



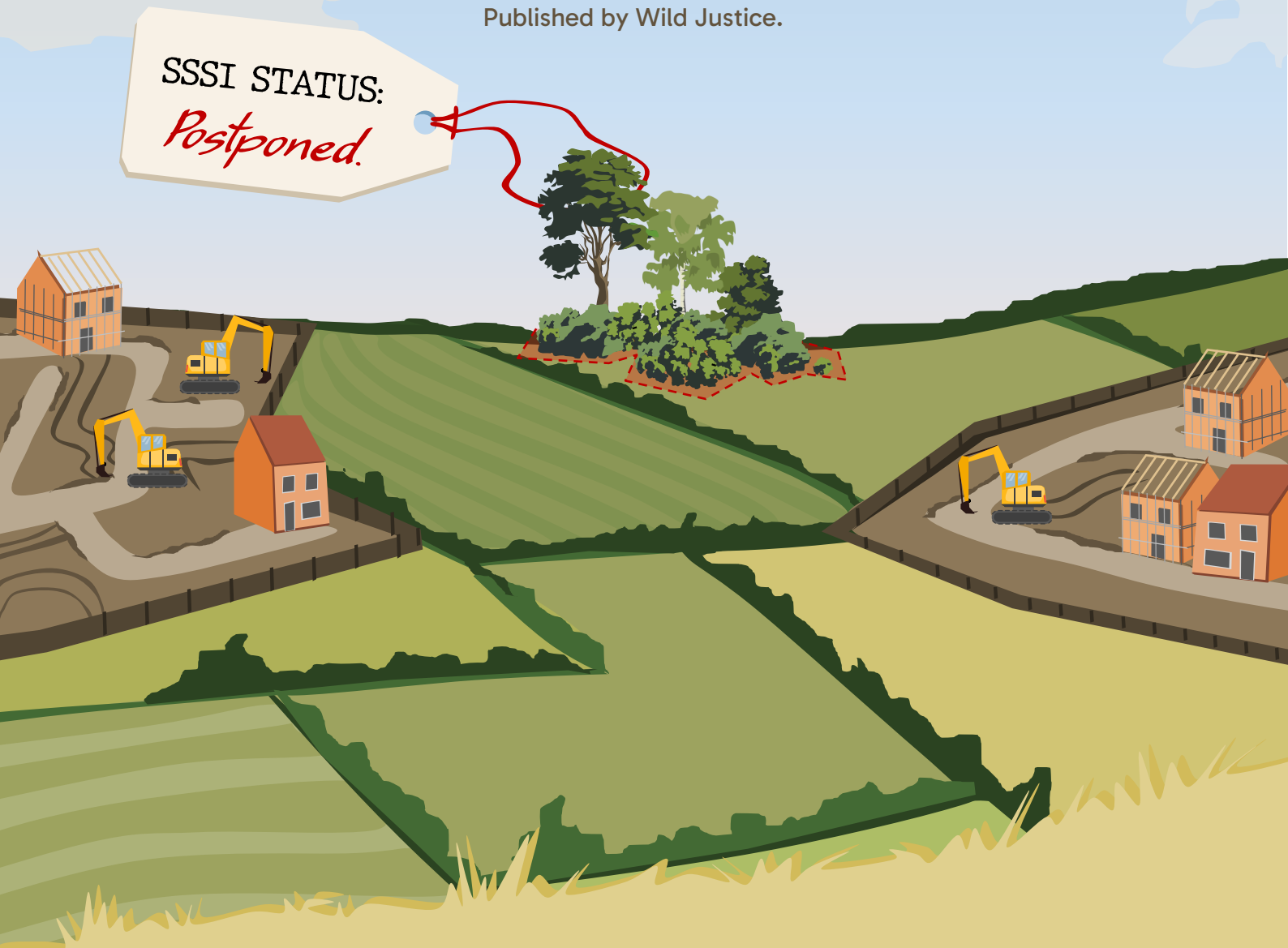
# UNPROTECTED *Nature*

Is Natural England failing to protect  
our most special sites from  
development?

Written by Dr Kiera Chapman,  
Professor Malcolm Tait & Dr Rob Davies.

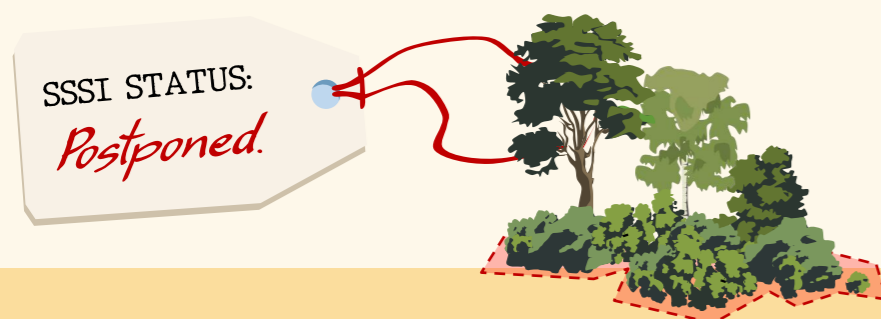
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SSSI STATUS:  
*Postponed.*



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One of our most valuable tools for protecting nationally valuable habitats and species is our ability to declare certain ecologically-rich pieces of land as SSSIs.



Once designated by Natural England, these extraordinary places have greater protection from urban development within the planning system.

But Natural England has stopped designating SSSIs - and we are now losing sites to development that are havens for wildlife .

# EXECUTIVE SUMMARY

Since the 2024/5 financial year, Natural England has quietly, yet deliberately, paused its process for designating new Sites of Special Scientific Interest, or SSSIs.

