

## Written evidence from Natural England (PAE0008)

Dear Kate,

We are delighted to contribute to your important and timely work on protected areas and understand that the Committee has requested background data on the quality and condition of designations along with any other current reflections.

Please find that detail outlined below along with some related comments on the wider context for Nature recovery which we trust will prove useful.

### Overview

- The 25 Year Environment Plan (YEP) set an ambitious goal and Government is paving a way towards delivering it with the exciting and promising toolkit of measures coming from the post Brexit legislation on Agriculture and Fisheries, The Environment Act, the recent EIP and associated strategies on air, water, forestry, soils, food, farming and planning.
- Studies show that people are becoming increasingly aware of the intrinsic value of Nature and the role it plays in underpinning and sustaining economic growth, the public goods we rely upon and our health and wellbeing. However as willing as people are to embrace Nature many are unable to do so.
- We believe that the most effective outcomes are achieved when we are able to integrate 'place-based plans' that reflect the land use needs of the communities that designed them whilst echoing our national imperatives for food security, transport, energy, housing and space for nature. Connecting people and building partnerships for Nature's recovery is clearly a central goal in achieving the vision and mission and fully realising our potential. There is an important role for aligned Local Nature Recovery Strategies and the land use planning system here.
- In the face of competing land use choices - there is much to be gained from looking at how we approach and structure spending in three major areas – **farming, forestry and flooding**. And how they can be integrated in a strategic way that boosts progress on Nature recovery. In relation to farming, providing incentives so that land managers can restore Nature alongside producing food is imperative – only with security of Nature can we have long-term security of domestic food supply. Under ELMs the relationships between ambitious groups of farmers and Natural England's advisers will be pivotal in deriving major benefits for Nature from land with the highest potential.
- With forestry, improving domestic timber security is an important driver alongside the need to use woodland and tree cover to tackle the climate and Nature emergency. By promoting a range of woodlands with the right trees in the right places we can achieve both goals: more native woodlands are essential to boost Nature recovery; new conifer plantations can serve long-term domestic timber and wood fibre needs; and more mixed, multi-functional woodlands can help meet both requirements. All play a role in absorbing carbon in the right place.
- On flooding, Nature recovery can go a long way to helping to reduce the risk to homes and businesses by keeping more water in the environment and out of properties. Better soil quality, healthier rivers and more ponds all help while also making the landscape more resilient to climate change and more attractive to people looking for recreation opportunities, improving their health and wellbeing.

At a time when money is tight for households and the country, every pound spent must deliver multiple benefits, rather than those sought from what can sometimes be rather siloed policy goals.

- Funding will of course be an important element of this, matching our ambitions and the amount of work needed to turn round decades of wildlife declines. This won't just be new money but intelligent use of existing Nature budgets as well as unleashing the vast but still largely unrealised potential of private sector investment. It is also about integrating Nature recovery into the substantial budgets that work in landscapes for parallel purposes.
- As a 5-year plan, the EIP and the important targets it contains give us a necessary focus on delivery, which is what we need at this stage of the journey towards 2030. Natural England look forward to passing important milestones, with our partners in the coming year, towards establishing a [Nature Recovery Network](#) (NRN) across the country.
- Natural England have been working closely with Defra to advise on the steps needed to drive us towards our ambitious targets for Nature recovery and our work on the ground and at sea will be central to taking the steps and building the partnerships required. It is important that the levers within the EIP are used in a strategic, coordinated way, to deliver the biggest strides towards restoring Nature. Those levers are fortunately now many and varied ranging from Biodiversity Net Gain to land-based investments in achieving net zero carbon goals and from Local Nature Recovery Strategies to the strategic development of the protected landscapes network, including the National Parks and Areas of Outstanding Natural Beauty.

### **Protected areas**

- Biodiversity continues to decline both internationally and in England. The Living Planet Report 2022 shows an average decline of 69% in wildlife populations since 1970. Target 3 of the Kunming-Montreal Global Biodiversity Framework (30 by 30) acknowledges that 30% of land and sea managed for nature is a minimum requirement to reverse biodiversity declines.
- Protected areas play an essential role in supporting Nature but are not in themselves sufficient. Existing levels of protection need to be maintained as a minimum, but we must go further if we are to recover nature. Measures that strengthen the requirements on relevant authorities to further the purposes of National Park and AONB and management plan actions will be important.
- **On land**, the quality of our natural environment inside SSSIs far exceeds that of the wider environment. They offer the greatest benefits when integrated into the Nature Recovery Network where, when well-managed, they act as the core 'battery packs', driving wider nature recovery at the landscape scale.
- There is a clear role for SSSIs in meeting the Environment Act species extinction risk target, in terms of re-colonisation of wider landscapes and higher productivity enabling species populations to 'brim over' beyond the SSSI boundary, but they will not be the only solution, especially for species abundance where action needs to be at a broader scale.
- Between 2010-19 pro-active work on SSSIs essentially stopped due to Government funding cuts. Current activity to improve SSSI condition is starting to have an effect, but condition figures show that whilst SSSIs are an effective mechanism to prevent sites from being destroyed, without on-going investment to

improve their condition they will not fulfil their full potential to government's biodiversity targets or fully contribute to 30 by 30.

- Our analysis of the likely trajectory to meet Government's targets identifies the three biggest pressures impacting on SSSI as
  - Water pollution (agricultural and discharges);
  - Air pollution and
  - Inappropriate grazing.
- Government has published ambitious interim targets for SSSIs in pursuit of the Environment Act biodiversity targets, which will also set sites on the trajectory to meet the goal for 75% of SSSIs to be in favourable condition by 2042.
- We are reforming our approach to monitoring so that we assess SSSI condition on a whole feature basis, maximising use of technology, working with partners and citizen science, with the frequency and nature of assessment informed by risk. We are also developing a clear understanding of the resources required through an improved SSSI database shared with our delivery partners and accessible to the public.
- We are also pleased to have recently published our Enforcement Report 2018-2022 which can be accessed at the following link - [Report on Natural England's enforcement activity: 1 April 2018 – 31 March 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/107222/report-on-natural-england-s-enforcement-activity-1-april-2018-31-march-2022.pdf).
- Regulation has a key role in driving improvements in protected sites, including for instance the Habitats Regulations in addressing nutrient pollution – in saying such we also appreciate that existing mechanisms won't be enough though and we have identified the greatest priorities to be addressing burning of all peatlands, air and water pollution, ensuring ELM schemes sufficiently incentivise land management action and developing a sustainable future for the uplands.
- In **the marine environment** MPAs have achieved a huge amount in the marine environment in a relatively short time, and the existing network of MPAs in English waters goes a long way in helping to protect and recover important marine habitats and wildlife for the future.
- Requirements under the British Energy Security Strategy and demands from ongoing fishing activity represent two of the largest current pressures to our marine environment. Marine Net Gain for marine development activities will be an important tool in helping meet the ambitious targets for net zero and the environment, contributing to ocean recovery. Marine Net Gain aims to put the marine environment into recovery.
- Recent initiatives such as Marine Natural Capital Environment Assessment (mNCEA), Blue Carbon research, the HPMA pilot project, [Planning Offshore Wind Strategic Environmental Impact Decisions \(POSEIDON\)](#), have highlighted the need for a co-ordinated, joined-up, strategic approach, in order to answer as many of the increasing number of questions being asked about the marine environment, from both a policy and reporting perspective.

