

# NORTH MEADOW AND CLATTINGER FARM SPECIAL AREA OF CONSERVATION INTERIM RECREATION MITIGATION STRATEGY

2023 - 2028

May 2023



Photo credit – Des Hobson



Prepared by Cotswold District Council, Swindon Borough Council  
and Wiltshire Council in partnership with Natural England

Reference as: Gallagher, M; Hobson, D; Jones, R; Price, S; Squirrell, N (2023) 'North Meadow and Clattinger Farm Special Area of Conservation Interim Recreation Mitigation Strategy 2023 – 2028'. Cotswold District Council, Natural England, Swindon Borough Council, Wiltshire Council

## Contents

1. Summary
2. Introduction and Overview
3. Background
4. Legislation
5. North Meadow and Clattinger Farm Special Area of Conservation – Description, Nature Conservation Importance and Statutory Designations
6. Potential Likely Significant Effects on the North Meadow and Clattinger Farm Special Area of Conservation
7. Visitor Survey Analysis
8. Setting the Zones of Influence
9. Predicted Local Housing (and other relevant housing) Growth
10. Proposed Mitigation Measures and Costs
11. Implementation of Mitigation Measures
12. Governance
13. Strategy Review and Monitoring
14. Appendices

## 1. Summary

1.1 This Strategy sets out a strategic approach to mitigate recreational impacts, associated with new development, on the North Meadow part of the North Meadow and Clattinger Farm Special Area of Conservation (SAC).

1.2 This provides a framework under which planning applications, which are likely to have a significant effect on the SAC, can be permitted. It sets out measures to ensure that adverse effects on the integrity of the SAC can be ruled out. This enables development, while ensuring sufficient protection is in place for the SAC. The Strategy applies to larger developments, which may affect the integrity of these sites alone, and smaller developments where “in combination” effects may be the critical factor.

1.3 The Clattinger Farm part of the SAC is not subject to this Strategy.

1.4 The site has two main types of users – local year round visitors (walkers and dog walkers), who originate from very locally and seasonal visitors from further afield, who come to view the flowering fritillaries. Accordingly, the Strategy sets two Zones of Influence (Zol), -

- an inner zone of 0 – 4.2km from North Meadow
- an outer zone of 4.2 – 9.4km from North Meadow

1.5 Within the inner Zol, all new relevant development will be expected to provide mitigation, both at North Meadow - Strategic Access Management and Monitoring (SAMM) measures and through the provision of additional measures which provide alternatives for potential local users of North Meadow e.g. improved natural greenspace.

1.6 Within the outer Zol all new relevant development will be expected to provide mitigation at North Meadow - Strategic Access Management and Monitoring (SAMM) measures.

1.7 The Strategy is an interim approach, while further monitoring and surveys are undertaken and will be reviewed within 5 years or earlier, if required.

With thanks to our colleagues at the three Councils and at Natural England for their help in preparing this Strategy.

## 2. Introduction and Overview

2.1 This Strategy is an approach to mitigate recreational impacts, associated with new developments, on the North Meadow and Clattinger Farm Special Area of Conservation<sup>1</sup> (SAC). The SAC is part of a network of European sites (Habitat sites) that are of great importance for nature conservation and subject to strict legal protection. The strategy applies only to the North Meadow Site of Special Scientific Interest part of the SAC.

2.2 The Strategy has been prepared and agreed by Cotswold District Council, Swindon Borough Council and Wiltshire Council in partnership with Natural England (NE). Joint working between these organisations will continue through the setting up of a North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Steering Group.

2.3 Because the exact level and type of adverse recreational impacts on the SAC has not been determined, it has been concluded, following the precautionary approach, that an interim 5 year Mitigation Strategy is the appropriate way forward. Data collected, as part of the monitoring elements of the Interim Mitigation Strategy will enable the Strategy to be reviewed.

2.4 The objective of the Strategy is to provide a mitigation framework that enables new development of varying scales, which might otherwise have a significant effect on the SAC, either alone or in combination, to come forward. It offers a mechanism by which planning applications can be progressed and site allocations can be included in Development Plans, while ensuring that adverse recreational effects on the integrity of the SAC are avoided.

2.5 The Strategy is relevant to all new developments within the Zols that may either alone or in combination with other developments, plans and projects, increase recreational impacts on the SAC. The relevant development types are listed in more detail in section II, but include net increases in overnight accommodation (new dwellings, tourist accommodation, student accommodation, Gypsy and Traveller sites etc). The Strategy covers both larger developments that by virtue of their size or location may have the potential to directly affect the integrity of the SAC on their own or smaller developments, which may, together with other developments have an “in combination” impact on the SAC.

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<sup>1</sup> <https://sac.jncc.gov.uk/site/UK0016372>

### 3. Background

3.1 The three Local Authorities are in the process of either updating/reviewing their Local Plans or in the case of Swindon producing a new integrated Local Plan. This process is supported by Habitats Regulations Assessments of the plans, which highlighted that there could be Likely Significant Effects (LSE) on the North Meadow and Clattinger Farm SAC from increased recreational pressures due to new developments, either alone or in combination with other developments, plans and projects.

3.2 Natural England raised specific concerns about recreational impacts on the SAC. As a result of this Swindon Borough Council initiated the preparation of a visitor survey to take place in April 2020. This survey work was prevented by the pandemic. Land Use Consultants were commissioned to undertake a high-level literature review of the Zols of other comparable sites (September 2020), which concluded, based on the best available scientific evidence (and in the absence of visitor survey information) that an 8km Zol was appropriate. This was agreed by all the partner Local Authorities and NE as an interim Zol.