No new SSSI has been designated since 2023. The delay to protecting these places leaves **sites that are potentially very valuable for nature at risk from urban development.**

This matters because we are in a nature emergency. The UK is currently one of the most nature-depleted countries in Europe. One of our most valuable tools for protecting nationally valuable habitats and species is our ability to declare certain ecologically-rich pieces of land as SSSIs. Once designated by Natural England, these extraordinary places have greater protection from urban development within the planning system.

We assessed the 22 sites in Natural England's public designation pipeline. We used nationally-available data to search for planning applications and decisions that signal an intent to develop on the potential SSSI sites, or within a 1 km radius of them. This is a very conservative estimate of harm,

since many types of urban development inflict damage on ecology over a much wider radius.

We found that one potential SSSI has been lost to development while it has been sitting in the Natural England pipeline. 14 potential SSSIs (64%) were at high risk of suffering harm from development within 1 km.

This suggests that Natural England is failing to protect these important sites from harmful development.



Image: Ivy Bee, by Andrew Neal

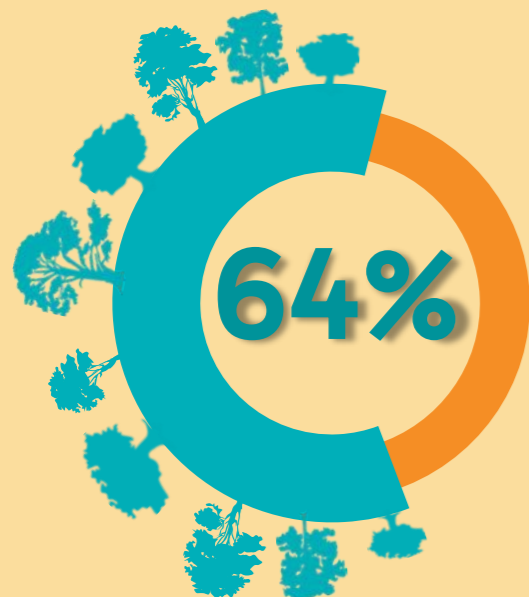
## HEADLINE FINDINGS:

- One site - in Thurrock - has had a planning application approved on the potential SSSI itself. This site will now be lost to development.
- Eight potential SSSI sites had a major development proposed in a Local Plan within 1 km. Six of those Local Plans had been approved and adopted.
- During the time that they have been sitting on the Natural England waiting list, 14 potential SSSI sites received a planning application or decision for major development within 1 km. Of these, 12 had the planning application approved. One is still under consideration, and in one case the planning application was withdrawn. The results of these planning processes might have been better for nature if the site had been given SSSI status.

**Natural England is failing in its duty to designate. But the fact that planning approvals are being granted within 1 km of potential SSSIs also suggests that Local Planning Authorities are failing to meet their legal duty to protect biodiversity.**



Image: Wildflowers at Middlewick, by Andrew Neal



64% of potential SSSIs were at **high risk** from development.



**14** potential SSSIs had a planning application for a major development submitted within **1 km**



## WHAT IS A SSSI?

Most countries have networks of sites where the conservation and protection of wildlife is prioritised.

In the UK, we have many different designations, with varying levels of protection. Sites of Special Scientific Interest (SSSIs) are the basic building blocks of nature conservation. They are selected, or 'designated', by Natural England using a process that considers a complex series of criteria.

The process is supposed to safeguard the diversity and geographic range of habitats and species

throughout the country. SSSIs are designed to ensure that we have land to house viable populations of all of our threatened native species, and examples of the full range of natural and semi-natural habitats.<sup>1</sup> This makes SSSIs an important tool in biodiversity conservation. But these places also deliver social benefits to people, in the shape of natural resources, sites for recreation and tourism, and support for human health and wellbeing.

## WHY IS SSSI DESIGNATION IMPORTANT?

SSSIs are a vital tool to protect the most valuable places for nature in the UK.

They have existed since 1949. Alongside the international designations of Special Protection Areas, Special Areas of Conservation, and Ramsar Sites, they provide the main means for the UK to meet its commitment to the UN Convention on Biological Diversity, to 'establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity'.<sup>2</sup>

In recognition of the nature emergency, the UK signed up to the 30by30 target at COP15 in 2022, which committed us to protect 30% of land and sea for nature by 2030.<sup>3</sup> SSSIs are currently one of the main designations that count towards the 30% target. Yet, England has only protected 7.1% of its

land, and if we include only SSSIs in favourable or recovering states, this falls to a mere 6.4%.<sup>4</sup> This is a lower level of protected land than any EU country.

Increasing the coverage of SSSIs is therefore a key element to meeting our 30by30 target. This is recognised by the government: Mary Creagh MP, the Minister for Nature, recently stated: "SSSIs continue to be one of the most effective tools for protecting and enhancing biodiversity and deliver a wide range of health and socio-economic benefits."<sup>5</sup> A report written by Natural England in 2022 made the case for SSSIs as 'nature nuclei', with its Chair, Tony Juniper, arguing that they are crucial 'battery packs' charging nature recovery.<sup>6</sup>

## WHO IS RESPONSIBLE FOR DESIGNATION?

Natural England has a statutory duty to notify and designate SSSIs in England.

Its legal duties are set out under Section 28 of the Wildlife and Countryside Act 1981 (amended 2000) and the Water Resources Act 1991. The responsibility is assigned entirely to Natural England. It does not require ministerial signoff, because the judgement is regarded as apolitical and scientific. It should be based on the merits of the site and its contribution to nature conservation.

Research suggests that there are gaps in the SSSI series for almost all habitats and species considered. Despite this, progress on designation of SSSIs has been very slow. The Office for Environmental Protection estimates that 100,000 hectares of land potentially meet the criteria for SSSI designation yet most of these sites have not been considered further.<sup>7</sup>

## HOW DOES DESIGNATION PROTECT LAND?

All public bodies have a responsibility to conserve and enhance SSSIs in all aspects of their work, and to consult conservation bodies if anything they are planning to do might affect these special sites.

