked from west of the A1 major trunk road north, all the way east to the coast. It clearly includes the A1 road, for example. The blue area clearly covers the road, therefore including it on this map of SSSI. So, according to your map; in the future, this will become an area that humans will not be allowed to access. All areas on the map that are left empty of blue, orange etc (demarcation) will become the human settlement zones of the future. Therefore these coloured areas are representative of 'protected zones' that will be out of bounds for us. How will we travel North on those roads if they become designated (no entry) 'Wildlife Corridors', as stated in the SDGs of Agenda 2030? As it stands, this map is very troubling and needs very clear explanation.	<p>This is the Blyth and Pont Rivers Local Wildlife Site, so it runs under the A1 rather than over it. This is an existing designation, relating to nature conservation. These designations have no impact on whether people can access them or not.</p> <p>It is not correct to say that all places that are not designated sites or irreplaceable habitat will become built-up areas. The development of land is steered through the Local Plan process which is wholly separate to the LNRS</p> <p>The LNRS has been drawn together without reference to the Sustainable Development Goals 2030.</p>
MAP047	Individual 11 (line 23)	Switch to a Bioregional Mapping Framework: Bioregional mapping strengthens nature recovery by showing how habitats sit within the wider logic of place — revealing the watersheds, soils, climate patterns, species movements, land-use pressures, and cultural assets that shape ecological resilience. By integrating this with local knowledge, community priorities, and long-term climate risks, it enables far more targeted, connected, and cost-effective habitat measures than site-based planning alone. It turns fragmented actions into a coherent landscape strategy, helping councils and communities work with natural processes rather than against them. *Maps that integrate habitats with hydrology and soils: These maps lead to better restoration decisions because they show why a habitat is struggling and where interventions will work. They	See response to MAP021.

		<p>reduce wasted effort and make investment more defensible. *Maps co-created with communities: When local people help generate the map, they are far more likely to support and participate in the actions that follow. This is one of the strongest predictors of durable change. *Maps that include cultural assets and local knowledge: These maps unlock action because they show where community energy already exists — stewardship groups, heritage sites, food networks, schools — making it easier to mobilise people and resources. The bioregional mapping approaches that consistently lead to real, on-the-ground change are those built around watershed logic, ecological processes, and community co-creation. Watershed-based maps are especially powerful because they align with how councils already manage flooding, water quality, and land-use decisions, making them immediately actionable. Maps that integrate habitats with hydrology, soils, and species movement help target interventions where they will actually work, reducing wasted effort and strengthening ecological networks. When mapping includes local knowledge, cultural assets, and community priorities, it generates public ownership and long-term stewardship — one of the strongest predictors of durable action.</p>	
MAP048		<p>I found this link a bit unwieldy and whilst there is a huge amount of good quality information, I felt overwhelmed. I just want to know enough to understand what part I can play in my locality. I therefore need to know things like: what are the greatest threats to nature where I live? Which keystone species are at risk? What is the water quality in my local river? How can I make a difference in my local landscape? I need accessible, bitesize information that is meaningful and relevant to my own micro-habitat so that we can act together in community and see the results in nature.</p>	<p>The LNRS is a strategy over a very large area. Unfortunately, we are not able to work at such a local scale. We realise people are disappointed because the LNRS is a strategy rather than a bite-size “action plan”.</p> <p>We do plan to make a more accessible booklet or leaflet, once the LNRS has been published.</p> <p>In relation to species, the approach was to consider all the species that are present, and then consider which ones would not be catered for by the proposed measures. We will add this clarity to the text.</p>

