

## **Brighton & Hove Local Wildlife Sites Review 2018**

Carried out on behalf of South Downs National Park Authority

Review undertaken by East Sussex Local Sites Partnership Technical Panel

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## 1 Summary

- 1.1 The Brighton and Hove Local Wildlife Site 2013 review process was reviewed by the East Sussex Local Nature Partnership Technical Panel in 2017/18 to endorse its findings and to ensure that the recommended suite of local wildlife sites is robust and fit for inclusion in the South Downs National Park Local Plan. The review was carried out in accordance with Defra guidance.
- 1.2 Thirty-four existing Sites of Nature Conservation were assessed as being worthy of retention and should be renamed as Local Wildlife Sites (LWS) and included in the National Park Local Plan policies map. Twelve new sites have also been endorsed for designation and inclusion. Three sites have been identified as having potential to be designated as LWS, pending an assessment of up-to-date survey information; these sites will be listed as candidate LWS within the Local Plan.

## 2 Introduction

- 2.1 In 2010, the City Ecologist for Brighton & Hove City Council (BHCC) embarked on a process to review Local Wildlife Sites (LWS) in Brighton and Hove, formerly known as Sites of Nature Conservation Importance (SNClS). The process involved the Brighton & Hove Wildlife Forum and other local groups in a series of selection panels which met in July 2013.
- 2.2 Whilst the 2013 selection panels made recommendations as to the designation of a suite of LWS, some of which were already designated as SNClS, the City Ecologist post was made redundant shortly afterwards and the process was never formally ratified by the Council.
- 2.3 As the review was not completed in time to be included in the Brighton & Hove City Plan Part One (CPP1), the CPP1 policies map<sup>1</sup> shows the SNClS that were designated by the Brighton & Hove Local Plan 2005, including those that now lie within the National Park. These remain applicable until alternatives have been approved for planning purposes. This is relevant to the current review as until the National Park has an adopted Local Plan, all the saved Brighton & Hove Local Plan policies are relevant to land in the National Park within the administrative area of the City.
- 2.4 The 2018 report documents work undertaken that is considered appropriate to endorse the 2013 process to help demonstrate that it is fit for inclusion in the National Park Local Plan. No sites were resurveyed. Subject to endorsement by the 2017/18 panel the sites surveyed and considered in 2013 will be shown as LWS designations on the policies map to the draft Local Plan.

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<sup>1</sup> [Brighton & Hove City Plan Part 1, Adopted Policies Map \(Adopted March 2016\)](#).

2.5 This 2017/18 review has been restricted to those LWS, either existing SNCIs or proposed new sites, which occur within Brighton & Hove and inside the South Downs National Park. Ten sites (four existing SNCIs, and six proposed sites) lie partly within the National Park. Those parts of the sites that lie outside the Park are outside the remit of the National Park Local Plan, but from an ecological perspective, they have been considered as a whole and therefore included in the current review. Those 10 cross boundary sites have also been included in the Brighton & Hove City Council City Plan Part 2 (CPP2) as have those sites which lie within Brighton & Hove but outside the National Park. The review has also only considered whether or not sites meet criteria to be declared as LWS and not LNRs.

### 3 Background

#### 3.1 Local Wildlife Sites

- 3.1.1 The system of statutory designations is widely recognised as leaving out many sites that are of significant value for the conservation of biodiversity and geological features. This is because the purpose of such statutory designations is to provide a representative rather than a comprehensive suite of sites, the individual sites exemplifying the nation's most important wildlife and geological features, rather than including every site with such interest.
- 3.1.2 In most areas, local authorities, working with other local partners, have set up systems of locally valued non-statutory sites. A Local Sites Review Group reported in 2000 that Local Sites systems varied considerably making it difficult to apply national or regional policies consistently or to target national funding streams. It recommended a consistent approach to provide a better basis for the appropriate management and protection of Local Sites. The Defra guidance published in 2006<sup>2</sup> sought to provide this consistent approach.
- 3.1.3 Local Sites contribute significantly to delivering both UK and local biodiversity targets by providing a comprehensive rather than a representative suite of sites, by providing wildlife refuges, and by complementing other site networks through their connecting and buffering qualities. They also represent local character and distinctiveness and contribute to the quality of life and well-being of the community, with many sites providing opportunities for research and education.
- 3.1.4 Although non-statutory, LWS are recognised by Government as making a vital contribution to biodiversity conservation and are protected through national planning policy<sup>3</sup>. Paragraph 113 of the National Planning Policy Framework (NPPF) states that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife sites will be judged, with distinctions made between the hierarchy of international, national and locally