SSSI designation also offers these special pieces of land a greater degree of protection from development. In the UK, this is regulated by the planning system, which oversees spatial decisions.

Local Planning Authorities, who make decisions about planning in local areas, have a statutory duty to protect and enhance protected sites, including SSSIs. Paragraph 193(b) of the National Planning Policy Framework, which sets out

national planning policy, states that '*development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.*'<sup>8</sup>

Harms to SSSIs from development are not limited to loss of the site itself: land use change close by or upstream can also do harm. When Local Planning Authorities make decisions about planning applications, they will therefore check potential impacts on SSSIs within a wide radius. The exact distance depends on the type of SSSI and the type of development.<sup>9</sup>



Image: Common Blue Butterfly, by Andrew Neal

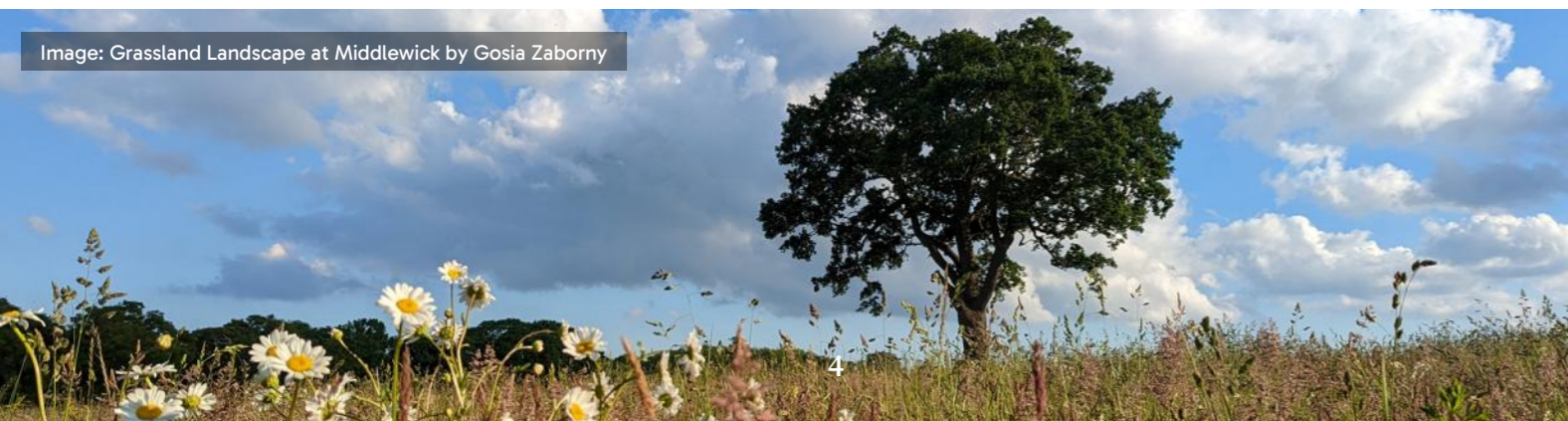


Image: Grassland Landscape at Middlewick by Gosia Zaborny

# HOW IS NATURAL ENGLAND FAILING TO PROTECT SSSIs?

In 2012, Natural England launched a new SSSI Designations Strategy.

This set out an ambition to designate between 12 and 20 cases a year for two to three years, after which approximately 50 cases would be decided each year.<sup>10</sup> In 2016, it began to publish the list of sites that were being considered under 'Natural England's designations programme', often referred to as the 'SSSI pipeline'.

However, the pace of new SSSI designations has been far slower than this.



Image: Nightingale, by Andrew Neal

## According to data obtained by the Office for Environmental Protection (OEP):

No more than six SSSIs have been designated, modified, or extended in any year since 2012

6

2.8%

Since 2005, the total area of SSSIs has grown by just 2.8%.<sup>11</sup>

A total of just 33 sites have been designated over the last 14 years.

33

0

No sites have been designated, modified, or extended since 2023.

The OEP recently published a valuable report on how protected areas (such as SSSIs) are being managed.<sup>12</sup> Part of its work evaluated the rate of progress towards designating SSSIs, using archived web pages to assess how many potential SSSI sites were in the designation pipeline each year since 2016. We used the same method to assess how long each of the current sites in the pipeline have been sitting on the potential designations list.

Table 1 presents our analysis. 2 sites have been waiting in the pipeline for 10 years or more (Filey Brigg to Scarborough South Bay, and Flamborough Head). A further 6 have been waiting for 9 years. Almost half of the sites currently listed for consideration as SSSIs have now been in the programme for more than 7 years.

Potential SSSI site	Number of years on designation list	Potential SSSI site	Number of years on designation list
Filey Brigg to Scarborough South Bay	10	Caen Valley Bats	4
Flamborough Head		Cartmel Area	
Bernwood	9	Creech Barrow and Valley	
Nettlecombe Park		Fenn's Whixall, Bettisfield, Wem and Cadney Mosses	
Pixton Park		Morley Quarry	
Prees Heath		Nine Mile River	
Rutland Water		Rydal Park	
Trowbridge Woods		Savernake Bat Tunnel	
Thames Estuary Invertebrates, Essex and Kent	6	Strensall Common	
Quarry Hangers and Quarry Dean Meadows	5	Tudeley Woods and Pembury Walks	
		Vernatt's Drain	
		Wensum Woodlands	

Table 1: Potential SSSI sites and the number of years they have been awaiting designation.



Image: Common Lizard, by Andrew Neal



Image: Oxeye Daisies at Middlewick by Stephanie Murran

# A TOTAL PAUSE TO DESIGNATION

We have obtained legal letters sent by Natural England to a local campaign group concerned about an ecologically valuable site that is under threat of development.

