

Date: 17 September 2024  
Our ref: 486539  
Your ref: PA/2023/1124



Ed Senior  
North Lincolnshire Council  
Business Development  
Church Square House  
30-40 High Street  
Scunthorpe  
DN15 6NL  
[planning@northlincs.gov.uk](mailto:planning@northlincs.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

## BY EMAIL ONLY

Dear Ed Senior,

**Planning consultation:** Planning permission for the development of 599 dwellings and lake, along with associated infrastructure, including landscaping, public open space and play area, pedestrian and cycle links, pumping station and sub-station.

**Location:** Lincolnshire Lakes, Land east of M181 and north of Burringham Road, Scunthorpe.

Thank you for your consultation on the above dated 27 August 2024. We advise this advice letter is read alongside our previous advice letter dated 07 February 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### SUMMARY OF NATURAL ENGLAND'S ADVICE

#### FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Humber Estuary Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), and Ramsar. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following further information is required:

- Further assessment of loss and/or disturbance to functionally linked land associated with the Humber Estuary Ramsar/SSSI, including wintering/passage bird surveys.
- Further assessment of potential recreational disturbance impacts to the Humber Estuary SAC/Ramsar/SSSI.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

## THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)

### Additional information required

#### Functionally linked land

##### *Wintering/passage bird surveys*

In our previous advice letter dated 07 February 2024, and subsequent email dated 22 May 2024, we advised the following information was obtained to support the Habitats Regulations Assessment (HRA).

- Wintering and passage bird surveys to determine bird usage of the fields within and surrounding the proposed development site by Ramsar species. We recommend that the surveys follow the Vantage Point Survey methodology detailed in Annex C.

We note that the current consultation relates to a Lincolnshire Lakes Wintering Bird Survey report (dated 13 August 2024), which was uploaded to the planning portal on 27 August 2024. We note that the surveys detailed in this report do not cover the proposed development site, as stated in 1.1, 2.1, 4.6, and 4.7 and demonstrated in Figure 1 (site map). The report states that the habitat at the proposed development site is considered comparable to the habitat at the areas surveyed and suggests that these surveys are therefore sufficient for assessing whether the proposed development site comprises functionally linked land. However, Natural England do not consider that the surveys undertaken for the blue line area indicated in Figure 1 (and therefore outside of the red line boundary for the proposed development), are applicable for assessing whether the proposed application site is functionally linked to the Humber Estuary Ramsar.

As noted in our email dated 22 May 2024, we welcome that spring passage surveys have been completed for the proposed development site (March and April 2024), however, we continue to advise that full wintering/passage surveys are required to determine whether the site is functionally linked to the Humber Estuary protected sites. Please refer to Annex C (attached to this consultation response email) for further information around our recommended survey methodology.

##### *Desk-based assessment*

Alongside passage/wintering surveys as detailed above, we provided advice in our response dated 07 February 2024 around the records centre data desk-based assessment carried out in the shadow HRA. We note that further clarification around these points has not yet been provided and advise that this should be provided alongside the additional survey assessment above. Please find these comments again below:

- Natural England notes that two records centres – LERC and NEYEDC – were referred to in the shadow HRA, with the NEYEDC bird records only referred to regarding two species in Table 6: European golden plover and Bar-tailed godwit. This is inconsistent with the information given in Section 3.3 of the Shadow HRA, where it states that NEYEDC found records of three species: Eurasian Marsh Harrier, Ruff, and Common Redshank. Natural England advises that justification for the intermittent use of these two records centres and clarity on the source of records is provided.
- Natural England notes that the Shadow HRA finds it unlikely that large numbers of golden plover will use the site, despite the habitat being suitable, due to the enclosed nature of the site. Natural England disagrees with this reasoning due to the large size of the proposed development site.
- Natural England notes that no bird records were referred to for the waterbird assemblage in the shadow HRA and advises that this information is required to inform the HRA.

## Recreational disturbance

We note that further assessment of recreational disturbance has not yet been provided and advise that this should be provided alongside the additional assessment above. Please refer to our advice 07 February 2024 again below.

Natural England notes that the proposed development is approximately 2.5km from the Humber Estuary Special Area of Conservation (SAC) and Ramsar site. This planning application is part of allocation SS7 of the emerging 2020 – 2036 North Lincolnshire Local Plan. Due to the application site falling within the Zone of Influence for recreational disturbance impacts on the designated sites, we advise that it is not possible to rule out likely significant effects from potential recreational pressure / disturbance impacts to the Humber Estuary SAC / Ramsar at the screening stage of the HRA. An appropriate assessment should therefore be undertaken to further assess recreational disturbance impacts, with any relevant mitigation measures included where appropriate.

If a Suitable Alternative Natural Greenspace (SANG) is being proposed to mitigate for recreational disturbance impacts, we advise that Natural England's SANG guidance (attached alongside this letter) should be considered in designing a SANG. This guidance has been produced since the Local Plan was adopted. It should be noted that this document is specific to the SANG creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Such provisions can help minimise any predicted increase in recreational disturbance/ pressure by containing the majority of recreation within and around the development site boundary away from the European site.

As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas of 8 ha per 1000 population.
- Circular dog walking routes of 2.3 - 2.7 km within the site.
- Signage/information leaflets to promote these areas for recreation.
- Dog waste bins.
- A commitment to the long-term maintenance and management of these provisions.

## Air quality

We note that the Local Planning Authority's ecologist has provided updated comments on air quality dated 01 July 2024. This confirms that "...the project would not create a predicted change of daily traffic flows of 1,000 AADT (Annual Average Daily Traffic) or more, either alone or in combination with other plans or projects, at Keadby Bridge (A18) or Burringham Road". We therefore concur that impacts resulting from air quality on the Humber Estuary SAC, Ramsar or SSSI can be ruled out, and we have no further comments to make in relation to air quality.