MAP049		The link just showed a map of Northumberland - there was no information relating to Nature Recovery.	See response to MAP004, MAP005, MAP006
MAP050	Individual 12 (line 24)	Could be more user friendly	See response to MAP004, MAP005, MAP006
MAP051	Individual 16 (line 30)	Maps need to be online and interactive so anyone is able to access the information at a detailed level.	The maps are online and interactive.
MAP052		Need to include soils	Soils are an area where nature recovery and the long-term health of farmland intersect. Soils in their own right are out of scope, although there are references throughout the document to soils where relevant to particular habitat issues.
MAP053		Need to include important trees of high social, cultural and environmental value outside of woodland	Comment noted. Many of these types of trees will be classified as Ancient or Veteran. Measures for these are included under priority WTS 1. These include ancient or veteran trees found outside of woodland.
MAP054		LNRS needs writing out in full	The web mapping on the stage1 map will be altered so that the words are written in full.
MAP055	Individual 19 (line 35)	With regard to Important Grasslands, I think the definitions are fine but the mapped resource is severely lacking (underestimated), and this poses a potential risk of many valuable areas still being lost, but this loss going un-noticed as a result of poor survey effort in some areas. For example in nearby fields, I have found 6 species of waxcaps, plus earth tongues, or coral and club fungi). Other neighbouring fields such were similar but have been recently lost. if not mapped more will be lost.	See response to MAP043. In relation to waxcaps, sites that met the criteria to be an SSSI (or nearly) were selected, according to the methodology published by the JNCC. (Guidelines for selection of biological SSSIs: Chapter 14 Non-lichenised fungi). The priority action is for important undesignated grasslands are protected, restored, and managed appropriately. If you are aware of a field that is missing, please let us know. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea. Wherever possible, ecological data should be shared with the Environmental Records Information Centre.
MAP056		It would be extremely useful if the survey protocols and thresholds that are used to define all these habitat time are clearly signposted so that the citizen science community can help to compile data.	Chapter 13 of the draft aimed to give more of a background. If you are aware of a site that is missing, please let us know. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea. Wherever possible, ecological data should be shared with the Environmental Records Information Centre.

		<p>Increase in survey effort would yield more smaller areas of priority habitats. within 1km of us are 2 small gills of semi natural ancient woodland - as characterised by tree and shrub species and by ground flora including. Mapping these smaller patches will greatly help in landscape scale recovery by providing corridor stepping stones. the patches close to us are also not mapped as LEWS and are therefore missing from the inventory.</p> <p>Wonder whether there has, or could be an exercise to map trees with TPOs against veteran tree criteria and also look a potential as propagule sources for restoration projects.</p>	<p>See response to MAP058 re woodland mapping.</p> <p>See response to MAP031 re LEW.</p> <p>Tree Preservation Orders tend to relate to trees, groups of trees, or woodlands for their public amenity value, not always (but often) their nature value. This suggested piece of work would make an interesting research project for a student.</p>
MAP057	Individual 24 (line 43)	I liked the maps - a potentially useful resource - but found them difficult to use.	See response to MAP004, MAP005, MAP006
MAP058	Individual 25 (line 45)	The existing woodlands in the Aln valley , with the exception obviously of parts of Thrunton Wood are on the whole shown on the 1865 OS maps, thus suggesting that they may have some residue of ancient woodland by definition.	<p>The maps of ancient woodland are about to be republished by Natural England and we are using the most up to date version of the Inventory in our stage1 mapping.</p> <p>The stage5 mapping relating to areas around ancient woodland was done using the new inventory, so the potential measures are based on the newer mapping. Further clarity has been added to chapter 13 on the method.</p>
MAP059		It is extremely difficult to follow and interpret and manipulate on a standard machine.	<p>Further details would be needed to understand how the mapping could be improved relating to the way it is being interacted with.</p> <p>See response to MAP004, MAP005, MAP006.</p>
MAP060	Individual 35 (line 62)	I've personally mapped large areas and although a difficult task can testify to the benefits that this brings - it really helps focus resource and understanding. Really important to also rate the quality of habitats.	<p>If you are aware of a site that is missing, please let us know. There are actions relating to growing the evidence base (OP 2.1 – OP 2.4) that are relevant to this idea.</p> <p>Wherever possible, ecological data should be shared with the Environmental Records Information Centre.</p>
MAP061	Individual 44 (line 87)	The mapping chapter isn't particularly well written, and there are quite a few typos. I was also confused about the statement that it isn't known how the LNRS maps will interact with biodiversity net gain. I was under the impression that any land that's	<p>See response to MAP005 and MAP006.</p> <p>We will ask a fresh person to check for typos and readability in Chapters 11 and 13.</p>