These letters clearly state that the SSSI designation pipeline has been deliberately but quietly paused by Natural England since the 2024/25 financial year.

Work is proceeding on just three sites, all of which contain Special Protected Areas (SPAs) for birds.<sup>13</sup> In March 2024, the OEP launched an investigation into indications that Natural England may have failed to comply with its duties to classify, manage

or adapt SPAs, which might explain why these are the only sites that were not paused.

It is also clear that Natural England has stopped any work to bring new sites onto the pipeline. The letters state that it has allocated no money in its budget for this important work.

Natural England argues that it does not have adequate resources to continue the work of SSSI designation. It claims that it is currently reviewing its internal processes to develop a new strategy for these sites.

However, the government agency has not formally announced this pause to SSSI designation to the public, and it has not updated its website to reflect the fact that no work is happening on the majority of pipeline sites. Natural England's latest strategy, published in November 2025, makes no mention of SSSIs.<sup>14</sup>

The only reference to designated sites is a commitment to expand National Nature Reserves, a weaker designation which is not protected under national planning policy.<sup>15</sup>

We are uncertain whether the OEP is fully aware of the pause to designation, since its December 2025 report only mentions a pause to one site (Bernwood). Indeed, it argues that '*Resources [for SSSIs] increased between 2020 and 2024. This allowed for work that had been largely paused to be restarted*' (p. 20). This suggests that the OEP may believe that Natural England is actively working to designate most pipeline SSSI sites, when our information suggests that the vast majority of the work has been paused. The Government response to the OEP's recommendation that '*Natural England should significantly increase the speed and scale of its programme for designating SSSIs*' only makes vague commitments that it is reviewing the process and will use SSSI designation alongside other measures such as weaker National Nature Reserve designation.<sup>16</sup>



Image: Nick Beer, Shutterstock

# WHY IS DESIGNATION IMPORTANT IN THE CONTEXT OF PLANNING REFORM?

SSSI designation confers a good degree of protection from urban development. The Labour government is currently in the process of deregulating planning to make it easier for people to concrete over pieces of land.

The 2024 National Planning Policy Framework (NPPF) introduced the concept of 'greybelt', enabling large areas of the greenbelt to be redesignated for development. This includes land close to SSSIs and land on sites in the designation pipeline.

The Planning and Infrastructure Act (2025) has moved the planning system away from site-specific conservation measures, towards a 'cash to trash' policy. This allows developers to harm protected sites, such as SSSIs, in exchange for a contribution to the Nature Recovery Fund by the developer. The funds are supposed to be spent on conservation work elsewhere, set out in an Environmental Delivery Plan made by Natural England. However, there are significant concerns that this piece of legislation has few safeguards to ensure that the certainty of biodiversity destruction is matched by proper mitigation and compensation.

One major problem is that development can happen quickly once permission is granted, yet it can take much longer for a compensatory offset to reach the condition that a particular species requires to survive, meaning that species are left with nowhere to live when development happens at a rapid pace. Historically, too, many planning commitments on paper do not necessarily translate into action on the ground.<sup>17</sup>

The government is currently revising the National Planning Policy Framework. The consultation text for the new version downgrades protection to SSSIs. The current NPPF states that development which has an adverse effect on SSSIs '*should not normally be permitted*'. The new version suggests more permissive wording, meaning that such development could be allowed as long as certain conditions are met. The need to consider harms of development close to SSSIs is also minimised within the new policy.

Even though the government is proposing to weaken protection for SSSIs, designated land is still offered a greater degree of protection from development than undesignated land.

## 2. The current SSSI Designation Programme

The SSSI designations programme is published as part of [Natural England's designations programme - GOV.UK](#). Below are details of each case's current status, as a result of Business Planning decisions for 2025/26:

Cases	Status in 2025/26
Bernwood, Buckinghamshire	Paused
Caen Valley Bats, Devon	Paused
Cartmel, Cumbria	Paused
Creech Barrow and Valley, Dorset	Paused
Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses, Shropshire	Paused
Flamborough & Filey Coast, North Yorkshire (presented as two cases on Gov.uk)	Progressing
Marshwood Vale, Dorset	Paused
Confidential site, not to be shared publicly	
Morley Quarry, Leicestershire	Paused
Nettlecombe Park, Somerset	Paused
Nine Mile River, Wiltshire	Paused
North Thames Estuary & Marshes, Essex (part of Thames Estuary Invertebrates)	Progressing
Pixton Park, Somerset	Paused
Prees Heath, Shropshire	Paused
Quarry Hangers & Quarry Dean Meadows, Surrey	Paused
Rutland Water, Rutland	Paused
Rydal Park, Cumbria	Paused
Savernake Bat Tunnel, Wiltshire	Paused
Strensall Common, North Yorkshire	Paused
Trowbridge Woods, Wiltshire	Paused
Tudeley Woods and Pembury Walks, Kent	Paused
Vernatt's Drain, Lincolnshire	Paused
Wensum Woodlands, Norfolk	Paused

Figure 1: Image from an internal Natural England document disclosed by email from Natural England's lawyers to a local campaign group, showing pauses to site designations.

## ANALYSIS:

### How vulnerable are sites in the pipeline to urban development?



There are currently 22 sites in the Natural England pipeline for designation as SSSIs.

This list includes parcels of land that would constitute brand new SSSIs, and sites that extend the area of existing SSSIs.

#### What questions did we ask?

We took the list of sites in the pipeline and asked two questions:

1. Are any of the potential SSSI sites in the pipeline under direct threat from development on the land within their boundary?
2. Are any of the potential SSSI sites under threat from harm of development within a 1 km radius?