## **WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)**

### Humber Estuary Site of Special Scientific Interest (SSSI)

Natural England notes that the application site is located in close proximity to Humber Estuary SSSI. Natural England considers that the proposed development could have potential significant effects on the interest features for which the sites have been notified. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. Our advice regarding the potential impacts upon the Humber Estuary SSSI coincides with the advice set out above.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter, please contact me on [laura.tyndall@naturalengland.org.uk](mailto:laura.tyndall@naturalengland.org.uk).

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely,

Laura Tyndall  
Yorkshire and Northern Lincolnshire Area Team  
Natural England

## Annex A –Natural England general advice

### Protected Landscapes

Paragraph 182 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/11/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

### Wider landscapes

Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapeinstitute.com/resources/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

### Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/complying-with-the-biodiversity-duty) for further information.

### Designated nature conservation sites

Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/sites-of-special-scientific-interest-public-body-responsibilities)).

### Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities](https://www.gov.uk/government/guidance/protected-species-and-development-advice-for-local-planning-authorities)

[gov.uk](https://www.gov.uk) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/wildlife-licences-when-you-need-to-apply) for more information.

### **Local sites and priority habitats and species**

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/local-nature-recovery-strategies) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-and-species-of-principal-importance-in-england) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.gov.uk/guidance/brownfield-hub-buglife) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/dataset/open-mosaic-habitat-draft) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

### **Biodiversity and wider environmental gains**

Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/guidance/national-planning-policy-framework) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

For further information on the timetable for mandatory biodiversity net gain, we refer you to [Biodiversity Net Gain moves step closer with timetable set out - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain-moves-step-closer-with-timetable-set-out). [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric - JP040 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/our-work/our-approach-to-nature/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

### **Ancient woodland, ancient and veteran trees**

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Best and most versatile agricultural land and soils**

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### **Green Infrastructure**

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

### **Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

## **Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) – August 2021**

### **Introduction**

‘Suitable Alternative Natural Greenspace’ (SANG) is the name given to green space that is of a quality and type suitable to be used as avoidance within the Thames Basin Heaths Planning Zone.

Its role is to provide alternative green space to divert visitors from visiting the Thames Basin Heaths Special Protection Area (SPA). SANG are intended to provide avoidance measures for the potential impact of residential development on the SPA by preventing an increase in visitor pressure on the SPA. The effectiveness of SANG as mitigation will depend upon the location and design. These must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.

This document describes the features which have been found to draw visitors to the SPA, which should be replicated in SANG. It provides guidelines on

- the type of site which should be identified as SANG
- measures which can be taken to enhance sites so that they may be used as SANG

It also covers the outputs of the recent Thames Basin Heaths Project 2021.

These guidelines relate specifically to the means to provide mitigation for significant impact arising from new housing within the Thames Basin Heaths Zone of influence. They do not address nor preclude the other functions of green space. Other functions may be provided within SANG, as long as this does not conflict with the specific function of mitigating visitor impacts on the SPA.

SANG may be created from:

- existing open space of SANG quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public
- existing open space, which is already accessible, but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SPA
- land in other uses which could be converted into SANG

The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan. These sites may require an ecological discount of their proposed SANG area.

SANG continue to need to be delivered in advance of any associated housing stock being occupied. They should also be funded for in perpetuity as is the current process.

### **The Character of the SPA and its Visitors**

The Thames Basin Heaths SPA is made up of 13 Sites of Special Scientific Interest, and consists of a mixture of heathland, mire, and woodland habitats. They are essentially ‘heathy’ in character. The topography is varied, and most sites have a large component of trees and some contain streams, ponds and small lakes. Some are freely accessible to the public and most have a degree of public access, though in some areas this is restricted by army, forestry or other operations.

Survey effort in 2005 showed that more than 83% of visitors to the SPA arrive by car, though access points adjacent to housing estates showed a greater proportion arriving on foot (up to 100% in one case). 70% of those who visited by car had come from within 5km of the access point onto the SPA. A very large proportion of the SPA visitors are dog walkers, many of whom visit the particular site on a regular (more or less daily) basis and spend less than an hour there, walking on average about 2.5km. Almost 50% are retired or part-time workers and the majority are women. Further detailed information on visitors can be found in the reports referenced at the end of this document. These figures have been supported in further SPA wide surveys, the most recent being in 2018.

### **Guidelines for the Quality of SANG**

The quality guidelines have been sub-divided into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from visitor surveys carried out at heathland sites within the Thames Basin Heaths area or within the Dorset heathlands. These are listed as references at the end of this document.

The principle criteria contained in the Guidelines have also been put into a checklist format which are contained in Appendix 1.

### **Accessibility**

**Most visitors come by car and want the site to be fairly close to home.** Unless SANG are provided for the sole use of a local population living within a 400-metre catchment around the site, then **the availability of adequate car parking at sites larger than 4 ha is essential.** The amount and nature of parking provision should reflect the anticipated use of the site by visitors and the catchment size of the SANG. It should provide an attractive alternative to parking by the part of SPA for which it is mitigation. **Car parks should be clearly signposted and easily accessed.**

New parking provision for SANG should be advertised as necessary to ensure that it is known of by potential visitors.

### **Target groups of Visitors**

This should be viewed from two perspectives, the local use of a site where it is accessed on foot from the visitor's place of residence, and a wider catchment use where it is accessed by car. **Most of the visitors to the SPA come by car and therefore should be considered as a pool of users from beyond the immediate vicinity of the site.** All but the smallest SANG should therefore target this type of visitor.

