



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

Report of consultation by Natural England

Date: October 2022

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1. Introduction

Formal consultation on defining a new baseline and assessing the implications of change to SSSI reporting metric was undertaken for a period of 6 weeks, between 7 December 2020 and 18 January 2021. The purpose of this Consultation Report is to describe the extent of the consultation and the responses obtained from respondents.

Table 1. Summary of responses

Consultation topic: Defining a new baseline and assessing the implications of change to SSSI reporting metric.	
Total number of stakeholder responses within deadline	53
Total number of late responses after deadline	1*
Public sector	8
Universities	2
Interest groups	19
Businesses / Consultancies	14
Anonymous	10
Number of supporting responses	17
Number of neutral responses	9
Number in support of feature assessment but not to use the 'Least Favourable Condition' option for setting the baseline.	14
Number in support of 'Least Favourable Condition' option for setting the baseline and do not support the shift to feature assessment	3
Number of responses not in support	5
No response	5
Number of responses affirming implication on use	41

Number of responses with no implication on use	10
No response to implications	2

*Note: The response submitted after the deadline is presented in this report for information only.

2. Background

Natural England monitors and reports on SSSI condition through a risk-based programme to assess the condition of each feature on each unit on every SSSI within an appropriate monitoring cycle. The results for each feature are used to categorise the condition of each unit (favourable, unfavourable recovering etc.) and these are aggregated to report on the area of SSSI in each category.

Natural England is developing a monitoring and assessment approach which will provide evidence on how our Protected Sites function within landscapes or ecological networks. A key change is the move to whole feature assessment and reporting, rather than the current SSSI unit-based approach. This will mean that we assess the condition of each feature at the scale of the feature within a SSSI and assign a condition category to the whole feature.

There are differences in the scale of monitoring and assessment between the countries within the British Isles. All the other country nature conservation organisations monitor by ecological interest feature, assigning a condition status to each feature. They differ in whether they focus on SSSI features at the SSSI site extent (Scotland and Northern Ireland), N2K features at the N2K site extent (Wales) or features of interest across the whole natural range of that feature, both within and outside of protected sites (Republic of Ireland). This latter strategy demonstrates a landscape-scale approach in the broadest sense. Natural England is alone in breaking SSSIs down into units and applying a condition to each unit.

Changing the SSSI assessment metric will better reflect our increased understanding of the importance of landscape-scale ecological processes and conservation successes, allowing us to deliver key aspects of the 25 YEP.

3. The consultation process

3.1 Stages of the consultation process and raising awareness

The consultation was open to anyone with an interest in the statistics for reporting and monitoring SSSI condition in England and was pre-announced on the Defra statistics calendar, four weeks prior to the launch on 7 December 2020.

At the start of the consultation, Natural England contacted national and local stakeholders with an interest in official SSSI statistics and the proposed change in metric. A total of 91 stakeholders including the Major Landowners Group (MLG), water companies, local authorities, universities and the Wildlife Trusts Federation were contacted by e-mail on the start date of the formal consultation.

Natural England encouraged stakeholders to share the details of the consultation with other partners and colleagues to encourage fair, open and inclusive participation in the consultation process.

Natural England also used the Government Twitter @DefraStats account and the NE Chief Scientist Twitter feed to announce the start of the consultation.

Participants were encouraged to respond via an online survey (hosted by the Citizen Space website). The formal consultation package was made available online and comprised the consultation summary document and an online consultation form for completion by respondents.

Information was displayed on Natural England's website to inform stakeholders about the consultation.

During the consultation period, a teleconference discussion with the Major Landowners Group was held on 7 January 2021. A PowerPoint presentation was made by a Principal Officer in Natural England to inform stakeholders of the proposed change. A question-and-answer session ensued, and answers were provided to questions from the stakeholders. A total of 18 stakeholders were present at the teleconference discussion. The attendees were encouraged to complete and submit the online consultation form.

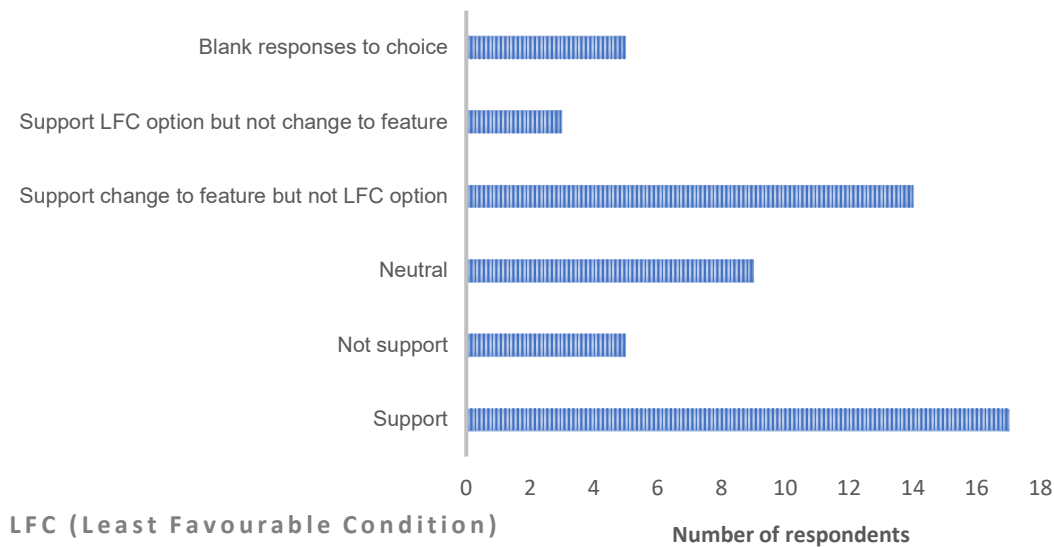
During the consultation period, a reminder to stakeholders and anyone with an interest in the official statistic to complete the online consultation form was made by Natural England, via the Government Twitter @DefraStats account and the Natural England Chief Scientist Twitter feed.

