

Shadow Habitats Regulations Assessment (sHRA)

Land at Malmesbury Road, Cricklade

Mac Mic Strategic Land Limited

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Shadow Habitats Regulations Assessment
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1. Introduction

1.1. Background and Proposals

- 1.1.1. The report has been prepared by Ecology Solutions to undertake an assessment of the potential impacts of the Development Proposals at Land at Malmesbury Road, Cricklade hereafter referred to as the Application Site (see Plan ECO1), both alone and in- combination with other proposals on the relevant statutory designated sites.
- 1.1.2. Outline planning permission is sought for up to 315 dwellings with associated access and infrastructure including Suitable Alternative Natural Greenspace (SANG). All matters are reserved except for access. The position of the Application Site relative to European designated sites in the locality is shown on Plan ECO1. Information downloaded from the MAGIC website is included at Appendix 1.
- 1.1.3. Full details on the baseline conditions regarding habitats and protected species are provided within the Ecological Impact Assessment (10742.EcIA.vf, dated March 2026) and should be read in conjunction with this report.

1.2. Site Location

- 1.2.1. The Application Site comprises two parcels of land to the north and south of Stones Lane, in the west of the town of Cricklade. The Application Site comprises four grassland fields used as grazing pasture for cattle.

1.3. Purpose of the report

- 1.3.1. This report specifically assesses the potential significant effects of the Development Proposals on international / European designated sites (now referred to as 'Habitats Sites'). Within this document specific regard is had to the tests under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 63 is described and considered further at section two of this document, along with additional information relevant to the application of the legal tests and associated guidance.
- 1.3.2. Assessment under Regulation 63 of the Habitats Regulations is required in this instance, since the Application Site lies within the zone of influence identified within the relevant mitigation strategy for the North Meadow and Clattinger Farm Special Area of Conservation (SAC).
- 1.3.3. It should be noted that the screening for relevant designated sites has been undertaken with full regard had to the development plan and information published by Natural England. The proximity of the Application Site to these designated / classified sites is described in detail at section two of this sHRA.

- 1.3.4. As part of this assessment, professional judgement has necessarily been applied in some instances in order to interpret information.
- 1.3.5. In line with relevant jurisprudence, this report assesses the likely significant effects of the Development Proposals as a whole, both alone and in combination with other plans / projects. It then goes on to consider whether the development proposals will give rise to an adverse effect on the integrity of the relevant designated sites.
- 1.3.6. By way of headline summary, it is the opinion of Ecology Solutions, following detailed assessment, that the Development Proposals would not result in an adverse effect on the integrity of any European / international sites, either alone or in combination with any other plans or projects, and that as such the test contained at Regulation 63 of the Habitats Regulations would be passed.

2. Legislative Framework

2.1. Legislation and Relevant Case Law

2.1.1. The EC Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna (the 'Habitats Directive') and the EC Directive on the Conservation of Wild Birds (the 'Birds Directive') are relevant in this instance. These two Directives are transposed in UK legislation through the Habitats Regulations (2017).

2.1.2. The relevant Directives and UK legislation are discussed below.

Habitats and Birds Directives

2.1.3. Under the EC Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, commonly referred to as the Habitats Directive (Council Directive 92/43/EEC), Member States are required to take special measures to maintain the distribution and abundance of certain priority habitats and species (listed in Annexes I and II of the Directive). In particular each Member State is required to designate the most suitable sites as SACs. All such SACs will form part of the European network under article 3(1) of the Habitats Directive.

2.1.4. Article 2(3) sets out that member states have a duty, in exercising their obligations under the Habitats Directive to:

...take account of economic, social and cultural requirements and local characteristics.

2.1.5. Under the EC Directive on the Conservation of Wild Birds (the Birds Directive) (Council Directive 2009/147/EC, previously 79/409/EEC), Member States are required to take special measures to conserve the habitats of certain rare species of birds (listed in Annex I of the Directive) and regularly occurring migratory birds.

2.1.6. Each Member State is required to classify the most suitable areas of such habitats as SPAs. This is designed to protect wild birds, and to provide sufficient diversity of habitats for all species so as to maintain populations at an ecologically sound level. All Birds Directive SPAs are also part of the European network under article 3(1) of the Habitats Directive.

2.1.7. Thus, there is an obligation under the Habitats Directive and the Birds Directive for Member States to designate sites before turning to measures for their protection.

2.1.8. The protection afforded to SPAs is delivered through Article 6 of the Habitats Directive. Article 6(2) requires Member States to take appropriate steps to avoid the deterioration of natural habitats and disturbance of species for which the sites have been designated, in so far as the disturbance could be significant in relation to the objectives of the Directive. Article 6(3) and Article 6(4) require that a plan or project not directly connected with the management of the site, but likely to have a significant effect upon it, either individually or in combination

with other plans or projects, must be subject to an appropriate assessment of its implications on the site, in view of the site's conservation objectives.

- 2.1.9. Having undertaken an appropriate assessment, the competent authority may agree to a plan or project where it can be concluded that it will not adversely affect the integrity of the site. In light of a negative assessment on the implications for the integrity of the site, Article 6(4) provides that the plan or project may still proceed where it can be demonstrated that there are no alternatives and there are imperative reasons of over-riding public interest as to why it must proceed. In the event that a plan or project is to proceed on the basis of imperative reasons of overriding public interest, by direction of Article 6(4), compensatory measures must be put in place to ensure that the overall coherence of the European network is protected.

The Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.1.10. The Conservation of Species and Habitats Regulations 2017, commonly referred to as the Habitats Regulations, transpose the requirements of the Habitats Directive and Birds Directive (2009/147/EEC, previously 79/409EEC) into UK legislation. The Habitats Regulations aim to protect a network of sites in the UK that have rare or important habitats and species in order to safeguard biodiversity. The Habitats Regulations 2017 consolidate all the various amendments made to the Habitats Regulations 2010.
- 2.1.11. Under the Habitats Regulations, competent authorities have a duty to ensure that all the activities they regulate have no adverse effect on the integrity of any of the European sites (e.g. SPAs and SACs). Regulation 63 of the Habitats Regulations requires that:

63(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for a plan or project, which:-

is likely to have a significant effect on a European site or a European offshore marine site in Great Britain (either alone or in combination with other plans or projects) and

is not directly connected with or necessary for the management of the site,

shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

63(3) The competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority may specify.

63(5) In the light of the conclusions of the assessment, and subject to regulation 62, the authority shall agree to a plan or project only after having ascertained that it will not adversely affect the integrity of the European site.

63(6) In considering whether a plan or project will adversely affect the integrity of the site, the authority shall have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.

- 2.1.12. Regulation 63 of the Habitats Regulations therefore sets out a two-stage process. The first test is to determine whether the plan / project is likely to have a significant effect on the European site; the second test (if applicable) is to determine whether the plan / project will affect the integrity of the European site.

2.2. Case Law

- 2.2.1. Some key concepts of the Habitats Directive and Habitats Regulations have been clarified through case law. The most pertinent cases in relation to the Development Proposals are the Waddenzee Judgement¹, the Sweetman Cases² ³ the Holohan Judgement⁴, the Wealden Judgement⁵ and the Dutch Nitrogen Cases⁶ and the People Over Wind Judgement⁷.
- 2.2.2. Whilst the UK left the European Union on 31 January 2020, EU case law prior to this date will continue to be relevant for the purposes of assessment pursuant to the Habitats Regulations. However, relevant cases in the EU after this date will not be relevant to the UK.
- 2.2.3. Relevant case law has been considered and used to inform the potential impacts expected in relation to the proposed project. The key outcomes of these have been summarised below.
- 2.2.4. **Waddenzee Judgement** – A Competent Authority is required to undertake an Appropriate Assessment where there is a realistic possibility that a plan or project may have a significant effect on a European site. In circumstances of doubt, the obligation to carry out an Appropriate Assessment arises regardless.
- 2.2.5. **Sweetman Cases**– An adverse effect on site integrity may include the loss of part of a habitat where such loss would undermine the site's conservation objectives.
- 2.2.6. **Holohan Judgement** – The Appropriate Assessment must consider all aspects of the site's conservation objectives, including habitats or species not directly impacted by the plan or project but which are functionally linked to the site.
- 2.2.7. **Wealden Judgement** – The assessment must account for in-combination effects arising from other plans or projects, particularly where traffic emissions, air quality, or similar cumulative impacts are relevant to the site's integrity.

¹ C-127/02 Landelijke Vereniging tot Behoud van de Waddenzee & Another v Staatssecretaris van Landbouw ("Waddenzee") [2005] 2 CMLR 31 at [59]

² C-258/11 Sweetman v An Bord Plenala [2014] PTSR 1092 at [44]

³ C-164/17 Grace & Sweetman v An Bord Plenala at [51]

⁴ C-461/17 Holohan v An Bord Plenala [2019] Env LR 16 per AG Kokott at [30]

⁵ Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council, and South Downs National Park Authority [2017] EWHC 351

⁶ Coöperatie Mobilisation for the Environment UA and Vereniging Leefmilieu v. College van gedeputeerde staten van Limburg and College van gedeputeerde staten van Gelderland; Stichting Werkgroep Behoud de Peel v. College van gedeputeerde staten van Noord-Brabant (Joined Cases C-293/17 and C-294/17) [2018]

⁷ C-323/17 People Over Wind v Coillte Teoranta [2018] OJ C 200/19, CELEX: 62017CA0323

- 2.2.8. **Dutch Nitrogen Cases** – At the screening stage, a Competent Authority cannot rely on unproven or uncertain mitigation measures. The precautionary principle applies, and any mitigation relied upon must be certain and enforceable at the Appropriate Assessment stage.
- 2.2.9. **People Over Wind** – At the screening stage, a Competent Authority cannot take account of mitigation measures when determining whether a plan or project is likely to have a significant effect on a European site. Any mitigation can only be considered at the Appropriate Assessment stage, once the likely significant effects have been established.

2.3. National Planning Policy

National Planning Policy Framework (NPPF)

- 2.3.1. Paragraphs 187 to 195 of the National Planning Policy Framework (NPPF) (December 2024, as amended February 2025) are of direct relevance. Paragraph 187(a) makes reference to protecting and enhancing sites of biodiversity value “in a manner commensurate with their statutory status or identified quality in the development plan”. Paragraph 194 (and subsequent paragraphs) assert that potential SPAs, listed or proposed Ramsar Sites, possible SACs, and sites providing compensatory measures for adverse effects should be afforded the same level of protection as classified SPAs and designated SACs (referred to in the NPPF as ‘habitats sites’).

