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Ref: SSSI assessment consultation  
Contact: Alisha Anstee  
Tel: 07384216927

## Changes to the measurement (metric) used to report on the condition of SSSIs in England

Natural England [recently consulted](#) on the proposed change to the measurement used in the reporting of SSSI condition in England. The changes will be a move from a unit or area based assessment to one which measures the condition of a notified feature across the whole of the SSSI. The NFU sought member feedback and responded to this consultation in full. Please see below for responses to the questions asked.

### 1 What is your name?

Name: Alisha Anstee

### 2 What is your email address?

Email: [Alisha.Anstee@nfu.org.uk](mailto:Alisha.Anstee@nfu.org.uk)

### 3 What is your organisation, if applicable?

Organisation: NFU

## Questions

### 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

Description: The National Farmers' Union (NFU) represents 55,000 members across England and Wales. There are over 4,000 SSSI's in England, many of which are found on farmland and therefore managed by farmers. At present, the only funding for SSSI management is through agri-environment schemes. Countryside Stewardship is the only current agreement open to new applicants and it is a condition of the agreements to include any SSSI land within a holding in the application/agreement. Many farmers with SSSI's will still be involved in a Higher Level Stewardship (HLS) agreement in either the original or an extended form. NFU's use of the official statistic is therefore due to many of our members being engaged in some form of agri-environment scheme (CS or HLS) to support the management of their SSSIs. The SSSI condition assessment directly influences the agri-environment agreement when it is set up and at appropriate points of review. Therefore, condition assessment is important to the management of the agreement and the farm business. The SSSI condition assessment is the only means of reporting back to farmers whether their management has delivered the desired outcomes. It's often disheartening for our members that been in an agri-environment agreement for many years (could be 30 years) following Government advice to find the SSSI still has not reached favourable or an improved condition. As such the current system does not work well, nor will the proposed new approach. Prior to 2013, the frequency of monitoring was on a 6-yearly cycle for all SSSI's. However, since 2013 the frequency is based on a number of factors including location and risk, which means SSSI's can go much longer than 6 years without being monitored. The SSSI condition assessment influences the management of the SSSI land and in some cases, the surrounding areas too, having a direct impact on our farming members. The SSSI condition assessment can impact on farm businesses seeking planning permission to improve infrastructure and help the business to remain modern and competitive delivering high standards of food production and animal welfare. SSSIs can create added costs for businesses to apply for planning permission or permissions and consents. These can be onerous.

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

Yes

**7 If yes please explain below**

Impact: • Adopting the most precautionary approach and including the “unknowns” in the data does not demonstrate a willingness to work with land managers, who feel disheartened that their best efforts are not delivering results and feel the failure is easily applied through the current approach to the assessment criteria. It creates a negative language around the site condition, not providing positive feedback or recognition for ongoing management attempts. • The presented consultation paper assumes that Natural England have the capacity to assess a vast majority of the “unknowns” included in the datasets and consequently reduce the “unknowns’ value. Consequently, leading to the “least favourable approach” presenting the most similar figure to the current unit-based assessment. This is only the case if more resources are allocated to Natural England, as outlined in the paper. The NFU believes that the outlined “Most frequent” approach provides a fairer approach and recognises efforts across the entire feature and does not allow for one area (potentially a small proportion of the entire SSSI) to bring down the entire result. This is especially crucial in large SSSI’s being managed by various parties, such as a SSSI found on a common. Additionally, the most frequent approach provides the closest value to the current monitoring of SSSI’s in favourable condition (including unknowns).

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

Suggestions: Moving forward, it is crucial the monitoring and reporting procedure for SSSI’s is done with constructive engagement working with land managers. If the SSSI assessment is changed Natural England need to explain this to site managers, particularly where it leads to a lower assessment. The SSSI assessment does not provide a positive and constructive feedback to farmers managing SSSIs. As a tool it does not report on the change and impact which are directly related to activities within their control. Some sites will never achieve favourable condition. In many cases to date, the reporting of a SSSI where it is not favourable does not match up to the farmers expectations, particularly where they have been managing the SSSI in accordance with Natural England advice for many years (such as involvement in a HLS agreement). Farmers often feel confused around the results and uninformed as to why the management has been ineffective. The NFU encourages Natural England to improve the communication with land managers, moving away from the use of negative language and work to build better two-way relationships towards a shared goal. Farmers want to have a clear understanding of what good looks like if they’re managing a SSSI. Setting a clear baseline to work from is important with a common understanding of what can realistically be achieved through management. This helps to build ownership of the task in hand. The assessment and the reporting frequency back to land managers must improve, currently many SSSIs go longer than the previous 6-yearly cycle without having follow up assessments. We are aware of cases where Natural England’s site management advice changes over the period of time. There is a balance to be struck between developing knowledge of the best management to deliver an agreed outcome, a consistent management approach and a good on-going feedback.

The NFU understands that the correct management of a site to achieve favourable condition may not be known, or it may take many years to achieve (e.g. blanket bog recovery). In these scenarios the NFU would welcome a continuation of the current approach that recognises the efforts of the land manager through the implementation of a management plan and is deemed “recovering”. Natural England should carefully consider the potential impacts of this move on common land, which host many SSSI’s and has a complex and often unique ownership/ grazier structure. The NFU would like to understand more around the assessments that Natural England have conducted to understand how this change may impact common land and how Natural England will manage this with the various parties involved moving forward.

**9 Would you be happy for someone from Natural England to contact you regarding your comments?**

Yes

**10 If yes please supply an email address or phone number**

Contact: Alisha.Anstee@nfu.org.u