### **Condition of protected areas**

- We understand that the committee is interested to understand more about which designations are included in monitoring. Natural England routinely collect data at the scale of the SSSI (unit or feature). The European designations (SPA/SAC) and Ramsar sites are usually co-located with multiple SSSIs and often have features which are analogous. Please find the detailed tabulated data on designation quality and condition included at **Annex 2** for reference.

- By way of background, the data shared through Designated Sites Views (DSV) is the SSSI condition information collected at the scale of the SSSI feature or unit. Through reports in DSV we can apportion these data spatially to represent the condition of SPA, SAC, Ramsar, National Park, AONB, Landowner etc. This information is the condition of the underlying SSSI. The data for the SSSI units located within these other designations are amalgamated together to provide area-based condition information.
- Information on the condition of MPAs can also be found in DSV reports at this link: <https://designatedsites.naturalengland.org.uk/MarineReports/MarineReportLanding.aspx>
- In relation to SSSI monitoring vis-a-vis SAC and SPA sites the JNCC are responsible for reporting data on those European sites and reports detailing the specific condition SAC/SPA features can be found on the JNCC website at <https://jncc.gov.uk/our-work/european-reporting/> This includes details on the condition of individual habitats and species can be found in these reports and filtered for the country scale. Natural England provide an area-based assessment for European sites based on the underpinning SSSI data. This data is not extrapolated but unit condition data is amalgamated to cover the area of the European site - it represents the best available information at that scale.
- Natural England has been coordinating the collection and reporting of environmental data within protected landscapes for 10 years through the Framework for Monitoring Environmental Outcomes in Protected Landscapes (MEOPL).
- Working with Defra and partners, we are developing a new Targets and Outcomes Framework for National Parks and AONBs to drive local delivery under the four themes of 'Nature', 'Climate', 'People' and 'Place'. The framework will establish targets for each protected landscape and indicators for monitoring and reporting progress against national targets. This will replace MEOPL once it is fully launched.

### **The potential of Local Nature Recovery Strategies (LNRS)**

- Natural England believes LNRS have the potential to make a real difference to our ability to meet commitments and targets for nature recovery and is giving high priority to helping responsible authorities prepare their strategies.
- The land use planning system is a key delivery mechanism for nature recovery and clear alignment between LNRS and statutory local development plans is essential to ensure that objectives for nature recovery and access to nature are realised. LNRS have been created to work with the planning system and new Environment Act measures, particularly biodiversity net gain, and it is important that we get this relationship right. We see this as a twofold approach, firstly with the LNRS used as an evidence tool (with habitat mapping used to help steer the development strategy for the area) and secondly, with specific LNRS proposals embedded in the statutory development plan to protect areas of biodiversity importance (designated sites as well as buffer areas and corridors) and identify and secure opportunity areas for nature recovery.
- Clarity on how new Protected Sites Strategies and Species Conservation Strategies will work alongside development plans will also be very beneficial in supporting integration and to support delivery of LNRS.

- There may be additional ways to take forward areas of opportunity for nature through the planning system, including broadening the scope of the existing Local Green Space designation or enabling reformed development plans to identify and protect those areas proposed in the LNRS for nature recovery and accessible greenspace - areas that could be integrated with development opportunities in the plan and would need to be protected from future inappropriate development.
- Measures which align LNRS with development plans and ensure nature is embedded in plan-making would be very helpful especially if supported by forthcoming statutory guidance on the links between LNRS and the planning system.
- The review of the National Planning Policy Framework and the new National Development Management Policies provide a timely opportunity to strengthen policies for nature and explain the role of the LNRS in identifying areas for nature recovery. In addition, there is a need to clarify the relationship between LNRS and the current planning system since LNRS will be progressing from April 2023 in advance of the planning reforms-this should be straightforward as the current NPPF includes policies on habitat restoration and creation.
- Natural England has a key role to play in the practical application and development of LNRS, acting as a coordinator, facilitator, and convenor between partners across the counties who are coming together for the formation of this new strategic approach. Using regulations and guidance (to be confirmed by Government) Natural England will advise and guide Responsible Authorities (RAs) so that the LNRS they create will reflect the framework set out by Government.
- Natural England have also been closely involved in a number of LNRS pilots which have provided a blueprint for other councils to follow. Spread across the country and each reflecting different local circumstances (Unitary authorities, Combined authorities with mayoralities amongst others) and the involvement of different players (National Parks, AONBS, SSSIs and others) these pilots have provided examples of best practice and answered several questions around the process.
- Crucially LNRS represent a new opportunity for communities to come together and for community leaders and local government to engage with the wide range of local people and groups to share views and find ways in which they think the environment can be improved as well as help to design delivery mechanisms.
- As noted, Natural England looks forward to continuing to bring together local partners and making available our science, evidence and experience of delivery, to share best practice from across the country to support and assist responsible authorities as they develop and shape these important local plans.

### **Green Infrastructure Framework**

- Parks and greenspaces in England deliver an estimated £6.6 billion of health, climate change and environmental benefits every year. But with 80% of people now living in towns and cities, one third of people do not have access to good quality green and blue space within 15 minutes of their home.
- The government's recently published Environmental Improvement Plan includes a very valuable new measure to address this disparity linked to a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home.