ODPM/DEFRA Circular (ODPM/DEFRA, 2005)

- 2.3.2. Guidance on the determination of whether an effect on a European designated site is likely to be significant, together with the scope of Appropriate Assessments and ascertaining the effect on the integrity, was previously provided within Circular 06/2005 “Biodiversity and geographical conservation – statutory obligations and their impact within the planning system” (DEFRA). The Circular originally accompanied Planning Policy Statement 9 (PPS9) and is referenced in the NPPF at footnote 68.
- 2.3.3. With respect to the significance test, the Circular states at paragraph 13 that:
The decision as to whether an appropriate assessment is necessary should be made on a precautionary basis.
- 2.3.4. The *Waddenzee* Judgement is specifically referred to at paragraph 13 of the Circular. With regard to the need to undertake an Appropriate Assessment; this is only required where it is not possible to conclude, on the basis of objective information, that the plan / project will not have a significant effect on the European site, either individually or in-combination with other plans / projects.
- 2.3.5. Paragraph 14 clarifies that, in considering the likely significance of an effect, the decision taker should assess whether the effect would be significant in terms of the site's Conservation Objectives.

- 2.3.6. Paragraph 15 clarifies the importance of assessing the likely significant effect on each of the interest features for which the site is designated.

- 2.3.7. Guidance on the scope of an Appropriate Assessment is provided at paragraph 17:

If the decision-taker concludes that a proposed development (not directly connected with or necessary to the management of a site) is likely to significantly affect a European site, they must make an Appropriate Assessment of the implications of the proposal for the site in view of the site's conservation objectives. These relate to each of the interest features for which the site was classified...The scope and content of an Appropriate Assessment will depend on the nature, location, duration and scale of the proposed project and the interest features of the relevant site. It is important that an Appropriate Assessment is made in respect of each interest feature for which the site is classified; and for each designation where a site is classified under more than one international obligation...

- 2.3.8. At paragraph 20 the definition of 'integrity' for the purpose of interpreting the tests contained within the Habitats Regulations is given as:

The integrity of a site is the coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.

- 2.3.9. The Circular includes a flow diagram setting out the series of steps Competent Authorities are required to take in considering proposals affecting internationally designated nature conservation sites (see Appendix 2). This was based on the information and flow charts given in guidance issued by the European Commission (European Commission Environment DG, 2001).

- 2.3.10. Paragraph 195 of the NPPF (December 2024, amended February 2025) states that:

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

- 2.3.11. Further guidance is available at the 'appropriate assessment' section of planning practice guidance on the GOV.UK website⁸. This largely summarises the requirements of an assessment, in light of the case law outlined above, with particular regard afforded to changes arising as a result of the *People over Wind* judgement.

⁸ Ministry of Housing, Communities and Local Government. *Guidance – Appropriate Assessment*. Available at: <http://www.gov.uk/guidance/appropriate-assessment> (published 22 July 2019)

2.4. Local Planning Policy

Wiltshire Core Strategy

- 2.4.1. The Wiltshire Core Strategy was adopted in January 2015 and is the main document used to guide decisions on planning applications in the county. Relevant policies to ecology and nature conservation with regard to the Application Site are discussed below:
- 2.4.2. **Policy CP50** – Biodiversity and Geodiversity: This policy relates to consideration towards biodiversity as a whole but also specifically with regard to the protection of designated sites including Natura 2000 sites. Going on to state that “Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy”.
- 2.4.3. **Policy CP52** - Green Infrastructure: This policy relates to provision for the retention and enhancement of Wiltshire's green infrastructure network. It states that development will be required to consider the green infrastructure in the local area including, retaining and enhancing existing green infrastructure, making provision for open spaces within development sites, managing open space appropriately throughout the lifespan of the development and providing appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy.

Draft Wiltshire Local Plan 2020 – 2038

- 2.4.4. The Draft Wiltshire Local Plan 2020 – 2038 is an emerging document yet to be adopted by Wiltshire council. This document has been described by the council as a Local Plan Review produced to ensure consistency and alignment with National Planning Policy Framework. Relevant policies are discussed below:
- 2.4.5. **Policy 88** – Biodiversity and geodiversity: This policy incorporates elements of Policy CP50 (see above) and focuses on protection of features of nature conservation value including protected species, priority habitat, habitats of principal importance and protected sites. Where possible, enhancements to onsite habitats should be targeted.
- 2.4.6. The policy also requires the provision of integral bird nesting features, integrated bat boxes, hedgehog highways throughout the development site and provision of specific nesting opportunities for house martins. The policy also requires provision of habitat of value to wildlife including wildflower / meadow grassland, native hedgerow and tree planting and wetland areas, alongside species specific enhancements such as log piles, insect hotels and hibernacula.
- 2.4.7. **Policy 89** – Biodiversity net gain: This policy requires a minimum 20% biodiversity net gain. Gains should be delivered in a hierarchical manner with onsite delivery favoured. All planning application subject to biodiversity net gain must submit a Biodiversity Gain Plan.

- 2.4.8. **Policy 90** – Woodland, hedgerows and trees: This policy requires major development to retain and enhance Wiltshire's woodlands, hedgerows and trees.

North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy

- 2.4.9. North Meadow and Clattinger Farm SAC has an interim mitigation strategy⁹ in place for recreational impacts and relates to an increase in housing and tourism development in the designated zone of influence.

2.5. Key Guidance and other Relevant Documents

- 2.5.1. Guidance on the interpretation of key terms and concepts contained within the European and UK legislation of relevance to European designated sites is provided through several documents issued by the European Commission and national organisations, such as the Joint Nature Conservation Committee (JNCC) and Natural England. Key elements of this guidance are outlined below.

Standard Data Forms

- 2.5.2. A standard reporting format has been developed for European sites (SPAs and SACs) to ensure that the relevant site selection information is reported and stored in a consistent manner which can be easily made available.
- 2.5.3. A standard reporting form for SPAs and SACs was developed by the European Commission and published in 1996. The form is used for all sites designated or proposed to be designated as SPAs and SACs under the relevant Directives, with the information stored on a central database.
- 2.5.4. Article 4 of the Habitats Directive provides the legal basis for providing the data. Article 4 states that information shall include a map of the designated site, its name, location, extent and the data resulting from application of the criteria specified in Annex III and that this shall be provided in a format established by the Commission. Under Article 4 (paragraph 3) of the Birds Directive, Member States are required to provide the Commission with all relevant information to enable it to take any appropriate steps in order to protect relevant species in areas where the Directive applies.
- 2.5.5. Whilst it is the relevant country agency (i.e. Natural England) that is responsible for designating a site, it is the JNCC who are responsible for collating the lists of European and international designated sites, together with relevant supporting information. The European Data Forms for SPAs and SACs are therefore made available by JNCC.
- 2.5.6. Within the explanatory notes for Natura Standard Data Forms the following "main objectives" of the Natura data form / database are given:

⁹ 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

1. **“to provide the necessary information to enable the Commission, in partnership with the Member States, to co-ordinate measures to create a coherent Natura 2000 network and to evaluate its effectiveness for the conservation of Annex I habitats and for the habitats of species listed in Annex II of Council Directive 92/43/EEC as well as the habitats of Annex I bird species and other migratory bird species covered by Council Directive 79/409/EEC.”**
2. **“to provide information which will assist the Commission in other decision making capacities to ensure that the Natura 2000 network is fully considered in other policy areas and sectors of the Commission’s activities in particular regional, agricultural, energy, transport and tourism policies.”**
3. **“to assist the Commission and the relevant committees in choosing actions for funding under LIFE and other financial instruments where data relevant to the conservation of sites, such as ownership and management practice, are likely to facilitate the decision making process.”**
4. **“to provide a useful forum for the exchange and sharing of information on habitats and species of Community interest to the benefit of all Member States.”**

- 2.5.7. Copies of the Standard Data Forms for the European designated sites of relevance to this assessment are included as appendices to this document.

Conservation Objectives

- 2.5.8. The formal European Site Conservation Objectives for SPAs and SACs are produced by Natural England.

2.6. Shadow Habitats Regulations Process

- 2.6.1. Guidance on the process and procedures for assessments are contained in a number of documents:
- Habitat Regulations Assessments: Protecting a European Site – government standing advice on HRA¹⁰;
 - NPPF and the accompanying ODPM/DEFRA Circular (ODPM 06/2005, DEFRA 01/2005);
 - Managing Natura 2000 sites ‘The Provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC. European Commission. Nov 2018; and
 - Assessment of plans and projects significantly affecting Natura 2000 sites. European Commission November 2001.
- 2.6.2. As set out within government standing advice and as laid out within the flow chart within the ODPM circular 06/2005 (see Appendix 2), the procedure for assessment is an ordered process following a number of key stages. Reference should be made to the more recent government guidance ‘*Habitats Regulations Assessments: Protecting a European Site*’ which similarly sets out the staged approach to assessment, comprising Stage 1: Screening, Stage 2: Appropriate

¹⁰ Habitats Regulations Assessments: Protecting a European site. February 2021 (updated December 2023)
<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

Assessment, and where necessary, Stage 3: Derogation. This guidance provides further clarity on the purpose and requirements of each stage, noting that these stages correspond to, but are not explicitly labelled within, the ODPM flow chart.