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<sup>2</sup> Defra, 2006. *Local Sites. Guidance on their identification, Selection and Management.*

<sup>3</sup> [NPPF 2012, paragraph 113.](#)

designated sites, so that protection is commensurate with their status and gives appropriate weight to wider ecological networks.

- 3.1.5 Strategic Policy SD9 of the draft Local Plan<sup>4</sup> relates to biodiversity and geodiversity and states that the National Park Authority will only permit development proposals where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration and creation. Such strategies include linking and repairing habitats and nature conservation sites to achieve landscape scale improvements to biodiversity.
- 3.1.6 It should be noted that designation as a LWS does not necessarily preclude development subject to appropriate avoidance of harm, including finding an appropriate balance between in-situ retention, mitigation and compensation.

## 3.2 Wildlife Sites in Brighton & Hove

- 3.2.1 The City's SNCIs were reviewed and updated in 1998/99, soon after Brighton & Hove was established as a Unitary Authority. The review methodology was endorsed by the then English Nature, amongst other organisations.
- 3.2.2 A review began in 2010, following detailed guidance published by Defra in 2006<sup>5</sup>. The review was to update survey data ensuring it was still relevant, to benefit from improved detection techniques (particularly with the support of improved aerial photography) and to ensure the Defra best practice guidance was fully integrated into the selection process.
- 3.2.3 A steering group with representatives from professional nature conservation organisations was first assembled in spring 2010 to agree and document the site selection criteria (Appendix 1), the sites to be surveyed and the survey form (Appendix 2). The organisations represented on the steering group were the Sussex Wildlife Trust, Natural England, South Downs National Park Authority, The Royal Society for the Protection of Birds and the Environment Agency.
- 3.2.4 Within the National Park, 57 potential LWS (including those already designated as SNCIs in CPP1) across Brighton & Hove were surveyed from autumn 2010 to autumn 2012 and the survey data was supplemented by records held by the Sussex Biodiversity Record Centre (SxBRC) and other sources.
- 3.2.5 Permission to survey was sought from landowners. In line with Defra guidance<sup>6</sup>, landowners were also invited to comment on recommendations for their site(s). Only sites where access permission was granted were surveyed. Three landowners provided comments on the survey process and their views were incorporated into the 2013 review.

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<sup>4</sup> [South Downs Local Plan. Pre-submission. September 2017.](#)

<sup>5</sup> Defra, 2006. *Local Sites. Guidance on their identification, Selection and Management.*

<sup>6</sup> Ibid (as previously cited).

- 3.2.6 In March 2013, selection panel invitations were sent out for the end of April 2013. The dates of the panels were set by the Council to address internal work programme deadlines and the steering group was not involved in the decision. Subsequently, the Brighton & Hove Wildlife Forum asked for more time to consider the survey information. The timetable was reviewed and it was recognised that the selection timetable was over-ambitious. The selection panels were delayed to July 2013 to accommodate this request, ensuring best practice would be followed throughout the selection process.
- 3.2.7 Three panels were organised covering east, central and west Brighton & Hove. CityWildlife 'naturewardens', local and national nature conservation organisations, friends groups and the LATs were invited to attend or to submit comments in writing.
- 3.2.8 The role of the selection panels was to review the survey data presented against the pre-agreed selection criteria and to make a collective judgement on whether each site presented qualified for designation as a LWS. The panel also made recommendations on whether some sites should be considered by the Council for designation as statutory LNRs.
- 3.2.9 The three panel meetings were held on 09/07/13 at Saltdean Community Centre (east area), 17/07/13 at Portslade Town Hall (west area) and 23/07/13 at Brighton Town Hall (central area). Summary reports of the three meetings listing the attendees and the recommendations made are provided in Appendix 3.