		prioritised for nature recovery earns developers more BNG credits per unit area?	The text has been amended to make it clear that habitat creation or enhancement for BNG that is within the land that is mapped in the 'proposed measures' mapping layer and which will contribute to the relevant measures will benefit from the strategic significance multiplier.
MAP062		This is a fascinating map! I was confused by the fact that there are three tick boxes for the North of Tyne boundaries, and it would have been helpful if the National Character Areas were labelled	The three tick boxes for the boundaries enable the detail beyond North of Tyne to be masked out – we will investigate if two of the tick boxes can be removed. We will add labels for the National Character Areas – we didn't know existing labels were not appearing.
MAP063		I can't see the proposed measures on this map, which is frustrating. I can see the Strategic Recovery Areas and the suggested opportunities in the wider countryside, but nothing else.	See response to MAP005 and MAP006. Layers will be switched on by default rather than off, to make it easier.
MAP064	Individual 45 (line 89)	Many areas of Priority Habitat are not show on the maps and this needs to addressed. Maps derived from remote sensing and modelling need to be ground truthed with resourced directed at the SRA's initially. It should be a priority to get accurate peat depth mapping in forestry plantations adjacent to designated sites, especially in / next to SRAs eg Harwood Forest. The Forest Design Plan Review cycle could help prioritise the need for data to be gathered.	<p>Legislation dictates to us what we can and can not include in the "stage1" map of designated sites and irreplaceable habitat. Alongside the LNRS text, our StoryMap explained this. We were not able to include all priority habitats.</p> <p>We agree, accurate peat depth mapping, including in afforested areas, would be useful. This can be shared with the England Peat Map to further refine their mapping.</p> <p>Forest Plans were extended by 5 years in 2021 and so should have been republished by 2026. At the time of writing, it is not known when Forestry England will update these. An indicative timetable has been shared and there should be 3 coming out in the next few months.</p>
MAP065		The breeding wader recovery areas mapping is very crude and is missing some areas of breeding waders whilst including others areas where waders do not breed. Priority peatland restoration areas and restore to bog areas need to be expanded based on accurate data not incomplete mapping. These areas need to be mapped in a way that considers hydrological function.	<p>We are considering areas where waders breed and feed – and they are an incredibly mobile species.</p> <p>It could be an ambition for the next LNRS, in 5-10 years' time, to have an improved map of all the areas used by breeding and feeding waders.</p> <p>Even considering hydrological function, the areas between breeding and feeding sites are still important. It is not known how a wader would change its flight patterns in response to changing land use in between areas they use.</p>