Stage 1: Screening

- 2.6.3. Box 1 of the flow chart is not of relevance to development proposals and hence the first stage is to identify whether the proposals will result in any 'likely significant effect' on the internationally important features of the European Sites, either alone or in combination with other plans or projects (box 2 of the flow chart).
- 2.6.4. In line with the Court of Justice of the European Union (CJEU) ruling (People over Wind, Peter Sweetman v Coillte Teoranta, Case C-323/17, dated 12 April 2018), mitigation measures intended to avoid or reduce the harmful effects of a plan or project on a European Site should not be taken into account at this screening stage, and instead these must be considered as part of an Appropriate Assessment (Stage 2).
- 2.6.5. Where it is considered that a plan or project will result in no such 'likely significant effects', no further assessment is necessary and permission should not be refused under the assessment.
- 2.6.6. If any 'likely significant effects' are identified or where it remains unclear whether effects will be significant, the assessment procedure should follow on to Stage 2 (box 3 of the flow chart).
- 2.6.7. In reaching this decision, the plan or project should be considered 'likely' to have an effect if the Competent Authority is unable, on the basis of objective information, to exclude the possibility that it could have significant effects on the integrity of any European designation or their Conservation Objectives, either alone or in combination with other plans or projects. The test of significance is therefore set at a relatively low bar, with significant effects considered as any negative effects, i.e. effects that are neither negligible nor inconsequential, but which are capable of having an adverse effect¹¹.
- 2.6.8. If the proposal can be screened out for effects from it alone, it should then be screened for any potential for it to combine with any other proposals planned or underway. If, in combination the proposal could have a significant effect on a European designation, it is necessary to progress to Stage 2.

Stage 2: Appropriate Assessment

- 2.6.9. Should it be determined that a plan or project could result in 'likely significant effects' on a European Site, as set out on the flow chart, the Competent Authority should proceed to the next stage within flow chart boxes 3 and 4 onwards. This

¹¹ Case C-258/11: Judgment of the Court (Third Chamber) of 11 April 2013 and Opinion of the Advocate General dated 22nd November 2012. Peter Sweetman and Others v An Bord Pleanála. Reference for a preliminary ruling: Supreme Court – Ireland

requires an 'Appropriate Assessment' of the likely effects of the plan or project to be undertaken by the Competent Authority.

- 2.6.10. Under Appropriate Assessment, it is necessary to determine whether the proposals, either alone or in combination with other projects or plans, will result in any adverse effects on the integrity of the European designation as defined by the conservation objectives and status of the relevant SPA/SAC. The precautionary principle should be applied, and the focus should be on objectively demonstrating, with supporting evidence, that there will be no adverse effects on the integrity of the European Site. Where this is not the case, adverse effects must be assumed. Thus, one must be able to rule out all reasonable scientific doubt that the proposal would not have an adverse effect on the integrity of a site before it is allowed to go ahead.
- 2.6.11. If it is considered that the proposal will not adversely affect the integrity of the designation, either alone or in combination with other projects, permission can be granted. If this cannot be ascertained, or there is uncertainty, the assessment procedure should follow on to Stage 3.

Stage 3: Derogations: Allow Exceptions

- 2.6.12. Should a proposal fail the integrity test, in certain circumstances, a project may still be able to proceed under a derogation.
- 2.6.13. Under Stage 3, it is necessary to assess if there are alternative solutions and whether there are imperative reasons of overriding public interest. If these tests are passed, authorisation may be granted subject to compensation measures being secured.

3. Stage 1: Screening for Likely Significant Effects

3.1. European Sites Within Search

- 3.1.1. All European Sites (SPAs, SACs) are designated under the Habitats Regulations 2017 as amended and any Development Proposals that could affect them will require a HRA.
- 3.1.2. The Site is located with the Zone of Influence (Zoi) of the following designated site:
 - North Meadow and Clattinger Farm SAC, located approximately 0.3km north of the Application Site at its closest point).
- 3.1.3. North Meadow and Clattinger Farm SAC is underpinned by Clattinger Farm SSSI and North Meadow, Cricklade SSSI
- 3.1.4. The North Meadow and Clattinger Farm SAC Citation, Natura 2000 form and Conservation Objectives are provided at Appendices 3, 4 and 5 respectively.
- 3.1.5. An additional search area for European / International sites of 5km has applied. This is considered appropriate given the nature and scale of the Development Proposals and the potential impact pathways.
- 3.1.6. No additional European / International sites are located within the 5km search area.

3.2. Initial Screening of Impact Pathways

- 3.2.1. Based on the available information, including the Site Improvement Plan (see Appendix 6) prepared for the SAC, a number of potential impact pathways have been identified in relation to North Meadow and Clattinger Farm SAC. Those relevant to the Development Proposals include:
 - Increased recreational pressure;
 - Water quality; and
 - Hydrological regime.
- 3.2.2. All other pathways have been scoped out of assessment based on the distance from the Application Site and / or the designated features of the SAC.
- 3.2.3. On the basis of the above, further details in relation to relevant European designations and whether a likely significant effect may occur as a result of the Proposed Development are required, either alone or in combination with other plans and projects. This is set out below.

Table 3.1. Screening of Likely Significant Effects on North Meadows and Clattinger Farm SAC

European Site of Interest Features	North Meadow and Clattinger Farm SAC qualifies under EU Habitats Directive for the presence of the following habitats listed in Annex I of the Directive: Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>)
Conservation Objectives of the European Site	The formal Conservation Objectives for the SAC are defined by Natural England as follows: Ensure that 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 maintaining or restoring: - The extent and distribution of qualifying natural habitats; - The structure and function (including typical species) of the qualifying natural habitats; and - The supporting processes on which qualifying natural habitats rely; <u>Qualifying Features:</u> H6510. Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>)
Condition of European Site / SSSI	The most recent condition assessment for the component SSSIs underpinning the SAC found the following conditions: North Meadow, Cricklade SSSI – NORTH MEADOW 1 = 'Favourable'.
Threats / Pressures	Identified SSSI threats / pressures as listed within the Site Improvement Plan and / or Natural England's Designated Sites View are as follows: - Recreational disturbance; - Drainage (Inappropriate water levels and water pollution); - Cutting / mowing / cultivation regime; - Commons management; and - Habitat fragmentation. Cutting / mowing / cultivation regime, commons management and habitat fragmentation are specific to the management of the SSSI / SAC itself, the Development Proposals would have no impact on this and therefore further consideration of these potential impact pathways are scoped out. Relevant threats / pressures with regard to the Development Proposals are as follows: - Recreational disturbance; - Drainage (Inappropriate water levels and water pollution); These threats / pressures are considered further below.
Screening of Likely Significant Effects Relevant To European Site and SSSIs	
Increased Recreational Pressure	Construction - No likely significant effects are expected during the construction phase of the Proposed Development in relation to increase in recreation pressure.

	Operational - The Proposed Development falls within the Zone of Influence (Zoi) of North Meadow and Clattinger Farm SAC. There is therefore potential for the Proposed Development to increase recreational pressure on the SAC both alone and in combination with other plans and projects during the operational phase in the absence of mitigation. The Proposed Development is for the construction of up to 315 new residential units, equating to roughly 756 residents (based on 2.4 persons per household). It is considered that a likely significant effect may occur to the SAC and underpinning SSSIs during the operational phase.
Drainage / hydrological Impacts	Construction - During the construction phase there is potential for pollution events to occur through inappropriate storage of materials / chemicals. The topography of the Application Site could result in silt / chemical entering the field drain in the northern parcel that discharges into the River Thames. Operational - The drainage strategy for the Development Proposals includes discharge of surface water to a drainage ditch that ultimately drains into the river Thames which runs along the boundary of the North Meadow, Cricklade SSSI. In the absence of mitigation there would be potential for an alteration in hydrological regime and / or water quality impacts on the North Meadow and Clattinger Farm SAC during storm events where the river Thames floods the adjacent grassland.
Conclusion - Could the proposed development result in a likely significant effect?	
Alone Yes, a likely significant effect cannot be ruled out in relation to: <i>Construction</i> • Drainage (water quality) / hydrological impacts <i>Operational</i> • Increase in recreational pressure; • Drainage (water quality) / hydrological impacts	
In combination with other plans or projects (potential third party residential scheme) Yes, in-combination effects are anticipated with regard to: <i>Operational</i> • Increase in recreational pressure; No likely significant in-combination effects are identified as a result of loss of functionally linked land, drainage and hydrological impacts, air quality, direct habitat loss, lighting, dust, noise and vibration, and visual impact.	

4. Appropriate Assessment

4.1. Assessment of Effects

- 4.1.1. Following the screening assessment, it has been identified that the Proposed Development may impact the designated features of the North Meadow and Clattinger Farm SAC and underpinning SSSIs through the following pathways:
- Recreational impacts both alone and in combination during the operational phase.
 - Drainage / hydrological regime impacts during the construction phase.
 - Drainage / hydrological regime impacts during the operational phase.
- 4.1.2. As outlined above in Section 2, in line with the People over Wind Judgement, relevant avoidance and mitigation measures can be considered (where necessary) at the Appropriate Assessment stage.

4.2. Recreational Impacts (Operational Phase)

The Published Mitigation Strategy

- 4.2.1. North Meadow and Clattinger Farm Recreation Interim Mitigation Strategy 2023 – 2028 outlines the approach to mitigate for recreational impacts of new developments on the SAC. It is noted that the strategy only covers the North Meadow parcel and not the Clattinger Farm parcel.
- 4.2.2. The mitigation strategy outlines two zones of influence (Zoi), an inner zone and an outer zone. The Application Site is located 0.3km from the SAC at its closest point and is therefore within the inner Zoi which extends to 4.2km from the SAC.
- 4.2.3. Within the inner Zoi, the mitigation strategy requires both on-site Strategic Access Management and Monitoring (SAMM) payments and Infrastructure Mitigation Projects (IMP) and / or Suitable Alternative Natural Greenspaces (SANG).
- 4.2.4. The mitigation strategy specifies that large scale developments of 50+ residential units would likely be expected to provide SANG, whereas smaller developments could mitigate through an IMP / SANG contribution.
- 4.2.5. Appendix 4 of the North Meadow and Clattinger Farm Recreation Interim Mitigation Strategy 2023 – 2028 provides a list of guidelines for Developer delivered SANGs. These guidelines have been considered when designing the proposed SANG at the Application Site.

Onsite SANG Provision

- 4.2.6. In line with the strategy, the Development Proposals will include a developer delivered SANG to the west of the Application Site in the parcels of land both north and south of Stones Lane. The Development Proposals are for up to 315

dwelling, using a residents per dwelling figure of 2.4, this results in up to 756 new residents that may use the North Meadow parcel of the North Meadow and Clattinger Farm SAC for recreational purposes.

- 4.2.7. The Mitigation Strategy requires a SANG to provide 8ha per 1000 new residents. Using this ratio and assuming that 315 dwelling are brought forward at the detailed design phase, the SANG provided to mitigate for the Development Proposals should be a minimum of 6.048ha.