#### Why a 1 kilometre radius?

Natural England provides Impact Risk Zones (IRZ) for all existing SSSIs. These list the types of development with the potential to impact these special sites at a range of distances. These suggest that most larger scale urban and rural residential and infrastructure development within 1 km of a SSSI has the potential to cause harm to nature. For many SSSIs, developments well beyond this radius can also be damaging.

We used a 1 km radius to assess whether sites were vulnerable to harm. This is an extremely conservative assessment of potential damage. The likelihood is that, for many of these sites, the possible impacts of development are far greater than we are reporting.

#### How did we gather data?

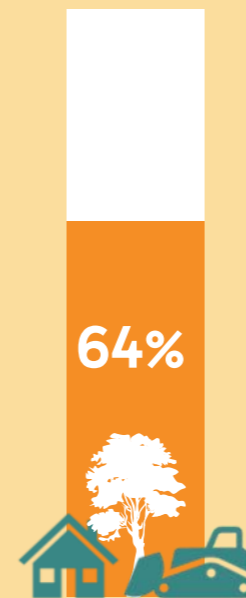
We looked at planning applications and decisions for all major developments within 1 km of the proposed SSSI, and assessed whether there had been a planning application or decision since they entered the designation pipeline. We checked whether the development had been approved, rejected, or was still under consideration. We also checked Local Plan documents, as these allocate land for future development. Inclusion of a site in a Local Plan gives a very strong presumption that development can take place. We identified whether sites were allocated in a fully approved (or 'adopted') plan or a draft plan.

We restricted our search to major developments, including major housing developments (> 10 houses), as well as major commercial and industrial developments, for example port construction.

In some instances, the location of the proposed SSSI was not completely clear from preparatory studies on the Natural England website. However, we exercised our judgement and used the location of existing designations and data to approximate the location of the proposed SSSI to within a few metres.

Whilst the existence of a planned or approved development within 1 km of a potential SSSI does not, by itself, indicate harm to its ecological features, when considered as a whole it may indicate a systematic failing to consider the biodiversity of these very important places within the planning system.

## WHAT DID WE FIND?



14 of the 22 potential SSSIs in the pipeline are under threat from development...

...and at least one site has been lost to development.

these 14 potential SSSIs

had a planning application for a major development submitted or decided within 1 kilometre since they entered the designation pipeline.

12 of these 14 have had those planning applications approved.

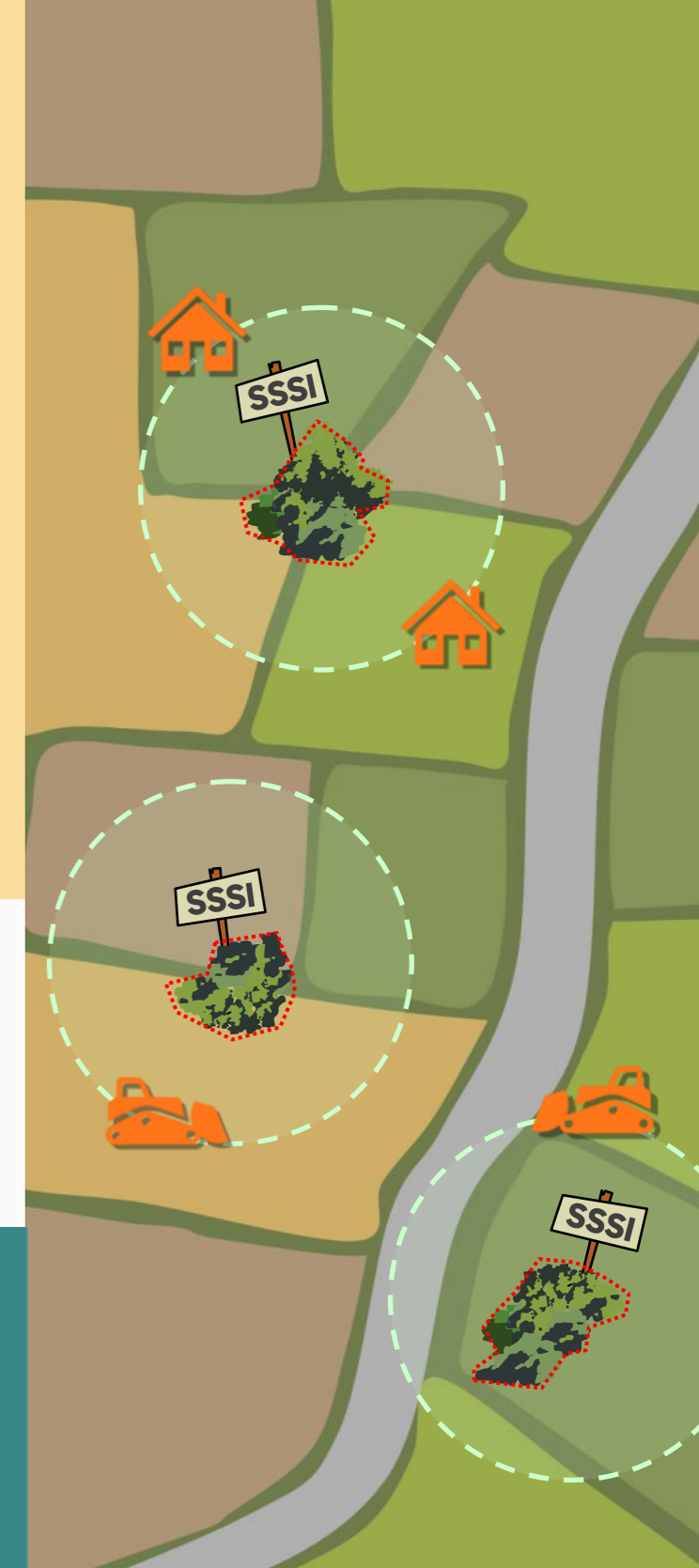
1 is still under consideration and 1 had a major application withdrawn.