3.3 The Local Planning Authorities (LPAs) have used this 8km Zol in deciding whether planning applications should be subject to the Habitats Regulations Assessment processes. The new Zols (section 8) set out in this 2023 Strategy supersede the previous 8km Zol.

3.4 A visitor survey was commissioned by the Local Authorities in 2022 (lead Authority – Swindon Borough Council) and undertaken by the consultancy, Ecological Planning and Research (EPR) in 2022. A final report was submitted in March 2023. Further information is provided in section 7 of this Strategy.

## 4. Legislation

4.1 The key legislation is the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>2</sup> commonly referred to as the ‘Habitats Regulations’. Recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019) take account of the UK’s departure from the EU.

4.2 The government has provided additional guidance<sup>3</sup> on how the Regulations should be implemented.

4.3 In summary, the Local Authorities, as “competent authorities”, are legally obliged under the Habitats Regulations to consider whether any project or proposal, including planning applications or Development Plans would affect the integrity of an SAC. A project/proposal (e.g. approve a planning application, adopt a Local Plan) can only progress where the competent authority is certain that it will not lead to a negative impact on the ecological integrity of the SAC, i.e. the precautionary approach operates. This consideration is undertaken by a process called Habitats Regulations Assessment (HRA), which is divided into a number of steps – screening, appropriate assessment and derogations.

4.4 At the appropriate assessment stage of the process, the competent authority considers any mitigation measures, where there is evidence to show that their implementation would prevent negative impacts on the integrity of the SAC. By providing a package of mitigation measures delivered by the authorities, the strategy avoids the need for individual planning applicants to prepare bespoke mitigation proposals. This particularly assists small scale developments. Through appropriate contributions to this strategic approach, the measures set out in the North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy (2023) can be implemented. This provides a robust and comprehensive consideration of the avoidance and mitigation measures necessary to adequately prevent adverse recreational effects on the SAC.

4.5 A planning applicant may provide bespoke mitigation based upon their own evidence (usually in the form of a shadow HRA), however these require the advice of a specialist, can be expensive and time-consuming to prepare and may not be sufficiently evidence-based to show conclusively that they can be effectively implemented.

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<sup>2</sup> <https://www.legislation.gov.uk/ukksi/2017/1012/contents/made>

<sup>3</sup> <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>



## 5. North Meadow and Clattinger Farm Special Area of Conservation – Description, Nature Conservation Importance and Statutory Designations

5.1 The SAC is divided into two units –

- North Meadow near Cricklade
- Clattinger Farm near Ashton Keynes and Somerford Keynes.

5.2 Both lie within Wiltshire but very close or adjacent to the Gloucestershire and Swindon boundaries. (Appendix I)

5.3 North Meadow and Clattinger Farm are examples of lowland hay meadow. North Meadow is located in the Thames Valley and represents an exceptional surviving example of the traditional pattern of management of lowland hay meadows. The grassland habitats present on typical floodplain soils are very restricted in distribution and form the basis for the SAC designation. North Meadow also contains a very high proportion of the surviving UK population of snake's head fritillary *Fritillaria meleagris*, a plant highly characteristic of damp lowland meadows in Europe and now rare throughout its range. The snake's head fritillary is also present at Clattinger Farm in lower abundance.

5.4 Both North Meadow and Clattinger Farm are meadows within the Cotswold Water Park which is a largely man-made area of wetlands created by the restoration of sand and gravel workings. The Cotswold Water Park covers an area of 40 square miles with over 150 lakes of varying size. Prior to the exploitation of sand and gravel this area of the Upper Thames catchment was made up of floodplain grassland, river habitats and arable farming.

5.5 Management of both sites aims to maintain traditional hay-meadow regimes of hay cutting from midsummer, followed by grazing with livestock through the autumn and into the winter as ground conditions permit. This management allows plants to flower and set seed prior to hay cutting. Both sites, but in particular North Meadow, are regularly flooded by their adjacent watercourses such as the river Thames.

5.6 The qualifying features<sup>4</sup> / habitats for the SAC are –

Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

5.7 The conservation objectives<sup>5</sup> for the SAC (Natural England 2014) are –

With regard to the SAC and the natural habitats and /or species for which the site has been designated (the Qualifying Features) and subject to natural change:

Ensure the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintain or restoring:

- the extent and distribution of qualifying natural habitats
- the structure and function (including typical species) or qualifying natural habitats, and
- the supporting processes on which qualifying habitats rely

(In respect of the objectives, “to maintain” implies restoration if the feature is not currently in favourable condition.)

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<sup>4</sup> <https://sac.incc.gov.uk/site/UK0016372>

<sup>5</sup> <http://publications.naturalengland.org.uk/publication/6299293463871488>

5.8 North Meadow<sup>6</sup> is also a Site of Special Scientific Interest (SSSI), a National Nature Reserve (NNR) and part of the site is common land, where the public have a right of access on foot. (Appendix 2)

5.9 North Meadow NNR is open to the public and includes almost 4km of designated pathways around the site to facilitate access, including the Reedbed Walk, the River Walk and the Willow Walk. In addition to these the Thames Path, a 298km national trail, passes along the southern boundary of the SAC adjacent to the river. There is no official car park associated with North Meadow, but there is unrestricted on-street parking locally. North Meadow is also readily accessible on foot from the settlement of Cricklade.