MAP066	Environment Agency	<p>We are concerned that the current mapping of river and wetland opportunity areas focuses only on selected drainage catchments, leaving others across the North of Tyne unmapped. This risks creating an uneven playing field for investment, project development, and partnerships. Areas not shown on opportunity maps may struggle to attract funding or support, even where ecological need and potential for nature recovery are clear.</p> <p>Unmapped catchments—including smaller tributaries, urban watercourses, and rural headwaters—face pressures such as diffuse pollution, habitat fragmentation, soil erosion, and species decline. These issues are not confined to the catchments highlighted in the LNRS. Excluding certain areas may reinforce existing disparities and miss chances for meaningful improvements.</p> <p>A key concern is the evidence base used to select catchments. If mapping relies on existing datasets or prior project activity, data-rich areas may be prioritised simply because more information exists. This creates a feedback loop: areas with more data attract more investment, while data-poor areas remain overlooked. The LNRS should acknowledge this and commit to identifying opportunities in unmapped catchments as new data emerges.</p> <p>This is especially important given the North of Tyne's varied landscape—from upland peatlands in Northumberland to urban rivers in Newcastle and North Tyneside. Selective mapping risks oversimplifying this complexity. For example, smaller watercourses feeding the Tyne estuary may not appear as priorities yet are vital for biodiversity, community access, and climate resilience. Similarly, rural headwaters could offer opportunities for flood management and habitat enhancement.</p> <p>Ecological interconnectedness is another concern. Focusing only on certain catchments may undermine habitat connectivity. A holistic, catchment-wide approach would ensure interventions are coherent and deliver benefits across the region.</p>	<p>DEFRA guidance requires that Responsible Authorities prioritise what is included on the map, and RAs that have included too much have been prevented from moving forward to publication. Therefore prioritisation has had to be undertaken for all habitats. This has proved unusually challenging for rivers because many of the measures included in the Freshwater Habitats chapter apply so widely across all catchments. A further complication is that the guidance requires that we don't map measures which are aimed specifically at improving the status of designated sites, as for example the River Till Restoration Strategy aims to do. With all of that in mind we came up with the following criteria to guide the prioritisation process:</p> <ol style="list-style-type: none"> 1. We cannot map all watercourses (or all of any other habitat) because we are required to prioritise. 2. In prioritising, we need to consider: <ul style="list-style-type: none"> (iii) the potential for the LNRS to help stimulate/support new activity (iii) The likelihood of delivery over the next 3-10 years (the lifetime of the first iteration of the LNRS) (iii) The relationship with other LNRS priorities 3. We are aware that there are a group of watercourses that have been relatively neglected to date in terms of conservation activity but where activity is now starting to build and therefore there is a good chance of transformational change being delivered or at least commencing, during the lifespan of this first LNRS. Given that we have to prioritise, we chose those as a logical focus for this first iteration of the LNRS, and our hope is that activity on those watercourses will start to catch up with activity on the Tyne and Tweed. 4. The two largest of these, the Coquet and the Wansbeck, also sit within an area of the North of Tyne where lots of other LNRS priorities are coalescing to
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		<p>The current approach may also limit participation from communities, landowners, and smaller organisations. Stakeholders rely on LNRS maps to see where efforts align with priorities. If their catchment is excluded, they may feel discouraged, undermining the LNRS goal of broad engagement. Climate change adds urgency. Some unmapped catchments may become critical for flood mitigation, drought resilience, or species movement. Upland headwaters could support water storage and flood attenuation, while urban watercourses may aid cooling and stormwater management. By not identifying these areas now, the strategy risks missing opportunities to future-proof ecosystems. Consistency with neighbouring LNRS areas is essential. Rivers and ecological processes cross administrative boundaries. Divergent mapping approaches could lead to fragmented delivery, duplication, or gaps. A shared methodology would ensure actions are aligned and ecologically meaningful. We urge collaboration with neighbouring authorities to harmonise mapping and avoid inconsistencies.</p> <p>Finally, funding tied too closely to mapped areas could restrict project development. Many effective solutions come from community-led initiatives. The strategy should state that high-quality proposals outside mapped areas will still be considered.</p>	<p>form a very strong and striking east to west corridor from Druridge Bay to the Scottish border around Kielderhead, creating a corridor of nature recovery opportunities through mid-Northumberland – again, an area that has historically received less attention than other areas.</p> <ul style="list-style-type: none"> - We are aware of concerns that projects located in areas outside of the mapped priorities may be less likely to receive funding than areas that are mapped. However, if the funding question revolves around whether the project will deliver LNRS priorities and measures, then that is a question that needs to be answered with reference to the text of the LNRS not just the map, because so many measures apply across all areas of a particular habitat or are just fundamentally unmappable. It seems very unlikely that any project that a delivery partner would wish to do could not be clearly and robustly identified as meeting LNRS priorities or delivering LNRS measures. <p>We will add a paragraph to the LNRS to set this out.</p> <p>We have discussed with Durham LNRS their approach and boundary issues.</p>
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DELIVERY

Number	Respondent	Comments	Proposed Response
DEL001	Coquet River Action Group (CRAG) and Felton Climate and Nature (Felton CAN)	<p>We think you should have asked a question about useability. Having talked with people in the community, many felt overwhelmed by the LNRS. It is large and quite traditional in presentation. There is a huge amount of information and evidence but it is quite thin on how the LNRS could be used. It doesn't talk about who is responsible for action and the actions are relatively generic – they wouldn't become useful until they are related to specific projects. Our suggestions would be to make more use of modern techniques (videos and story-maps, blogs and vlogs) to</p>	<p>Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase. We are also looking in to how the final LNRS document can be published in a format that is most easily accessible to people.</p>