It is apparent from access surveys that a significant proportion of those people who visit the sites on foot, also visit alternative sites on foot and so this smaller but significant group look for local sites. **Where large populations are close to the SPA, the provision of SANG should be attractive to visitors on foot.**

### **Networks of sites**

**The provision of longer routes within larger SANG is important in determining the effectiveness of the authorities' network of SANG as mitigation.** The design of routes within sites will be critical to providing routes of sufficient length and attractiveness for mitigation purposes.

**Though networks of SANG may accommodate long visitor routes and this is desirable, they should not be solely relied upon to provide long routes.**

## Paths, Roads and Tracks

The findings suggest **that SANG should aim to supply a choice of routes of around 2.3 - 2.5km in length** with both shorter and longer routes of at least 5km as part of the choice, where space permits.

Paths have to be of a width acceptable to visitors.

**Paths should be routed so that they are perceived as safe by the users**, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well spaced mature trees, or wide rides with vegetation back from the path), especially those routes which are 1-3 km long.

The routing of tracks along hill tops and ridges where there are views is valued by the majority of visitors.

## Artificial Infrastructure

Little or no artificial infrastructure is found within the SPA at present apart from the provision of some surfaced tracks and car parks. Generally, an urban influence is not what people are looking for when they visit the SPA and some people undoubtedly visit the SPA because it has a naturalness about it that would be marred by such features.

However, **SANG would be expected to have adequate car parking with good information about the site and the routes** available. Some subtle waymarking would also be expected for those visitors not acquainted with the layout of the site.

Other infrastructure would not be expected and should generally be restricted to the vicinity of car parking areas where good information and signs of welcome should be the norm, though discretely placed benches or information boards along some routes would be acceptable.

## Landscape and Vegetation

**SANG do not have to contain heathland or heathy vegetation to provide an effective alternative to the SPA.**

Surveys clearly show that **woodland or a semi-wooded landscape is a key feature** that people appreciate in the sites they visit, particularly those who use the SPA. This is more attractive than open landscapes or parkland with scattered trees.

A **semi-natural looking landscape with plenty of variation** was regarded as most desirable by visitors and some paths through quite enclosed woodland scored highly. There is clearly a balance to be struck between what is regarded as an exciting landscape and a safe one and so some element of choice between the two would be highly desirable. The semi-wooded and undulating nature of most of the SPA sites gives them an air of relative wildness, even when there are significant numbers of visitors on site. SANG should aim to reproduce this quality.

**Hills do not put people off visiting a site**, particularly where these are associated with good views, but steep hills are not appreciated. **An undulating landscape is preferred to a flat one.**

Water features, particularly ponds and lakes, act as a focus for visitors for their visit, but are not essential.

## Restrictions on usage

The bulk of visitors to the SPA came to exercise their dogs and so it is imperative that **SANG allow for pet owners to let dogs run freely over a significant part of the walk. Access on SANG should be largely unrestricted, with both people and their pets being able to freely roam**

**along the majority of routes.** This means that sites where freely roaming dogs will cause a nuisance or where they might be in danger (from traffic or such like) should not be considered for SANG.

### **Assessment of site enhancement as mitigation**

SANG may be provided by the enhancement of existing sites, including those already accessible to the public that have a low level of use and could be enhanced to attract more visitors. The extent of enhancement and the number of extra visitors to be attracted would vary from site to site. Those sites which are enhanced only slightly would be expected to provide less of a mitigation effect than those enhanced greatly, in terms of the number of people they would divert away from the SPA. In order to assess the contribution of enhancement sites in relation to the hectare standards of the Delivery Plan, it is necessary to distinguish between slight and great enhancement.

Methods of enhancement for the purposes of this guidance could include enhanced access through guaranteed long-term availability of the land, creation of a car park or a network of paths.

SANG which have not previously been open to the public count in full to the standard of providing 8ha of SANG per 1000 people in new development. SANG which have an appreciable but clearly low level of public use and can be substantially enhanced to greatly increase the number of visitors also count in full. The identification of these sites should arise from evidence of low current use. This could be in a variety of forms, for example:

- Experience of managing the site, which gives a clear qualitative picture that few visitors are present
- Quantitative surveys of visitor numbers
- Identified constraints on access, such as lack of gateways at convenient points and lack of parking
- Lack of easily usable routes through the site
- Evidence that the available routes through the site are little used (paths may show little wear, be narrow and encroached on by vegetation)

### **Practicality of enhancement works**

The selection of sites for enhancement to be SANG should take into account the variety of stakeholder interests in each site. Consideration should be given to whether any existing use of the site which may continue is compatible with the function of SANG in attracting recreational use that would otherwise take place on the SPA. The enhancement should not result in moving current users off the SANG and onto the SPA. The specific enhancement works proposed should also be considered in relation not only to their effects on the SANG mitigation function but also in relation to their effects on other user groups.

## TBH SPA Mitigation Project – January 2021

The Hart, Rushmoor and Surrey Heath Councils worked together with Natural England to complete a project reviewing the approach to mitigation within the Thames Basin Heaths. The work analysed eleven potential alternative options when it comes to delivering SPA mitigation. The report concluded that the role and design of SANG could be clarified further.

To be made very clear from the outset. There remains a hierarchy of SANG provision. Great weight will be given to those SANGS meeting all the existing quality criteria (shown in Appendix 1) which should be delivered in the first instance. Only if this is **not possible, for clearly established reasons**, should the delivery of the options outlined in the section below be considered. If any proposed SANGS do not meet all of the Appendix 1 quality criteria, then these SANGS will continue to be assessed on a case by case basis and should be **agreed** with both the competent authority and Natural England. The proposal will need to demonstrate equivalent effectiveness of mitigation being provided to ensure a robust, consistent approach continues. Any shortfall in SANG criteria should be offset by other complementary means, such as an elevated provision rate, size or high-quality features.