### 3.3 Wildlife Sites in East & West Sussex

- 3.3.1 In the early 1990s, a network of sites were surveyed and notified as SNCIs in East and West Sussex as part of a partnership between local planning authorities and conservation bodies.
- 3.3.2 In East Sussex, the resources available for support and review of LWS at a County level have been very limited, and there has been no agreed county-wide system of LWS monitoring and review. Each District and Borough Council takes responsibility for administering their own suite of sites with varying approaches depending on different levels of in-house ecological expertise and available resources.
- 3.3.3 Despite limited resources, a Local Sites Partnership (LSP) was established in East Sussex to take account of the Defra guidance. The Partnership, led by East Sussex County Council, collates statistics on the proportion of LWS in positive conservation management (extrapolated from the number of sites with management plans or in management agreements such as Environmental Stewardship) and reports annually to Defra under the Single Data List 160-00<sup>7</sup>.
- 3.3.4 The East Sussex LSP has also established a Technical Panel made up of local experts

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<sup>7</sup> [The single data list of central government data requirements from local government 2017-18.](#)

to consider Local Site issues and reviews on an *ad hoc* basis. Amongst other things, the Technical Panel assessed the full review of LWS recently undertaken by Wealden District Council to inform their Local Plan, as well as a selection of sites that were recently re-surveyed through a project aimed at targeting those LWS where little information was available, mostly within Lewes District. The Technical Panel has also provided a view on the status of LWS where this has been called in to question through planning applications, e.g. Wanderdown Road Open Space in Brighton & Hove.

3.3.5 At the time of writing, the East Sussex Technical Panel is made up of the following members, although other members with a particular area of expertise may be co-opted for specific issues:

- Dr Kate Cole MCIEEM (County Ecologist, East Sussex County Council)
- Thyone Outram (Community Ranger, Lewes District Council)
- Murray Davidson (Environment & Natural Resources Manager, Hastings Borough Council)
- Laura Brook (Conservation Officer, Sussex Wildlife Trust)
- Ben Rainbow (Arboricultural & Biodiversity Officer, Wealden District Council)
- Barry Kemp ACIEEM (Independent Consultant, Barry Kemp Conservation Ltd)
- Kate Ryland CEnv MCIEEM (Independent Consultant, Dolphin Ecological Services)
- Richard Cowser (Conservation Officer, Sussex Ornithological Society)
- Lois Mayhew (Biodiversity Data Support Officer, Sussex Biodiversity Record Centre)

3.3.6 In West Sussex, up until 2016, West Sussex County Council employed an SNCI officer with responsibility for monitoring and managing the LWS network. Since 2016, the responsibility for administering West Sussex sites was passed to the SxBRC.

3.3.7 In an effort to provide consistency across Sussex and to share resources, as well as to comply with Defra guidance, those responsible for the East and West Sussex systems have been working together recently. In 2016, revised selection criteria were produced for East and West Sussex, based on national criteria but taking into account local circumstances (Appendix 4). These have been approved by the Technical Panel and were tested in the recent review of Wealden and Lewes sites.

## 4 Review Methodology

- 4.1 A list of 142 sites was drawn up by the Brighton & Hove Steering Group in 2010 including sites within the National Park. In the case of the existing SNCIs, the boundaries of the surveys did not necessarily match that of the designated site, and in some cases, more than one survey covered a single site; the reason for this is not known. For ease of reference, Appendix 5 includes the existing site names and reference codes (e.g. BH02) and the survey names and reference numbers.
- 4.2 In 2013, survey information for Brighton & Hove sites was collated on the approved survey forms (Appendix 2), and that information was provided to all interested parties in advance of the panel meetings. The survey forms included a map of each survey site; these were digitised onto GIS.
- 4.3 Three selection panels met in July to consider the sites against the Brighton & Hove LWS criteria. As spaces on the panels were limited, they were allocated on a first come first served basis.
- 4.4 Each site was discussed and a consensus was reached on whether sites should be designated or not. Other than a summary of decisions, no formal notes were filed of the discussion process.
- 4.5 In 2017/18, the East Sussex Technical Panel was asked to review the 2013 panel decisions. Given their professional involvement in nature conservation and/or in Strategic Planning Policy in Brighton & Hove, the following people were also involved in the Panel:
  - Katharine Stuart (Senior Planning Policy Officer, South Downs National Park Authority)
  - Adam Brown (Research & Evidence Officer, South Downs National Park Authority)
  - David Larkin (Conservation Manager, Brighton & Hove City Council)
  - Rich Howarth (Biosphere Programme Manager, Brighton & Lewes Downs Biosphere Partnership)
  - Rebecca Fry (Principal Planning Officer, Brighton & Hove City Council).
- 4.6 The 2017/18 panel reviewed the survey sheets and maps, and from the information available, assessed whether the sites met the Brighton & Hove LWS selection criteria and the Sussex criteria, with the results collated in a spreadsheet (Appendix 5). The 2013 panel decision was noted, as was the 2017/18 decision. Any discrepancies between the panel decisions were noted and discussed in the notes column.