5.10 More general information, including information for visitors can be found on the website for the Cricklade Court Leet.<sup>7</sup>

5.11 Clattinger Farm SSSI is managed by Wiltshire Wildlife Trust as a nature reserve.

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<sup>6</sup>

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002417&SiteName=North%20Meadow&countyCode=&responsiblePerson=&SeaArea=&IFCArea=>

<sup>7</sup> <https://crickladecourtleet.org.uk/>



## 6. Likely Significant Effects on the North Meadow and Clattinger Farm SAC

### Clattinger Farm

6.1 The Clattinger Farm SSSI component of the SAC is managed by the Wiltshire Wildlife Trust. Access to the area is through a visitor centre and is carefully managed by the Trust. At North Meadow, which is Common Land, the public have access on foot over the whole area, unlike at Clattinger Farm where the Trust can open and close areas and routes. The habitats at Clattinger Farm are not considered to be subjected to damaging recreational pressures at present and the site is therefore not considered further in this Interim Mitigation Strategy. The area will be subject to a low level of visitor monitoring as part of the Strategy to confirm the baseline levels of access and ensure that changes in visitor management at North Meadow do not impact upon Clattinger Farm.

### North Meadow

6.2 Natural England has highlighted that growing visitor numbers in recent years have led to an increase in recreational impacts at North Meadow and considers that the increase in visitors is driven by increases in local population as well as an increased propensity to visit the countryside.

6.3 The Site Improvement Plan<sup>8</sup> (2014) for the SAC includes under “Priority & Issue” - “Public Access/Disturbance”, with the measure to address this being -

- Manage and mitigate the effects of public access.

6.4 The action associated with this priority is –

- Seek to minimise the impact of high levels of trampling by the general public, especially during times when Snake's head fritillary is in flower

6.5 The types of potential damage from recreational pressures on grassland habitats can include –

- Trampling. This can lead to changes in vegetative communities and soil compaction, which reduce permeability to rain and floodwater (exacerbating flooding issues). The 3 main walks at North Meadow total approximately 4km of paths which equates to roughly 0.8ha (approximately 1.8% of the overall lowland meadow habitat) . The high footfall within these paths favours competitive grasses which are more tolerant of disturbance. Over time, the vegetative communities within the paths have become distinct from the rest of the meadow, reducing the area of lowland meadow. In addition, the vegetative communities adjacent to the paths differ from undisturbed areas of the meadow due the edge effect. Over time the paths are also likely to widen as walkers try to avoid muddy areas.
- Eutrophication / Nutrient enrichment from dog faeces. The current management regime helps maintain the intermediate fertility of North Meadow. Increased nutrient levels cause competitive grasses to dominate resulting in reduced species diversity. In particular, species such as the snake's head fritillary may reduce in abundance following excessive nutrient input.
- Litter
- Interference with hay production e.g. dog toys in the grassland; dog faeces in the grassland; flattened grasses.

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<sup>8</sup> <http://publications.naturalengland.org.uk/publication/4565167836758016>

- Interference with grazing e.g. free-roaming dogs
- Picking of flowers

6.6 North Meadow has been subject to a high level of botanical monitoring, however this has focussed on the core parts of the site and the most important species and habitats. The Floodplain Meadows Trust have carried out a number of surveys and further information is available on their website<sup>9</sup>. There is currently a lack of data related to the nature of the impacts of recreational pressure on the SAC, in terms of exact location, timing and long-term effects. A more detailed understanding of recreational pressure is required and monitoring to establish that evidence forms part of this Mitigation Strategy.

6.7 This Mitigation Strategy does not consider other potential impacts on the SAC such as air quality or nutrient enrichment from diffuse pollution.

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<sup>9</sup> <https://www.floodplainmeadows.org.uk/content/north-meadow-cricklade>

## 7. Visitor Survey Analysis

7.1 Consultants, Ecological Planning and Research, were commissioned by Swindon Borough Council on behalf of the Steering Group to undertake visitor questionnaire surveys in 2022. The surveys followed a recognised visitor survey methodology using tally counts and questionnaires. The visitor survey comprised surveys within two key windows: the 'peak' season in April/May 2022 when the snake's head fritillaries are flowering; and in July/August 2022, the 'off-peak' season, when the meadow had been cut.

7.2 The full report of the visitor survey is available on request to the 3 Local Authorities.

7.3 Key findings of the survey are:

- The majority of visitors travel from home to visit North Meadow;
- Approximately 7% of visitors to the site are on holiday
- The majority of visitors travel from within a 1km radius of North Meadow;
- Dog walkers are the most frequent visitors to the site, with the majority visiting at least once a week, throughout the year;
- Walkers represent another user group who visit the site on a regular basis throughout the year;
- During the 'peak' (i.e. flowering) season, an additional cohort of visitors visit the site to view the meadow and flowers, they travel longer distances to reach the site, but visit less frequently.

7.4 The EPR report recommended not including holiday accommodation users within the assessment of impacts. However, further consideration of the data has shown that the post code information for that visitor group was inconsistently answered. It has been concluded that there is insufficient evidence, adhering to the precautionary approach, to exclude this user group from requiring mitigation. New holiday accommodation is included within the scope of development types to which this Interim Strategy applies.

7.5 There are two key groups of visitors to North Meadow –

- Local year round users, often dog walking (arrive at site by car or on foot)
- Fritillary visitors (seasonal)

7.6 There are also users of the Thames Path and other types of users but they have been considered under the above two categories and only occur in very small numbers.