The evidence shows that the use of SANG networks, linear orientated sites and small sites of no smaller than two hectares have potential to provide effective mitigation where traditional SANG is unavailable. These SANG areas will be linked and/or in proximity to an already established SANG. If effectiveness can be demonstrated of small or linear SANGs working alone, then we will assess this on a case by case basis, taking in to account the site's context amongst the wider greenspace network.

Historically Natural England have apportioned significant weight to the requirement for a 2.3 – 2.5km circular walk, which is less likely to be achievable in a small or linear SANG. These guidelines do not remove weight from the requirement but do accept that in specific circumstances the walk doesn't have to be included within every single SANG unit. It is however desirable to provide the full Appendix 1 criteria across a local SANG network or on another SANG.

Natural England would urge all Local Planning Authorities to take note, that this approach **could** enable sites previously deemed unacceptable to Natural England, to now qualify as valid avoidance measure. Please come and speak to us if you feel that is the case.

## Appendix 1: Site Quality Checklist – for a SANG

This guidance is designed as an Appendix to the full guidance on Suitable Alternative Natural Greenspaces (SANG) to be used as mitigation (or avoidance) land to reduce recreational use of the Thames Basin Heaths SPA.

### Must haves

- For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANG and the SPA.
- Possible to complete a circular walk of 2.3-2.5km around the SANG.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the visitor use the SANG is intended to cater for.
- The SANG must have a safe route of access on foot from the nearest car park and/or footpath/s
- All SANG with car parks must have a circular walk which starts and finishes at the car park.
- SANG must be designed so that they are perceived to be safe by users; they must not have tree and scrub cover along parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming to urban in feel.
- SANG must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANG larger than 12 ha must aim to provide a variety of habitats for users to experience.
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANG must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).

### Should haves

- SANG should be clearly sign-posted or advertised in some way.
- SANG should have leaflets and/or websites advertising their location to potential users. It would be desirable for social media to be used as well, with the goal of reducing paper use. Although a leaflet for a new home is desirable. It could advertise the TBH Partnership website at <https://www.tbhpartnership.org.uk/greenspace/>

### Desirable

- It would be desirable for an owner to be able to take dogs from the car park to the SANG safely off the lead.

- Where possible it is desirable to choose sites with a gently undulating topography for SANG
- It is desirable for access points to have signage outlining the layout of the SANG and the routes available to visitors.
- It is desirable that SANG provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water is encouraged and desirable on sites. However large areas of open water cannot count towards capacity.
- Where possible it is desirable to have a focal point such as a viewpoint, monument etc within the SANG.

## Appendix 2: Further clarification on the TBH Project 2021

Reliance on the length of circular walk could be given less weight in specific circumstances on individual SANG sites. A circular route is still required. This will be agreed on a case by case basis by Natural England and the relevant Local Planning (Competent) Authority and only where equivalence can be effectively demonstrated. Sites will also only be accepted where most of the other criteria from Appendix 1 are met, either individually or as part of a group of sites.

**Small SANG** – This will be no smaller than 2 hectares in size. Where possible all other Appendix 1 criteria should be met, and the site will be adjacent to, linked in an accessible manner to, or close to a SANG or network which can deliver the required circular walk. Small SANG should be available to residents on their doorsteps.

**Linear SANG** – This approach allows for the width of a SANG to be reduced, where the walk incorporates an attractive linear feature or links to other open sites. For example, alongside waterways or disused railway lines. Linear SANG should include sites with wider areas, creating irregular shapes and opportunities for dogs to exercise freely off lead. In exceptional cases a there and back walk could qualify. It would require strong evidence and visitor surveys to show that it will provide an avoidance experience like that of a traditional SANG. It would also be preferable for linear SANG to link with wider routes and/or other SANGs to provide opportunities for a variety of walks.

**SANG Network** – Where several SANGs are in proximity or adjacent, they can be used and visited as one single entity. This approach allows for the use of links between SANG units to deliver a circular walk and meet all the Guidelines in combination. The default position is that the SANG links would not count as having capacity or catchments but would need to be secured in perpetuity. If they happen to be a substantial unit of green space themselves then they could be included within the SANG calculation. The size of an individual SANG catchment can be increased depending on the area afforded by an overall SANG network (excluding links), in line with the quanta figures in the TBH Delivery Framework.

**Equivalence** – This will be required on all SANG sites not meeting the guidelines in Appendix 1. There will have to be an over provision of something else to offset the lack of the full circular walk. This would be likely to incorporate an increased provision rate, for example providing 12 hectares of SANG per thousand head of population. A significant high quality SANG in terms of amenities and habitats could also demonstrate this requirement. We are happy to discuss this matter further on a case by case basis, either through our DAS Service for developers or our Local Plan Service for Local Planning Authorities.

### Appendix 3: Suitable Alternative Natural Greenspace: A best practice guide

Natural England would urge that these recommendations are followed unless there is valid justification for a deviation.

A SANG can be greatly improved for visitors and wildlife by implementing some of the suggestions in this guide. They are based on Natural England's Strategic Access Management and Monitoring teams' findings from visiting SANG and undertaking visitor number and questionnaire surveys.