4. Consultation responses

Natural England received 53 consultation response submissions during the formal consultation period. Of the total response submissions, 8 were from the public sector, 2 were from universities, 19 were from interest groups, 14 were from businesses and consultancies, and 10 were from anonymous bodies. Of the 53 response submissions, 55 were full consultation responses and two were blank forms.

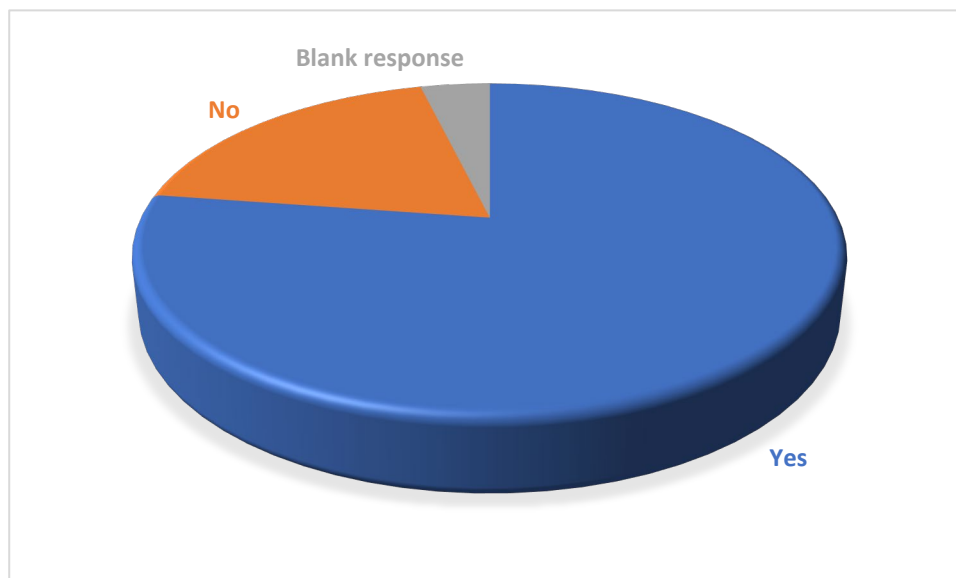
Natural England also received one consultation response via e-mail, after the formal consultation period had finished.

Figure 1. Summary bar chart of responses to proposed change in metric to Least Favourable Condition



As shown in Figure 1, of the 53 formal consultation response submissions, 17 respondents (32.1%) were in favour of the proposed change, 5 respondents (9.4%) were not in favour of the proposed change, 9 respondents (17.0%) were neutral. 14 respondents (26.4%) were in favour of the change to feature based monitoring, but not in favour of the Least Favourable Condition option while 3 respondents (5.7%) were in favour of the Least Favourable approach option but not in favour of the change to feature based monitoring. 5 respondents (9.4%) did not express a preference.

Figure 2. Pie chart showing percentage of respondents that envisage the proposed change impacting on their use of information



As shown in Figure 2, of the 53 formal consultation submissions, 41 respondents (77%) stated that the proposed change would have implications for their use of the statistics, 10 respondents (18.9%) did not think the proposed change would have an impact on their use of the statistics, and 2 respondents (3.8%) submitted blank forms.

Of the 53 formal consultation submissions, 45 respondents (84.9%) agreed to be contacted again by someone in Natural England, 6 respondents (11.3%) declined to be contacted again, and 2 respondents (3.8%) submitted blank forms.