- We recognise that planners and developers need practical and direct support to help achieve this goal and were delighted to recently launch the [Green Infrastructure Framework](#) (GIF) which is a major new tool that provides a structure for planners and developers to analyse where greenspace in urban environments is needed most.
- Natural England has worked closely with Defra, government departments, and a 70-strong Advisory Group, made up of universities, representatives from the active travel sector and environmental experts, to develop the framework which has been tested by local planning authorities and developers. The Green Infrastructure Mapping Tool is part of Defra's Natural Capital Ecosystems Assessment Programme.
- The framework integrates green infrastructure tools, principles, standards and design guidance. It is structured by five key standards:
  - **Urban Nature Recovery Standard** – aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change. Incorporating nature-based solutions, including trees and wildflowers, into the design of towns and cities will increase carbon capture, prevent flooding and reduce temperatures during heatwave
  - **Urban Greening Factor (UGF) for England** – This planning tool improves the provision of green infrastructure and increases the level of greening in urban environments. The standard is set at 0.4 for residential development, which means there is a target in place for approximately 40% of residential developments to have green and blue spaces, green roofs or green walls. When adopted by a local planning authority it provides clarity about the quantity and quality of green infrastructure required to secure planning approval in a major new development. The Greater London Authority is already applying this principle
  - **Urban Tree Canopy Cover Standard** – promotes an increase in tree canopy cover in urban environments. Trees are vital for capturing carbon and can mitigate flood risk as they absorb excess water during flooding incidents. The standard sets out that major residential and commercial development should be designed to meet locally agreed targets
  - **Accessible Greenspace Standards** – promote access to good quality green and blue space within 15 minutes' walk from home. The People and Nature Survey published by Natural England found that 82% of adults agree that being in nature makes them very happy over but [one third of people in England do not have access to green space within this distance](#). The Framework includes an award-winning mapping tool that can help to identify places where green space is needed most. The government has already used the tool to ensure the £9 million Levelling Up Parks fund reaches low-income areas with limited access to green space
  - **Green Infrastructure Strategy** – This standard supports the National Planning Policy Framework's policy that local authorities should develop strategic policies for green infrastructure. At an area wide scale, the Green Infrastructure Standard will see Local Authorities develop Delivery Plans to support the creation and enhancement of new and existing greenspaces.
- Partnerships are integral to the uptake and application of the guidance. The Institute for Civil Engineers has included the Green Infrastructure Standards in their new Manual of Blue-Green Infrastructure and the Green Infrastructure

Standards are already being applied in places like Allestree Park in Derby - a former golf course, which is now set to become one of the UK's largest urban rewilding projects. Over time it will become a nature-rich greenspace full of wet landscapes, grasslands and trees which can be used by community groups and families for leisure, exercise and socialising. Derbyshire Wildlife Trust, the University of Derby and Rewilding Britain are working to transform this landscape into a haven for wildlife and people and are showing how meeting Natural England's standards can increase access to good quality greenspace for local communities.

- As a comprehensive tool, the Green Infrastructure Framework and accompanying Design Guide will support local planning authorities and developers design and create more nature-rich urban greenspaces to meet mandatory Biodiversity Net Gain requirements and support the development of the Nature Recovery Network.

We understand that your Clerks have also set out a list of additional questions and we have reflected some of what we have above in those specific responses attached separately as **Annex 1**.

I trust that these observations and the data enclosed are useful and please don't hesitate to contact us should you have any queries or require any further information.

With best wishes,

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Juniper', with a stylized flourish at the end.

Tony Juniper  
Chair Natural England



## **ANNEX 1 – Responses to your specific questions**

### **1. What are the key aspects of Natural England’s role with regards to protected areas in England, including land and, to the extent relevant, sea, and protected sites and, to the extent relevant, protected landscapes?**

- Existing protected areas in England are typically divided into two different types
  - Protected sites: Those areas which are designated primarily on the basis of their biodiversity or geological features (protected sites). These include nationally designated National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and internationally designated Special Protection Areas (SPA) and Special Areas of Conservation (SAC), under the EU’s Birds and Habitats Directives, and sites designated under the Convention on Wetlands of International Importance (Ramsar).
  - Protected Landscapes: Landscape-scale designations, Areas of Outstanding Natural Beauty (AONB) and National Parks were established to conserve and enhance natural beauty, wildlife and cultural heritage and promote public enjoyment and understanding
- Sites of Special Scientific Interest (SSSIs) were first introduced by legislation in 1949
- There are 4,128 SSSIs in England covering just over 1.1 million hectares, equivalent to more than 8% of England’s land area.
- Natural England is the designating authority for SSSIs in England and has clear duties, along with other public bodies, to conserve and enhance the special features of SSSIs. These duties include:
  - Notification and confirmation of new SSSIs
  - Notification of variations to existing SSSIs including enlargement, denotification
  - Issuing of consents (to owners/occupiers) and assents (to statutory undertakers, public bodies) in relation to authorising specific operations on SSSIs
  - Where required, ensuring positive management through application of management schemes, use of management notices
  - Undertaking regulatory compliance and enforcement duties
- Key elements of Natural England’s non-statutory role in relation to SSSIs are:
  - Provision of guidance and advice, targeting of funding
  - Monitoring and reporting on site condition
- Government has set a target for 75% of SSSI to be in ‘favourable condition’ by 2042. Favourable condition means that the SSSI’s habitats and features are in a healthy state and are being conserved by appropriate management. Our vision is that SSSIs are a naturally functioning and thriving core of the Nature Recovery Network, with their characteristic range of geodiversity, habitats, and species, contributing to the wellbeing of wider society. Our SSSI Improvement Plan sets out how Natural England will enable the vision for SSSIs to be achieved, including:
  - ensuring we have properly described what good looks like for each SSSI feature, mindful of the predicted effects of climate change
  - reforming our approach to monitoring so that we assess condition on a whole feature basis, maximising use of technology, working with partners



and citizen science, with the frequency and nature of assessment informed by risk