The SANG comprises 6.5ha of grassland currently grazed by cattle. The proposed SANG route is 1.6km in length and will be usable year-round which would be an attractive alternative route for existing and future residents. The provision of a bespoke onsite SANG will supplement additional walking routes and open space within and around the main development footprint proposed in the eastern parcel of the Application Site.

Funding of Creation and Future Management

It is envisioned at this stage that the creation of the SANG will be funded by the developer. Future management of the SANG would be funded through a management fee applied to the owners of all new dwellings within the development.

SAMM Contributions

- 4.2.8. In line with the mitigation strategy for large scale development in the inner Zol, the Development Proposals will also require a SAMM contribution. This comprises a payment per dwelling of £323. As the Development Proposals are for up to 315 dwellings, the SAMM contribution will be for up to £101,745 to be secured by legal agreement i.e., s106.

4.3. Drainage / Hydrological Regime (Construction Phase)

- 4.3.1. During the construction phase, standard construction mitigation and avoidance measures will be put in place to protect the natural environment including the River Thames and by association the North Meadow and Clattinger Farm SAC. The measures would include safe storage of materials and chemical, appropriate refuelling locations, provision of spill kits and installation of silt prevention measures (where appropriate).
- 4.3.2. Measures to prevent sediment silt from entering the watercourses adjacent to the site may include silt / settlement ponds, silt mats, floc mats, silt wattles, pipe reactors and silt fences / barrier.
- 4.3.3. The exact method of silt/muddy water capture will be determined by carrying out a construction site run-off assessment and producing a Silt Management Plan. Once this has been carried out, the CEMP will include the specific measures to control/prevent silt transportation/run-off into any watercourses. Once construction work commences, the Silt Management Plan will be reviewed on a weekly basis, to ensure that it is fit for purpose and the measures that have been put into place are effective.

4.3.4.

4.3.5. These measures could be secured via an appropriately worded condition requiring a Construction Ecological / Environmental Management Plan (CEMP).

4.3.6. During the construction phase and in the absence of mitigation measures there is potential for a minor increase in quantity of runoff discharged to the River Thames due to a reduction in vegetation across the site. However, this is considered to be a negligible increase, especially considering the size and baseline levels of water within the stretch of the River Thames that surface water would discharge to and that works within the northernmost parcel, where the field drain is found would be limited to path installation for the proposed SANG and landscaping works. Nonetheless, if deemed necessary measures to slow down discharge rates during the construction phase could be detailed in a management plan secured via a suitably worded condition.

4.3.7. It is considered that the implementation of standard mitigation and avoidance measures secured by a CEMP would provide certainty that no adverse effect would occur on the relevant SAC via the drainage / hydrological regime pathway.

4.4. **Drainage / Hydrological Regime (Operational Phase)**

4.4.1. The drainage strategy for the Development Proposals will include a Sustainable Drainage System (SuDS) designed to clean surface runoff to an appropriate level prior to discharge from the Application Site. It is noted that the Application Site is currently used for cattle grazing which would result in a baseline level of nutrient enrichment due to waste. This grazing would cease if the Development Proposals were to come forward, resulting in a betterment to water quality being discharged from the Application Site. Nonetheless, there is potential for increases in pollutants associated with housing developments once the development is complete. The exact drainage specification will come forward at the reserved matters stage. However, it is envisioned that the SuDS strategy will include measures such as permeable paving and bypass separators.

4.4.2. With regard to hydrological regime discharge to the field drain present within the northern parcel that subsequently discharges into the River Thames will be controlled at below greenfield runoff rate to ensure no increase in discharge rates on account of the Development Proposals.

4.4.3. It is considered that the SuDS designed for the Application Site will ensure that no adverse effect occurs on the North Meadow and Clattinger Farm SAC via the drainage and hydrological regime pathway during the operational phase.

4.5. **Specific Consideration for the In-Combination Test**

4.5.1. It is considered by Ecology Solutions that the potential effects identified in relation to the Development Proposals will be avoided or fully mitigated through the implementation of the measures described above, such that, at the

Appropriate Assessment stage, it may be concluded that there would be no adverse effects on the North Meadow and Clattinger Farm SAC when considered alone or in combination.

Summary Conclusion of Appropriate Assessment

- 4.5.2. Having considered all of the potential significant effects that could arise from the Development Proposals, Ecology Solutions conclude that the proposals would not be likely to give rise to a significant effect on the integrity of North Meadow and Clattinger Farm SAC or any other European / International designated site when considered, either alone or in combination with other plans or projects. The Development Proposals have been designed to be in full compliance with the North Meadow and Clattinger Farm Recreation Interim Mitigation Strategy 2023 – 2028. As such, considering this and the other mitigation measures described above the Proposed Development would by definition be acceptable under the tests of the Habitats Regulations and therefore in those terms it is considered that there is no reason for the Competent Authority not to grant consent for the Development Proposals at the Application Site.

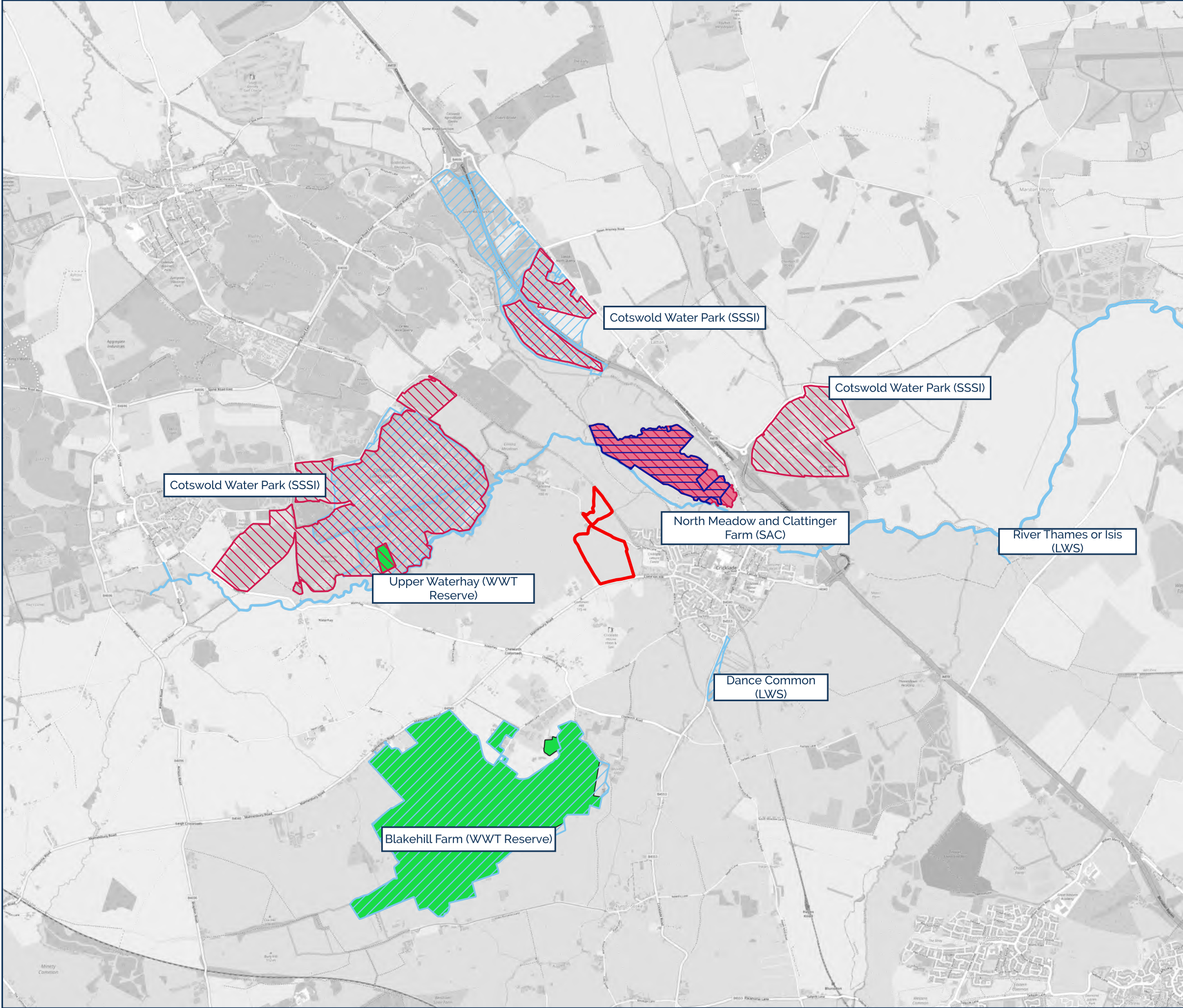
5. Summary and Conclusions

- 5.1.1. As the project alone or in combination would not contribute to an overall significant effect that may have an adverse effect on the integrity of any of these European / International designated sites, the Development Proposals would, by definition, be acceptable, subject to securing the mitigation and avoidance measures proposed.
- 5.1.2. It is therefore concluded that the Proposed Development would, by definition, be acceptable under the tests of the Habitats Regulations and, therefore, in those terms, it is considered that the Competent Authority could legally and safely grant consent for the proposed plan/project.
- 5.1.3. With reference to paragraph 195 of the NPPF and matters concerning the presumption in favour of sustainable development, in this instance, a project-level HRA is required to be undertaken by the Competent Authority in relation to the proposed development. Thus paragraph 195 of the NPPF is engaged. This (shadow) HRA report provides information which allows the Competent Authority to complete the project-specific HRA and, as required, Appropriate Assessment in line with its statutory obligations. The clear conclusion reached in this assessment report is that the Proposed Development will not adversely affect the integrity of the North Meadow and Clattinger Farm SAC, or any other European/international designated site ("habitats site") when the project is considered both alone and in-combination with other plans/projects. It follows, therefore, that the planning test at paragraph 195 of the NPPF is passed and the presumption in favour of sustainable development remains engaged.
- 5.1.4. The Proposed Development is considered to be fully compliant with the relevant legislative and planning policy framework as well as the North Meadow and Clattinger Farm Recreation Interim Mitigation Strategy 2023 - 2028.
- 5.1.5. In conclusion, provided the measures, as described in this report, are carried out, there would be no adverse effect on the integrity of the North Meadow and Clattinger Farm SAC, or any other European / international designated site as a result of the Proposed Development.