- 4.7 The Brighton & Hove criteria include mandatory requirements, as well as contributory and descriptive features. For the purposes of the 2017/18 review, if a site met all of the mandatory criteria, it was assessed as qualifying as a LWS. Whether or not a site met the contributory and descriptive features was also noted if it met the mandatory criteria. The relevant columns are colour coded on the spreadsheet for ease of reference with the criteria.
- 4.8 If the site met one or more of the Sussex criteria, it was assessed as qualifying as a LWS.
- 4.9 It should be noted that the ecological value of a site is determined by many variables and there will always be the need for best professional judgement in site selection.
- 4.10 The GIS boundaries produced from the survey maps were then compared with the existing SNCI boundaries. Any boundary changes noted were assessed to see if they a) related to a new area/feature identified through the surveys that merited designation or no longer merited designation, b) were the result of a mapping anomaly, likely resulting from an improvement in digitisation and/or base maps, or c) showed the removal of features such as hard standing or buildings. In some cases where the area surveyed did not include areas of an existing SNCI, a decision was made to retain the boundary unchanged in that area as there was insufficient information to justify any boundary changes that would result in a deletion to the site.
- 4.11 For some of the proposed new LWS, no surveys were carried out but the 2013 panel decision was that the site should be treated as if designated until survey information from an independent, qualified ecologist was provided to establish otherwise. In such cases, it was the opinion of the 2017/18 Panel that there was insufficient evidence to justify designation, but that the sites should be noted as candidate LWS, worthy of future consideration.
- 4.12 Citations for those sites qualifying as LWS have been produced using information from the survey forms. Copies of citations are available on request.

## 5 Results

- 5.1 Full details of how each site, either existing SNCIs or proposed new sites, met the selection criteria, is provided in Appendix 5. The sites are shown on Map 1 (Appendix 6). A summary is provided below.
- 5.2 Existing SNCIs
- 5.2.1 There are 22 existing SNCIs within Brighton & Hove that lie outside the National Park, and as such have not been included in this review (see paragraph 2.5 above). Existing sites outside the National Park are listed in Table 1.

5.2.2 Table 1: Existing Brighton & Hove SNCIs that lie outside the South Downs National Park and have been excluded from the current review.

BH07 Emmaus Gardens & St Nicholas	BH27 Crespin Way
BH09 Benfield Valley	BH28 Brighton University
BH10 Basin Road South	BH29 Volk's Railway
BH12 Toad's Hole Valley	BH30 Woodvale Extra-mural and Downs Cemeteries
BH15 Three Cornered Copse	BH31 Black Rock Beach
BH17 Bramble Rise Copse	BH32 Wilson Avenue Whitehawk
BH20 Tivoli Copse & Railway Woodland	BH33 Brighton Marina
BH21 Foredown Allotments	BH42 Ovingdean School Grounds
BH22 Oakdene Southwick Hill (adj. NP)	BH43 Wanderdown Road Open Space
BH25 Brighton Station (Brighton Greenway)	BH60 St Helen's Churchyard
BH26 Hollingbury Industrial Estate (adj. NP)	BH62 Honeysett