This guide has been produced to provide more advice to Local Planning Authorities and developers up front. These are features found throughout the current SANG suite that we feel have tangible positive impacts on the draw to a SANG. We understand that it may not be possible to adopt them all, especially in a smaller SANG. There are a lot of quick fixes in this list which will generate a substantial uplift in SANG attractiveness. Natural England are likely to raise fewer concerns through the formal planning process on a SANG which provides the majority of the following.

It is essential that Natural England visits and agrees a SANG, before any housing development can be attributed towards it. This is in line with Policy NRM6 of the South East Plan. For SANG development advice please contact Natural England's Discretionary Advice Service:

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

It is advisable to contact your local planning authority at the first instance of SANG development.

#### Naming of SANG:

1. Use a name which highlights any attractive features within the site. E.g. meadow, copse, lake etc.
2. Avoid the use of the word 'SANG' in the name of the site.
3. Keep the name relevant to the location but dissimilar to nearby SANG's.
4. The name is different to any associated development.

#### Location of SANG:

1. Where possible, provision of connectivity to wider greenspace/other SANG is recommended but should ensure a SANG does not result in new and additional access and visits to sensitive sites.
2. Seek to protect and enhance any existing local wildlife site designations (e.g. SSSI/SINC/SNCI) within or adjacent to the SANG boundary.

#### Biodiversity:

1. Ensure habitat of SANG complements adjacent habitats. e.g by extending similar landscape or something complementary such as grassland for foraging woodland birds.
2. Ensure appropriate connectivity of landscape scale habitat features. e.g. hedgerows, tree belts etc.
3. Include features such as; dead wood, sand banks, wildflower meadows etc.
4. Where open water is included, separate dog ponds and wildlife ponds. (Case study 4)
5. Avoid frequent mowing as a tool to manage grasslands, it is an expensive technique which produces little biodiversity benefit.
6. Grazing is a good management tool. It is not suitable for all SANG, but if it possible on your SANG, a route must be provided which avoids the grazing area for the benefit of those nervous of cattle.
7. Good practice monitoring of SANG use should be built into in perpetuity management of the site, and work consistently with the SAMM Project.

Biodiversity Net Gain (BNG) is an approach to land management and/or development that aims to leave biodiversity in a measurably better state than before. BNG does not change existing protections to protected sites, irreplaceable habitats or protected species.

Through appropriate design and implementation BNG can complement the purpose of SANGS. These are designed to provide more natural and diverse green space for communities to benefit from and, consequently, delivering more effective mitigation to alleviate pressure on SPAs. [SANG is not an automatic delivery mechanism for BNG but the two can exist on the same site. BNG on SANG is only attributable](#) to such habitat creation or enhancement that proves measurable additionality over and above the minimum requirements of the SANG, demonstrated through use of the Biodiversity Metric stipulated by the consenting body.

For BNG to be delivered on SANG, the SANG should achieve nature conservation outcomes that demonstrably exceed existing obligations under the SANG guidance, as quantified through the metric. It is encouraged that, where applicable, additional or enhanced features at SANGs are informed by local nature or wildlife strategies and priorities, such as Local Nature Recovery Strategies (LNRS). It is recommended that the BNG calculations for the SANG are done separately from the rest of the project calculations, in order to ensure a clear audit trail and allow for simple demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements. Any additional features provided for BNG purposes should not conflict with the principle purpose of the SANG. Consideration should be given for other ecosystem services provided by the SANG and design should ensure BNG does not compete with these but delivers alongside them. For example, a wildflower rich grassland area created for biodiversity benefits would provide additional ecosystem services but could potentially also conflict with recreational services provided by the SANG. Careful consideration should be given to the design of any additional biodiversity features introduced into the SANG to ensure they did not conflict with the SANGs principle purpose.

For the purposes of the BNG calculation, the baseline value of the SANG is the site with the Habitat Regulation key required habitat features incorporated. Enhancements should be additional to count towards BNG, in that the enhancements would not have taken place in the absence of the BNG funding (or commitment of funding) and the biodiversity benefit (as measured through the metric) should not also be claimed to compensate for another project's biodiversity impact. Further information on BNG is set out in the following guidance and standards

1. The CIEEM, CIRIA, IEMA Good practice principles for development should be followed: <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>
2. [The British Standard for Biodiversity Net Gain \(BS 8683\) is a process standard that describes the implementation of BNG by a project \(to be released in 2021\).](#)

Equality Act 2010 Compliance:

1. This does not fall under the remit of Natural England and we will not be giving bespoke advice about it during our pre application discussions. However, we urge developers and Local Planning Authorities alike to consider the requirements of it, when designing their SANG solutions.

Paths:

1. We are concerned about sections of the circular route that seasonally are wet, muddy or flooded, and could put visitors off from visiting. In these cases, we recommend boardwalk or paths are built up, for them to remain as compliant SANG. Relating to this, if applying grip to surfaces, avoid wire netting as it can trap dog claws.
2. Path surfacing needs to remain semi natural. The highest specification surface we would accept is resin bound hoggin.

3. Avoid convoluted paths and pinch points in SANG design. By maintaining a minimum width between paths of 100 m in open ground and 50 m in dense woodland.  
If necessary, look to extend the area of the SANG, or look at a local SANG Network.
4. Avoid paths running through areas adjacent to major infrastructure with prolonged loud noise. For example, adjacent dual carriageways or motorways. Natural England look at a maximum decibel limit of 60, before requiring discounting of SANG area.

#### Way-marking and signage:

1. Provide a map at the entrances with an easy to follow circular walk.
2. Gates, fencing and planting following natural land features can help distinguish routes.
3. Highlight points of interest and site history.
4. Car parks well sign posted using highways specification. Where possible through use of the brown sign initiative.
5. Provide contact details for site manager at main entrance.