- developing a clear understanding of the resources required through an improved SSSI database shared with our delivery partners and accessible to the public, informed by up-to-date condition assessments, identified pressures and mechanisms to address them; and
  - adopting a phased approach to improving site condition, focussed in priority places where we will work proactively with partners, and running in parallel with a limited number of thematic approaches.
- Current mechanisms available to address pressures include advice, regulation, incentives (in particular agri-environment funding and NE's Conservation Enhancement Scheme), direct funding (eg water industry asset management programmes) and development and implementation of strategic plans (eg Protected Sites Strategies, nutrient management plans).
  - Effective regulation has a key role in preventing damage and driving improvements in protected sites, including for instance the Habitats Regulations in addressing nutrient pollution.
  - Natural England also has statutory responsibilities that extends 12 nautical miles out to seas. (Other bodies have a more limited remit covering only the terrestrial or marine environment, with varying legislative boundaries). Natural England is responsible for advising Government on the designation and management of many inshore Marine Protected Areas (MPAs) (specifically SACs, SPAs, Ramsar sites, MCZs and HPMAs) within English territorial waters (0-12nm) and has direct responsibility for the designation of the remainder (marine areas of SSSIs and NNRS).
  - Natural England has responsibilities under the Conservation of Habitats and Species Regulations 2017 (as amended) for Special Areas of Conservation (SACs) & Special Protection Areas (SPAs); and the Marine and Coastal Access Act 2009 for Marine Conservation Zones (MCZs), to give advice on how to further the conservation objectives of Marine Protected Areas, identify the activities that are capable of affecting the qualifying features within those MPAs and the processes which they are dependent upon.
  - Special Protections Areas (SPA) and Special Areas of Conservation (SAC) were both introduced by EU Directives: The Wild Birds Directive in 1979 for SPAs and the Habitats Directive in 1992 for SACs. In England there are 88 SPAs and the terrestrial sites cover more than 750,000, there are 256 SACs and the terrestrial sites cover more than 730,000 ha. From 1994, both SACs and SPAs were subject to the Conservation (Natural Habitats &c.) Regulations, which transposed the EU Habitats Directive into national law. Following EU exit, the Conservation of Habitats and Species Regulations 2017 have been amended to ensure continued operability and are part of a category of domestic law known as Retained EU Law. Natural England's role Includes:
    - Provision of advice on the Conservation Objectives for these sites on land and at sea out to twelve nautical miles
    - Acting as an adviser and statutory consultee on Habitats Regulations Assessments undertaken by other competent authorities
    - Acting as a competent authority when proposing to give permission consent or license, or when it proposes to undertake or promote a project itself, which may affect a SPA or SAC

- Provision of advice to the Secretary of State on the selection of potential SAC/SPA or proposed amendments to existing SAC/SPA
- Natural England also has wide-ranging landscape powers and duties, including specific responsibilities for designating and advising on matters affecting National Parks (NPs) and Areas of Outstanding Natural Beauty (AONBs). England's 44 Protected Landscapes comprise 34 AONBs and 10 NPs (including the Broads). These protected landscapes cover around a quarter of England, are home to approximately 2.6% of the population and receive tens of millions of visitor days each year.
- Natural England is leading on an ambitious new designated landscapes programme including:
  - Assessing proposals for 4 new/extended AONBs
  - Strategic mapping of areas with potential for NP/AONB designation and where landscape enhancement may deliver the greatest benefits for people and nature
  - Exploring alternatives to National Park or AONB designation, to drive nature recovery and improve people's connection with nature, initially focusing in and around towns and cities.

**2. What is Natural England's latest assessment of the current environmental state of the protected areas in England which might be included in the commitment to protect 30% of land and sea by 2030, across the different protected sites and landscapes?**

- In December 2010 the area of SSSI in favourable condition was 37.2% and a further 59.3% was unfavourable but recovering. As a result of a renewed monitoring programme begun in 2020, we are now picking up the decline that occurred between 2010-19 when pro-active work on SSSIs essentially stopped due to Government funding cuts.
- Our current activity to improve SSSI condition is starting to have an effect, but the decline being picked up through our monitoring programme is currently outstripping the gains. Alongside this is the challenge that favourable/unfavourable may be too static a measure (notwithstanding our subdivision of unfavourable condition into 'recovering', 'no change' and 'declining'). This is because there can be a significant lag time (from a few years to several decades or more) between pressures being addressed and features reaching favourable condition.
- Since April 2020 the area in favourable condition has fallen from 38.7% to 37%, with 49.4% reported as unfavourable but recovering. The area reported as destroyed or part destroyed remains very low, increasing from 0.03% in 2010 to 0.05% now.
- The figures show that whilst SSSIs are an effective mechanism to prevent sites from being destroyed, without on-going investment to improve their condition they will not fulfil their full potential towards government's biodiversity targets or fully contribute to 30 by 30.
- MPAs have achieved a huge amount in the marine environment in a relatively short time, and the existing network of MPAs in English waters goes a long way in helping to protect and recover important marine habitats and wildlife for the future. However, it is widely evidenced, not least during COP 15, that we are in a

biodiversity and climate crisis, and we need to ensure that we are recovering nature and helping to combat climate change, by getting the most we can out of our existing MPA network, and by ensuring these sites are well-managed, in order to give our ocean wildlife and our climate the best possible chance of recovery.

- While much of our MPA network was initially designed with the aim of achieving ecological coherence, for example through the application of the Ecological Network Guidance (ENG)[2], there are arguments that it falls short in some areas or does not fully meet these criteria[3] . Whilst the Government's Environment Improvement Plan states "Having created over 100 MPAs in English waters since 2010, we have now established a comprehensive network of 178 MPAs covering 40% of English waters", Recent analysis for Wildlife and Countryside Link in terms of addressing the 30x30 target (itself a potential indicator of coherence) suggest that only 8% of the existing MPA network is managed in such a way as to contribute to this target.

### **3. What are the existing monitoring methods used to assess environmental condition in the different protected areas designations, what gaps in monitoring and data exist with regards to the '30 by 30' target, and what improvements could be made to monitoring?**

- Natural England has a statutory obligation to report on the condition of Protected Sites. Monitoring is necessary to understand the condition of the notified features, provide evidence to support site management, and provide feedback to land managers to deliver the best environmental outcomes; assess the effectiveness of interventions and provide advice to regulators on the impact of activities on protected sites.
- Natural England currently sub-divides each SSSI into one or more administrative units, set at the local level. Historically, SSSI monitoring in England has assessed the condition of each feature in each unit, to assign an overall unit condition. The total area of each unit in each condition category is then used to provide the national statistic on SSSI condition.
- Many SSSI features however are mobile and not tied exclusively to specific units. If the populations of mobile species using those units change, this could result in large areas of SSSIs appearing to decline in condition, even if the habitat condition of the SSSI is stable or improving. Reporting the condition of SSSIs primarily on a feature, rather than a unit basis is therefore preferable. In order to rectify this, Natural England is moving to a Whole Feature Assessment (WFA) approach for monitoring from April 2023 which will enable the setting of protected sites in a wider landscape context and be at the heart of the Nature Recovery Networks. There will still be the capacity to report at the unit scale to support conversations with land managers. The move to WFA will also align NE with all other UK Statutory Nature Conservation Bodies. The move to feature based reporting has been acknowledged by UK government and is incorporated into the interim targets of the Environmental Improvement Plan, which include the delivery of an up-to-date condition assessment for every SSSI feature by end of January 2028.
- Natural England will produce a single condition for each monitored feature on a SSSI, using data gathered from across the feature's extent. Alongside this overall-condition, NE will continue to have the ability to assign a different condition, if

needed, to specific units where the feature is found. This will allow NE to record variation in a features condition across SSSIs, and better inform management through unit-specific comments.