- 5.2.3 Four sites (BH02 Mile Oak Fields, BH34 Sheepcote Valley, BH35 Westplain Plantation/Hog Plantation, and BH36 Tenant, Lain and Moon's Gate Woods) lie partly within the National Park. Whilst those parts of the sites that fall outside the Park are outside the remit of the Local Plan, for the purposes of the technical review, they have been considered as a whole as they are ecologically coherent sites. Cross boundary sites are listed in a separate tab in the spreadsheet in Appendix 5, and are also included in Brighton & Hove CPP2.
- 5.2.4 There are 36 existing SNCIs within Brighton & Hove and inside the National Park, plus four which lie partially within the Park. The 2017/18 review recommends that 34 of those sites should be retained and renamed as LWS and six should be de-designated. This supports the recommendations made by the 2013 review in all but two cases: BH23 Ewe Bottom Hill and BH37 Woodingdean Cemetery. In both these cases, the 2013 review recommended retention of the sites. However, neither of the sites met either the Brighton & Hove or Sussex selection criteria, and as such, the 2017/18 review recommends that they should be de-designated.
- 5.2.5 Both the 2013 review and the current review recommended that Cockroost Bottom Lynchett (BH04) should be designated on the grounds that it does not meet the selection criteria. The 2013 review also recommended the de-designation of Foredown Ridge Earthworks (BH05). The 2017/18 panel concur with this decision but recommend that the site be retained on a list of sites for review. The site consists of a mound of chalk in an arable field, originally designated for species-rich chalk grassland. When surveyed in October 2011, the majority of the site had been colonised by opportunistic, nutrient demanding species and trees, and was subject to frequent disturbance and lack of conservation management. Fragments of species-rich chalk grassland remain on the south side but they are small and isolated. Given the ongoing presence of a Priority Habitat/Habitat of Principal Importance, it is the view of the 2017/18 panel that the site is worthy of an updated survey.
- 5.2.6 The 2013 review recommended that Coney Wood SNCI (BH18) should be combined with Green Ridge (BH16). The 2017/18 concurs and recommends that Coney Wood is de-designated to avoid overlap, and combined into a larger site: Green Ridge and Coney Wood (BH98). The previous site code for BH16 Green Wood will be retired and a new code used to reflect the changes.
- 5.2.7 Due to a disparity between the 2013 surveys and the existing SNCI boundaries, the existing site BH40 St Wulfran's Wood was not considered in isolation. The site was included in a larger survey area (Ovingdean Church to Cattle Hill, survey reference 117) which also included the existing SNCI, BH38 Cattle Hill. The 2013 review recommended designation of the whole survey area as one site. The 2017/18 panel concurs and recommends that St Wulfran's Wood is de-designated to avoid overlap, but combined into a larger complex (BH99 Ovingdean Church to Cattle Hill).

5.2.8 Of the 34 existing sites recommended for retention, 11 are proposed for retention with no change to the boundary, whilst minor amendments are proposed to two to adjust for mapping anomalies. It is proposed that the boundaries of the remaining 21 are changed or extended to take into account features identified through the 2013 review and associated surveys. The 34 existing SNClS that have been proposed to be retained and renamed as LWS are listed in Table 2.

5.2.9 Table 2: Existing SNClS to be retained and renamed as LWS.

BH01 Cockroost Hill West	BH46 Bexhill Road, Woodingdean
BH02 Mile Oak Fields (part BHCC)	BH47 Cowley Drive Paddocks
BH03 Cockroost Hill East	BH48 Bostle Bottom
BH06 Foredown Ridge Eastern Side	BH49 Castle Hill Arable Field
BH08 Bridleway East of Benfield Bridge	BH50 Whiteway Lane
BH11 Brighton & Hove Golf Course	BH51 Balsdean Down West
BH13 East Hill	BH52 High Hill Pasture
BH14 Waterhall	BH53 Balsdean Downland East
BH19 Braypool Sports Ground	BH54 Wivelsfield Road Grassland
BH24 Chattri Down	BH55 Balsdean Downland North
BH34 Sheepcote Valley (part BHCC)	BH56 Quarry Field
BH35 Westlain Plantation/Hog Plantation (part BHCC)	BH57 Looes Barn Woodland
BH36 Tenant Lain and Moon's Gate Wood (part BHCC)	BH58 Coombe Farm
BH39 Mount Pleasant Ovingdean	BH59 Roedean School Bank
BH41 Happy Valley	BH61 Ewe Bottom
BH44 Ovingdean Horse Paddocks	BH98 Green Ridge & Coney Wood (formerly BH16 Green Ridge and includes BH18 Coney Wood)
BH45 Abinger Road Open Space	BH99 Ovingdean Church to Cattle Hill (formerly BH38 Cattle Hill and includes BH40 St Wulfran's Wood)