7.7 A number of other visitor surveys have been undertaken at North Meadow, for example the Ethos Visitor Survey<sup>10</sup> (2017) and their results are broadly consistent with the findings of the EPR 2022 visitor survey.

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<sup>10</sup> Ethos (2017). *DRAFT Visitor Survey. North Meadow, Cricklade National Nature Reserve*. Ethos, Wick.

## 8. Setting the Zones of Influence

8.1 The two groups of site users, the “local year round users” and the “fritillary visitors” come from different locations (distances from the SAC); exhibit different behaviours and have different reasons for visiting, it is therefore necessary to set two Zols, within which different forms of mitigation are appropriate.

8.2 Taking the distances visitors from the two groups travelled to reach the SAC, the data can be used to define the visitor catchment or Zone of Influence. The 75th percentile figure taken from a cumulative frequency distribution curve defines the distance from within which 75% of visitors have travelled to reach a site. Such a figure is typically used for catchment analysis in most SAC recreation mitigation strategies (Liley *et al.* 2013; Southgate *et al.* 2018). This is because it excludes the upper distances travelled by only a few visitors that skew calculated averages, providing a more representative understanding of travel patterns.

8.3 For consistency, travel distance is taken as the linear distance from the home postcode to the closest boundary of the SAC.

8.4 The two Zones of Influence have been set –

- Inner Zone (local users arriving on foot and by car all year round) is set at 0 - 4.2km from the boundary of the SAC. It represents the area within which 75% of local year round users originate. They visit the site all year round.
- Outer Zone (fritillary visitors) is set at 4.2 - 9.4km from the boundary of the SAC. It represents the area within which 75% of those that come to view the fritillaries during the main summer flowering season originate.

8.5 If the curtilage of a unit of accommodation and its point of access is located on the boundary between the 2 Zols, it will be considered to fall within the inner zone. If it falls on the outer boundary of the outer Zol it will be considered to fall within that outer zone.

8.6 Maps of the Zols can be found at Appendix 3.

## 9. Predicted local housing (and other relevant development) growth

9.1 Data on potential future housing growth and other relevant development types for the period 2023 - 2028 was provided by the three Local Planning Authorities, both allocated sites and potential windfalls.

Table 1. Potential Housing and other relevant development 2023 - 2028	
Local Planning Authority	Potential housing and other relevant growth 2023-2028 (number of units) within 9.4km of North Meadow
Cotswold District Council	486
Swindon Borough Council	300
Wiltshire Council	133
Total	919

9.2 These estimates of housing growth are approximate and a snapshot in time, but highlight the scale of growth requiring mitigation. If substantially more development comes forward than currently predicted, the mitigation proposals in the Strategy are scalable and would be able to deliver the required levels of mitigation to address any additional impacts, without the need to review the Strategy.

## 10. Proposed Mitigation Measures (and costs)

10.1 Recreational mitigation strategies have been used successfully at a number of internationally important sites across the UK to enable new developments to come forward without increasing recreational impacts. They usually include a suite of mitigation measures ensuring that if one measure is less successful there is certainty that the measures taken together as a package will deliver the required mitigation.

10.2 Mitigation measures normally include –

- On-site measures such as increased wardening/rangers; monitoring; signage etc. (often termed SAMMs – Strategic Access Management and Monitoring)
- Off-site measures such as new greenspaces (often called SANGs – Suitable Alternative Natural Greenspaces), enhancement of public rights of way etc. (known as “infrastructure mitigation projects” (IMPs)

10.3 Local year round users visit North Meadow as a location to walk their dogs and take exercise and would be likely to use an alternative(s) if that was available. However the summer visitors come to view the ecological interest of the site – the fritillaries, and the creation of an alternative site with such a rich flora would be extremely difficult, particularly within the 5 year period of this Interim Mitigation Strategy. Their impacts are best addressed by on-site visitor management mechanisms, which will also help to reduce the impacts of local year round users.

10.4 Given the differences between the users, a different range of mitigation measures will be required in each Zol.

- Within the inner Zol (0 – 4.2km) both on-site (SAMMs) and off-site (Infrastructure Mitigation Projects (IMPs) and/or SANG) measures will need to be delivered as mitigation for any potential recreational impacts.
- Within the outer Zol (4.2 – 9.4km), for most developments only on-site measures (SAMMs) will need to be delivered as mitigation for any potential recreational impacts. Larger developments may need to provide additional mitigation (e.g. SANG) as advised by NE.

## On-site measures (SAMMs)

10.5 These are relevant to all in scope developments within 0-9.4km of the SAC.

<b>TABLE 2.</b>			
<b>ON-SITE MITIGATION MEASURES (SAMMs)</b>			
<b>Relevant to all in scope developments within 9.4km of the SAC</b>			
<b>Theme</b>	<b>On-site mitigation measures</b>	<b>Likely cost over 5 years</b>	<b>Justification</b>
Staff	On site wardening – 0.75FTE for 5 years (site management; visitor management; raising public awareness, investigation of future mitigation measures (e.g. changes to car parking etc)	£170,000	Warden will work with local, year round users and “fritillary” visitors to interpret and explain the special biodiversity of the meadows and how they can avoid harming this during their visit. (Existing staff focus primarily on site management.)
Education and awareness	Social media strategy and online campaign	£10,000	Provide a regularly updated facility for promoting and explaining appropriate use of the SAC as well as promoting other natural greenspaces and circular walks to visitors and potential visitors in the 9.4km Zol to complement existing information.
	Information pack for new residents (and holiday makers); National Nature Reserve leaflet; DL-size flyer; walks information and countryside sites within 9.4km of the SAC	£2,000	Inform residents in new homes (and holiday homes) about nearby alternative countryside sites and walks and how to visit the countryside without harming biodiversity
	Develop Code of Practice during flowering period to be printed on DL, two sides in colour with QR code	£3,000	A simple message for visitors at peak flowering period to encourage behaviour which does not harm biodiversity
Infrastructure	Temporary walk boards at muddy points	£1,500	Managing the visitor pressure when the meadows are wet during peak visitor period to avoid trampling, widening paths and invasive plants