Plans & Appendices

Plans

Plan sHRA1 – Site Location and
Ecological Designations



- KEY:**
- Application Site Boundary
 - National Nature Reserve (NNR)
 - Special Area of Conservation (SAC)
 - Sites of Special Scientific Interest (SSSI)
 - Local Wildlife Site (LWS)
 - WWT Reserves



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**10742: Land at Malmesbury Road,
Cricklade**

PLAN ECO1: SITE LOCATION AND
ECOLOGICAL DESIGNATIONS

Rev: A
Feb 2026

Appendices

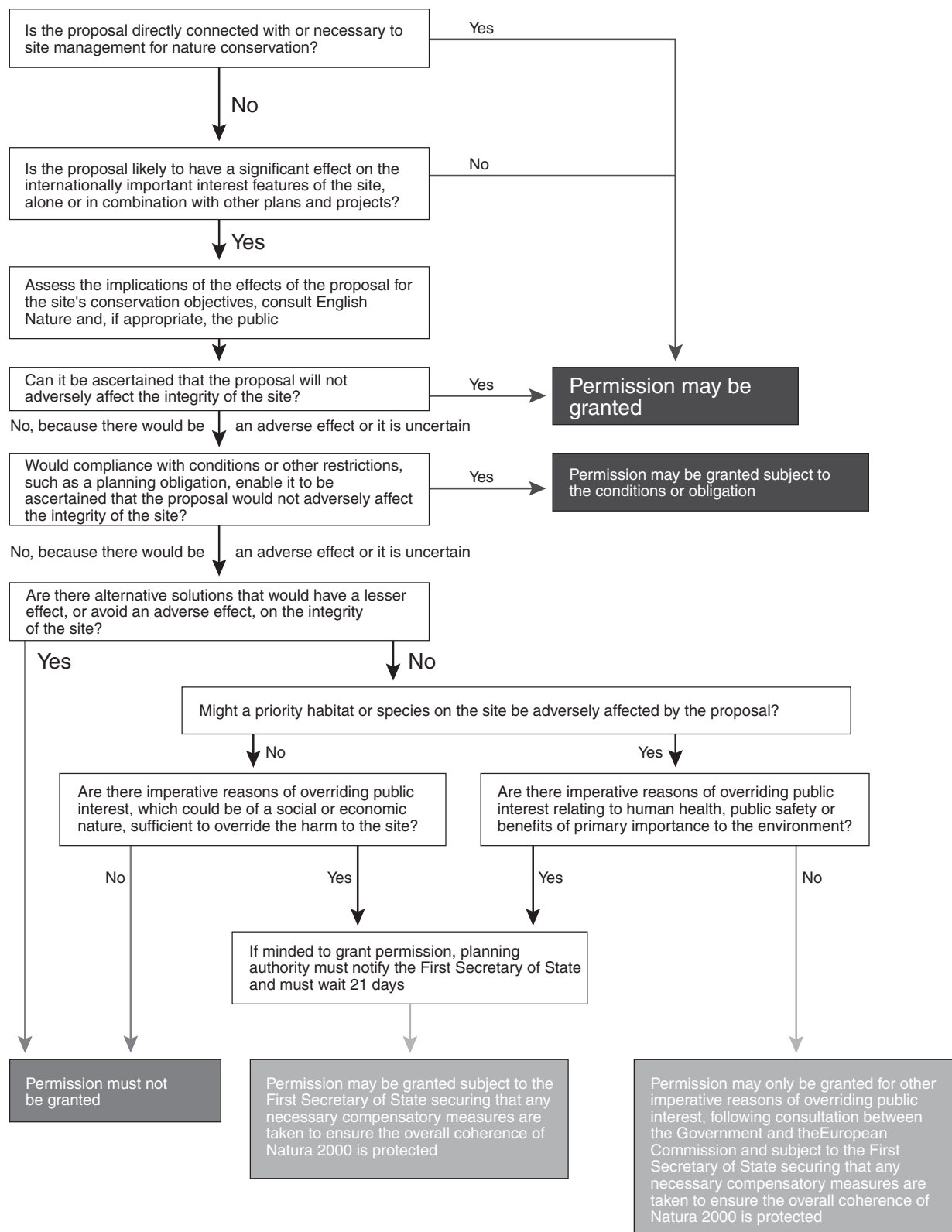
Appendix 1 – MAGIC Designated Sites Information



**North Meadow
& Clattinger
Farm (SAC)**

Appendix 2 – Flow Diagram from the
ODPM / DEFRA circular relating to
NPPF

Figure 1: Consideration of development proposals affecting Internationally Designated Nature Conservation Sites



Appendix 3 – North Meadow and Clattinger Farm SAC Citation

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: North Meadow and Clattinger Farm
Unitary Authority/County: Wiltshire
SAC status: Designated on 1 April 2005
Grid reference: SU014934
SAC EU code: UK0016372
Area (ha): 104.88
Component SSSI: Clattinger Farm SSSI, North Meadow, Cricklade SSSI

Site description:

This site in the Thames Valley represents an exceptional survival of the traditional pattern of management of lowland hay meadows. It contains a very high proportion of the surviving UK population of fritillary *Fritillaria meleagris*, a species highly characteristic of damp lowland meadows in Europe and now rare throughout its range.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

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

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0016372

Date of registration: 14 June 2005

Signed: *Trevor Salmon*

On behalf of the Secretary of State for Environment,
Food and Rural Affairs

Appendix 4 – North Meadow and Clattinger Farm Natura 2000

STANDARD DATA FORM for sites within the 'UK national site network of European sites'

Special Protection Areas (SPAs) are classified and Special Areas of Conservation (SACs) are designated under:

- the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters);
- the Conservation (Natural Habitats &c.) Regulations 1994 (as amended) in Scotland;
- the Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) in Northern Ireland; and
- the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) in the UK offshore area.

Each SAC or SPA (forming part of the UK national site network of European sites) has its own Standard Data Form containing site-specific information. The information provided here generally follows the same documenting format for SACs and SPAs, as set out in the [Official Journal of the European Union recording the Commission Implementing Decision of 11 July 2011 \(2011/484/EU\)](#).

Please note that these forms contain a number of codes, all of which are explained either within the data forms themselves or in the end notes.

More general information on SPAs and SACs in the UK is available from the [SPA homepage](#) and [SAC homepage](#) on the JNCC website. These webpages also provide links to Standard Data Forms for all SAC and SPA sites in the UK.

<https://jncc.gov.uk/>



NATURA 2000 - STANDARD DATA FORM

For Special Protection Areas (SPA),
Proposed Sites for Community Importance (pSCI),
Sites of Community Importance (SCI) and
for Special Areas of Conservation (SAC)

SITE UK0016372
SITENAME North Meadow and Clattinger Farm

TABLE OF CONTENTS

- [1. SITE IDENTIFICATION](#)
- [2. SITE LOCATION](#)
- [3. ECOLOGICAL INFORMATION](#)
- [4. SITE DESCRIPTION](#)
- [5. SITE PROTECTION STATUS AND RELATION WITH CORINE BIOTOPES](#)
- [6. SITE MANAGEMENT](#)

1. SITE IDENTIFICATION

1.1 Type B	1.2 Site code UK0016372	Back to top
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1.3 Site name

North Meadow and Clattinger Farm

1.4 First Compilation date 1996-01	1.5 Update date 2015-12
--	-----------------------------------

1.6 Respondent:

Name/Organisation: Joint Nature Conservation Committee

Address: Joint Nature Conservation Committee Monkstone House City Road Peterborough
PE1 1JY

Email:

Date site proposed as SCI: 1996-01

Date site confirmed as SCI: 2004-12

Date site designated as SAC: 2005-04

National legal reference of SAC designation:

Regulations 11 and 13-15 of the Conservation of Habitats and Species Regulations 2010
(<http://www.legislation.gov.uk/uksi/2010/490/contents/made>).

2. SITE LOCATION

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2.1 Site-centre location [decimal degrees]:

Longitude

-1.979166667

Latitude

51.63888889

2.2 Area [ha]:

105.23

2.3 Marine area [%]

0.0

2.4 Sitelength [km]:

0.0

2.5 Administrative region code and name

NUTS level 2 code

Region Name

UKK1

Gloucestershire, Wiltshire and Bristol/Bath area

2.6 Biogeographical Region(s)

Atlantic (100.0
%)

3. ECOLOGICAL INFORMATION

3.1 Habitat types present on the site and assessment for them

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Annex I Habitat types						Site assessment			
Code	PF	NP	Cover [ha]	Cave [number]	Data quality	A B C D	A B C		
						Representativity	Relative Surface	Conservation	Global
6510			74.71	0	G	A	B	A	A

- **PF:** for the habitat types that can have a non-priority as well as a priority form (6210, 7130, 9430) enter "X" in the column PF to indicate the priority form.
- **NP:** in case that a habitat type no longer exists in the site enter: x (optional)
- **Cover:** decimal values can be entered
- **Caves:** for habitat types 8310, 8330 (caves) enter the number of caves if estimated surface is not available.
- **Data quality:** G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation)

4. SITE DESCRIPTION

4.1 General site character

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Habitat class	% Cover
N09	15.0

N14	12.0
N06	2.0
N10	71.0
Total Habitat Cover	100

Other Site Characteristics

1 Terrestrial: Soil & Geology: sedimentary,alluvium,neutral,clay,limestone 2 Terrestrial: Geomorphology and landscape: floodplain,lowland

4.2 Quality and importance

Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*) for which this is considered to be one of the best areas in the United Kingdom.

4.3 Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i o b]
H	G01		I
H	H02		B
H	A04		I
H	J02		B
H	J03		B

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i o b]
H	A02		I
H	A04		I
H	A04		I
H	D05		I

Rank: H = high, M = medium, L = low

Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification,

T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions

i = inside, o = outside, b = both

4.5 Documentation

Conservation Objectives - the Natural England links below provide access to the Conservation Objectives (and other site-related information) for its terrestrial and inshore Natura 2000 sites, including conservation advice packages and supporting documents for European Marine Sites within English waters and for cross-border sites. See also the 'UK Approach' document for more information (link via the JNCC website).