#### Bins and dog fouling:

1. Dog bins should be in convenient sections of site and near the entrances.

#### Car park standard:

1. Provide a minimum of 1 parking space per ha.

#### Safety and security:

1. Where required for health and safety purposes, the SANG should have suitable access for emergency vehicles.
2. Car parks should be designed to reduce risk of anti-social behaviour, break in or feelings of vulnerability for site users.
3. Perimeter fencing secure to prevent dogs getting out.

#### Amenities:

These are **not a requirement** but have proved an attractive feature in those SANG with the space available.

1. A play area is a feature that attracts those with children to visit the site, as these are not present on the SPA. If a play area is included, it should be made from sustainable natural sources and not be full of bright plastics.
2. A café or food/drink provisions often attracts more visitors to the site. (Case study 4)

#### To conclude

We sometimes lose track of the basic requirement for a SANG, which is to attract people away from the SPA. When designing all SANG, the visitor experience needs to be put first. Costings and even habitat creation should all fall from a strong Visitor Strategy, which should form part of the SANG Management Strategy. Sites and their information should be created in a positive manner to interest visitors and have them coming back time and time again. Though biodiversity and landscape planning are obviously important, we urge you to start by considering the local populous and what they want and how they want to interact with your site, when creating a new SANG.

## Case Studies

1. Edenbrook Country Park – Hart District Council - Well surfaced paths, and provisions for wildlife.

Edenbrook is a 24-hectare country park, delivered by Berkeley in partnership with Natural England and Hart District Council.

The paths are sufficiently wide for a combination of site users (Figure 1). There is also a good network of surfaced paths which are not convoluted and avoids pinch points. This was historically agricultural fields, but through innovative design, they have delivered a site that delivers both for visitors but also for biodiversity. Hart District Council have recognised the SANG network approach here and are bolting on extra area to the SANG and linking to other SANG in the vicinity.



**Figure 1:** The surfaced paths at Edenbrook are located sufficiently far from one another, and from wildlife rich-areas. They are wide enough for the whole combination of site visitors to use.

## 2. Farnham Park – Waverley Borough Council - Provisions for dogs and wildlife.

Several of the ponds in Farnham Park are designated as wildlife ponds. These are rich in wildlife, hosting many amphibian and invertebrate species. Dead hedges were built around three of the ponds, using materials cut from Farnham Park. To provide water and an opportunity to swim, 'Friends Pond' has been kept fully accessible to dogs. It is located nearest the main entrance and is easily accessible to all visitors. The wildlife ponds are further away from the main entrance, where visitor density is expected to be lower.



**Figure 2:** 'Friends Pond' a dog pond on Farnham Park which allows dogs to swim and drink from, whilst other ponds are fenced to protect wildlife.

### 3. Bucklers Forest – Bracknell Forest Council Comprehensive and engaging interpretation.

At the entrance to the site, Buckler's Forest includes a map that shows 3 options for circular routes (measuring 3.6 km, 2.4 km and 1.3 km). It also includes information on the wildlife that visitors can expect to see on site. As well as this, it highlights the site history. The inclusion of such comprehensive signage encourages users to care more about the site.

Buckler's Forest has showcased its site history by incorporating green electrical boxes, retained from the transport laboratory, into the site design. These have been transformed into benches, bug hotels, and even mini 'museum' exhibitions. The integration of the site's history is beloved by many site visitors and it creates a distinctly 'country park' feel.



**Figure 3:** A mini 'museum' exhibition including some archaeological samples found on site. Located within a green electrical box present when the site was a transport laboratory.



**Figure 4:** A bug hotel also within a repurposed green electrical box.

4. Heather Farm – Delivered by Horsell Common Preservation Society in partnership with Woking Borough Council - Provision of amenities.

Heather Farm has proved to be a very popular SANG, particularly for of its amenities, including a café and a large car park. Whilst it is not possible, or advisable, to include a café on every SANG, at Heather Farm, it has attracted a lot of visitors, many of whom would otherwise visit the SPA. After identifying a need for additional parking provisions, Horsell Common Preservation Society added 57 new spaces to the car park. There are currently 109 car parking spaces for visitors. Heather Farm provides 4 spaces per hectare, significantly more than the suggested minimum of 1 space per hectare.



**Figure 5:** A view of some of the habitat creation at Heather Farm

5. Wellesley Woodlands – Rushmoor Borough Council - Waymarking and signposting.

Wellesley Woodlands has incorporated non-intrusive way-markers to clearly signpost users around the 8 trails included in the SANG. These are easy to follow for site users whilst remaining unobtrusive. Where multiple trails intersect, signposting is clear to ensure that trails can be followed with ease. Both the map and associated markers clearly identify those trails that are suitable ground for wheelchairs and those with restricted mobility.



**Figure 6:** A signpost clearly defining two all-ability trails, the Birch Trail and the Holly Trail.



**Figure 7:** A way-marker to signpost users along the Wellesley Willow Trail.

## 6. Biodiversity Net Gain

Examples of Biodiversity Net Gain delivered within a SANG:

- A. If an extra hedgerow was put into a SANG, not for screening purposes, this could count. If it is put in for screening reasons, this is a key SANG feature and therefore cannot count towards BNG unless the hedgerow was of higher distinctives than that needed for screening purposes or maintained in better ecological condition, in which case it could count.
- B. Planting wildflower bulbs on appropriately sited amenity grassland within a SANG and in turn converting it to species rich meadow could be counted towards BNG.
- C. If the SANG has structures such as a toilet block or café, then BNG could be delivered through the introduction of green/vegetated roofs and/or walls on such structures.