8

Eight potential SSSI sites had a major development proposed in a Local Plan within 1 km.

6

Six of those plans have been approved and adopted.



This strongly suggests that potential SSSI sites that are not yet designated are at high risk of development. Natural England is failing in its duty to designate and Local Planning Authorities are not taking harms to these special areas seriously.

Site	Is land within 1 km allocated for major development in the Local Plan?	Have any major planning applications been approved within 1 km?	If yes, what kind of application?
Bernwood	No	Yes	Various applications approved for HS2 from 2017. Calvert New Town site proposed next to potential SSSI, but not yet in the Local Plan.
Caen Valley Bats	No	No	
Cartmel Area	No	Yes	Residential, 39 dwellings (2025).
Creech Barrow and Valley	No	No	
Fenn's Whixall, Bettisfield, Wem and Cadney Mosses	No	No	
Filey Brigg to Scarborough South Bay	Yes	Yes	A number of approved planning applications since 2016, including for large urban extension (approx. 600 homes) at Middle Deepdale (allocated in Scarborough Local Plan 2017).
Flamborough Head	No	Yes	New hotel at Bridlington Links, 2025.
Morley Quarry	Yes	Yes	Numerous planning applications for housing granted in vicinity of Morley Quarry (303 houses approved; a further 325 under consideration).
Nettlecombe Park	No	No	
Nine Mile River	No	Yes	107 space car park approved 2022, 14 homes approved 2023.
Pixton Park	No	No	
Prees Heath	No	No	
Quarry Hangers and Quarry Dean Meadows	No	Under consideration	Application for 81 houses submitted 2025.
Rydal Park	No	No	

Site	Is land within 1 km allocated for major development in the Local Plan?	Have any major planning applications been approved within 1 km?	If yes, what kind of application?
Rutland Water	Yes (Local Plan at draft stage)	Yes	74 houses & 11 flats in Edith Weston (2023). 213 houses edge of Oakham (2022). Treatment Plant at Manton (2022). 122 houses under consideration, an application for a further 220 may be submitted soon (the developer has applied for a screening opinion on whether this would be acceptable). St George's Barracks site identified as 'area of opportunity' in draft Rutland Local Plan.
Savernake Bat Tunnel	No	No	
Strensall Common	Yes	Yes*	4 hectare employment site allocated next to Strensall Common (City of York Local Plan, 2025).
Thames Estuary Invertebrates	Yes	Yes	Potential SSSI site lost to development. New industrial area (Tilbury 3) approved (2026). Lower Thames Crossing Development Consent Order (DCO) approved (2025). Tilbury 2 DCO approved 2019. Thames Freeport designation (2021). Tilbury 3 site proposed in draft plan (2023).
Trowbridge Woods	Yes	Yes	2600 home Ashton Park urban extension, approved 2025 (site allocated in the 2015 Wiltshire Core Strategy and in the draft Wiltshire Local Plan).
Tudeley Woods and Pembury Walks	Yes	Yes	74,000 square metre employment area approved and allocated in Local Plan (2025). New 145 bed student accommodation permitted for Pembury Hospital.
Vernatt's Drain	Yes	Under consideration	One application for 70 houses has been approved, whilst another application for a further 160 houses is still under consideration'. Area allocated for the Vernatt Sustainable Urban Extension (4000 houses) in the Local Plan (2019).
Wensum Woodlands	No <sup>†</sup>	Withdrawn	Norwich Western Bypass withdrawn 2025 due to NE objection.

\* Application approved within the Zone of Influence for the existing SSSI (2023).

† Included in Department for Transport's Major Road Network and Large Local Majors Programme Schemes (2026).

# THURROCK'S LOST SSSI

## CASE STUDY

On 24 February 2026, a development known as Tilbury 3 was granted planning permission by Thurrock Council.

This will destroy part of a site in the Natural England SSSI designation pipeline, known as 'Ashfield A1', and part of the West Tilbury Marshes Complex Local Wildlife Site. Natural England's own assessment describes it as *'the most important area for invertebrates across the North Thames area'*.<sup>18</sup>

The borough of Thurrock, next to the Thames in South Essex, is on the frontline of new infrastructure investment. With an industrial legacy shaped by its proximity to the River Thames and London, there is high demand for new infrastructure projects in Thurrock, including port expansion and the Lower Thames Crossing.

Yet this corner of Essex also contains rich habitats for nature, including significant areas of ecologically important brownfield land known as 'Open Mosaic Habitat on Previously Developed Land'. From 2006-2008, Natural England and Buglife mapped 6,000 hectares of the Thames Estuary, including Thurrock, and identified 198 sites that were of high or medium conservation value for insects. **Just six years later, 100 of these had been lost to development, or were under imminent threat from urbanisation.**<sup>19</sup>

In 2020, Natural England recognised the severity of the threat, and placed the wider Thames Estuary area into its designation pipeline.<sup>20</sup> Six years later, however, nothing has happened to protect the Ashfield A1 site - despite the fact that Natural England indicated in 2024 that it had collected the required data for its designation, and that a decision should be expected in 2025.<sup>21</sup>

In the meantime, Tilbury Port had been expanding. In 2019, Tilbury 2 was granted a Development Consent Order on the site of the former Tilbury Power Station, also a nationally important site of SSSI quality (known as the 'Lytag Brownfield Local Wildlife Site').<sup>22</sup> Ashfield A1 is therefore the second site of SSSI quality in this area that has been lost to development.