- The long-term monitoring plan (LTMP) aims to produce a more coherent and structured approach to SSSI monitoring, to ensure that all features have an up-to-date assessment by Jan 2028. The plan combines both feature risk and site risk to prioritise when features should be visited over the next 4 years. Features have a maximum monitoring cycle, which acts as the 'safety net' which has been derived by evaluating the best available evidence on individual feature's risk of change.
- Whilst we are confident that the monitoring is underway on protected sites to be able to assess the series against the 30x30 assessment criteria in a timely way (driven by the EIP target to have condition assessments in place for all features by 2028), the same is not yet certain for areas outside protected sites but within protected landscapes. The National Landscapes Partnership and Defra's Outcomes Framework are seen as key mechanisms to help facilitate this, but how this works in practice and whether National Park & AONB authorities have the right resources to lead this, is still in discussion. It is not expected that all areas contributing to 30x30 will require the same level of monitoring as protected sites.

#### **4. What in Natural England's view are the main factors affecting the environmental state of England's protected areas on land and sea, including stressors and positive management practices? What works well with regards to management plans for protected areas, and what are the key challenges?**

- Ecological impacts from nitrogen deposition, now the most significant and widespread atmospheric pollutant, are well-evidenced at national and international level and have been associated with major changes to habitats and their dependent species in England. The pressure is widespread, with over 97% of sensitive habitat area, and over 89% of SSSIs, predicted to be exceeding their critical loads for nitrogen deposition threatening both biodiversity objectives and development growth.
- Excluding air pollution, the biggest pressures on site condition are:
  - Water pollution (Agriculture & discharges)
  - Inappropriate grazing
  - Hydrological change (e.g. drainage or abstraction)
  - Recreation (predominantly as a result of disturbance)
  - Invasive species
  - Inappropriate burning (mainly in the uplands)
- Natural England has a relatively good understanding of the pressures affecting protected sites, and the kind of interventions that are required to improve and maintain condition. More than one in four of all SSSIs are affected by off-site pressures, i.e. outside the immediate control of the SSSI land manager. Where there are existing pressures on sites that are already causing exceedance of ecological limits and unfavourable condition it can make it difficult to permit further negative impacts. Identifying the source of some pressures (eg diffuse pollution) is not always easy.

- Mechanisms to address site pressures include advice, regulation, incentives (e.g. agri-environment funding), direct funding (e.g. Natural England's National Nature Reserves and water industry asset management programme), and the development and implementation of strategic plans (eg diffuse water pollution plans, flood risk plans, nutrient management plans, lake and river restoration plans and water level management plans).
- Cuts of more than 60% to Natural England's budget from 2010-19, meant that the pace of data collection about protected site condition, significantly declined during this period and information on the actions required to maintain and improve condition is therefore increasingly out of date. The increased uncertainty of the data makes it more difficult to develop and implement plans that will improve condition.
- Increased funding since 2020, together with improvements to monitoring techniques and greater use of third-party data has started to improve the evidence base and provide information on the effectiveness of previous interventions. With current levels of funding, we expect to have updated the evidence on site condition and the required action to maintain or improve condition for every SSSI by 2028. Increased investment would speed up this process.
- One of the key challenges is that SSSIs are managed by around 13,000 landowners and occupiers, from large estates to people with rights of common. The Major Landowners Group (MLG) of environmental NGOs such as RSPB, National Trust and Wildlife Trusts, large land-owning companies and public bodies, collectively manage 50-60% of SSSI land. The remainder is managed by farmers, private landowners, and private, public and third sector enterprises, and this range and complexity makes any management difficult to drive forward. There are no automatic statutory obligations on landowners to bring their sites into favourable condition and although public bodies, share a general statutory duty to further the conservation and enhancement of SSSIs through the exercise of their functions, there is no guaranteed ring-fenced funding for this duty and in our experience the duty to "conserve" generally works much better than the duty to "enhance".
- The challenges within protected landscapes are complex and are well detailed in the 2022 Landscapes review . These include:
  - Landscape protection has little influence on land use and the targeting of agri-environment payments in their areas
  - Climate change and pollution impacts
  - Landscape protections seen as conserving 'natural beauty' rather than nature more explicitly, and hence seeing less attention than protected sites in this regard.
  - National Parks and AONBs management bodies not delivering on designation purposes, primarily due to lack of levers within their control and resource constraints.

**5. Of the delivery tools or mechanisms which Natural England has some involvement in, which do you see to be key mechanisms for contributing to '30 by 30', and how will this contribution be realised?**

- The 30x30 commitment will be delivered via a number of tools and mechanisms applicable to both protected areas and land outside of these areas (other effective areas-based conservation measures – OECMs).
- Mechanisms to address protected site pressures include advice, regulation, incentives (e.g. agri-environment funding), direct funding (e.g. Natural England's National Nature Reserves and water industry asset management programme), and the development and implementation of strategic plans and protected sites strategies (e.g. diffuse water pollution plans, flood risk plans, nutrient management plans, lake and river restoration plans and water level management plans).
- Mechanisms beyond the protected site series include planning protections via the NPPF, the enhanced biodiversity duty, Local Nature Recovery Strategies, conservation covenants and government funding pots (e.g. nature for climate, ELMs, Species survival Fund).
- There are significant gaps in funding for nature and climate recovery. Natural England supports the development of a sustainable, long-term funding model that ensures sufficient blended finance to meet environmental, societal, and economic needs.
- A holistic funding model that uses regulatory and voluntary incentives effectively to ensure long-term sustainable blended finance for nature and climate recovery needs to be based on:
  - High-integrity markets underpinned by robust data, standards, monitoring and reporting.
  - There must be a clear role for government in ensuring the operation of markets results in nature-positive outcomes.
  - Clear rules that underpin the operation of the markets, particularly in relation to the 'stacking and bundling' on environmental services on the same parcel of land. There is a need for rapid clarification of 'stacking and bundling' rules supported by worked examples of different scenarios and accompanying case studies; and
  - The taxation system should function as an enabler, and not a blocker, of high-integrity environmental outcomes.
- The 30x30 contribution needs to be realised via a range of activities which Natural England is involved with to build a Nature Recovery Network, including:
  - Protected sites: The SSSI Improvement Programme, Protected Site strategies, NNR and SSSI declarations and notifications programmes.
  - Protected landscapes: The National Landscapes Partnership, the outcomes framework, management plan reviews.
  - OECMs: Identifying those areas outside of protected sites which deliver for biodiversity need to be recognised and in some cases resourced to contribute to the core network and 30x30. Natural England's role in this space is not yet defined, but we would like a role in standard setting and/or assessment towards the 30% as well as to help facilitate via our NRN partnership engagement work.