		demonstrate how planners, how landowners, how a government agency (e.g. Natural England or the Environment Agency), how community groups might use the information. We would like to see some example strategies for local areas codesigned with the community to demonstrate how the LNRS could be used in a local area. How can Parish Councils use the LNRS to develop their biodiversity plan or Neighbourhood Plan. We would like some learning resources to help community groups (schools and scouts, University of the 3rd Age, Women's Institute or Rotary) understand the LNRS, and how they could contribute to nature recovery. Perhaps all of this is yet to come??	
DEL002		Related to the above, we would have likely to see something in the LNRS about how it will encourage behaviour change. Effective monitoring and education are key to behaviour change, as is a media profile and demonstration of the LNRS as a high priority for governments (of all levels). Ultimately, nature recovery will only happen when behaviour and attitudes have changed. Again related to the above, to get the public engaged with nature recovery requires using issues that people can relate to. For example, it is really difficult to get people interested in peat bogs. However, if it is explained that restoration of peat bogs can lead to greater flood resilience and/or a reduction in wildfires and/or an improvement in the quality of water that we extract from our rivers for drinking, then it is easier to get people interested and involved.	Comment noted.
DEL003		Finally, there is a question about responsibility. The LNRS states on pages 6 and 7, 'The main purpose of these strategies is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. The strategies do not force the owners and managers of the land identified to make any changes. Instead, the Government is encouraging action through, for example, opportunities for funding and investment.' Putting aside the issue that the current lack of SFI funding is a major impediment to delivery of the LNRS, we just can't see that this is enough. Surely some authority has to be given responsibility for ensuring delivery of LNRS, even if their role is restricted to encouraging landowners and managers to engage, to communicating and engaging communities and businesses, and to help appropriate groups develop and implement strategies for SRAs. A regional organisation needs to be given responsibility for shaping and delivering the LNRS, or else we can't see the ambitious actions that are needed for nature recovery happening.	Comment noted.
DEL005	Wylam Parish Council	There isn't really much on how the strategy will be delivered either. Perhaps it is too soon to say but there is big money around in BNG and for the community forests. Will there be delivery plans and maybe year by year action plans and funding plans?	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will

			keep our webpages up to date during the delivery phase.
DEL007	Rothbury Climate and Nature	The LNRS could be a powerful lever for behaviour change when used to align advice, funding, planning and partnership working. How could this potential be explicitly recognised in the strategy?	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase.
DEL008	Solidarity Farm CIC	Farms and landholdings within the North of Tyne vary significantly in scale, capacity and operating models. Small family livestock farms often operate with limited capital and labour but provide high levels of observational management and flexibility. These holdings are well suited to delivering fine-scale habitat mosaics, adaptive grazing management and multifunctional outcomes. Delivery mechanisms, funding models and expectations should recognise these differences in scale and avoid approaches that inadvertently favour large estates or well-resourced organisations.	Comment noted.
DEL009		Nature recovery should not be considered solely through single-outcome habitat creation. Many of the most resilient landscapes are those where multiple functions are delivered simultaneously, including food production, biodiversity, climate mitigation, water management, access and community benefit.	Comment noted.
DEL010		Multifunctional livestock farming systems; particularly low-input and agroecological models, should be recognised as a priority delivery mechanism for nature recovery across the wider countryside.	Comment noted.
DEL011		Many farms within the North of Tyne contribute to wider social outcomes, including education, skills development, health and wellbeing, volunteering and youth engagement. These functions can strengthen public connection to nature and support long-term stewardship. Where compatible with ecological objectives, nature recovery initiatives should support and enable these social roles.	Comment noted.
DEL012		I am glad the report recognises the wider multifunctional of smaller family farms beyond food production with farming practices recognised as central to landscape character and nature outcomes. Diversity over uniformity creates a range of habitats and recognising that farmers come from a range of backgrounds and view natural capital through a different lens-I remain unconvinced as to whether nature can be commodified and broken down into units of a monetary value as outlined in BNG-it is far more advanced and complex than current market frameworks can deal with and despite scientific advances their remain elements of nature that go beyond scientific/human understanding.	Comment noted.

