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British Lichen Society

Surrey County Council
Case Officer: Ms Janine Wright
mwcd@surreycc.gov.uk

SCC Reference: **2021/0130**

Application number: **GU21/CON/00038**

15th June 2022

Dear Ms Wright,

Thank you for forwarding the Ecological Note from the Applicant, BLS member Andy Cross has reviewed the document for me and has made the following comments.

What is at stake here is a nationally important assemblage of lichens in an ancient wood pasture/parkland habitat.

Most of the country has not been surveyed in detail. Previously unknown nationally important ecological features are, at times, found when surveys are carried out. This happens often enough for there to be published guidance on what to do about it in a planning context. The guidance is published by the Chartered Institute of Ecology and Environmental Management (CIEEM) under paragraph 4.15 in their Guidelines for Ecological Impact Assessment (EclA) and is:

“4.15 Conversely, there may be occasions when an undesignated site is considered to meet published selection criteria for statutory or non-statutory site designation, or have substantive potential to meet them. This should be used to guide the assessment of importance and discussions should be held with the potential designating authority to agree how the site should be treated.”

The lichen assemblage at Albury Park meets the criteria for consideration for selection as a Site of Special Scientific Interest (SSSI) as was illustrated by a recent English Nature commissioned report (Sanderson, 2021).

There is nothing in the Ecological Note stating that the Applicant has held any discussions with the potential designating authority about how the site/nationally important lichen assemblage should be treated.

We consider that this guidance should be followed, and that Natural England be consulted about how the site/lichen assemblage should be treated.

At present, the Applicant has not provided a lichen report and there are no lists of lichen species, their conservation significance, what the sensitivity of these particular species are, and where they are in relation to the proposed scheme and the area where air quality will change. We have concerns about the critical load/levels used for the sensitivity of the lichen species/assemblage. We are also concerned about the screening threshold criteria being used for the lichen assemblage. These are issues that would be addressed in consultation with Natural England.

The Applicant does state in the Ecological Note that Natural England (NE) has no objection to the proposed scheme. It is important to note that that was NE's position before the Applicant was made aware of the lichen assemblage. There is no evidence in the Ecological Note that the Applicant has made Natural England aware of the presence of a nationally important lichen assemblage within the area where their proposed scheme will change the air quality.

None of the reports/note by Air Pollution Services (APS) mention lichens and it is unclear whether the Applicant has informed them of the presence of a nationally important lichen assemblage.

The review carried out by RPS appears to have been done without them knowing about the nationally important lichen assemblage.

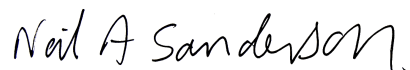
The proposed development lies within an area of Wood Pasture and Parkland habitat – this is a NERC Act S41 Priority Habitat. Surveys by lichenologist have found a nationally important assemblage of lichens. Wood Pasture (and Pasture Woodland) is a rich and complex habitat. Given that this one has this important lichen assemblage, there may be other important ecological features within the Wood Pasture habitat that have not yet been identified.

In conclusion, we think that the process/guidance to assess the potential impacts to the nationally important lichen assemblage has not been followed and that there is not enough information specific to this feature to be certain that there are no significant impacts to this vulnerable, nationally important ecological feature.

Yours sincerely

Yours sincerely,

Neil A Sanderson



President, British Lichen Society

(Email president@britishlichensociety.org.uk & Phone xxxxxxx)

The society is a Charitable Incorporated Organization (number 1194213)

References

Sanderson, N. A. (2021) *Lichen Survey of Albury Park, Surrey, 2021*. A report by Botanical Survey and Assessment for Natural England.