	Temporary signage during flowering period	£5,000	Encouraging visitors to avoid harm to the SAC during the peak flowering period
	Dog waste bins near entrance to North Meadows – 2 bins (including maintenance)	£6,000	Reducing and avoiding the concentrated enrichment of the site by dog faeces
Monitoring	Visitor surveys e.g. 'Winter' survey monitoring – early and late day winter survey	£20,000	This is to provide certainty that the Strategy is delivering suitable mitigation during the interim period and resolve some aspects of visitor evidence.
	Annual visitor counts data and reporting (annual fee x 5 years)	£15,000	Natural England manage remote data loggers, the data collected needs to be analysed and interpreted professionally on an annual basis to show visitor access levels.
	Habitat impact study to establish harm (baseline) and continued monitoring	£24,000	There are significant amounts of historic survey data, this will be reviewed against the adverse impacts on the SAC and used to confirm/adjust ongoing monitoring priorities such as a Natural England path survey in 2023.
	Review of strategy evidence and a survey update to be undertaken in year 3	£40,000	This will present the monitoring data collected for use by the Steering Group and Councils.
	<b>TOTAL COST OF ON-SITE MITIGATION MEASURES OVER 5 YEARS</b>	<b>£296,500</b>	
	<b>PREDICTED NUMBER OF UNITS OF RELEVANT NEW DEVELOPMENT WITHIN 9.4KM OF NORTH MEADOW</b>	<b>919</b>	
	<b>FINANCIAL MITIGATION CONTRIBUTION COST PER UNIT</b>	<b>£323</b>	total cost of on-site mitigation measures over 5 years divided by predicted number of units of relevant new development within 9.4km of North Meadow

10.6 All costs to be reviewed annually by the Steering Group so that costings can be amended in the light of inflation (CPI measure) and other pressures. All measures undertaken will be sensitive to protected characteristic groups, including particularly disability and age with published online / offline material in accessible formats and physical site accessibility suitable for all users.

10.7 The cost of delivering these mitigation measures over the five year period of the Interim Mitigation Strategy should be shared by all relevant developments coming forward. The housing and other relevant new development predictions in section 9 have been used to calculate a per unit cost.

10.8 Given these SAMM costs and that an estimated 919 units of accommodation will come forward in the next five years, the cost per unit is £323 to ensure effective mitigation of potential impacts.

### Off-site Measures (SANGs/IMPs)

10.9 These are relevant to all in scope developments within 4.2km of the boundary of the SAC.

10.10 In line with recreation mitigation strategies prepared for other SACs, large scale developments of 50+ residential/holiday units will normally be expected to provide sufficient natural recreational focussed greenspace to ensure that residents do not impact upon the SAC. This natural green space provision should meet the requirements set out in Appendix 4.

10.11 For smaller scale developments (less than 50 units), where it would be difficult for planning applicants to provide their own SANGs an alternative solution will be necessary. This is to set up an Infrastructure Mitigation Projects system, to combine funds from developments to deliver measures that will encourage new and existing users of the SAC to use alternative sites. This is similar to the approach used in the Dorset Heathlands Mitigation Strategy<sup>11</sup> and elsewhere. This could include –

- The provision of new dedicated dog training/exercising sites (where dogs can be safely let off the lead)
- Improvements of existing and creation of new footpaths
- Enhancements/extensions of existing public recreational natural open spaces or creation of new ones.

10.12 Given the interim nature of this Strategy and the current lack of certainty on what proposals might come forward as infrastructure mitigation projects, it is difficult to exactly estimate the costs. As a surrogate for that detailed costing an estimate has been made based on work done on the Thames Basin Heaths SAC<sup>12</sup> where it was concluded that 8ha of Suitable Alternative Natural Greenspace should be provided per 1000 people, using an estimate of 2.4 people per dwelling<sup>13</sup>. Using government figures<sup>14</sup> for 2019 with an approximate agricultural land value set at £25,000/ha that results in a figure of £480/unit of accommodation.

10.13 This figure should be reviewed when the next government land value figures become available.

<sup>11</sup> <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning/mitigation/heathland-mitigation#:~:text=Mitigation%20delivery,education%20and%20monitoring%20the%20strategy>.

<sup>12</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf>

<sup>13</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021>

<sup>14</sup> <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019>

10.14 Taken as a package of measures deliverable within a specified duration (5 years) Natural England has confirmed that these will provide sufficient certainty that development securing the mitigation measures may proceed and that where predicted housing delivery is exceeded the measures may be scaled up accordingly using the agreed contribution rates.

## 11. Implementation of Mitigation measures

11.1 The relevant Local Authorities will work together with Natural England to ensure that the Interim Mitigation Strategy is effectively and collaboratively implemented.

