



## DEFINING A NEW BASELINE AND ASSESSING THE IMPLICATIONS OF CHANGE TO SSSI REPORTING METRIC

### Natural England Consultation

Date: 18 January 2021

Consultation page: <https://consult.defra.gov.uk/natural-england/changes-to-the-measurement-metric-used-to-report-o/>

### Summary/Context

- SSSIs are notified for one or more ecological feature – e.g. a species, habitat, or geological feature that is present on the land and for which the SSSI should be managed. The Government’s aim is for all SSSIs to be classed as in favourable condition.
- SSSIs monitoring and reporting is currently done according to units within a SSSI – normally split by tenure or management. So a SSSI may contain several units (e.g farms) and each one is given a condition status according to their overall condition across all the features for which the SSSI is notified.
- Natural England are planning to move to a new way of monitoring and reporting SSSI condition, which aims to fit with an ecological network approach. Reporting will be based on the environmental feature (or features) for which the site is notified (i.e. a particular species or habitat) rather than on units according to tenure or management.
- For example, if one reason for SSSI notification is to protect the ‘Large Blue Butterfly’ then SSSI condition will be based on this feature across the whole site. Rather than having a SSSI comprising different units with different status, the SSSI will be classified with a single status for each relevant feature.
- Four options were evaluated by NE and the preferred option is the “Least Favourable Feature Condition Status”. This would mean that for each ecological feature, the condition is equal to the lowest condition of any unit in the SSSI. For example if 3 units were classified as “favourable” for the large blue butterfly, and one unit was classified as “Unfavourable (recovering)” then the whole SSSI would be classified as “Unfavourable (recovering)” for the large blue butterfly.

### Questions

1. *What is your name?*

Harry Greenfield

2. *What is your email address?*

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3. *What is your organisation, if applicable?*

Country Land and Business Association (CLA)

4. *Do you use Natural England's current SSSI reporting statistics?*

Yes

5. *If yes please provide a brief description on how you use the official Statistic below*

The CLA uses these statistics to inform policy positions and improve advice to our members. We have evidence from our members about specific SSSI monitoring and the impact this has. We also engage with Government on policies such as agri-environment schemes, planning decisions and forth-coming environmental targets, all of which affect and are affected by the condition of SSSIs both individually and at the national level.

6. *Do you envisage the proposed change impacting on your use of the information?*

Yes

7. *If yes please explain below*

NE's analysis shows that the change will clearly mean that a smaller proportion of SSSI sites are classed as in favourable condition. This could have implications for policies, for example increased investment in those areas most needed or changes to current management practice and consent in order to achieve better ecological condition.

8. *Do you have any comments or suggestions to mitigate for the potential impacts of this change?*

It is imperative that this does not adversely impact land management options within SSSI land. There are a range of policy mechanisms that can be used to improve SSSI condition nationally and this is an area that the CLA is engaged with. However, there is some concern that using a new classification system which results in individual SSSIs being classified as in poorer ecological condition could be used to restrict the activities available to land managers.

A particular concern would be if a change in classification for a SSSI had an impact on when consents for 'operations requiring Natural England's consent' (ORNEC) was required. If consent is currently given it should remain so, even if the condition data changes under the new system.

Similarly, the use of more granular data when considering granting consent should be retained. The new way of presenting data may not disaggregate according to holding, which would mean that land managers could be tarred with the brush of a neighbour who

is not managing the land as sensitively. Decisions around consent should take account of the individual units within a SSSI, as well as the feature across the whole SSSI.

If this new metric is used to force changes in management practices without additional policy support then it will not be popular with land managers. Any new baseline metric will not change the underlying reasons for SSSIs being in the condition they are. The ways to improve this are well-known and include better advice, incentives and NE working with land managers to allow environmental management to fit into their business operations.

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