Sites of Nature Conservation Importance in Surrey
Improving the Process of Identification, Selection and Protection

1. Background
Sites of Nature Conservation Importance (SNCIs), often termed Local Wildlife Sites elsewhere, form the cornerstone for biodiversity protection in the county, additional to the statutory 63 Sites of Special Scientific Interest, SSSIs. SNCIs have their origin in the first Surrey Structure Plan in 1975 and since then a system of identification, selection and recommendation for protection in planning has been in place, originally under the remit of the Surrey Nature Conservation Liaison Group (SNCLG). Following the recommendations of the 2006 Defra guidance¹ this body was renamed as the Surrey Local Sites Partnership (Surrey LSP).

Despite the importance of SNCIs, their protection is limited to that offered through jurisdictional planning policy. SNCIs can therefore be protected from development that would damage them under policies within Local Plans, but these rarely require or imply expectation for SNCIs to be managed positively to maintain their biodiversity interest. Relatively recently, the management of Local Wildlife Sites has been made accountable as National Indicator 197, now termed Single Data List 160-00. This records the number of sites ‘in positive management’ and in consequence, a general awareness of the importance of these sites has been raised. Local Wildlife Sites were considered in the Making Space for Nature² report (relevant extracts in Appendix 1), where two key issues are considered; their protection and their management. This paper concentrates on aspects of the protection mechanism that needs improvement in Surrey.

2. Current Situation
Recommendations for newly-discovered SNCIs, or proposed modifications to existing SNCIs (as extensions or deletions) currently arise from the ad hoc biodiversity re-surveys of the Surrey Districts and Boroughs, and as new data is collected by Surrey’s wildlife recording community. These recommendations are presented to the Surrey LSP for endorsement and onward uptake within Local Plans. The Partnership considers each site against the SNCI Selection Criteria³ and officially recommends the reviewed SNCI schedule to the respective Local Authority. Only when sites are recognised in Local Plans can they be considered to be ‘designated’ (no statutory legislation exists to designate SNCIs, unlike SSSIs for example). Thus there is a potentially protracted process from identification to a site eventually appearing in a Local Plan, which may take several years. This creates particular difficulties where, for example, developments are proposed involving identified sites that clearly merit SNCI status but have not yet been included within the Local Plan.

3. Proposed Way Forward
Surrey’s Local Nature Partnership (SyNP) has adopted the Surrey LSP as a working group within its overall governance and management structure. The Surrey Nature Partnership was approved and its

¹ Local Sites, Guidance on their Identification, Selection & Management (Defra 2006)
³ Guidance for the Selection of Sites of Nature Conservation Importance (SNCIs) in Surrey (SWT 2008)
official mandate assured by Defra in August 2012. In its Local Nature Partnerships guidance paper of 2012\(^4\) Defra states that Local Nature Partnerships:

“...have an important contribution to make to strategic planning matters within their area. Government’s intention is to add LNPs to the Duty to Co-operate in the Local Planning Regulations as soon as possible after the first LNPs have been announced. This will mean that bodies bound by the Duty will need to have regard to the views of LNPs on strategic planning matters.”

It is imperative that the process of identification and selection of SNCIs becomes more transparent and inclusive, and that the Surrey LSP works more closely with the Boroughs and Districts to establish the best approach to protecting these sites. As an initial improvement, the Surrey LSP can promptly update summary SNCI selection qualifying criteria and location maps on the SyNP web pages as a follow up to the consideration meetings cycle.

However, there remains an important issue around how new Surrey LSP-endorsed SNCIs and their accompanying information is received and managed in development control by local planning authorities prior to their recognition under policies in Local Plan documents. The status of such sites following decision-making by the Surrey LSP therefore needs consideration, including the evidence it has gathered in support of its decisions, and how this impacts the way new SNCIs are to be taken into account at the earliest stages in the development planning process. This might involve the use of an easily-edited master GIS Alert Map for all sites of SNCI quality at whatever stage in the identification and selection process; the triggering of consultations on pre-application planning proposals with appropriate, specialist organisations; and support and assistance with describing the relative value of those sites when drafting recommendations in reports to planning committees, when they are not formally identified in the relevant Local Plans.