4.1 Details of consultation responses

Consultees are categorised as follows:

A – Public Sector

B - Universities

C – Interest Groups

D – Businesses / Consultancies

E – Anonymous

Table 2. Consultation responses within deadline from public sector organisations.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
North East Lincolnshire Council	1. The respondent did not provide any answer on how the information is used.	1. States that a change to the way the SSSI condition is recorded would limit what NELC could do to change the condition status of the SSSI.	[No suggestion was provided.]
ENMO Parish Council	1. States that the condition status of SSSI is used notably at Kirby Moor.	1. States that the Least Favourable precautionary approach and its contribution to the nature network will enable the Parish and hopefully the Local Planning Authority to take into consideration during planning decisions, especially at Kirby Moor SSSI.	1. Whichever method is used, needs accurate up to date baseline data.
North Lincolnshire Council	1. Used for the Local plan and other Local Authority policies. 2. Used as part of the evidence base for the Humber Management Scheme under the Habitats Regulations.	1. States that the adoption of a precautionary approach is welcomed insofar as it is important that site condition is not exaggerated or reported as improving, if that is not the case.	1. Whilst the precautionary approach should be adopted, there perhaps need to be a parallel mechanism to record progress in restoring SSSI units other than the worst ones.
Weymouth Town Council	1. For monitoring reports with environmental policies relating to the number of SSSI and its condition.	1. States that the proposed change is potentially advantageous, as it will focus on reason for listing rather than a broad category.	1. States that, if the proposed change enables more frequent assessment, it will mitigate the infrequent broad assessment, as the rate of change in adjoining land use is potentially a greater concern.

Forestry Commission / Forestry England	1. Includes the condition of woodland SSSIs in its Annual Key Performance indicators.	1. We have no issue with the least favourable-lowest common denominator method to set the baseline for SSSI condition, but this method is not appropriate going forward.	1. We should decouple the measure of SSSI condition with the target for condition. For instance, the measure should cover features across England. 2. The target should be applicable to every landowner and reflect the effort that has been put in, to attain favourable-feature status.
Defence Infrastructure Organisation (MOD)	1. Receive monthly updates via the Major Landowners Group. This data is used to validate MOD's own SSSI condition data and acts as an archive showing when / where condition monitoring (ISA or Site Check) has taken place.	1. DIO/MOD will need to follow the new metric for departmental reporting on SSSI to ensure it aligns with Defra and wider government reporting.	1. The existing system of spatial SSSI units could be retained with condition and actions still assigned to these land parcels.
Internal Drainage Board (IDB)	1. To measure progress.	[No information was provided.]	[No information was provided.]
Marine Management Organisation	1. SSSI condition assessment reporting is used to inform statutory monitoring and reporting on the effects and effectiveness of marine plans, carried out by the Marine Management Organisation. 2. Existing monitoring measures (SSSI condition assessments) are used to provide indicators associated with intended policy specific effects.	1. Need to redesign our indicator and associated report card to take account of the updated metric. 2. This proposed change in metric will have to be considered where assessment data are represented differently in different marine plan reporting windows, eg, SSSI assessed by unit vs Marine Plan report 2, SSSI assessed by feature.	1. A need for further information and direct engagement. 2. Relevant points of contact to engage on monitoring and reporting (SSSI or otherwise) would be helpful.

		<p>3. This may impact our ability to draw a comparison easily across reporting windows.</p> <p>4. If the proposed change results in increased data gaps (I'm not clear if it will) it may impact our ability to report on particular policy effects.</p>	
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Table 3. Consultation responses within deadline from universities.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
University of York	1. For site identification in relation to habitat status (peatlands). An overall peatland (blanket bog) management project and several PhD projects are looking at linking habitat status to ecological functions, specifically carbon storage, GHG emissions, water quality and biodiversity (including soil biota).	<p>1. Hoping that the proposed changes will include ecological functions and soil biota in the overall assessment.</p> <p>2. Know from various other ecosystems that above ground vegetation does not necessarily relate to functional traits - what we need to know is how functions (carbon, GHG, water) relate to classifications.</p> <p>3. Notably, arbitrary measures of assessment are questionable and should be replaced by clearly identified objective and measurable</p>	[No information was provided.]

		parameters (in addition to any above ground assessment).	
University of Oxford	<ol style="list-style-type: none"> To find out about the condition of individual sites that I am interested in. As context for considering the pressures and threats to woodland more generally. 	[No information was provided.]	<ol style="list-style-type: none"> It is sensible to move to feature reporting at a site level because it often did not make much sense reporting on a unit level for woodland, where the state and the structure of the woodland naturally changes over periods of decades. The main problem I see is that, if sites have been split up into many different units, each of which is very small, then the whole feature might be classed as unfavourable because of one small part of the site.

Table 4. Consultation responses within deadline from interest groups.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
Yorkshire Wildlife Trust	<ol style="list-style-type: none"> To understand the significance of the site, a history of the condition of the site and sometimes views on improved management. 	<ol style="list-style-type: none"> Some SSSIs are in different ownership, so unit boundaries may follow ownership boundaries. If data is based on a site, it may be hard to determine which units are in good condition/failing etc. 	<ol style="list-style-type: none"> Notes on condition assessment should be unit specific.
Moorland Association	<ol style="list-style-type: none"> Monitoring the improvement and condition of our members' landholding. 	<ol style="list-style-type: none"> Our members are responsible for land within their own SSSI unit and not the whole SSSI. 	<ol style="list-style-type: none"> Progress reports are still required at the local level. If only one small element of the SSSI is in poor condition the whole SSSI should not be marked down.