Two years later, in 2021, the Government designated a large area of Thurrock as a Freeport, making it easier for development to proceed there. In 2024, a planning application was submitted for a new port area, 'Tilbury 3'. The proposal included removing the whole of Ashfield A1, despite the fact that it had been sitting in Natural England's pipeline since 2020. In an attempt to compensate for the lost habitat for Tilbury 3, new habitat is proposed. However, this

is partly on land that is already being used as ecological mitigation for other developments in the area. The work to construct these habitats has not yet been completed. We are therefore losing habitat that is of high value for invertebrates, for uncertain compensation.<sup>23</sup>

**The delay in designating this area of the Thames Estuary as a SSSI has undoubtedly affected the protection given to rare species on this site.**

While designation does not entirely rule out destruction of habitats, it nonetheless provides a strong reason for the planning system to stop any development that harms the most vulnerable species and habitats.

Image: Tilbury Ashfields, Peter R Harvey



# IMPLICATIONS BEYOND PLANNING: The Middlewick Ranges Catch-22

## CASE STUDY



Image: Bluebells at Middlewick, Martin Pugh

SSSI designation has implications beyond urban development. It can also be used to insist that these special places are managed properly, with conservation in mind.

Natural England sends all SSSI owners a 'site management statement' describing the ideal way that the land should be looked after. If the owner refuses to manage the land properly, Natural England can take enforcement action, requiring the work to be done. However, some sites that might meet the SSSI criteria are currently degrading, because their landowners cannot be forced to manage them properly with wildlife in mind. Pausing the pipeline is therefore causing harm since local communities cannot demand that the land is properly managed. This risks the loss of biodiversity.

Middlewick Ranges is a 76 hectare parcel of dry acid grassland (a priority habitat for conservation), forming a mosaic with sandy ground, scrub and woodland on the outskirts of Colchester. It is currently owned by the Ministry of Defence (MoD), and was once a firing range, but is no longer used for this purpose. It was allocated for housing in the area's Local Plan in 2016, based on an erroneous ecological assessment of the habitat onsite. The community has been fighting to deallocate it ever since on the grounds that it is a haven for wildlife.

Local people have commissioned a range of specialist surveys from ecological professionals. **These have revealed at least 1,480 species of invertebrate, including 465 species of Lepidoptera, and 173 spider species.** Natural England itself advised Colchester Council that Middlewick 'supports nationally important assemblages of invertebrates'.<sup>24</sup> Middlewick is also an important site in England for Nightingales, and is home to

10 species of bat, including the rare Barbastelle. **There are at least 21 species of waxcap present, which suggests that the site may be an example of rare ancient unimproved grassland.**<sup>25</sup>

Middlewick surpasses the Joint Nature Conservation Committee (JNCC) guidelines for the selection of SSSIs, yet Natural England has not put it into the pipeline for designation. This weakens the ability of the community to demand that the site's landowner (the MoD) manages the land properly.<sup>26</sup> The MoD acknowledges that there is no land management plan in place for this site, stating that 'Middlewick Ranges does not currently qualify for an ecological management plan under MoD policy, as it does not hold any statutory designations'.<sup>27</sup>

Community campaigners at Middlewick have catalogued a series of ways in which the site is not being looked after in accordance with best conservation practice. Some areas show the encroachment of scrub onto sensitive open sandy habitats, there has been removal of woodland edge without surveys or mitigation, and the acid grassland has not been managed consistently, with inappropriate early spring cutting leaving ruts and compacting soils, to the detriment of delicate waxcap mycorrhizae. In some instances, arisings have been left in situ when they should have been removed (grass clippings that are left to rot tend to enrich soils, depleting biodiversity). The site has also been mowed in July, during the Skylark nesting season, destroying known nesting sites and any associated chicks.<sup>28</sup>

The MoD has not put a management plan in place, because the site is not designated. Natural England says that it cannot force the landowner to maintain the land, because it is not designated as

a SSSI. Yet Middlewick cannot be designated as a SSSI because Natural England has paused the pipeline. This leaves the campaign in an impossible Catch-22 situation, and in the absence of SSSI designation, biodiversity on the site remains at risk.

Home to  
at least  
**1,480**  
species of  
invertebrate



Image: Gorse Weevil by Andrew Neal

# RECOMMENDATIONS

## Wild Justice calls for:

1. Natural England to **restart the pipeline** for designating SSSIs and to produce a timeline to ensure a rapid decision on the designation of all existing sites (within the next two years).
2. Natural England to demonstrate a **greater degree of transparency** in its handling of the SSSI pipeline, **notifying the public** when work has been paused or no progress made.
3. The government to **provide adequate resourcing** for Natural England to do this work, ensuring that our most precious natural spaces can be protected.
4. The planning consent to develop a site that potentially meets SSSI criteria in Thurrock to be **urgently reviewed**.
5. An urgent review in the wider Thurrock area of the valuable sites that are left, with a **priority pipeline** to secure designation in this area where nationally important invertebrate populations are under threat from development pressure.
6. The Middlewick Ranges and other sites that potentially meet SSSI criteria to be **added to the pipeline** for designation with immediate effect.
7. Natural England to **make use of an existing evidence base** to speed up the process of designation (e.g. recent ecological surveys completed as part of the planning process, or as part of opposition to planning decisions). In many cases, the scientific evidence to support designation already exists. This should be taken into account, enabling applications to be fast-tracked through the system in a resource-constrained context.
8. The duty of public bodies to protect SSSIs to be **extended to encompass sites that are in the pipeline** but not yet designated, ensuring that these can be adequately managed for the future.



Image: Field Scabious, Martin Pugh

## ABOUT THE AUTHORS

**Kiera Chapman** is a Postdoctoral Researcher in Attention, Flourishing, and the Humanities at Oxford University, and Co-Investigator on the ESRC-funded Planning for Nature project. Her work ranges across the arts and humanities, social sciences, and science, asking questions about suburbia, housing, and the vision of nature that gets realised in space. She is also an established nature writer and author of *Nature's Calendar: the British Year in 72 Seasons*, published by Granta, with a subsequent book on time, ritual, and folklore to follow in 2026.