**6. Beyond the Government and other statutory bodies, who are the key actors that Natural England works with for each type of protected area**

## **designation, and are there any plans to develop engagement strategies for working with them to deliver '30by30'?**

- SSSIs including N2K sites: SSSI landowners and managers. All members of the NE run Major Landowners Group (MLG) that focuses on SSSI condition issues.
- NNRs: NNR managers including landowners, National Trust, Wildlife Trust, RSPB, local authorities. We run this via an NNR Partnership Group.
- Protected Landscapes: Nationally on 30x30 NE expects to work with National Parks England and the National Association for AONBs, and locally (as Area Team capacity and priorities allow) with individual National Park Authorities and AONB leads. We have been funding a Nature Recovery post in each of National Parks England and the Association of AONBs. Related discussions may also be held in future with the Campaign for National Parks and eNGOs, and with National Trails as part of the proposed National Landscapes Partnership. Links to Heritage Coasts will also be considered. We seek independent expert advice on all our landscapes work via the Natural England Landscapes Advisory Panel.
- Local wildlife site issues are currently being explored via The Wildlife Trusts, and links to Local Authorities will need to be considered.
- We also fund a Nature Recovery post within the Local Government Association.
- Overall stakeholder engagement on 30x30 is most likely to be managed through the NRN partnership, in particular the NRN Management Group, and any associated Nature Recovery Coordinator posts funded by Natural England.
- Much of the 30x30 work is still at the policy development stage and sits with Defra who have their own mechanism for technical engagement and stakeholder involvement.

## **7. What are the future priorities for Natural England's designation programme, and to what extent will ecosystem services and/or a natural capital approach be factored into decision-making on designations?**

- Natural England first published a designation programme on Gov.uk in April 2016 and most recently updated it in December 2022. The programme shows the areas, sites and trails that Natural England is considering for designation, either as the designating authority or adviser to ministers.
- The current programme includes 22 cases to be assessed for SSSI notification, for which Natural England is the designating authority. Natural England prioritises cases for consideration for SSSI notification in view of their importance for key species, habitats and geology, and with reference to the Government's Environmental Improvement Plan ambitions, particularly because of the contribution they would make to the Nature Recovery Network and because of their value to local communities and the wider public.
- Decisions on SSSI notification for cases in the programme are made on the basis of Natural England's opinion on the flora, fauna, or geological or physiographical features of special interest, informed by the SSSI selection guidelines for Great Britain published by the Joint Nature Conservation Committee. The programme enables Natural England to prioritise those cases that, when assessed in



accordance with its statutory duty, are likely to make the greatest contributions to nature recovery.

- 'Natural England's approach to National Nature Reserve Declarations is driven by:
  - The NNR Strategy, which has been refreshed with and adopted by the NNR Steering Group (a group of partners representing the 60+ Approved Body managing organisations for NNRs) and signed off by NE Board in 2022
  - The NNR Selection Principles, also recently revised (following on from the Strategy refresh), which frame the criteria by which we select and approve new NNRs, to deliver the priorities of the NNR Strategy (for nature conservation, nature recovery, nature connection and environmental science)
- In addition, the government's Environment Improvement Plan also makes a commitment for twenty-five new (or significant extensions) NNRs in the next 5 years as a key contribution to England's Nature Recovery Network, with a declaration pipeline in place to address this.
- Natural England's current landscape designation programme is based on proposal received from proponents, prioritised against government policy priorities of supporting nature recovery, levelling up and improved access to nature,

## **8. What roles could the Nature Recovery Network and Local Nature Recovery Strategies play to support improvements in the condition of protected areas and the '30 by 30' target more widely?**

- Local Nature Recovery Strategies (LNRS) will support spatial planning for nature recovery. They may highlight key areas where improvements for nature may improve buffering and connectivity of PSs, thus informing and directing works which would support their condition. Within protected landscapes they may highlight both areas of current biodiversity value and priority areas for improvement, supporting the improvement of their overall condition and directing actions to take to increase their potential contribution towards 30x30 including also to inform Protected Landscapes Management Plans. Outside of PAs LNRS may play a role in highlighting key areas in which to explore the potential of sites to become OECMs.
- The Nature Recovery Network (NRN) will form the web of natural areas which buffer, support and connect 30x30 sites, which in turn will form the high-quality core of the NRN. The NRN partnership will support partners in bringing sites into the 30x30 pipeline, including opportunities for investment and partnership working.

## **9. How could Biodiversity Net Gain contribute to the '30 by 30' target, and what are the necessary conditions for it to be a success?**

- It is not expected that onsite Biodiversity Net Gain (BNG) will count towards 30x30, however offsite BNG areas may count automatically if they meet the longevity and protection criteria due to being ensured for 30 years. In order for this to be a success sites must be effectively managed for biodiversity, and this must be evidenced.
- This will likely be achieved through BNG Habitat Management and Maintenance Plans (HMMP).

- A sites biodiversity outcomes must be monitored, for which there should be a monitoring programme, possibly built into the HMMP. Also, the BNG register must be designed to support 30x30 reporting, by including spatial (polygon) data – the area that will include is yet to be determined.

## **ANNEX 2 – Designations condition background data**

### **1. Natura 2000 site condition (most recent data)**

**Note** - As we monitor at the scale of the SSSI, these data represent the condition of the underpinning SSSI unit data, cut to cover the area of SAC and SPA sites.

<b>SAC condition</b>	<b>% meeting area of favourable or unfavourable recovering</b>	<b>Favourable</b>	<b>Unfavourable - Recovering</b>	<b>Unfavourable - No change</b>	<b>Unfavourable - Declining</b>	<b>Partially destroyed</b>	<b>Destroyed</b>	<b>Not Recorded</b>
<b>Area (ha)</b>	659,346.06	253,952.31	405,393.74	44,152.43	28,484.02	199.83	15.76	133.39
<b>Percentage</b>	90.04%	34.68%	55.36%	6.03%	3.89%	0.03%	0.00%	0.02%
<b>SPA condition</b>	Currently the SPA summary figures shown here exclude the following sites: Outer Thames Estuary SPA, Greater Wash SPA, Northumberland Marine SPA and Liverpool Bay SPA.							
<b>Area (ha)</b>	700,837.59	314,531.71	386,305.88	23,439.00	36,723.40	250.76	27.04	1,605.43
<b>Percentage</b>	89.16%	40.02%	49.15%	2.98%	4.67%	0.03%	0.00%	0.20%