Bumblebee Conservation Trust	1. To monitor the condition of SSSIs where <i>Bombus</i> species are qualifying features.	1. More confidence in the metrics if assessing qualifying features rather than units.	[No information was provided.]
Buglife	1.To assess the contribution of SSSIs to invertebrate conservation - mainly on a site by site basis.	1. The new approach would enable us to make wider assessments across the network.	1. We welcome this approach, but it will only work if sufficient resources are invested in the transition period to assess "unknown" features.
The Mammal Society	[No information was provided.]	[No information was provided.]	1. Whilst there are obviously concerns for any long-term dataset in changing the means of recording, I believe that the proposed changes will result in better data that can be used more effectively to further conservation aims.
Humber Nature Partnership	1. SSSI unit status to identify local issues around the Humber Estuary. 2. Work with partners to rectify any sites that are failing.	1. The change would mean that failing areas of the SSSI would be harder to identify.	1. I think the current system should be kept.
Yorkshire Marine Nature Partnership	1. To identify, share and interpret the condition status of coastal and marine SSSIs. 2. To highlight where particular management measures may be necessary, on behalf of partners with statutory duties.	1. It will be more difficult for partners and stakeholders to easily identify which areas of the SSSI are in favourable or unfavourable condition, particularly across a large site.	1.Continue to provide individual unit assessments on the designated sites system but use the single metric for reporting.

National Trust	<p>1. Condition assessment of SSSI is a core metric incorporated into the National Trust's corporate Key Performance Indicator framework.</p>	<p>1. The implications of this change for our own corporate reporting have not yet been fully explored.</p> <p>2. We do not foresee any significant problems in adopting this new statistic for corporate reporting, as long as some issues are adequately resolved.</p>	<p>1. Ensuring this metric change is fully integrated within the wider SSSI reform project including recommendations from the SSSI Review project to consider the adequacy of the Series in responding to environmental change.</p>
Fenland Wildfowling Association	<p>1. To assist and inform us when generating notices of intent during the wildfowling consenting process.</p> <p>2. For site management plan purposes.</p>	<p>1. The proposed approach will inevitably lead to a loss of clarity in the condition of a large SSSI which is made up of several units.</p> <p>2. Furthermore the proposed approach will in effect downgrade the performance of the entire SSSI network.</p>	<p>1. Change nothing until the new site feature approach comes into force in a year's time.</p> <p>2. Alternatively, if a short-term change is regarded as essential, then we would rank the 4 options as follows: 1) 90% Area, 2) Largest Area, 3) Most Frequent, 4) Least Favourable</p>
Kent Wildfowling and Conservation Association	<p>1. As an indicator of how the sites we manage are performing.</p>	<p>[No information was provided.]</p>	<p>1. This extension of the precautionary approach is not conducive to active land management.</p>
Dartmoor Commoners' Council	<p>1. For information on the SSSI status which determines the environmental agreement management options and the stocking rate of the area determined by Natural England.</p>	<p>1. Whilst there are benefits to moving to a feature-based assessment, the concern is how the transition in real time management will be undertaken.</p> <p>2. The preferred option to use the 'Least Favourable' condition may not provide the necessary information that would be beneficial in an easy understanding of SSSI assessments to enable proactive management to benefit the whole site.</p>	<p>1. The preferred option is 'most frequent' combined with 'proportionate area'.</p> <p>2. It is important to understand how much of a feature is in which designation, so, targeted improvements can be made where necessary.</p>

National Farmers Union	1. In Agri-Environment Scheme (CS or HLS) to support the management of their SSSIs.	1. 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.	1. If the SSSI assessment is changed, Natural England need to explain this to site managers, particularly where it leads to a lower assessment.
Royal Society for the Protection of Birds	1. To assess our progress on maintaining or restoring SSSIs to favourable condition. 2. To adjust our management as necessary.	1. Of the 4 options outlined in the document, we favour the least favourable option, ie, for each SSSI feature on a site, the least favourable condition status attributable to that feature on any unit that it occurs in should be used. 2. Importantly, this option is the most precautionary.	1. A hybrid feature / unit approach is needed. This must assign a condition to features at a unit level as well as at a site level.
Game & Wildlife Conservation Trust	1. Use the data in our day to day work. 2. Provide advice to land managers who are operating on SSSIs.	1. It will make it more difficult to achieve favourable status, both for land managers and Government organisations, and to demonstrate condition trajectory.	1. It would be much better to present more information by recording a % score ie, 75% favourable; 25% favourable - recovering. 2. This would enable better tracking of individual SSSI condition trajectories as the % split changed without incurring extra expense.
Country Land and Business Association	1. To inform policy positions and improve advice to our members. 2. Engage with Government on policies such as agri-environment schemes, planning decisions and	1. The change will clearly mean that a smaller proportion of SSSI sites are classed as in favourable condition. This could have implications for policies.	1. If this new metric is used to force changes in management practices without additional policy support, it will not be popular with land managers.