**Malcolm Tait** is Professor of Planning at the University of Sheffield, and Principal Investigator on the ESRC-funded Planning for Nature project. His work focuses on studying the impacts of the planning system on biodiversity loss. He has recently coauthored two books about the culture of

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**Rob Davies** is a Postdoctoral Researcher on the Planning for Nature project at the University of Sheffield. He is investigating the effectiveness of Biodiversity Net Gain in protecting and restoring nature, assessing how it has been applied so far, and comparing it to previous policy regimes. His wider research has focussed on understanding the effects of land-use change on biodiversity and how to effectively combat this, and better understanding the distribution of biodiversity.

## ABOUT WILD JUSTICE

**Wild Justice** is a not-for-profit company limited by guarantee. A not-for-profit company is one where the directors don't benefit from the profits of the company and money raised is spent on the aims (called the 'objects') of the company. Its work involves:

- **Nature conservation, primarily in UK.**
- **Advocacy to make UK laws, policies and practices more wildlife-friendly.**
- **Use of UK legal system to further nature conservation objectives.**
- **Encourage public participation in nature conservation issues.**

Wild Justice takes legal challenges against UK governments and their agencies and campaigns for a better deal for wildlife.

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Image: Chris Packham, Ruth Tingay, Bob Elliot, Wild Justice

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## REFERENCES

1. The [criteria](#) are produced by the Joint Nature Conservation Committee (JNCC).
2. [Article 8](#), Convention on Biological Diversity.
3. Target 3 of the Kunming-Montreal Global Biodiversity Framework.
4. The UK government [will only include areas in 'favourable' or 'unfavourable recovering' states](#) in its 30by30 calculation.
5. [Written answer](#) by Mary Creagh MP, 13 January 2025.
6. Galbraith, C.A. & Stroud, D.A. 2022. [Sites of Special Scientific Interest \(SSSIs\) in England: their historical development and prospects in a changing environment](#). Juniper, T. (2022) ['Blog: The battery-powered partnerships of nature recovery'](#).
7. Office for Environmental Protection [Review of implementation of laws for terrestrial and freshwater protected sites in England](#).
8. This wording is currently under revision, with the [new draft of the NPPF](#) weakening protection for SSSIs (see discussion below).
9. Natural England has developed ['Impact Risk Zones'](#) that identify the threat posed by different type of development at varying distances from different kinds of SSSI.
10. [Natural England Designations Strategy](#) July 2012 (NE353).
11. Office for Environmental Protection [Review of implementation of laws for terrestrial and freshwater protected sites in England](#).
12. Office for Environmental Protection [Review of implementation of laws for terrestrial and freshwater protected sites in England](#).
13. This was confirmed in 'Enclosure 2, a Guidance Note on NE's position on designating SSSIs in 2025/26'.
14. Natural England, [Natural England's Strategy: Recovering Nature for Growth, Health and Security](#).
15. [The National Planning Policy Framework](#) only mentions SSSIs, SACs, SPAs and Ramsar sites, not National Nature Reserves, as receiving protection from development.
16. Office for Environmental Protection [Review of implementation of laws for terrestrial and freshwater protected sites in England](#), p. 20; [Government response to OEP recommendations](#).
17. Wild Justice, [Lost Nature: Are housing developers delivering their ecological commitments?](#)
18. Letter from Natural England to Thurrock council, 7 August 2025.
19. Jamie Robins, Sarah Henshall, Alice Farr [The state of brownfields in the Thames Gateway](#), Buglife.
20. See [Natural England Board Meeting, 10 November 2021](#), though Natural England had already stated in 2018 that it wished to add the area to the designation pipeline (Letter, 30 April 2018 from NE to Planning Inspectorate as part of Tilbury 2 NSIP application).
21. NE response to Scoping Opinion for Tilbury 3 (Thurrock Council planning ref: 24/01023/SCO).
22. This site also had [significant invertebrate diversity](#), thanks to Pulverised Fly Ash (PFA) left behind by the power station. Natural England suggested that it could also be a parcel of land that was suitable for designation: "In our opinion, the overall assemblage could be considered to be of sufficient quality to meet the designation requirements of a Site of Special Scientific Interest (SSSI). It has been lost to development, though the ash substrate was shipped by barge downstream to an ecological renovation site, with the expectation that the insect-rich habitat could be recreated.
23. The Ashfield A1 area had already had some remediation for insects in 2010-11, which had shaped the earth to create diverse habitats. The proposal is to remove the PFA substrate and transport it to the Mucking Landfill site and spread it at lower depths over a wider area. Natural England raised concerns, noting that "This proposal is not without risk, and there are uncertainties as to what the 'bounce-back' of invertebrate quality will be (Letter from Natural England to Thurrock Council, 7 August 2025, Thurrock Council planning ref: 25/00598/FUL)." The story of compensation sites being shifted around like a sliding puzzle raises serious concerns about the permanence of biodiversity compensation schemes.
24. [Natural England response](#) to 'Developing a Vision for Colchester'.
25. For more information on the diversity at Middlewick, see Buglife's [Middlewick Ranges: the Case for Site of Special Scientific Interest Designation](#) and their letters to [Marian Spain](#) and the [Secretary of State for Defence](#).
26. The conduct of the Ministry Defence violates government biodiversity policy on multiple grounds. Firstly, it has a [duty to conserve and enhance biodiversity](#), along with all other public bodies. Secondly, the Ministry of Defence has its own [internal biodiversity policies](#), setting out an intent to 'be an exemplar in the management of designated sites'. Thirdly, defence land, like Middlewick, is part of the ['National Estate for Nature'](#) that the Government says is essential to delivering 30by30 and Environment Act commitments.
27. Letter from Luke Pollard MP for Defence Readiness and Industry to Pam Cox, MP, 10 March 2026.
28. A video taken by the campaign is [available online](#).