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\(^4\) An overview of the Local Nature Partnership role (Defra, April 2012)
Appendix 1


(P.13) **Local Wildlife Sites** are identified and selected locally for their nature conservation value. As with SSSIs they take into account the most important, distinctive and threatened species and habitats, but they do so within a regional and local context as well as a national one - the selection process is overseen by a local partnership. **Local Wildlife Sites** are non-statutory, having only minimal protection through recognition in national planning policy, and are highly vulnerable to damage and loss. They can be used to influence the direction of agri-environment funds but in general their management is under-funded. **Local Wildlife Sites** are important to future ecological networks, because they not only provide wildlife refuges in their own right but can act as stepping stones and corridors to link and protect nationally and internationally designated sites.

(P.38) **4.1.1 Statutory and non-statutory designations**

**Tier 2** - Sites designated for their high biodiversity value but which do not receive full statutory protection.

The remaining significant wildlife designation type is the ‘**Local Wildlife Site**’. Defra Guidance (2006) advocates the use of this term but many other names are still used for these sites including ‘County Wildlife Site’ and ‘Site of Nature Conservation Interest’. These are non-statutory sites identified by **Local Wildlife Site partnerships**, which are often led by local authorities and partnered by a range of local interests. Government policy is to provide protection to them through the planning system. There are more than 42,000 of these sites across England, collectively accounting for over 690,000 ha of wildlife habitat. These important wildlife sites are often neglected and frequently damaged or lost, but their management, and our knowledge about their locations, has recently improved as a result of a local authority performance indicator (currently under review) which encourages management of these sites.

(P.68) There are a large number of surviving patches of wildlife habitat scattered across England outside SSSIs. Many of them, but by no means all, are recognised as **Local Wildlife Sites**. Most are both poorly protected and poorly managed. Many of these sites have the potential to make an important contribution to an enhanced ecological network, and some will be particularly significant in this regard.

(P.71) **Recommendation 2. Planning policy and practice should:**

- continue to provide the strongest protection to internationally important sites and strong protection from inappropriate development to SSSIs.
- provide greater protection to other priority habitats and features that form part of ecological networks, particularly **Local Wildlife Sites**, ancient woodland and other priority BAP habitats.

(P.78) **6.2.5 Protection through designation or purchase**

Across different systems of site designated, only SSSIs and European designations (the ‘Natura 2000’ sites, which on land are all also SSSIs), provide high levels of protection to components of the ecological network. Other designations, notably **Local Wildlife Sites**, do not receive sufficient
protection. There appear to be three options which are not mutually exclusive: we either need to find different, better ways of protecting **Local Wildlife sites** and other remaining areas of semi-natural habitat of high wildlife value (in particular BAP priority habitats) through the planning system; or we need to provide incentives for private owners to secure their future; or we need to designate more areas as SSSIs (for example, where key gaps in the SSSI series exists). In practice, a combination of these three approaches is likely to be the most cost-effective solution.

Although incentives will often be the preferred solution, there may also be times when, in consultation with landowners, purchase of critical sites proves to be the most cost effective and appropriate solution to help achieve the aims of England’s ecological network.

(P.79) The management of **Local Wildlife Sites** is an even greater cause for concern, with less than a third of sites under positive conservation management. No national assessment of the condition of these sites has been made. In the last couple of years, however, the awareness and management of **LWS** has improved as a result of local authority performance assessment indicator NI 197, which is currently under review. Whatever the future of local authority performance indicators, the recent positive trend in improving the management of **Local Wildlife Sites** needs to be sustained. This will require proper engagement with landowners so that they are aware that their land has been identified as **LWS**, together with the provision of management advice and support.

**Recommendation 12.** Local authorities should take responsibility for the identification and monitoring of Local Wildlife Sites and the management of LWS must be improved.