	forthcoming environmental targets.		
The British Association for Shooting and Conservation	<ol style="list-style-type: none"> 1. As a benchmark for government performance. 2. When applying for consent on SSSIs. 	<ol style="list-style-type: none"> 1. We think, in this case, the least favourable approach provides an unfair and misleading reflection for the condition on the site. 	<ol style="list-style-type: none"> 1. Requesting confirmation that any change in reporting of performance of the SSSI network will not result in a more precautionary approach for shooting-related consents.
The Wildlife Trust	<ol style="list-style-type: none"> 1. Nationally, the statistics are used to understand the Trusts' contribution to the national target and to know where further work may be required. 2. Also extremely useful for our public engagement and communications work. 3. The individual Wildlife Trusts also use the information, at the unit level, to inform their conservation management work and monitoring programmes. 	<ol style="list-style-type: none"> 1. For individual Trusts, losing the unit level would be unhelpful because, in many cases, the Trust may only own a few units of a SSSI whereas one or more other landowners manage the remainder. 	<ol style="list-style-type: none"> 1. We recognise that SSSI monitoring is already based on features but the switch from unit-based to feature-based reporting must not be at the expense of being able to report progress in a meaningful, fair and understandable format. 2. One comment we have on the preferred 'least favourable' option is that there is a risk – especially for those features which cover multiple units (potentially in multiple landholdings), that this option will bias reporting for the whole site based on the worst unit.
Moors for the Future Partnership	<ol style="list-style-type: none"> 1. For funding bids - to evidence landscape issues and restoration targets. 2. Stakeholder engagement - as one measure of the actual performance of a landscape for ecosystem services and more specifically for biodiversity. 	<ol style="list-style-type: none"> 1. It will impact stakeholder engagement in multiple landholdings. 	<ol style="list-style-type: none"> 1. Have another clear, resourced plan to mediate between unit holders who are going to become part of a larger partnership.

<p>Amphibian and Reptile Conservation Trust</p>	<p>1. To assess the status of amphibians and reptiles nationally, and how the SSSI series contributes to their conservation.</p> <p>2. Understanding the status of herpetofauna on SSSIs (at the site and unit level).</p>	<p>1. Welcome the focus of reporting at the interest feature level, which we assume will generate more species data for all notified interest features</p> <p>2. Agree with reporting at the 'least favourable condition' assessment, as this is more precautionary (the other approaches would provide an overly optimistic assessment and could mask important site issues).</p> <p>3. We are concerned that unless unit level assessments are undertaken and made accessible to stakeholders, improvements made on site condition and species knowledge on other parts of the site will be lost.</p>	<p>1. The move from unit to feature scale reporting needs to be transparent and should allow for interrogation.</p>
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Table 5. Consultation responses within deadline from businesses / consultancies.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
<p>South West Water</p>	<p>1. To report Pennon (South West Water and Bournemouth Water) Biodiversity performance on our own SSSI land holding.</p> <p>2. To plan capital works and natural capital delivery projects.</p>	<p>1. The change in reporting could have significant impacts on the larger upland SSSI's owned by other landholders. This could be beneficial when Pennon is working with these landowners to improve moorland peatland units for example, as it could act as a driver to deliver new restoration plans.</p>	<p>1. There would be less impact if one of the other approaches considered in the consultation document- "Most Frequent" was adopted.</p> <p>2. However, we understand that the arising concern would be that small areas not achieving favourable status</p>

			may not be addressed using this approach.
Yorkshire Water	1. The regulatory regime in which we operate includes a process for setting Performance Commitments and Outcome Delivery Incentives (ODIs) within our five business year plans.	1.The main concern around the move to feature based reporting relates to the nature of our larger SSSIs. NE accept that feature-based monitoring and investment decision making to address improvement will be "tricky" at this scale and so we have serious reservations about the proposal pending a clear explanation of how it would be applied to such larger multi-feature SSSIs.	1.The proposal to change metrics be halted and developed in partnership with landowners so the consequences are fully understood, including the potential impacts on regulation and compliance.
Severn Trent PLC	1. At a unit level the specific condition results allow us to judge our effectiveness as a landowner/ occupier in achieving the environmental outcomes and what we might need to do if the site is not favourable.	1. Continue to identify the condition at a unit level as well as at the site level. It is clear what steps are needed to correct the unit situation. 2. By moving away from a unit assessment, it will make it harder to bid for resources within our company to deliver favourable condition.	1. The Favourable Condition options proposed to monitor designated sites would not be quite effective.
Northumbrian Water	1. As a major element of the performance commitments made ever since the Water Industry accepted the Government PSA 2010 targets set in 2003.	1. Feature based reporting will not fairly reflect SSSI condition on small amounts of designated terrestrial land within Northumbrian Water ownership.	1. Please stick to unit-based monitoring. 2. The 'Unfavourable – Recovering' and 'Unfavourable – declining' categories could be retained in the 'least favourable' model so that a decline or improvement in condition is captured.
Wessex Water	1. To assess and inform the management options put forward	1. Feature based assessment is less linked to management responsibility areas than the unit-	1. A further consultation or discussion around the apparent long-term change