Link(s): <http://publications.naturalengland.org.uk/category/6490068894089216>

<http://publications.naturalengland.org.uk/category/3212324>

http://jncc.defra.gov.uk/pdf/Natura2000_StandardDataForm_UKApproach_Dec2015.pdf

5. SITE PROTECTION STATUS (optional)

5.1 Designation types at national and regional level:

[Back to top](#)

Code	Cover [%]	Code	Cover [%]	Code	Cover [%]
UK01	9.6	UK04	100.0		

6. SITE MANAGEMENT

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6.1 Body(ies) responsible for the site management:

Organisation:	Natural England
Address:	
Email:	

6.2 Management Plan(s):

An actual management plan does exist:

☐	Yes
☐	No, but in preparation
☒	No

6.3 Conservation measures (optional)

For available information, including on Conservation Objectives, see Section 4.5.

EXPLANATION OF CODES USED IN THE SPECIAL AREA OF CONSERVATION (SAC) AND SPECIAL PROTECTION AREA (SPA) STANDARD DATA FORMS

The codes in the table below generally follow those explained in the [official European Union guidelines for the Standard Data Form](#) (also referencing the relevant page number).

1.1 Site type

CODE	DESCRIPTION	PAGE NO
A	SPA (classified Special Protection Area)	53
B	cSAC, SCI or SAC (candidate Special Area of Conservation, Site of Community Importance, designated Special Area of Conservation)	53
C	SPA area/boundary is the same as the cSAC/SCI/SAC i.e. a co-classified/designated site (Note: this situation only occurs in Gibraltar)	53

3.1 Habitat code

CODE	DESCRIPTION	PAGE NO
1110	Sandbanks which are slightly covered by sea water all the time	57
1130	Estuaries	57
1140	Mudflats and sandflats not covered by seawater at low tide	57
1150	Coastal lagoons	57
1160	Large shallow inlets and bays	57
1170	Reefs	57
1180	Submarine structures made by leaking gases	57
1210	Annual vegetation of drift lines	57
1220	Perennial vegetation of stony banks	57
1230	Vegetated sea cliffs of the Atlantic and Baltic Coasts	57
1310	Salicornia and other annuals colonizing mud and sand	57
1320	Spartina swards (Spartinion maritimae)	57
1330	Atlantic salt meadows (Glaucio-Puccinellietalia maritimae)	57
1340	Inland salt meadows	57
1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)	57
2110	Embryonic shifting dunes	57
2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")	57
2130	Fixed coastal dunes with herbaceous vegetation ("grey dunes")	57
2140	Decalcified fixed dunes with Empetrum nigrum	57
2150	Atlantic decalcified fixed dunes (Calluno-Ulicetea)	57
2160	Dunes with Hippophya• rhamnoides	57
2170	Dunes with Salix repens ssp. argentea (Salicion arenariae)	57
2190	Humid dune slacks	57
21A0	Machairs (* in Ireland)	57
2250	Coastal dunes with Juniperus spp.	57
2330	Inland dunes with open Corynephorus and Agrostis grasslands	57
3110	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)	57
3130	Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea	57
3140	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.	57
3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	57

CODE	DESCRIPTION	PAGE NO
3160	Natural dystrophic lakes and ponds	57
3170	Mediterranean temporary ponds	57
3180	Turloughs	57
3260	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation	57
4010	Northern Atlantic wet heaths with Erica tetralix	57
4020	Temperate Atlantic wet heaths with Erica ciliaris and Erica tetralix	57
4030	European dry heaths	57
4040	Dry Atlantic coastal heaths with Erica vagans	57
4060	Alpine and Boreal heaths	57
4080	Sub-Arctic Salix spp. scrub	57
5110	Stable xerothermophilous formations with Buxus sempervirens on rock slopes (Berberidion p.p.)	57
5130	Juniperus communis formations on heaths or calcareous grasslands	57
6130	Calaminarian grasslands of the Violetalia calaminariae	57
6150	Siliceous alpine and boreal grasslands	57
6170	Alpine and subalpine calcareous grasslands	57
6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	57
6230	Species-rich Nardus grasslands, on silicious substrates in mountain areas (and submountain areas in Continental Europe)	57
6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)	57
6430	Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels	57
6510	Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)	57
6520	Mountain hay meadows	57
7110	Active raised bogs	57
7120	Degraded raised bogs still capable of natural regeneration	57
7130	Blanket bogs (* if active bog)	57
7140	Transition mires and quaking bogs	57
7150	Depressions on peat substrates of the Rhynchosporion	57
7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae	57
7220	Petrifying springs with tufa formation (Cratoneurion)	57
7230	Alkaline fens	57
7240	Alpine pioneer formations of the Caricion bicoloris-atrofuscae	57
8110	Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)	57
8120	Calcareous and calcshist scree of the montane to alpine levels (Thlaspietalia rotundifoliae)	57
8210	Calcareous rocky slopes with chasmophytic vegetation	57
8220	Siliceous rocky slopes with chasmophytic vegetation	57
8240	Limestone pavements	57
8310	Caves not open to the public	57
8330	Submerged or partially submerged sea caves	57
9120	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robur-petraeae or Ilici-Fagenion)	57
9130	Asperulo-Fagetum beech forests	57
9160	Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli	57
9180	Tilio-Acerion forests of slopes, scree and ravines	57
9190	Old acidophilous oak woods with Quercus robur on sandy plains	57
91A0	Old sessile oak woods with Ilex and Blechnum in the British Isles	57
91C0	Caledonian forest	57
91D0	Bog woodland	57
91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)	57
91J0	Taxus baccata woods of the British Isles	57

3.1 Habitat representativity (abbreviated to 'Representativity' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent representativity	57
B	Good representativity	57
C	Significant representativity	57
D	Non-significant presence representativity	57

3.1 Relative surface

CODE	DESCRIPTION	PAGE NO
A	> 15%-100%	58
B	> 2%-15%	58
C	≤ 2%	58

3.1 Degree of conservation (abbreviated to 'Conservation' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent conservation	59
B	Good conservation	59
C	Average or reduced conservation	59

3.1 Global assessment (abbreviated to 'Global' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent value	59
B	Good value	59
C	Significant value	59

3.2 Population (abbreviated to 'Pop.' in data form)

CODE	DESCRIPTION	PAGE NO
A	> 15%-100%	62
B	> 2%-15%	62
C	≤ 2%	62
D	Non-significant population	62

3.2 Degree of conservation (abbreviated to 'Con.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent conservation	63
B	Good conservation	63
C	Average or reduced conservation	63

3.2 Isolation (abbreviated to 'Iso.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Population (almost) Isolated	63
B	Population not-isolated, but on margins of area of distribution	63
C	Population not-isolated within extended distribution range	63

3.2 Global Grade (abbreviated to 'Glo.' or 'G.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent value	63
B	Good value	63
C	Significant value	63

3.3 Other species – essentially covers bird assemblage types

CODE	DESCRIPTION	PAGE NO
WATR	Non-breeding waterbird assemblage	UK specific code
SBA	Breeding seabird assemblage	UK specific code

BBA	Breeding bird assemblage (applies only to sites classified pre 2000)	UK specific code
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4.1 Habitat class code

CODE	DESCRIPTION	PAGE NO
N01	Marine areas, Sea inlets	65
N02	Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	65
N03	Salt marshes, Salt pastures, Salt steppes	65
N04	Coastal sand dunes, Sand beaches, Machair	65
N05	Shingle, Sea cliffs, Islets	65
N06	Inland water bodies (Standing water, Running water)	65
N07	Bogs, Marshes, Water fringed vegetation, Fens	65
N08	Heath, Scrub, Maquis and Garrigue, Phygrana	65
N09	Dry grassland, Steppes	65
N10	Humid grassland, Mesophile grassland	65
N11	Alpine and sub-Alpine grassland	65
N14	Improved grassland	65
N15	Other arable land	65
N16	Broad-leaved deciduous woodland	65
N17	Coniferous woodland	65
N19	Mixed woodland	65
N21	Non-forest areas cultivated with woody plants (including Orchards, groves, Vineyards, Dehesas)	65
N22	Inland rocks, Screes, Sands, Permanent Snow and ice	65
N23	Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites)	65
N25	Grassland and scrub habitats (general)	65
N26	Woodland habitats (general)	65

4.3 Threats code

CODE	DESCRIPTION	PAGE NO
A01	Cultivation	65
A02	Modification of cultivation practices	65
A03	Mowing / cutting of grassland	65
A04	Grazing	65
A05	Livestock farming and animal breeding (without grazing)	65
A06	Annual and perennial non-timber crops	65
A07	Use of biocides, hormones and chemicals	65
A08	Fertilisation	65
A10	Restructuring agricultural land holding	65
A11	Agriculture activities not referred to above	65
B01	Forest planting on open ground	65
B02	Forest and Plantation management & use	65
B03	Forest exploitation without replanting or natural regrowth	65
B04	Use of biocides, hormones and chemicals (forestry)	65
B06	Grazing in forests/ woodland	65
B07	Forestry activities not referred to above	65
C01	Mining and quarrying	65
C02	Exploration and extraction of oil or gas	65
C03	Renewable abiotic energy use	65
D01	Roads, paths and railroads	65
D02	Utility and service lines	65
D03	Shipping lanes, ports, marine constructions	65
D04	Airports, flightpaths	65
D05	Improved access to site	65
E01	Urbanised areas, human habitation	65
E02	Industrial or commercial areas	65