DEL013		How can small, low-input livestock farms be supported to produce food, sustain livelihoods, and deliver nature recovery simultaneously across the wider countryside?	Comment noted.
DEL014	The Crown Estate	We would encourage the LNRS team to reach out as they start to consider how best to deliver the measures contained within the strategy. We are keen to stay involved and continue to liaise with LNRS teams, exploring opportunities to help enable the delivery of measures within the strategy and to ensure any potential conflicts between nature projects and existing agreements are managed. This is particularly important as we consider sectors that will interact across the land-sea interface – such as telecoms cables and transmission assets from future offshore wind farms. Due to the predicted growth in demand for data capacity, we anticipate further subsea telecoms cables to connect to the UK across spatially diverse routes and landfalls - though exact locations are currently undetermined. New cables will be critical for underpinning resilient UK digital connectivity, and preserving M: T: access for installation, maintenance, repair and decommissioning will be important. The same would also be true regarding access for transmission assets from future offshore wind farms. While developers are required to follow the mitigation hierarchy to reduce any potential environmental impacts, both developers and local authorities are encouraged to engage proactively at an early phase of planning to help deliver necessary infrastructure in a way that aligns with the ambitions of the LNRS.	Comment noted.
DEL015	Individual 3 (line 6)	Rangers in Park to manage environment	Comment noted
DEL016	Individual 19 (line 35)	It alarms me that the farmer comments are if you want better environment, give us more money. Basic best practice must be improved alongside more public money for nature restoration. intensification of farming for profit has destroyed nature in large swathes. Therefore, some of the cost of restoration must be borne by managers (polluter pays). That's not to mention that the taxpayer supports Northumbrian farmers to the tune of £60-80Million a year, largely through agri-environment schemes which should be delivering more for this money.	Comment noted
DEL017	Individual 24 (line 35)	There is very little discussion of implementation and mechanisms underpinning the LNRS. A public-private-charity Learning Hub for Nature ideally in Rothbury - along the lines of that for Archaeology at Ad Gefrin in Wooler - would be good.	Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase.
DEL018		The role of local communities and land managers is underdeveloped. Need to also enlist the support of local groups to support the strategy, e.g. Rothbury CAN, Northumbrian Angling Federation, Red Squirrel Group, etc	Comment noted. Through the process of 'landscape-scale conversations' undertaken during the production of the LNRS we attempted to reach as big a

			<p>range of organisations and individuals as possible, including community groups. However, in an area the size of the North of Tyne we recognise that it has not been possible to reach everyone. We will continue to try and engage widely during the delivery phase of the LNRS and can use the consultation responses received to identify additional interested groups.</p>
DEL019	Individual 25 (line 35)	<p>The 'we' is not only the landowners, managers and experts (who may be said collectively not to have done such a good job of sustaining nature) but the community -- it is our and our children's and future generation's nature. You then had a basis on which to develop measures starting from the vast amount of good data that you have collated, that would have a good chance of bringing that about. There is a technique for doing this known as 'Back-casting' and I recommend it. Another relatively simple technique that you should have used is a SWOT analysis. The ultimate question that you should have asked, which is linked to this point, is "how are we going to deliver this 'strategy'". For a strategy without a delivery mechanism is no strategy at all. I urge you to move on from here to address these points and above all to engage the community in that task.</p>	<p>Comment noted. Guidance and support in applying the LNRS will be developed as part of the delivery phase. We will keep our webpages up to date during the delivery phase.</p>

MONITORING AND REPORTING

Number	Respondent	Comments	Proposed Response
MON001	Hazlerigg Parish Council	Better monitoring and enforcement is necessary to ensure environmental benefits are delivered as promised. We would like to see less plastic tree tubes as these inevitably end up as litter, breaking down and leaching micro-plastics into the environment and more sensitive management of hedgerows to support biodiversity.	<p>Re monitoring: See response to MON002</p> <p>Re tree tubes: agreed – the text stresses the importance of natural colonisation where that can work. Remember however that a tree tube isn't a single use plastic, it is in place for up to 10 years, protecting the tree from mammal damage. An action to remove tree and hedge tubes would be a good idea.</p> <p>Re hedgerows: actions for hedgerows are suggested to farmers and land managers in the “wider countryside” section and pop-ups when clicking on the map.</p>
MON002	Corsenside Parish Council	Short term, medium term and long term goals may be useful in understanding how and what nature recovery may look like.	Agreed. The next step from the production of the strategy will be delivery. Guidance for us didn't include breaking down the priorities and measures into an action plan. This would include monitoring and indicators.
MON003	Taylor Wimpey UK Ltd	It is unclear how frequently the LNRS is going to be monitored and updated. This is an important consideration it would be useful to understand if the strategy is being effective and it also needs to be able to be responsive as opportunities may change over time. Commentary on this would be helpful within the LNRS.	<p>The schedule for reviewing LNRSs across England is up to the Secretary of State. A sentence about this will be added to the monitoring chapter.</p> <p>Re monitoring: See response to MON002</p>