### 5.3 Potential new LWS

5.3.1 Twenty-three potential new sites, six of which lie partly within the National Park, were put forward for consideration as new LWS. Of these, the 2017/18 panel has recommended 12 sites for designation as LWS, shown as green on the spreadsheet (Appendix 5). All of these sites were also recommended as LWS in 2013. For two of those sites (39 Acres and Ditchling Road), the 2013 review recommended designation of only parts of the sites surveyed. The 2017/18 panel concurs with this view, and further recommends that those two sites are combined with a third site (Ditchling Road SW) to form one LWS to be named Ditchling Road, meaning that a total of 10 new LWS are recommended. The 10 new LWS are listed in Table 3 with their main reasons for designation, and are shown on Map 1 (Appendix 6).

5.3.2 Table 3: New LWS and their reason for designation.

Site Name	Reason for designation
BH74 North Benfield Valley	Chalk grassland site with former dew pond. Supports Nationally Rare True Fox-Sedge.
BH84 The Dyke Trail	Mosaic of habitats including chalk grassland and scrub; Adder hibernation site.
BH86 Bevendean Horse Paddocks (part BHCC)	Mosaic of habitats supporting a number of notable species including the Hornet Robberfly and the largest density of Common Frog known in the City.
BH87 Land at Coldean Lane (part BHCC)	A mosaic of habitats including ancient woodland and semi-improved chalk grassland, which support a number of protected and notable species.
BH90 Bevendean Farm Slope	Chalk grassland amongst a mosaic of semi-natural habitats; important refuge and stepping stone.
BH91 Ditchling Road (to include 39 Acres, Ditchling Road and Ditchling Road SW)	Mosaic of habitats including species-rich grassland, supporting a number of protected and notable species; important wildlife corridor.
BH94 Falmer Hill	Block of dense native scrub within an agricultural landscape, providing an important stepping stone.
BH95 North Bevendean Down	Exceptionally large area of species-rich chalk grassland with diverse scrub and a dew pond, supporting a number of protected and notable species.
BH96 Stanmer Park	Mosaic of habitats including ancient woodland, species-rich chalk grassland, hedgerows and scrub.

Site Name	Reason for designation
BH97 Sweet Hill Scrub	Significant area of mature, diverse scrub in Brighton & Hove context, linked to small area of relict chalk grassland; supports number of notable species.

5.3.3 For two of the new LWS, the 2017/18 review has recommended some amendments to the boundaries from those proposed in 2013. A summary of those amendments and the reasons for them is provided in Table 4.

5.3.4 Table 4: Recommended boundary changes to new LWS.

Site	Boundary change
BH74 North Benfield Valley	Exclude southern tip to avoid overlap with adjacent LWS (BH08 Bridleway East of Benfield Bridge).
BH91 Ditchling Road	Combine survey areas 39 Acres (survey ref. 80), Ditchling Road (81) and Ditchling Road SW (70) to form one site, excluding area east of Ditchling Road.

#### 5.4 Candidate LWS

5.4.1 Three additional sites were recommended for designation by the 2013 panel. No survey information was available for these sites, but the panel decision was that they should be treated as if designated until independent survey information is provided to prove otherwise. As there was insufficient information to assess these sites against either the Brighton & Hove or Sussex criteria, it is the opinion of the 2017/18 panel that these sites should not be designated as LWS. However, as the 2013 recommendation implies that the sites have ecological significance, it is recommended that the sites are retained as candidate LWS.

5.4.2 The three candidate LWS are shown as amber on the spreadsheet (Appendix 5) and are listed below in Table 5. The location of the sites is shown on Map 2 (Appendix 6), although it should be noted that at this stage, the boundaries are indicative, subject to future survey findings. As these sites are not formally designated, they do not have a LWS code. For ease of reference, the survey numbers are included in brackets in Table 5; these are the numbers used by the 2013 panels and are those used in the summary of decisions from those panels (Appendix 3).

