Wildlife and Countryside LINK

Importance of site-specific surveys

Wildlife and Countryside Link - Land Use Planning Group briefing

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Early, up-front strategic planning based on strong environmental data can help to safeguard nature and reduce delays and costs in planning by providing basic information about where important and vulnerable habitats can be found and where development is appropriate. Better data and stronger processes for this kind of strategic planning can improve the granularity, accuracy and application of strategic environmental data to contribute to better planning decisions. However, improvements in strategic planning will not be able to replace site-specific survey work; they should be made in combination with more investment in site specific environmental information.

Where proposed development might result in a direct or indirect impact on the natural environment, the choices made in relation to the location, layout, design, construction, materials, green infrastructure elements, future use and management and the decision as to whether, subject to condition, such development should be approved need to be guided by:

- Ecological and environmental data of adequate coverage, quality, detail and currency
- The spatial information systems with which to employ these data
- The skills and knowledge to be able to use, give context to and interpret the resulting information

This approach should ensure that development is directed away from sensitive locations and, in line with the mitigation hierarchy set out in the National Planning Policy Framework (NPPF), that any negative impacts of a proposal will be minimised.[1] It will also help determine how best to meet biodiversity net gain (BNG), whether on site or in support of the strategic goals of the relevant Local Nature Recovery Strategy, Nature Recovery Network and wider national goals set out in the 25 Year Environment Plan.

In some situations, where adequate data already exist, it may be possible to rely solely on existing information, but in the great majority of cases, site and project-specific surveys should be undertaken in accordance with the current British Standard.[2] To ensure that assessments, recommendations and decisions are sound, ecological data must be valid and within their acceptable use-by date in accordance with the industry standard guidance provided by the Chartered Institute of Ecology and Environmental Management.[3]

Therefore, decisions on planning applications require accurate and robust ecological data including those which can only be collated from site specific surveys. The approach to data collection should follow relevant good practice guidance and satisfy legislative and policy standards.

The presence of protected species and important habitats, and the extent to which they could be affected by a proposed development, is a material consideration in determining the outcome of a planning application. It must be established before planning permission is granted. This cannot be achieved reliably without site specific surveys. Furthermore, robust data from site surveys is required to inform the design of a scheme to avoid, mitigate or compensate for impacts adequately, and ensure that the scheme adheres to national standards for impact assessment.[4]

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[1] https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment#para175

[2] British Standard BS42020: 2013 Biodiversity – Code of practice for planning and development.

[3] Advice note on the Lifespan of Ecological Reports and Surveys, CIEEM, April 2019.

[4] CIEEM (2018), Guidelines for Ecological Impact Assessment in the UK and Ireland, Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

A key example is the Preliminary Ecological Appraisal (PEA), the standard approach for understanding the ecology on a proposed development.[5] PEAs require a walkover of the site to assess its likely importance for habitats and species. This is the standard approach expected on developments and a basic requirement to ensure compliance for the Local Planning Authority (LPA), and is required at the early stage of the application process.

Such a visit alerts the developer to any protected species and habitats presently on site, allows mapping of their distribution and use of the site, and ensures the developer is aware of any planning or legal requirements at an early stage of the application process. Where protected species or habitats are identified at this early stage, mitigation measures should be agreed and implemented prior to development so that the ecology of the site is not harmed. This information, in combination with appraisal of existing local evidence or mapping from other surveys, can identify risks and also potential opportunities for enhancement, and ensure that compensatory measures are in place if required.

Removing such site visits could put the developer at risk of breaching legal requirements and cause delays to their planning application if protected species or habitats are found later in the process.

Biodiversity net gain

Biodiversity net gain, as introduced by the Environment Bill, will soon be mandatory for most development. An essential stage early in the biodiversity net gain process is to undertake a site visit prior to development to assess habitats against the Defra's biodiversity metric.[6] The metric requires data on several criteria, such as the distinctiveness and condition of the habitat, which can only be achieved by site survey.

Data from the site survey will then be used to measure and predict the number of Biodiversity Units before and after a project's development based on the habitats lost, retained, enhanced and created. Contemporary, accurate data collected onsite before development commences is therefore essential component of the biodiversity net gain process for both ecologist and developer. If the requirement for site surveys is removed, biodiversity net gain will not deliver the outcomes it is intended to.

A major limitation of using only desk-based data approaches, such as mapping, is that sites that are of high but currently unknown biodiversity value (e.g. not on a national or local database) may not receive sufficient baseline survey effort to characterise their value in ecological assessment.

Some examples of limitations are outlined below:

- Interpretation of grassland habitat types is very difficult in the absence of field surveys (e.g. acid, calcareous) except for highly modified agricultural pastures.

- Interpretation of some wetland habitat types is likely to be very difficult. For example, fen, marsh and swamp habitats, in particular smaller features such as springs and flushes.

- Accurately assigning Habitats of Principal Importance (NERC Act, 2006), Annex 1 habitat types (Habitats Directive 92/43/EEC) or NVC community types is likely to be extremely difficult given the quality and extent of desk-based data available for most sites.

[5] CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

[6] Natural England (2019) The Biodiversity Metric 2.0: auditing and accounting for biodiversity value. User guide..

- Accurately identifying the presence (or likely presence) of invasive plants (e.g. Japanese knotweed) which often have serious implications for the developer and neighbouring properties.[7][8]

Older data sources are likely to be of limited use for establishing a current habitat baseline, especially in dynamic environments.

Investment in data infrastructure and systems, modern data approaches like geospatial mapping and satellite imaging is, of course, essential for strategic spatial planning and proper implementation of Local Nature Recovery Strategies. Investment in a better data infrastructure should underpin delivery of local and national strategic approaches. However, no amount of mapping could replace site specific surveys for planning applications and biodiversity net gain implementation because data goes out of date quickly and does not always exist at the necessary granularity, if at all.

Any moves to reduce requirements for site-specific surveys would be ill founded, pose a legal risk to developers, be non-compliant with government guidance and industry survey standards, and potentially harm protected species and habitats in the process.

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This briefing is supported by the following Link members:

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[7] RICS (2012) Japanese Knotweed and Residential Property (1st Edition).f
[8] Property Care Association (2018) Code of Practice for the Management of Japanese Knotweed.