11.2 Given the nature of the impacts on the SAC, the following types of development are likely to cause detrimental impacts on the SAC if they occur within one of the Zols –

- All residential units (i.e. C3 Use Class)
- Residential/holiday/guest annexes
- Houses in Multiple Occupation (sui generis);
- Residential institutions within the C2 Use Class where the residents are not severely restricted by illness or mobility;
- Student accommodation;
- Sites for Gypsy, Roma, Travellers and Travelling Showpeople;
- Tourist accommodation, including hotels, self-catering, caravan and touring holiday accommodation.

11.3 And any other type of development that may lead to an increase in visitors to the SAC.

11.4 It is crucial that any development that could, either alone or in combination, lead to increased recreational pressures on the SAC is subject to appropriate assessment and where necessary required to provide mitigation. The list of application types above is a guide. There may be instances where application types on the above list are not required to provide mitigation, for example replacement dwellings of similar size and for development types not included on the above list to be required to provide mitigation.

11.5 The exact type, scale and location of development and the level of mitigation required will need to be considered on a case by case basis even if a “standard approach” is normally adopted. (This is particularly relevant where developers are proposing to create their own SANGs or IMPs.) These considerations should be undertaken prior to the application determination stage, preferably as part of pre-application discussions. They will form part of any appropriate assessment, which must be completed prior to determination. If necessary, these considerations should be subject to discussion and consultation with Natural England<sup>15</sup>.

11.6 There is potential for large scale developments (those that trigger the EIA Regulations) in the outer zone (4.2 – 9.4km) to impact on the SAC in their own right, particularly where there are good transport links to the SAC. They will be required to contribute to the SAMM measures at the SAC but may also be required deliver SANGs, or enhanced Green Infrastructure.

11.7 The crucial test is whether the development can demonstrate that it avoids a risk of increasing recreational pressures on the SAC. Where it is unclear if large scale developments (outside the 9.4km Zol) would require mitigation, developers should enter into dialogue with the Local Planning Authority (LPA) and Natural England as early on in the design process as possible. Site specific IMP / SANG solutions may be required.

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<sup>15</sup> <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

11.8 Any SANG provision would normally be expected to meet the guidelines set out in Appendix 4.

11.9 Some types of development do not require planning permission from the Local Planning Authority. These include developments covered by prior approval, permitted development, permission in principle and technical consents. These developments must be compliant with the Habitats Regulations (Regs 75<sup>16</sup>-78) and cannot be implemented if the Habitats Regulations issues have not been resolved. The most straightforward way to achieve this is for the proposals to deliver the relevant avoidance and/or mitigation measures, as set out in this Strategy. The Local Planning Authority can enter into agreements (e.g. s.111 agreements) with anyone undertaking such developments. This will secure avoidance and mitigation measures in line with this Strategy, as appropriate

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<sup>16</sup> <https://www.legislation.gov.uk/uksi/2017/1012/regulation/75/made>

11.10 The financial contribution per unit is –

Table 3. Mitigation Financial Contributions			
Zone	SAMM contribution per unit	Infrastructure Mitigation Projects/SANG contribution per unit	Total financial contribution to delivery of the Strategy/ per unit
Inner zone (0 – 4.2km) Relevant developments under 50 units	£323	£480	£803
Inner zone (0 – 4.2km) Relevant developments over 50 units	£323	Normally provided within the development site ie SANG, see Appendix 4 for criteria.	£323
Outer zone (4.2 – 9.4 km) All relevant developments	£323	N/A (except for larger developments (eg those that trigger the EIA Regulations), which will be considered on a site by site basis)	£323
Outside 9.4km	N/A  (Except for larger developments (eg those that trigger the EIA Regulations), which will be considered on a site by site basis)	N/A  (Except for larger developments (eg those that trigger the EIA Regulations), which will be considered on a site by site basis)	N/A  (Except for larger developments (eg those that trigger the EIA Regulations), which will be considered on a site by site basis)

#### Securing developer contributions

11.11 Developer contributions can be secured using s.111 or s.106 agreements / unilateral undertakings with planning applicants. The Local Planning Authorities will also require planning applicants to pay an administrative charge for each legal agreement. Details are available on the websites of the Local Planning Authorities.

11.12 In order to ensure that the appropriate mitigation is delivered in a timely manner and that any adverse impacts on the SAC are avoided the developer financial mitigation contributions should be paid prior to determination (s.111 agreements) or prior to commencement (s.106 agreements).

11.13 Where zones of Influence for different Special Areas of Conservation or Special Protection Areas overlap it will be necessary to ensure mitigation for all relevant SAC/SPAs and contributions will therefore normally be necessary for each SAC/SPA, i.e. a development may have to pay SAMM and SANG/IMP contributions for more than one SAC/SPA.

## 12. Governance

12.1 Each Local Planning Authority (LPA) will be responsible for securing developer contributions and ensuring that they are spent on the relevant mitigation as set out in the Mitigation Strategy. Details on the practical implementation of the mitigation strategy will be established through implementation guidance to include: financial procedures, interest and banking mechanisms, charges for administrative tasks and other monitoring costs.

12.2 The LPAs and Natural England will form a North Meadow and Clattinger Farm Special Area of Conservation Interim Recreation Mitigation Strategy Steering Group to further develop governance arrangement including terms of reference and a set of implementation guidance. This group will meet regularly and collaborate on the implementation of the Strategy. This Group will also be responsible for -

- up-dating the costs set out in the Strategy on a regular basis
- confirming the work plan and priorities for the Warden post
- reviewing the success of the Strategy
- amending the Strategy on an interim basis if major issues arise
- planning for a more long-term Mitigation Strategy
- setting up a monitoring framework.