CODE	DESCRIPTION	PAGE NO
E03	Discharges	65
E04	Structures, buildings in the landscape	65
E06	Other urbanisation, industrial and similar activities	65
F01	Marine and Freshwater Aquaculture	65
F02	Fishing and harvesting aquatic resources	65
F03	Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching, predator control, accidental capture (e.g. due to fishing gear), etc.)	65
F04	Taking / Removal of terrestrial plants, general	65
F05	Illegal taking/ removal of marine fauna	65
F06	Hunting, fishing or collecting activities not referred to above	65
G01	Outdoor sports and leisure activities, recreational activities	65
G02	Sport and leisure structures	65
G03	Interpretative centres	65
G04	Military use and civil unrest	65
G05	Other human intrusions and disturbances	65
H01	Pollution to surface waters (limnic & terrestrial, marine & brackish)	65
H02	Pollution to groundwater (point sources and diffuse sources)	65
H03	Marine water pollution	65
H04	Air pollution, air-borne pollutants	65
H05	Soil pollution and solid waste (excluding discharges)	65
H06	Excess energy	65
H07	Other forms of pollution	65
I01	Invasive non-native species	65
I02	Problematic native species	65
I03	Introduced genetic material, GMO	65
J01	Fire and fire suppression	65
J02	Human induced changes in hydraulic conditions	65
J03	Other ecosystem modifications	65
K01	Abiotic (slow) natural processes	65
K02	Biocenotic evolution, succession	65
K03	Interspecific faunal relations	65
K04	Interspecific floral relations	65
K05	Reduced fecundity/ genetic depression	65
L05	Collapse of terrain, landslide	65
L07	Storm, cyclone	65
L08	Inundation (natural processes)	65
L10	Other natural catastrophes	65
M01	Changes in abiotic conditions	65
M02	Changes in biotic conditions	65
U	Unknown threat or pressure	65
XO	Threats and pressures from outside the Member State	65

5.1 Designation type codes

CODE	DESCRIPTION	PAGE NO
UK00	No Protection Status	67
UK01	National Nature Reserve	67
UK04	Site of Special Scientific Interest (GB)	67
UK05	Marine Conservation Zone	67
UK06	Nature Conservation Marine Protected Area	67
UK86	Special Area (Channel Islands)	67
UK98	Area of Special Scientific Interest (NI)	67
IN00	Ramsar Convention site	67
IN08	Special Protection Area	67
IN09	Special Area of Conservation	67

Appendix 5 – North Meadow and
Clattinger Farm Conservation
Objectives

European Site Conservation Objectives for North Meadow and Clattinger Farm Special Area of Conservation Site Code: UK0016372



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that 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 maintaining or restoring;

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H6510. Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 as amended from time to time (the “Habitats Regulations”). They must be considered when a competent authority is required to make a ‘Habitats Regulations Assessment’, including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term ‘favourable conservation status’ is defined in regulation 3 of the Habitats Regulations.

Publication date: 27 November 2018 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

Appendix 6 – North Meadow and Clattinger Farm Site Improvement Plan

Site Improvement Plan

North Meadow & Clattinger Farm

Site Improvement Plans (SIPs) have been developed for each Natura 2000 site in England as part of the Improvement Programme for England's Natura 2000 sites (IPENS). Natura 2000 sites is the combined term for sites designated as Special Areas of Conservation (SAC) and Special Protected Areas (SPA). This work has been financially supported by LIFE, a financial instrument of the European Community.

The plan provides a high level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features. It does not cover issues where remedial actions are already in place or ongoing management activities which are required for maintenance.

The SIP consists of three parts: a Summary table, which sets out the priority Issues and Measures; a detailed Actions table, which sets out who needs to do what, when and how much it is estimated to cost; and a set of tables containing contextual information and links.

Once this current programme ends, it is anticipated that Natural England and others, working with landowners and managers, will all play a role in delivering the priority measures to improve the condition of the features on these sites.

The SIPs are based on Natural England's current evidence and knowledge. The SIPs are not legal documents, they are live documents that will be updated to reflect changes in our evidence/knowledge and as actions get underway. The information in the SIPs will be used to update England's contribution to the UK's Prioritised Action Framework (PAF).

The SIPs are not formal consultation documents, but if you have any comments about the SIP or would like more information please email us at IPENSLIFEProject@naturalengland.org.uk, or contact Natural England's Responsible Officer for the site via our enquiry service 0300 060 3900, or enquiries@naturalengland.org.uk

This Site Improvement Plan covers the following Natura 2000 site(s)

UK0016372 North Meadow & Clattinger Farm SAC

Site description

North Meadow & Clattinger Farm Meadows SAC consists of a series of traditionally managed unimproved grasslands within the floodplain of the Upper Thames which continue to be managed as pasture and as hay-meadow.

It contains a rich variety of species-rich grassland types including the rare MG4 community for which the SAC is designated as well as a number of notable plant species. These grasslands represent rare and scattered remnants of a much more widespread unimproved grassland habitat before agricultural intensification and extensive gravel quarrying locally were responsible for widespread losses of this habitat and its subsequent fragmentation.

Plan Summary

This table shows the prioritised issues for the site(s), the features they affect, the proposed measures to address the issues and the delivery bodies whose involvement is required to deliver the measures. The list of delivery bodies will include those who have agreed to the actions as well as those where discussions over their role in delivering the actions is on-going.

Priority & Issue	Pressure or Threat	Feature(s) affected	Measure	Delivery Bodies
1 Inappropriate water levels	Pressure/Threat	H6510 Lowland hay meadows	Review and update Water Level Management Plan	Environment Agency, Natural England
2 Habitat fragmentation	Pressure/Threat	H6510 Lowland hay meadows	Habitat restoration to improve the site's resilience	Natural England, Landowner(s)
3 Commons management	Pressure/Threat	H6510 Lowland hay meadows	Landowner agreement for livestock fencing	Defra: Common Land Branch, Natural England, Landowner(s)
4 Public Access/Disturbance	Pressure/Threat	H6510 Lowland hay meadows	Manage and mitigate the effects of public access	Natural England
5 Water Pollution	Threat	H6510 Lowland hay meadows	Investigate the risks from diffuse pollution carried in floodwaters	Environment Agency, Natural England

Issues and Actions

This table outlines the prioritised issues that are currently impacting or threatening the condition of the features, and the outstanding actions required to address them. It also shows, where possible, the estimated cost of the action and the delivery bodies whose involvement will be required to implement the action. Lead delivery bodies will be responsible for coordinating the implementation of the action, but not necessarily funding it. Delivery partners will need to support the lead delivery body in implementing the action. In the process of developing the SIPs Natural England has approached the delivery bodies to seek agreement on the actions and their roles in delivering them, although in some cases these discussions have not yet been concluded. Other interested parties, including landowners and managers, will be involved as the detailed actions are agreed and delivered. Funding options are indicated as potential (but not necessarily agreed or secured) sources to fund the actions.

1 Inappropriate water levels

An effective WLMP needs to be in place in order to protect the integrity of the site. The current one, possibly 20 years old, is no longer fit for purpose. There have been several unseasonal floods over the last six years which are beginning to cause changes and losses in the vegetation communities on the site.

Action	Action description	Cost estimate	Timescale	Mechanism	Funding option	Delivery lead body	Delivery partner(s)
1A	A revised Water Level Management Plan (WLMP) needs to be produced and implemented, based on an evaluation of eco-hydrological data. Flooding events have happened more regularly which may have resulted in changes to the vegetation composition and boundaries. Accordingly a WLMP should consider ways to minimise the effects of such events.	£6,000	2015-16	Water Level Management Plan	Not yet determined	Natural England	Environment Agency

2 Habitat fragmentation

The previously extensive species-rich grasslands have been lost over half a century to modern intensive agriculture and to widespread gravel extraction leaving only scattered remnants. The two component SSSIs are located 8km apart. Inclusion and restoration of a number of intervening sites locally would increase the habitat, thereby making it more resilient to fluctuating water levels in the face of climate change. The NNR team at North Meadow has, over a number of years, been working to achieve this aim. Also, one option is that additional land should be included within the North Meadow SSSI for this purpose. This would help buffer the site, possibly provide space for adaptation in anticipation of the effects of climate change, and better manage visitor impacts. Clattinger forms part of a more extensive site which provides good opportunities for on-site management.

Action	Action description	Cost estimate	Timescale	Mechanism	Funding option	Delivery lead body	Delivery partner(s)
2A	Reduce the fragmentation of semi-natural grasslands in the area around the SAC due to changes in agricultural practices and also gravel extraction by taking steps to restore the remaining areas.	£150,000	2014-24	Habitat creation / restoration strategy: Improvements to habitat connectivity	Not yet determined	Natural England	Landowner(s)

<i>Action</i>	<i>Action description</i>	<i>Cost estimate</i>	<i>Timescale</i>	<i>Mechanism</i>	<i>Funding option</i>	<i>Delivery lead body</i>	<i>Delivery partner(s)</i>
2B	Secure long term conservation management of buffer land adjacent to North Meadow to allow semi-natural grassland to be restored. Identification and implementation of a mechanism to this end is necessary.	£110,000	2014-24	Land / Tenancy Acquisition: Land Acquisition	Not yet determined	Natural England	Landowner(s)

<i>Action</i>	<i>Action description</i>	<i>Cost estimate</i>	<i>Timescale</i>	<i>Mechanism</i>	<i>Funding option</i>	<i>Delivery lead body</i>	<i>Delivery partner(s)</i>
2C	Explore undertaking a review of the SSSI boundary.	No cost	2015-20	Designation strategy (SSSI)	No funding required	Natural England	n/a

3 Commons management

Fencing is required to keep livestock from straying off site. North Meadow NNR is common land and it is the responsibility of neighbouring landowners to erect fences. There are a number of problems involved in achieving this.

<i>Action</i>	<i>Action description</i>	<i>Cost estimate</i>	<i>Timescale</i>	<i>Mechanism</i>	<i>Funding option</i>	<i>Delivery lead body</i>	<i>Delivery partner(s)</i>
3A	Seek agreement with neighbouring landowners to fence their boundaries to allow the site (common land) to be grazed effectively.	£10,000	2014-16	Partnership agreement	Not yet determined	Natural England	Defra: Common Land Branch, Landowner(s)

4 Public Access/Disturbance

There is increasing visitor pressure especially during the flowering time of Snake's-head Fritillary leading to localised damage on sites in the SAC.

<i>Action</i>	<i>Action description</i>	<i>Cost estimate</i>	<i>Timescale</i>	<i>Mechanism</i>	<i>Funding option</i>	<i>Delivery lead body</i>	<i>Delivery partner(s)</i>
4A	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	£5,000	2015	National Nature Reserve (NNR) management plan	Not yet determined	Natural England	n/a

5 Water Pollution

The SAC's hay meadow vegetation communities are sensitive to elevated nutrient levels. With increasing flooding there is an increased risk of flood water carrying diffuse pollution onto the site and causing soil enrichment with negative consequences for the species richness of the meadows.