	<p>for each SSSI owned, managed or otherwise influenced by Wessex Water.</p> <p>2. For internal and external reporting to demonstrate company performance, including against measured targets and performance commitments.</p> <p>3. For assessments and investment plans.</p>	<p>based approach. As such, where SSSIs have multiple owners/managers, actions by one may prejudice the management by others.</p> <p>2. The 'least favourable' option doesn't make provision to detect and document decline.</p>	<p>to a feature- based methodology would be appropriate for relevant stakeholders.</p>
United Utilities	<p>1. For corporate reporting, specifically the area of SSSI under United Utilities' ownership.</p> <p>2. For condition assessment.</p>	<p>1. The main concern around the move to feature based reporting relates to the nature of our larger SSSIs. It is not clear how the proposal would be applied to such larger multi-feature SSSIs.</p>	<p>1. We suggest that the proposal to change the metrics has wider consultation in partnership with landowners, so the consequences are fully understood, including the potential impacts on regulation and compliance.</p>
Habitat Designs Ltd	<p>1. When completing grant applications to HLF, Landfill, Green Recovery and to Agri-environment schemes.</p> <p>2. Referenced sometimes when applying for licences to re-introduce large blue butterflies to new sites/ landscapes.</p>	<p>1. Probably more realistic but it could cause problems ie, if one NGO's nature reserve is downgraded because of lack of management by another NGO on their reserve.</p>	<p>[No information was provided.]</p>
Harris Lamb Property Consultancy	<p>1. To produce ecology reports for planning applications and conservation projects.</p>	<p>1. For determining impacts of development or conservation actions it is useful to know areas of a SSSI that are failing therefore you would want to</p>	<p>[No information was provided.]</p>

		know the specific unit information rather than the information for the SSSI as a whole.	
Baker Consultants	<p>1. Consultancy work in protecting the features of the SSSI from development.</p> <p>2. Monitoring rare plants on behalf of the BSBI.</p>	1. If the information provides better and more accurate assessment, I will be able to rely on the data much more than the existing condition assessment.	[No information was provided.]
Consultant Ecologist	1. Report condition of SSSI units during projects for clients.	1. Proposed changes will remove the ability to provide clients with Unit-specific (and therefore sometimes owner-specific) information on condition.	1. It will make it harder to work with uncooperative owners.
H & H Land & Estate Ltd	1. To determine stocking levels and other management requirements on land that we help to manage or over which we are negotiating environmental agreements.	<p>1. It is likely to affect the stocking levels we can negotiate or utilise.</p> <p>2. Most land we are involved with comprises multiple SSSI units, currently in a range of different conditions.</p>	<p>1. SSSI condition assessment should be based on the proportion of that feature area (not SSSI unit area) that is in favourable condition.</p> <p>2. If more than 90% (say) of a feature in a SSSI is in favourable condition, the SSSI condition should be recorded as favourable.</p> <p>3. I would favour Option 4 from the consultation document, but with the areas based on feature area and not SSSI unit area.</p>
Thyme Consultants Ltd and AUKWC	1. In notices of intent, management plans, agri-environment scheme	1. Supportive of the proposed change where SSSI site condition is based on a site level assessment	1. There would be merit, whatever approach is eventually taken, for the current SSSI condition assessments and conditions to remain publicly

	<p>development, NNR management agreements.</p> <p>2. The focus for discussion and positive action with owners and occupiers.</p>	<p>and not unit-based, so long as proper context is used in practice at a more local level.</p> <p>2. The condition option being proposed by NE is the worst of the 4 options considered in our opinion.</p>	<p>available for the interim year through to April 2022 when the change to whole site feature-based reporting commences.</p> <p>2. This will at least provide comparison and context for the next year of interim measures.</p>
Rookmarsh Ecology	1. Riparian species population distribution.	1. Changes would further encourage the aggravated use of the precautionary principle, thereby restricting further the activities of land managers and other interested stakeholders.	1. In many instances, NE have used the precautionary principle in making site specific decisions, while not considering wider 'landscape-scale' factors which would have a significant bearing on the particular site.
Chattenden Syndicate Ltd	[No information was provided.]	[No information was provided.]	The proposed approach is not conducive to current active land management.

Table 6. Anonymous responses to the consultation.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
Blank Form			
	[No information was provided.]	[No information was provided.]	1. Whilst I understand the need for Natural England to review and revise SSSI condition assessment methodology, I would like reassurances that when this new approach is adopted, secondary features outside of the SSSI citation will not be ignored - particularly when it comes to focal species.