## 13. Strategy Monitoring and Review

13.1 This Strategy has been designed as an interim solution until such time as more monitoring and analysis has taken place to clarify the types and location of visitor pressures. The Strategy will be subject to –

- Brief annual review by all partners to ensure no major issues have arisen e.g. sudden increase or decrease in housing figures; inflationary changes to costs of mitigation etc
- Full review in year 3 to ensure new long-term Strategy in place for 2028 onwards.

## APPENDICES

### Appendix 1

Map to show general location of North Meadow and Clattinger Farm

### Appendix 2

Map to show boundaries of SAC, SSSI, NNR and common land at North Meadow

### Appendix 3

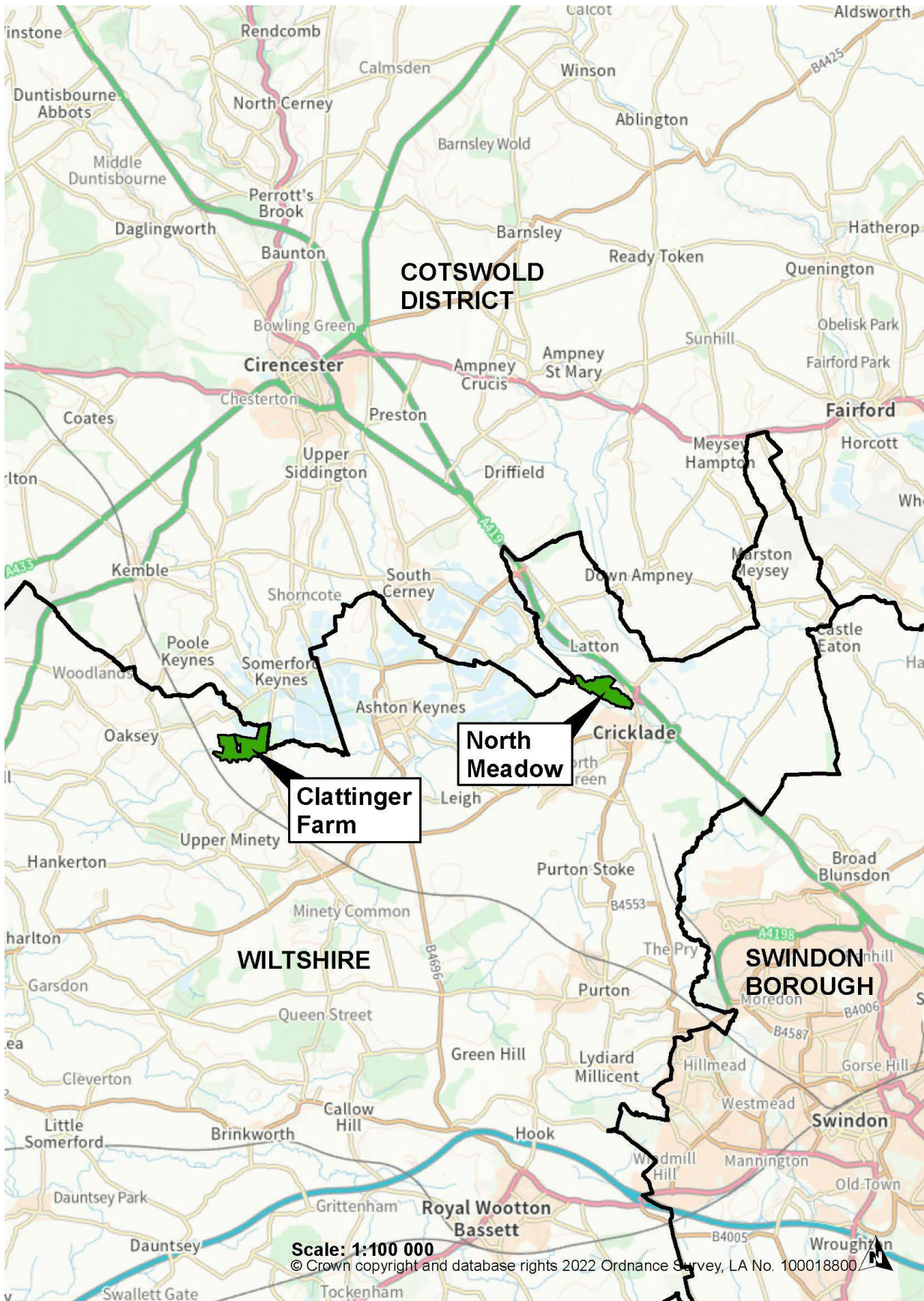
Map to show the two Zols and the administrative boundaries