### **2. SSSI Condition Data by Broad Habitat type – most recent data**

<b>Main Habitat Type</b>	<b>Favourable Area (ha)</b>	<b>Favourable %</b>	<b>Unfavourable Recovering Area (ha)</b>	<b>Unfavourable Recovering %</b>	<b>Unfavourable No Change Area (ha)</b>	<b>Unfavourable No Change %</b>	<b>Unfavourable Declining Area (ha)</b>	<b>Unfavourable Declining %</b>	<b>Destroyed Or Part Destroyed Area (ha)</b>	<b>Destroyed Or Part Destroyed %</b>	<b>Total Area (ha)</b>
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<b>ACID GRASSLAND - Lowland</b>	2838.85	32.16	5125.99	58.07	400.17	4.53	447.6	5.07	14.26	0.16	8826.87
<b>ACID GRASSLAND - Upland</b>	9279.34	35.62	11856.41	45.51	3350.9	12.86	1566.86	6.01			26053.52
<b>ARABLE AND HORTICULTURE</b>	13827.29	98.56	129.78	0.93	14.18	0.1	58.27	0.42			14029.52
<b>BOGS - Lowland</b>	661.87	7.03	6172.09	65.56	804.6	8.55	1748.14	18.57	27.22	0.29	9413.93
<b>BOGS - Upland</b>	18720.49	10.3	134443.47	74.01	19840.03	10.92	8661.3	4.77			181665.28
<b>BOUNDARY AND LINEAR FEATURES</b>	190.83	84.44	29.88	13.22			5.28	2.34			225.98
<b>BRACKEN</b>			102.76	85.98	0.12	0.1	13.29	11.12	3.35	2.8	119.51
<b>BROAD LEAVED, MIXED AND YEW WOODLAND -</b>	38429.66	48.31	34951.07	43.94	3599.06	4.52	2531.18	3.18	36.19	0.05	79547.15

<b>Lowland</b>											
<b>BROAD LEAVED , MIXED AND YEW WOODLAND - Upland</b>	6043.73	39.44	7077.6	46.19	1412.57	9.22	667.23	4.35	35.71	0.23	15322.79
<b>BUILT UP AREAS AND GARDENS</b>	22.77	38.28	1.78	2.98	0.84	1.41	18.91	31.79	15.19	25.54	59.48
<b>CALCAREOUS GRASSLAND - Lowland</b>	19664.73	45.73	21380.57	49.72	643.47	1.5	1120.67	2.61	194.85	0.45	43004.28
<b>CALCAREOUS GRASSLAND - Upland</b>	2245.14	27.36	4056.09	49.42	383.66	4.67	1521.86	18.54			8206.74
<b>CONIFEROUS WOODLAND</b>	3311.75	13.61	20961.46	86.16			53.96	0.22			24327.18

<b>AND</b>											
<b>DWARF SHRUB HEATH - Lowland</b>	23559.86	45.48	23393.99	45.16	2263.29	4.37	2567.7	4.96	14.92	0.03	51799.77
<b>DWARF SHRUB HEATH - Upland</b>	20073.94	11.04	143875.69	79.15	10454.38	5.75	7353.02	4.05	10.53	0.01	181767.56
<b>EARTH HERITAGE</b>	24413.52	91.25	902.89	3.37	283.56	1.06	1076.53	4.02	77.15	0.29	26753.64
<b>FEN, MARSH AND SWAMP - Lowland</b>	9624.36	36.11	13350.42	50.09	1359.84	5.1	2302.48	8.64	17.84	0.07	26654.94
<b>FEN, MARSH AND SWAMP - Upland</b>	943.3	36.13	1249.97	47.88	206.79	7.92	210.57	8.07			2610.63
<b>IMPROVED GRASSLAND</b>	960.26	74.51	149.44	11.6	54.45	4.22	124.67	9.67			1288.83
<b>INLAND ROCK</b>	2467.76	31.41	4404.17	56.06	565.04	7.19	409.59	5.21	9.55	0.12	7856.11
<b>INSHORE SUBLITTORAL</b>	1018.37	60.89	137.19	8.2	258.68	15.47	235.71	14.09	22.56	1.35	1672.5

<b>SEDIMENT - CL</b>											
<b>LITTORAL ROCK</b>	2804.19	85.59	363.62	11.1	50.74	1.55	57.73	1.76			3276.27
<b>LITTORAL SEDIMENT</b>	165924.57	60.49	84635.55	30.85	6496.64	2.37	17235.65	6.28	8.09	0	274313.74
<b>MONTANE HABITATS</b>	87.94	6.44	879.6	64.38	382.44	27.99	16.39	1.2			1366.37
<b>NEUTRAL GRASSLAND - Lowland</b>	23098.31	47.9	13087.26	27.14	3952.52	8.2	8036.15	16.66	52.42	0.11	48226.67
<b>NEUTRAL GRASSLAND - Upland</b>	1584.59	57.99	694.38	25.41	308.01	11.27	145.36	5.32			2732.34
<b>RIVERS AND STREAMS</b>	939.57	11.94	3069.22	39.01	3626.41	46.09	232.94	2.96			7868.14
<b>STANDING OPEN WATER AND CANALS</b>	15921.19	61.3	3824.32	14.72	4027.85	15.51	2189.03	8.43	12.01	0.05	25974.39
<b>SUPRALITTORAL ROCK</b>	4533.94	67.73	1551.16	23.17	284.36	4.25	324.73	4.85			6694.2
<b>SUPRALITTORAL SEDIMENT</b>	4702.44	33.24	7330.33	51.82	1347.72	9.53	703.65	4.97	29.39	0.21	14146



<b>Woodland : broadleaved, semi-natural, coppice with standards</b>	9.61	72.79					3.59	27.21				13.21
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### 3. Causes of unfavourable condition

Type of Adverse Condition Reasons (ACR)	Total Units	Total Area in Hectare	% of SSSI area with ACR
<b>MARINE POLLUTION - WATER POLLUTION - AGRICULTURAL SOURCES</b>	281	50055	4.54%
<b>AGRICULTURE – OVERGRAZING</b>	306	23516	2.13%
<b>FRESHWATER POLLUTION - WATER POLLUTION - AGRICULTURAL SOURCES</b>	747	20253	1.84%
<b>FRESHWATER POLLUTION - WATER POLLUTION - DISCHARGE</b>	631	20019	1.82%
<b>FRESHWATER POLLUTION - WATER POLLUTION - AGRICULTURE/RUN OFF</b>	833	19846	1.80%
<b>AIR POLLUTION - AIR POLLUTION</b>	88	13663	1.24%
<b>OTHER - OTHER - SPECIFY IN</b>	441	13472	1.22%