#### 5.4.3 Table 5: Candidate LWS recommended for further consideration.

Coldean Lane Slopes (83)
Dyke Road Strip (25)
Hogtrough Bottom (50)

5.4.4 It is recommended that candidate LWS are included on the National Park Local Plan policy map and should be given due consideration in the planning process. Opportunities should be sought to survey the sites and to assess their formal designation.

#### 5.5 Rejected sites

5.5.1 Three potential sites were declined as LWS by the 2013 panel. This view was endorsed by the 2017 review. One of those three sites (Wild Park) meets both Brighton & Hove and Sussex criteria but was rejected by the 2013 review. The reasons for this decision are not known. However, as the whole site is designated as a LNR with a full management plan in place, the 2017/18 panel supports the recommendation. Rejected sites are shown in red on the spreadsheet (Appendix 5) and are listed below in Table 6, with the survey reference number provided in brackets. The location of the sites is shown on Map 3 (Appendix 6).

5.5.2 Another four sites (Burstead Wood, Hollingbury Golf Course, Hollingbury Wood and Queensdown), shown in bold in table 6, also met both the Brighton & Hove and Sussex criteria. However, these sites are already designated as Local Nature Reserves. As designation as a non-statutory LWS would not provide any additional recognition or protection to the site, these sites are not being recommended as LWS under the 2017/18 review.

5.5.3 One site (Scrub East of Woodingdean) was recommended as a LWS by the 2013 review. However, the reasoning for this decision is unclear as the site does not meet the mandatory Brighton & Hove criteria. As the site does not meet any of the Sussex criteria, and given its small size, low diversity and lack of connectivity, the 2017/18 panel does not consider that the site merits designation.

#### 5.5.4 Table 6: Sites which have been rejected as LWS, and reasons for that decision.

Site Name	Reason for rejection
Bazehill Road Reservoir (124)	Species poor habitats. Does not meet criteria.
Brown Loaf Farm (91)	Habitat present does not qualify as a Habitat of Principal Importance. Does not meet criteria.
<b>Burstead Wood (75) (part BHCC)</b>	Site sufficiently protected under LNR status.
<b>Hollingbury Golf Course (77) (part BHCC)</b>	Site sufficiently protected under LNR status.

<b>Hollingbury Wood (76) (part BHCC)</b>	Site sufficiently protected under LNR status.
<b>Queensdown (78) (part BHCC)</b>	Site sufficiently protected under LNR status.
Scrub East of Woodingdean (123)	Site does not meet criteria.
<b>Wild Park (79)</b>	Site sufficiently protected under LNR status.



## 6 Discussion and Recommendations

### 6.1 Methodology

- 6.1.1 The NPPF states that planning policies and decisions should be based on up-to-date information about the natural environment<sup>8</sup>, and the British Standards for Biodiversity<sup>9</sup> state that ecological information should be sufficiently up-to-date, i.e. not normally more than two/three years old. Most of the surveys used to inform the 2013 review were carried out between 2010 and 2012.
- 6.1.2 The 2013 review was therefore based on up-to-date information. It could be argued that the current review is not robust as it is based on old survey data. However, it should be noted that the review reported in this document was not meant to resurvey sites, but to endorse the 2013 review recommendations. Where insufficient information was available to endorse the decisions made in 2013, those sites have not been put forward for designation as LWS, but have been retained as candidate LWS, thus ensuring that their potential designation in the future is not lost. These sites should be targeted for survey as soon as possible.
- 6.1.3 It should also be noted that where up-to-date information is available, for example where surveys have been carried out in relation to planning applications, this information has been used to inform the process.
- 6.1.4 In light of the above, the 2017/18 review is considered suitably robust for the LWS to be fit for inclusion in the National Park Local Plan.