### Appendix 4

Guidelines for Developer delivered SANGs



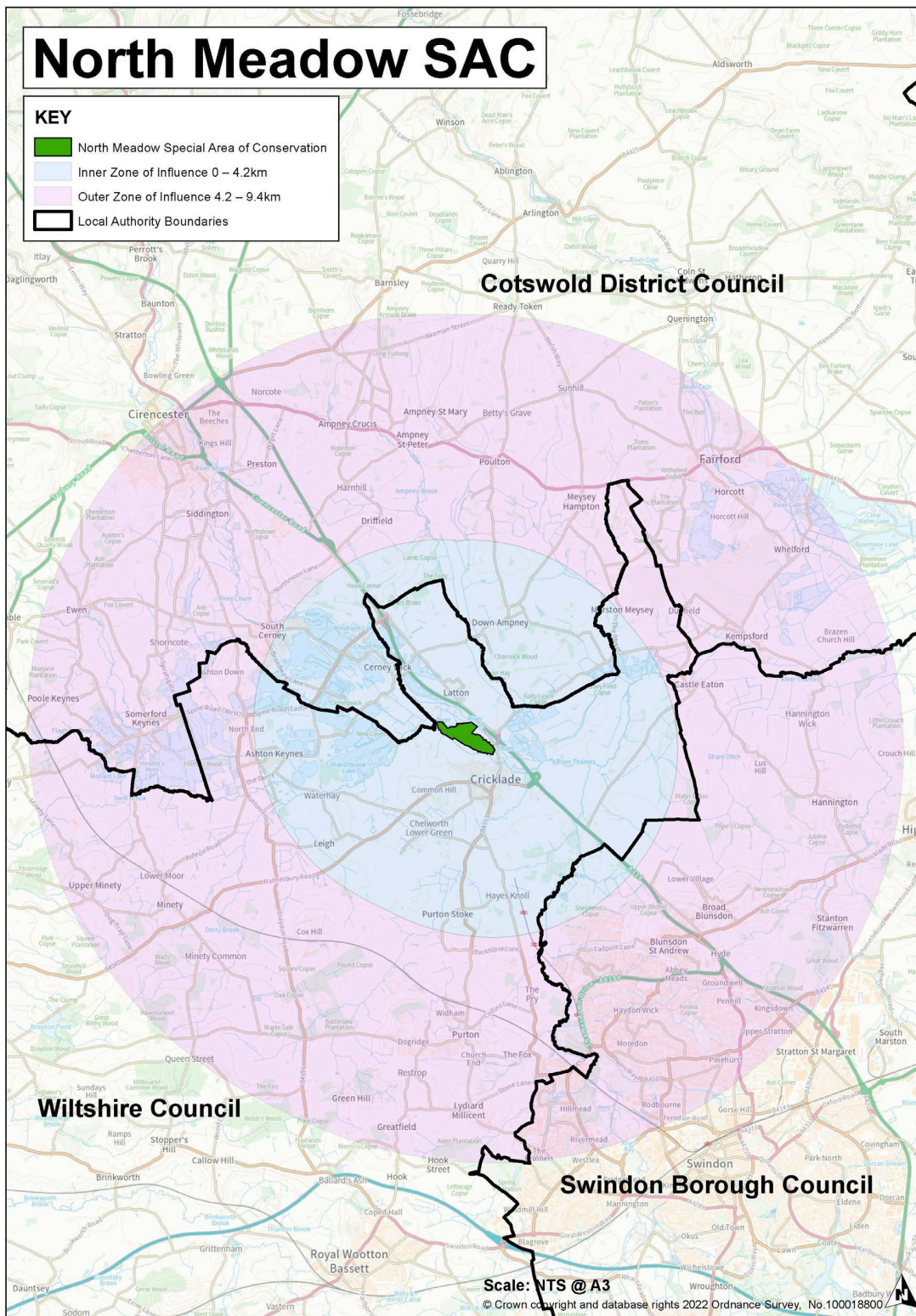
## Appendix I: Map to show general location of North Meadow and Clattinger Farm







**Appendix 3: Map to show the two Zols and the administrative boundaries**



## Appendix 4: Guidelines for Developer delivered SANGs

For developments of over 50 units within the inner ZOI (0 – 4.2km) developments will be expected to provide their own SANG unless there is a robust justification why a financial contribution towards the IMP/SANG project system as set out in the Mitigation Strategy, would be more appropriate.

Where developers are delivering SANGs as part of their own developments, the mitigation they deliver should aim to encourage local year round (both existing and potential new) users away from North Meadow by providing suitable functional and accessible greenspace. These are to be considered as guidelines and each site requiring a SANG will need to be assessed on a case by case basis, early engagement with the planning authority and Natural England will be welcomed.

The SANGs should –

- Be suitable and attractive to walkers and dog walkers (for example including areas where dogs can be walked off-lead, access to drinking water for dogs, dog poo bins etc.)
- Provide for visits of 30 - 60 minutes in duration, with at least 1.6km of walking distance, i.e. be of a reasonable size (North Meadow is 44 ha/108acres)
- Provide a high quality landscape
- Deliver a biodiversity quality that is above that in the wider countryside and which is visually attractive
- Be well promoted among existing and new residents and other users
- Provide appropriate on-site facilities including surfaced paths, litter bins, signage etc
- Provide good on-site facilities, such as benches, parking, surfaced paths and signage
- Deliver an area of functional natural greenspace at a quantum in line with 8 ha / per 1000 residents. (sports fields, play areas etc would not count towards this figure)
- If the SANG includes areas of existing natural greenspace or footpaths the current usage should be measured and taken into account in estimating the quantum of natural greenspace required
- Provide easy (and preferably traffic free) access from the units on the development site
- Not be subject to long periods of extensive flooding or other issues that may prevent use at certain times of the year.
- Not include areas of existing biodiversity value, such as Local Sites (nature conservation) or County Wildlife Sites, which could be adversely affected by increased recreational use
- Be provided in perpetuity or at least for the lifetime of the development (generally 80 years).