<b>COMMENTS</b>			
<b>FRESHWATER POLLUTION - WATER POLLUTION - URBAN AND/OR ROAD SOURCES</b>	413	12755	1.16%
<b>FRESHWATER POLLUTION - WATER POLLUTION - OTHER DISCHARGES</b>	412	12160	1.10%
<b>MARINE POLLUTION - WATER POLLUTION - URBAN AND/OR ROAD SOURCES</b>	56	10312	0.94%
<b>FRESHWATER - DRAINAGE</b>	326	10236	0.93%
<b>FRESHWATER - INAPPROPRIATE WATER LEVELS</b>	396	9465	0.86%
<b>MARINE POLLUTION - WATER POLLUTION - OTHER DISCHARGES</b>	42	7734	0.70%
<b>LACK OF CORRECTIVE WORKS - INAPPROPRIATE SCRUB CONTROL</b>	652	7202	0.65%
<b>AGRICULTURE - UNDERGRAZING</b>	539	7052	0.64%
<b>COASTAL - INAPPROPRIATE COASTAL MANAGEMENT</b>	83	6795	0.62%
<b>FRESHWATER - INVASIVE FRESHWATER SPECIES</b>	155	5602	0.51%
<b>FORESTRY - FORESTRY AND WOODLAND MANAGEMENT</b>	302	4956	0.45%
<b>MARINE POLLUTION - WATER POLLUTION - WATER COMPANY DISCHARGES</b>	16	4395	0.40%
<b>COASTAL - COASTAL SQUEEZE</b>	55	3972	0.36%

<b>FIRE - MOOR BURNING</b>	19	3946	0.36%
<b>FRESHWATER - SILTATION</b>	166	3549	0.32%
<b>COASTAL - INAPPROPRIATE DREDGING</b>	32	3409	0.31%
<b>PUBLIC ACCESS/DISTURBANCE - PUBLIC ACCESS/DISTURBANCE</b>	126	3035	0.28%
<b>AGRICULTURE - AGRICULTURE - OTHER</b>	212	3022	0.27%
<b>MARINE POLLUTION - WATER POLLUTION - INDUSTRIAL DISCHARGES</b>	14	2578	0.23%
<b>FRESHWATER - INLAND FLOOD DEFENCE WORKS</b>	67	2574	0.23%
<b>FRESHWATER - INAPPROPRIATE WEIRS DAMS AND OTHER STRUCTURES</b>	93	2549	0.23%
<b>FORESTRY - DEER GRAZING/BROWSING</b>	137	2431	0.22%
<b>LACK OF CORRECTIVE WORKS - INAPPROPRIATE DITCH MANAGEMENT</b>	134	2362	0.21%
<b>AGRICULTURE - INAPPROPRIATE STOCK-FEEDING</b>	14	1974	0.18%
<b>FRESHWATER - WATER ABSTRACTION</b>	102	1915	0.17%
<b>AGRICULTURE - INAPPROPRIATE CSS/ESA PRESCRIPTION</b>	32	1753	0.16%
<b>EARTH SCIENCE - EARTH SCIENCE FEATURE OBSTRUCTED</b>	279	1670	0.15%

<b>LACK OF CORRECTIVE WORKS - INAPPROPRIATE WEED CONTROL</b>	154	1641	0.15%
<b>FRESHWATER - FISH STOCKING</b>	84	1530	0.14%
<b>AGRICULTURE - INAPPROPRIATE CUTTING/MOWING</b>	126	1430	0.13%
<b>INVASIVE SPECIES - TERRESTRIAL PLANTS</b>	42	1038	0.09%
<b>AGRICULTURE - FERTILISER USE</b>	43	1034	0.09%
<b>INVASIVE SPECIES - FRESHWATER PLANTS</b>	17	884	0.08%
<b>VEHICLES - VEHICLES - OTHER</b>	18	683	0.06%
<b>FIRE - FIRE - OTHER</b>	42	661	0.06%
<b>VEHICLES - VEHICLES - ILLICIT</b>	31	628	0.06%
<b>DISEASE - PLANT</b>	14	322	0.03%
<b>GAME MANAGEMENT - GAME MANAGEMENT - OTHER</b>	6	313	0.03%
<b>PLANNING PERMISSION - PLANNING PERMISSION - GENERAL</b>	51	300	0.03%
<b>LACK OF CORRECTIVE WORKS - INAPPROPRIATE PEST CONTROL</b>	11	208	0.02%
<b>INVASIVE SPECIES - TERRESTRIAL ANIMALS (EXCLUDING DEER)</b>	3	186	0.02%
<b>GAME MANAGEMENT - GAME MANAGEMENT - PHEASANT REARING</b>	13	155	0.01%
<b>PLANNING PERMISSION - PEAT EXTRACTION</b>	8	150	0.01%
<b>INVASIVE SPECIES - FRESHWATER ANIMALS (EXCLUDING FISH)</b>	2	81	0.01%

<b>PLANNING PERMISSION - PLANNING PERMISSION - OTHER MINERAL AND WASTE</b>	13	80	0.01%
<b>FRESHWATER POLLUTION - WATER POLLUTION - UNKNOWN</b>	11	44	0.00%
<b>EARTH SCIENCE - EARTH SCIENCE FEATURE REMOVED</b>	13	36	0.00%
<b>DISEASE - ANIMAL</b>	2	12	0.00%
<b>AGRICULTURE - PESTICIDE/HERBICIDE USE</b>	1	5	0.00%

#### 4. Area of SSSI considered to be under threat, with reasons

<b>Types of Threat</b>	<b>Total Units</b>	<b>Total area in ha</b>	<b>% of SSSI area with threat</b>
<b>Change in land management</b>	5079	302433	27.43%
<b>Recreational disturbance</b>	1062	123006	11.16%
<b>Water Pollution</b>	2114	122364	11.10%
<b>Hydrological changes</b>	2098	99229	9.00%
<b>Changes in species distributions</b>	1163	96859	8.78%
<b>Invasive species</b>	1287	67194	6.09%
<b>Coastal squeeze</b>	372	45073	4.09%
<b>Direct impact from 3rd party</b>	390	31917	2.89%
<b>Physical modification</b>	356	24195	2.19%
<b>Deer</b>	950	23442	2.13%
<b>Disease</b>	794	20926	1.90%

<b>Biological Resource Use</b>	51	4580	0.42%
<b>Transportation and service corridors</b>	75	4350	0.39%
<b>Marine and freshwater fishery</b>	38	3554	0.32%
<b>Energy production</b>	22	3189	0.29%
<b>Direct land take from development</b>	78	2958	0.27%