	1. In my role as a volunteer with my local wildlife trust being on their Conservation Committee.	[No information was provided.]	1. Critical to the effectiveness of the system is the definition of the "feature" - if this is wrong or changes then whatever system is used will fail to properly reflect the condition of the site.
Blank Form			
	[No information was provided.]	[Comments not relevant to consultation questionnaire.]	[No information was provided.]
	[No information was provided.]	[No information was provided.]	<p>1. Some features are already assessed at the site level - eg, vascular plant interest. Having unit- based assessment is also very useful in highlighting which land managers are succeeding and which are not.</p> <p>2. Purely reporting at a site level would potentially remove this and would certainly make it harder for the public to see which parts of a site are causing problems.</p>
	1. Research at work, Social media communications and personal interest.	1. If the metrics are representative, I will probably use more often.	<p>1. Two sets of metrics are required. A general set that reflects previous record and acts as a benchmark and a platform for a more targeted approach.</p> <p>2. Don't ditch the old record. Make them available in an archive.</p>
	[No information was provided.]	[No information was provided.]	<i>No information provided</i>
	[No information was provided.]	[No information was provided.]	1. Focusing on one feature can have a disproportionate effect on the scoring of the whole SSSI.

	[No information was provided.]	1. As the owner of two SSSIs, I imagine you will want me to start reporting condition.	1. The metric needs to be adapted to cover only the relevant parts of the sites, not the whole site areas. 2. As a professional soil scientist, I could report on one of my sites (an SSSI / SAC for blanket peat bog), but for the other I would need a degree-level course on the identification of rare bryophytes. Hence the need for specialists to report on the metrics.
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Table 7. Consultation response after deadline by email.

Consultees	Use of information	Impact on use	Suggestions to mitigate potential impact
[Not provided]	1. For land management.	1. The proposed changes to the metrics do nothing to address the injustice of the current system, which is especially unfair to a moorland habitat that takes a long time to change due to its slowing growing cycle.	1. The condition assessment system needs splitting into two: One that assesses the state of the SSSI as it is currently, and another that assesses the management.

5. Actions

Natural England reviewed the consultation responses and arranged follow up meetings with stakeholder groups. In these meetings Natural England sought to understand the scale of the issues raised.

The primary concern was whether the new approach would remove the ability for landowners to report the condition of their landholding and understand the necessary management measures needed to bring about condition change.

In the summer of 2021 two pilots sought to address questions raised regarding the need for continued unit-based assessments and reporting. Following these pilots, changes were made to the outcomes of the programme and a mechanism has been designed to allow the continuation of unit-scale reporting even when the data has been collected at the whole feature scale.

The concerns raised about using the 'least favourable approach' to setting the baseline appear to be related to a misunderstanding. It should be noted that this is only about how we use the current unit-based information, held within Natural England's internal systems, to set a baseline for every feature. When we undertake new assessments, the feature condition will be based on data collected about that feature and assessed against the Common Standards Monitoring criteria to decide on current condition.

There have been two further pilots in summer 2022 which have looked at the following (the results and data analysis for which are still being reviewed):

- how to ensure that land managers are still able to understand whether the work they are doing is supporting site condition
- how to work on large and complex sites
- how to best use new technologies to support condition assessment
- how to use data from others and citizen science

We will provide regular updates about how we are addressing the concerns raised and the outcome of the pilots to those who have provided contact details.

6. Consensus

Natural England reviewed the consultation responses and identified specific concerns raised by stakeholders. The need to provide further opportunities for stakeholders to discuss these concerns was identified in order to agree solutions, develop ways of working in partnership and ensure smooth transition to feature based monitoring.

Some of the key take home points were that once stakeholders understood the process of how whole feature assessment and reporting will work, they were content with how we propose to maintain the link with units and management advice. Maintaining the ability to report at unit level until at least 2025 will enable stakeholders to report outcomes in relation to Management Plans.

The following information summarises the questions raised by stakeholders during face-to-face meetings and the solutions that Natural England have, or are proposing to, put in place.

Table 8. Concerns raised at a meeting with water companies on 6th May 2021. Further discussions were organised with representatives of the Water Industry, as part of the Major Landowners Group discussion. A total of 13 representatives attended the discussion.

Concerns	Solutions / mitigations
<p>1. By moving away from a unit assessment, it will make it harder to bid for resources within our company to deliver favourable condition</p>	<p>Assessments will be made at a whole feature level. There will be a mechanism for stakeholders to know what and where the issues are at unit/tenure level.</p> <p>Natural England will maintain the ability to report at a unit scale.</p>
<p>2. The proposal to change metrics be halted and developed in partnership with landowners so the consequences are fully understood, including the potential impacts on regulation and compliance.</p>	<p>1. Two pilot studies undertaken at Duddon Estuary SSSI and West Nidderdale Barden and Blubberhouses Moors SSSI respectively in 2021, and a further two pilots have been carried out on Salisbury Plain SSSI and River Frome SSSI in summer 2022 to inform Natural England: how whole feature assessments work at different complex sites; how to develop mitigation measures highlighted by MLG and others; and how we continue to provide information around management interventions at landowner level. MLG members were invited to participate in the pilots.</p> <p>2. Natural England will decide the feature condition from CSM compliant approaches.</p>

Table 9. Concerns raised at a meeting with MLG representatives on 13th May 2021. Further discussion was organised with representatives of Interest Groups, as part of the MLG discussion. A total of 7 representatives attended the discussion.