### 6.2 Representations on Local Plan Scoping Documents

- 6.2.1 Whilst there was general support for the proposed policy for biodiversity and geodiversity conservation in the South Downs Local Plan Preferred Options<sup>10</sup> consultation<sup>11</sup>, there were no specific comments made in relation to LWS. In response to the Brighton & Hove City Plan Part Two (CPP2) Scoping Document, two of the twenty four respondents who commented specifically on LWS<sup>12</sup>, expressed concerns about the 2013 review. These were Brighton & Hove Wildlife Forum (BHWF) that raised a concern over data collation and Sussex Wildlife Trust (SWT) that felt sites should not be deselected due to a lack of access to the site and promoted the use of East and West Sussex LWS selection criteria. The aim of the current review was to reassess sites, both existing and new, against both the Brighton & Hove and the more recent Sussex wide selection criteria, to endorse the process undertaken in 2013. SWT have been involved in the current review and are satisfied that the selection process is suitably robust to be included in the National Park Local Plan.

<sup>8</sup> NPPF 2015. Paragraph 165.

<sup>9</sup> BS42020:2013. *Biodiversity – code of practice for planning and development*. BSI.

<sup>10</sup> [South Downs Local Plan: Preferred Options, September 2015.](#)

<sup>11</sup> [Comments on South Downs Local Plan Preferred Options consultation.](#)

<sup>12</sup> [Comments on City Plan Part Two Scoping Paper.](#)

- 6.2.2 SWT felt strongly that if sites were unable to be accessed for the 2013 review that they should remain an SNCI until evidence is available to enable a review. This view is supported by the 2017/18 panel and has been incorporated into the assessment of site boundaries; where a survey did not cover the whole of an existing SNCI, those areas outside the survey area have been retained within the LWS boundary, and the features retained within the citation.
- 6.2.3 SWT encouraged adoption of the Sussex LWS selection criteria; this was done for the 2017/18 review. The National Park Authority is also working with the SxBRC, East Sussex County Council and others to adopt a Sussex wide process for the monitoring and review of LWS in the future.
- 6.2.4 BHWF requested that Brighton & Hove SNCIs should be updated in accordance with the 2013 review. They also advocated the designation of new sites where new information becomes available and the adoption of a mechanism for putting forward and adopting new sites as they arise. New information has been incorporated into the 2017/18 review where it has become available and a Sussex wide LWS strategy is currently in development.

### 6.3 Next Steps

- 6.3.1 The owners and occupiers of the sites recommended for designation should be notified and provided with copies of site citations.
- 6.3.2 As stated above, the current review has simply been to endorse the 2013 process. No new surveys have been undertaken. It should be recognised that the suite of LWS should be regularly monitored and reviewed to not only ensure that the National Park Authority meets its duties and responsibilities under the Natural Environment and Rural Communities Act 2006 and the NPPF, but also to ensure a robust and up-to-date evidence base against which planning policies and decisions are assessed.
- 6.3.3 The National Park Authority, East Sussex County Council, the SxBRC (who manage the West Sussex LWS system on behalf of West Sussex County Council) and others are currently working together to develop a Sussex wide strategy for the regular monitoring and review of LWS, ensuring a consistent approach and sharing resources. It is acknowledged that Brighton & Hove City Council is keen to engage in this process.
- 6.3.4 In the first instance, an exercise is being undertaken to prioritise the sites for review based on factors including time since the last visit/assessment, threat, habitat fragility, ownership and whether agreed management is in place.
- 6.3.5 The current review process reported here has also been carried out for those Brighton & Hove sites that lie outside the National Park, for inclusion in the CPP2.

## 7 Conclusions

- 7.1 The current review of the 2013 LWS selection programme has endorsed the process, with the majority of sites proposed for designation in 2013 being carried forward for inclusion in the National Park Local Plan. Where there has been a change in recommendation between the reviews, this has predominantly been based on a change in site conditions resulting from development, or a lack of available information. Where recommendations made in 2013 for the designation of new sites could not be endorsed due to the lack of survey data, these sites have been retained as candidate LWS.
- 7.2 Of the 40 existing SNCIs that lie within or partly within the National Park, 34 are recommended for retention and should be renamed as LWS in line with Defra guidance. Four are recommended for de-designation and a further two should be de-designated, but combined into larger sites. Twelve new LWS have been recommended as well as three candidate LWS. These 46 LWS and three candidate LWS should be included in the National Park Local Plan policies map.