Potential Opportunities for Biodiversity Net Gain



By vegetating the roof of this structure at Farnham Park SANG, measurable additionality over and above the minimum requirements of the SANG has been demonstrated and it can therefore count towards the delivery of biodiversity net gain.

## Appendix 4: SANG Information Form

This form is designed to help you gather information about any potential SANG. For more guidance on the creation of SANG, please also refer to the relevant Borough Council's Thames Basin Heaths SPA Interim Avoidance Plan.

Natural England, Local Planning Authorities, and other organisations will then be able to consider the potential suitability of the proposed SANG based on this initial information.

### Background information

<b>Name and location of proposed SANG</b>	<b>Name:</b>  <b>Address:</b>  <b>Grid reference:</b>  <b>(Please attach a map of the site with the boundaries clearly marked)</b>
<b>Size of the proposed SANG (hectares), excluding water features</b>	<b>hectares</b>
<b>Any current designations on land - e.g. LNR / SSSI</b>	
<b>Current owners name and address. (If there is more than one owner then please attach a map)</b>	
<b>Who manages the land?</b>	
<b>Legal arrangements for the land – e.g. how long is the lease?</b>	
<b>Is there a management plan for the site? (if so, please attach)</b>	

## Current visitor arrangements

<b>Is the site currently accessible to the public?</b>	
<b>Does the site have open access?</b>	
<b>Has there been a visitor survey of the site? (If so, please attach)</b>	
<b>If there has been no visitor survey, please give an indication of the current visitor levels on site</b>	
<b>Does the site have existing car parking?</b>	<b>How many car parks?</b> <b>How many car parking spaces?</b> <b>(Please mark car parks and numbers of car parking spaces on the site map)</b>
<b>Are there any existing routes or paths on the site?</b>	<b>(Please mark these on the map)</b>
<b>Are there signs to direct people to the site? (Please indicate where and what type of sign)</b>	

## Site quality checklist

<b>Must/should have – these criteria are essential for all SANG</b>			
	<b>Criteria</b>	<b>Current</b>	<b>Future</b>
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)		
2	Circular walk of 2.3-2.5km		
3	Car parks easily and safely accessible by car and clearly sign posted		
4	Access points appropriate for particular visitor use the SANG is intended to cater for		
5	Safe access route on foot from nearest car park and/or footpath		
6	Circular walk which starts and finishes at the car park		
7	Perceived as safe – no tree and scrub cover along part of walking routes		
8	Paths easily used and well maintained but mostly unsurfaced		

9	Perceived as semi-natural with little intrusion of artificial structures		
10	If larger than 12 ha then a range of habitats should be present		
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead		
12	No unpleasant intrusions (e.g. sewage treatment smells etc)		
13	Clearly sign posted or advertised in some way		
14	Leaflets or website advertising their location to potential users		
15	Can dog owners take dogs from the car park to the SANG safely off the lead		
16	Gently undulating topography		
17	Access points with signage outlining the layout of the SANG and routes available to visitors		
18	Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable		
19	Focal point such as a viewpoint or monument within the SANG		

## **Annex C: Passage and wintering bird surveys for functionally linked land associated with the Humber Estuary and/or Lower Derwent Valley designated sites (Version 1.1, December 2021)**

### ***Background***

The below guidance is intended to inform assessments of proposed development sites in proximity to the Humber Estuary and/or the Lower Derwent Valley designated sites only, where potential impacts from loss of/disturbance to functionally linked land (FLL) have been identified, for example due to presence of suitable habitat (such as arable land/grassland or open waterbodies) and/or relevant bird records and/or local knowledge.

Natural England recommends that surveys are undertaken of the site and surrounding fields to provide an overview of bird usage during wintering and spring/autumn passage periods.

We recommend that the surveys are carried out in line with the following best practice guidance. Where alternative approaches are used, clear justification should be provided.

Please note that recommended survey periods, frequency and design may differ for sites located within the boundaries of Humber Estuary or Lower Derwent Valley designated sites, or in proximity to other designated sites. Please contact Natural England in such cases.

### ***Survey periods and frequency***

Natural England recommends that surveys are completed at the following frequency:

- Autumn Passage – two surveys per month between August to October inclusive.
- Winter - two surveys per month between October to March inclusive.
- Spring Passage – two surveys per month between March - Mid-May inclusive.

We advise that spring and autumn passage surveys are completed (in addition to winter surveys) as the Humber Estuary and Lower Derwent Valley SPAs are important for species migrating between breeding and wintering sites. Further advice on seasonality for Humber Estuary SPA and Lower Derwent Valley SPA designated features can be found at [Designated Sites View \(naturalengland.org.uk\)](https://naturalengland.org.uk/designated-sites-view) and [UK9006092 Lower Derwent Valley SPA Published 14 Sep 2023 \(naturalengland.org.uk\)](https://naturalengland.org.uk/uk9006092-lower-derwent-valley-spa-published-14-sep-2023), respectively.

Weekly visits during the autumn and spring passage periods are recommended where birds are likely to be present in the migration period only, due to high turnover of birds during migration. Note that certain passage species, such as whimbrel associated with the Lower Derwent Valley SPA, may have specific survey requirements due to their migration behaviour. Please discuss such cases with Natural England.

Natural England recommends that two years of wintering and passage surveys should be completed in certain cases to provide a more robust understanding of SPA bird usage on the site and inform design of suitable mitigation, where relevant. This will depend on site-specific factors, for example where proposed development sites:

- are in very close proximity to the designated site/s; and/or
- have a large development footprint; and/or
- are expected/shown to have high bird sensitivity, especially where activity varies significantly between years; and/or
- existing bird records / expert advice demonstrates usage of the site by high numbers of SPA birds.

