



20 April 2018

Dear Sussex Recorders

As biological recorders, you will know that we are very excited about Local Wildlife Sites (LWSs) at the moment in Sussex. Thanks to the hard work of the SxBRC team and others we are currently appointing a Local Wildlife Site Officer to take this work forward – checking existing sites, finding new ones etc..

You may have also picked up that Sussex Wildlife Trust is particularly concerned about the proposed changes to the National Planning Policy Framework. This is the guidance against which all planning proposals are judged. This is **the ONLY mechanism that we have for protecting Local Wildlife Sites. We need to ensure that our precious Sussex Sites do not lose any protection through the NPPF changes.**

There is a consultation running on the NPPF until the 10th May. From an initial look at the proposed amendments to the NPPF: <https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework>, we are concerned that Local Wildlife Sites could be less well protected through the planning system.

Whilst the revised NPPF still makes lots of references to ecological networks, LWSs are not listed in the footnote which provides a definitive list of assets of importance which restrict scale, type or distribution of development in the plan area. Additionally, and of more concern, paragraph 113 which currently requires local planning authorities to 'set criteria based policies... with distinctions made between the hierarchy of international, national and locally designated sites...' has been removed. Instead the revised NPPF says:

172. To protect and enhance biodiversity and geodiversity, plans should: a) identify and map components of local wildlife-rich habitats, including the hierarchy of designated sites of importance for biodiversity⁴⁷; wildlife corridors and stepping stones that connect them; and areas identified by local partnerships for habitat restoration or creation⁴⁸,...

Footnote 47 says 'Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system'. However this circular is out of date and simply advises that LWS will be dealt with separately by Defra through 'new' LWS guidance. This guidance was produced in 2006, but subsequently archived. **As a result there is no longer any clear requirement in the NPPF to create local plan policies or make planning decisions that protect LWSs, in fact there is no reference to LWSs anywhere in the document.**

NB There are 637 Local Wildlife Sites in Sussex, many of which are sites of SSSI quality or are small and vulnerable (e.g. Wealden meadows sites). They also cover many local amenity or community sites on urban fringes that are vulnerable to incursions through planning.

So in summary, I am specifically asking if the biological recorders of Sussex, who appreciate the role and the vulnerability of our Sussex Local Wildlife Sites to please respond to this consultation and object to the erosion of the wording that we need to guide developers and local authorities in their decision making. See links below- **Please highlight the importance of maintaining if not enhancing the levels of protection given to these important sites.**

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Chairman: Carole Nicholson | Chief Executive: Dr. Tony Whitbread

Respond to the government consultation on the revised National Planning Policy framework (deadline 10 May) by:

- Filling in the [online survey \(https://www.surveymonkey.co.uk/r/NPPFconsultation\)](https://www.surveymonkey.co.uk/r/NPPFconsultation) *or*
- Sending an email to planningpolicyconsultation@communities.gsi.gov.uk *or*
- Posting your views to:

Planning Policy Consultation Team
Ministry of Housing, Communities and Local Government
3rd floor, South East
Fry Building
2 Marsham Street
London
SW1P 4DF

Sussex Wildlife has prepared some guidance that may be of help in your responses - <https://sussexwildlifetrust.org.uk/actswiftly>.

With best wishes to you all



Dr A Whitbread. Chief Executive

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