Concerns	Solutions / mitigations
<p>1.The existing system of spatial SSSI units could be retained with condition and actions still assigned to these land parcels.</p>	<p>We will maintain the ability to report at the unit scale.</p> <p>Data will be collected at the feature scale through CSM compliant processes, either a rapid assessment or a detailed assessment. These data along with information on management and pressures will enable unit conditions to be assigned.</p>
<p>2.We recognise that SSSI monitoring is already based on features but the switch from unit-based to feature-based reporting must not be at the expense of being able to report progress in a meaningful, fair and understandable format.</p>	<p>Natural England have committed to extend parallel reporting until at least 2025. At this point it is likely that a replacement for the reporting system will be in use and a more precise mechanism for reporting impacts to protected sites will be used.</p> <p>MLG participated in the discussion on the replacement of CMSi.</p>

Table 10. Concerns raised at a meeting with statutory bodies on 15th October 2021. Further discussions were organised with statutory body organisation representatives. A total of 5 representatives attended the discussion.

Concerns	Solutions / mitigations
<p>Ensuring this metric change is fully integrated within the wider SSSI reform project including recommendations from the SSSI review project to consider the adequacy of the series in responding to environmental change.</p>	<p>The Future Reforms Project is reviewing whether SSSIs need to change to accommodate the impacts of climate change. This includes reviewing what 'good' looks like.</p> <p>Natural England will decide, on balance, on the condition of the feature using CSM compliant Rapid Assessment approach.</p>

Table 11. Concerns raised at a meeting with farming organisations on 4th February 2022. Representatives of the farming and upland conservation groups were invited for further discussions. A total of 10 representatives attended the discussions.

Concerns	Solutions / mitigations
1.Mobile species and recreational pressures reporting on SSSI sites with regards to consenting and NE area team advisers.	Natural England will provide guidance.
2.Concerns that landowners and managers are not consulted or given feedback for pressures and local issues to inform condition.	Natural England will provide feedback to landowners about the pressures and local issues impacting site condition and they will also be given the condition of the notified features at site level, unit level and the condition of the unit.

7. Pilot Update

The overarching aim of the pilots is to establish whether it is possible to collect sufficient data for all the notified features in large and complex sites, and therefore make a condition assessment for each feature. It is also important to assess whether sufficient information can be collected to support management decisions.

In July 2021 two pilot surveys were run at West Nidderdale, Barden and Blubberhouses Moors SSSI and the Duddon Estuary SSSI, in collaboration with members of the Major Landowners Group (Yorkshire Water, National Trust, Crown Estates, RSPB).

A random sample approach of 37 stops per feature at predefined locations was used for both pilot sites as it was expected to gather sufficient information to make statistically robust conclusions regarding condition, as well as remove bias and reduce survey time. This random sample approach is not suitable for all features so more appropriate methods are used for less complex features. All notified features received a detailed Common Standards Monitoring assessment at whole feature scale.

Data from other sources (third-party data), earth observation and specialist contracts were used for gathering evidence to inform condition.

Condition assessments for all features were successfully made for the two pilot sites. Further visits are required to collect specific management and pressures information, and to ensure that the condition of every unit can also be reported. The evaluation of these two pilots has highlighted the additional data that needs to be collected to enable reporting at both the unit and whole feature scale. As a result, new protocols have been developed

and were trialled during the two pilots in summer 2022, the results and analysis of these pilots are currently being collated.

8. Conclusion

Natural England has listened to stakeholders and devised a mechanism to continue to report at a unit scale.

These new protocols are being trialled and refined during the 2022 pilots.

Please contact NE for further information.

Email: integrated.monitoring@naturalengland.org.uk

Appendix 1. Consultation questions

Online Questions

1. What is your name?
2. What is your e-mail address?
3. What is your organisation if applicable?
4. Do you use Natural England's current SSSI reporting statistics? Yes No
5. If yes, please provide a brief description on how you use the official statistic below.
6. Do you envisage the proposed change impacting on your use of the information? Yes No
7. If yes, please explain below.
8. Do you have any comments or suggestions to mitigate for the potential impacts of this change?
9. Would you be happy for someone from Natural England to contact you regarding your comments? Yes No
10. If yes, please supply an e-mail address or phone number.

Appendix 2: List of abbreviations

CSM	Condition Site Monitoring
DEFRA	Department for Environment, Food & Rural Affairs
DAFOR	Dominant, Abundant, Frequent, Occasional, Rare
DIO	Defence Infrastructure Organisation
GHG	Greenhouse gases
LFC	Least Favourable Condition
MOD	Ministry of Defence
NE	Natural England
NFU	National Farmers Union
NNR	National Nature Reserves
ODI	Outcome Delivery Incentive
SSSI	Site of Special Scientific Interest

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