Please contact Natural England if you are unclear on whether two years of wintering and passage surveys are recommended for this proposal.

### ***Survey design***

Wintering/passage surveys should be designed to ensure that results are sufficient to provide a robust picture of distribution, abundance and regularity of use by waterbirds associated with the Humber Estuary and/or Lower Derwent Valley SPAs across the full extent of the proposed development site. Please refer to Annex B and/or Annex B1 for the non-breeding waterbird assemblage list for the Humber Estuary and Lower Derwent Valley SPA, respectively.

A detailed methodology should be included in the relevant report/s, including key information such as number of visits, date and time of visits, viewpoint locations and/or transect routes walked. The survey results should provide some understanding of how the birds use the site (for example, for roosting or foraging) as well as presence/ absence. We would expect to see commentary of birds landing and taking off within and outwith the development site. We also recommend recording birds in flight, particularly if the application may have the potential to affect bird flight lines.

Consideration should also be given to surveys in poor weather/ visibility conditions. Usual survey methodology is to avoid surveying in poor conditions due to potential reduced detectability of birds. However, use can vary in different weather conditions, so it may be helpful to carry on with surveys in poor weather. Weather conditions may affect the results of the surveys and therefore should be considered in assessing the robustness of the dataset.

In addition, details of wider weather conditions should be included, for example, where there may have been a particularly wet or cold season and this may change bird distribution across the area, due to frozen ground etc. Furthermore, a milder autumn may lead to wintering birds arriving later and vice versa in colder autumns.

The methodology should also consider whether the site has any seasonal features such as dips and low-lying areas that retain water at particular times, for example early in the season or in wet years. These areas may have importance for waders at these times, but if surveyed during a drier spell or where full passage/winter surveys have not been completed, it may be possible to underestimate the importance of the site.

For sites in close proximity to the Humber Estuary, the surveys should cover different tidal states. Use of sites closer to the estuary are more likely to be tidally influenced. For sites which may potentially affect high tide roosts, observations should be conducted from two hours before high tide to two hours after high tide. For sites where there are high tide roosts, it may be beneficial to have a series of counts at different heights of tides ("through the tide counts"), as some sites are only used on Spring tides and others are only used on Neap and low tides.

For sites in proximity to the Lower Derwent Valley, the surveys should cover different times of day and different flooding states in the valley. For example, during certain winter periods, the designated site may be extensively flooded and therefore usage of surrounding functionally linked land may be higher for wading birds.

The surveys should cover open arable land/grassland and any waterbodies within the proposed site boundary, as well as land adjacent to the development that could be affected and provides the potential to support designated site species. Where a site is adjacent to the Humber Estuary designated site, additional considerations may be required, for example

ensuring adequate surveys of intertidal habitats. Please contact Natural England in such cases.

Surveys may also need to take account of surveys at dusk and dawn, depending upon the bird species (i.e. geese and swans). If geese and swans have the potential to use the development site or surrounding area, we would expect to see surveys 1 hour before and 1 hour after, dusk and dawn during the respective bird survey season (i.e. winter, spring and autumn passage (as above)). These surveys should be in addition to the standard daytime survey but can be carried out on the same day. For example, a dawn survey to count geese or swans at their night-time roost could then extend into a survey of daytime use of fields for foraging.

Natural England generally recommends that observations from vantage points (VP) are used. VP surveys are considered preferable to walkover surveys for observing behaviour of birds on the ground (i.e., whether they are foraging/loafing etc.), and to minimise the risk of flushing birds due to movement of a surveyor during a walkover survey. Also, birds which may otherwise have landed in the field during the survey period may be unlikely to do so with the presence of a moving surveyor. If landscape features mean it is not possible to avoid walking through part of the survey area to get from one point count to another, this should be noted and the reaction of any birds present recorded, including any that are flushed.

Further guidance on vantage point surveys can be found at [Recommended bird survey methods to inform impact assessment of onshore windfarms | NatureScot](#). Natural England recognises that the NatureScot VP guidance is written for impacts associated with wind turbines. However, Natural England considers that the survey guidance detailed in Section 3.7 provides an appropriate methodology to identify distribution and abundance of birds to inform the assessment of other developments. We acknowledge that some of the information regarding the required watch hours and height considerations etc will not be relevant in the context of other developments. Therefore, site-specific considerations should be taken into account when designing the survey methods.

Where VP surveys are not considered appropriate for a particular site, clear reasoning and justification regarding the alternative survey methods undertaken should be provided.

Natural England has generally advised that if  $\geq 1\%$  of a Humber Estuary bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly vulnerable due to declines in the Humber population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.

### *Nocturnal surveys*

Wader and waterfowl usage of arable land/grassland outside designated sites can be substantially different at night. Therefore, Natural England recommends nocturnal surveys are also carried out if waders and/or waterfowl have the potential to use the development site. These surveys should be in addition to the standard daytime surveys. We recommend that several visits should be completed to determine if the site and/or surrounding areas play a regular role in supporting SPA species at night. Night vision/infra-red equipment and survey on moonlit nights can establish presence of nocturnal species or presence and direction of feeding/migration movements both by calls and by sight<sup>1</sup>.

Guidance on nocturnal surveys can be found at [Nocturnal bird surveys | Bird Survey Guidelines](#). The nocturnal survey design should take this guidance into account, and the approach should be justifiable in the assessment. It should be noted that for most species nocturnal activity is likely to be underestimated in any attempted survey<sup>1</sup>.

---

<sup>1</sup> Scottish Natural Heritage: Recommended bird survey methods to inform impact assessment of onshore wind farms (March 2017- Version 2).