<i>Action</i>	<i>Action description</i>	<i>Cost estimate</i>	<i>Timescale</i>	<i>Mechanism</i>	<i>Funding option</i>	<i>Delivery lead body</i>	<i>Delivery partner(s)</i>
5A	Investigate the risks of diffuse pollution and if appropriate develop a Diffuse Water Pollution Plan for the SAC.	No cost	2015-20	Investigation / Research / Monitoring	Natural England, Water Framework Directive (WFD)	Natural England	Environment Agency

Site details

The tables in this section contain site-relevant contextual information and links

Qualifying features	
#UK Special responsibility	
North Meadow & Clattinger Farm SAC	H6510 Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>)

Site location and links	
North Meadow & Clattinger Farm SAC	
Area (ha) 104.88	Grid reference SU014934 Map link
Local Authorities	Wiltshire
Site Conservation Objectives	European Site Conservation Objectives for North Meadow & Clattinger Farm SAC
European Marine Site conservation advice	n/a
Regulation 33/35 Package	n/a
Marine Management Organisation site plan	n/a

Water Framework Directive (WFD)

The Water Framework Directive (WFD) provides the main framework for managing the water environment throughout Europe. Under the WFD a management plan must be developed for each river basin district. The River Basin Management Plans (RBMP) include a summary of the measures needed for water dependent Natura 2000 sites to meet their conservation objectives. For the second round of RBMPs, SIPs are being used to capture the priorities and new measures required for water dependent habitats on Natura 2000 sites. SIP actions for non-water dependent sites/habitats do not form part of the RBMPs and associated consultation.

North Meadow & Clattinger Farm SAC

River basin	Thames RBMP
WFD Management catchment	Cotswolds
WFD Waterbody ID (Cycle 2 draft)	n/a

Overlapping or adjacent protected sites

Site(s) of Special Scientific Interest (SSSI)	
North Meadow & Clattinger Farm SAC	Clattinger Farm SSSI
	North Meadow, Cricklade SSSI
National Nature Reserve (NNR)	
North Meadow & Clattinger Farm SAC	North Meadow, Cricklade NNR
Ramsar	
North Meadow & Clattinger Farm SAC	n/a
Special Areas of Conservation (SAC) and Special Protection Areas (SPA)	
North Meadow & Clattinger Farm SAC	n/a

<i>Version</i>	<i>Date</i>	<i>Comment</i>
1.0	21/11/2014	

www.naturalengland.org.uk/ipens2000



Appendix 7 – North Meadow and
Clattinger Farm Interim Mitigation
Strategy 2023 - 2028

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

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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 Conservation¹ (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.

¹ <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)² 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 guidance³ 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.

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

³ <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 features⁴ / habitats for the SAC are –

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

5.7 The conservation objectives⁵ 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.)

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

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

5.8 North Meadow⁶ 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.⁷

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

⁶

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

⁷ <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 Plan⁸ (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 to 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.

⁸ <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 website⁹. 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.

⁹ <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 Survey¹⁰ (2017) and their results are broadly consistent with the findings of the EPR 2022 visitor survey.

¹⁰ 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.

TABLE 2. ON-SITE MITIGATION MEASURES (SAMMs) Relevant to all in scope developments within 9.4km of the SAC			
Theme	On-site mitigation measures	Likely cost over 5 years	Justification
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.
	TOTAL COST OF ON-SITE MITIGATION MEASURES OVER 5 YEARS	£296,500	
	PREDICTED NUMBER OF UNITS OF RELEVANT NEW DEVELOPMENT WITHIN 9.4KM OF NORTH MEADOW	919	
	FINANCIAL MITIGATION CONTRIBUTION COST PER UNIT	£323	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 Strategy¹¹ 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 SAC¹² 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 dwelling¹³. Using government figures¹⁴ 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.

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

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

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

¹⁴ <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 England¹⁵.

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.

¹⁵ <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 75¹⁶-78) 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

¹⁶ <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

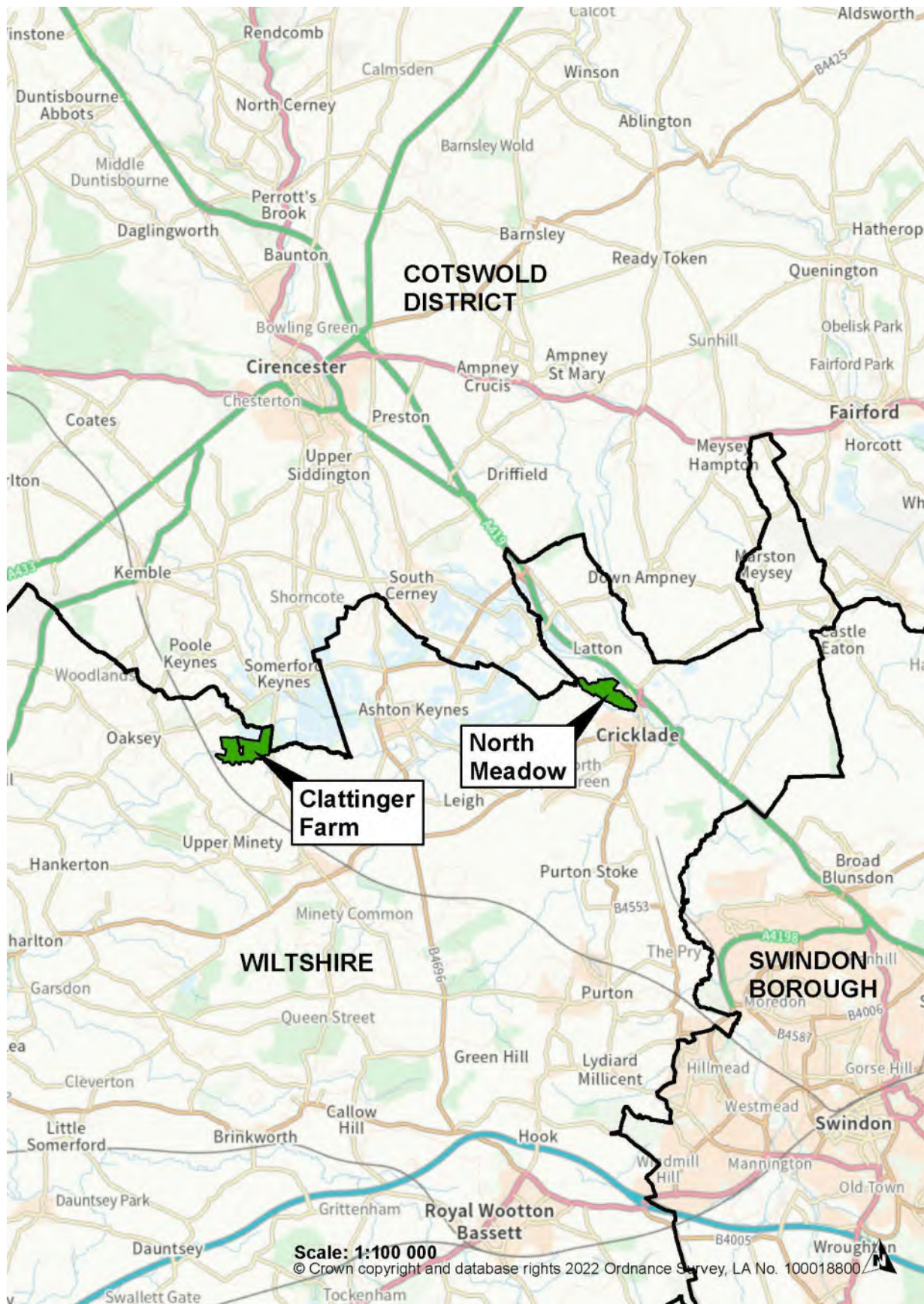
Appendix 3

Map to show the two Zols and the administrative boundaries

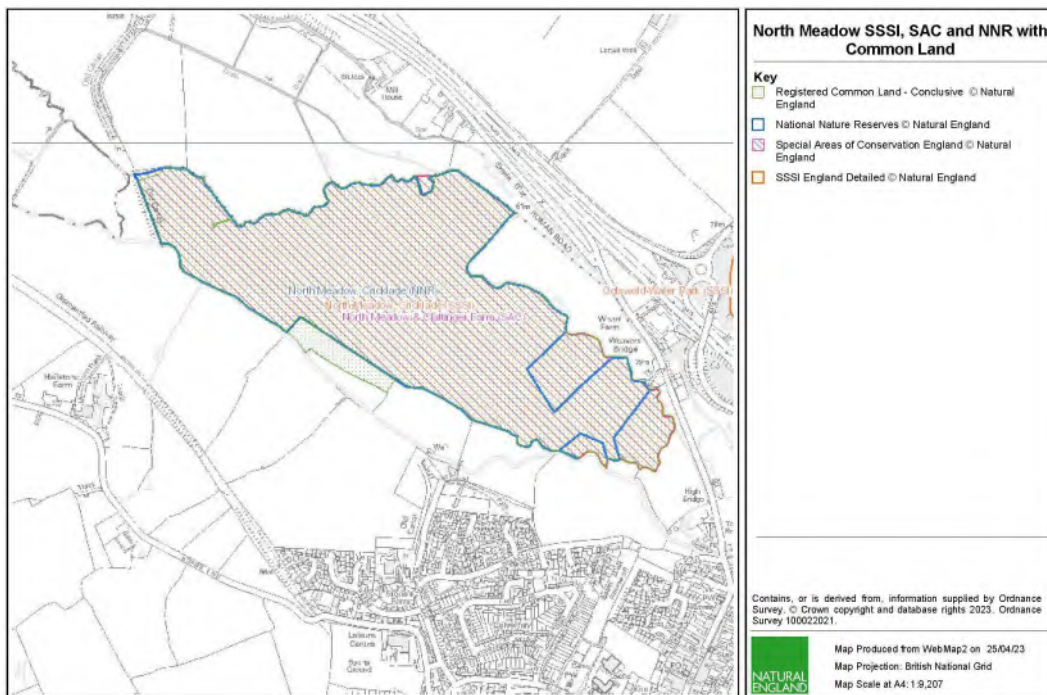
Appendix 4

Guidelines for Developer delivered SANGs

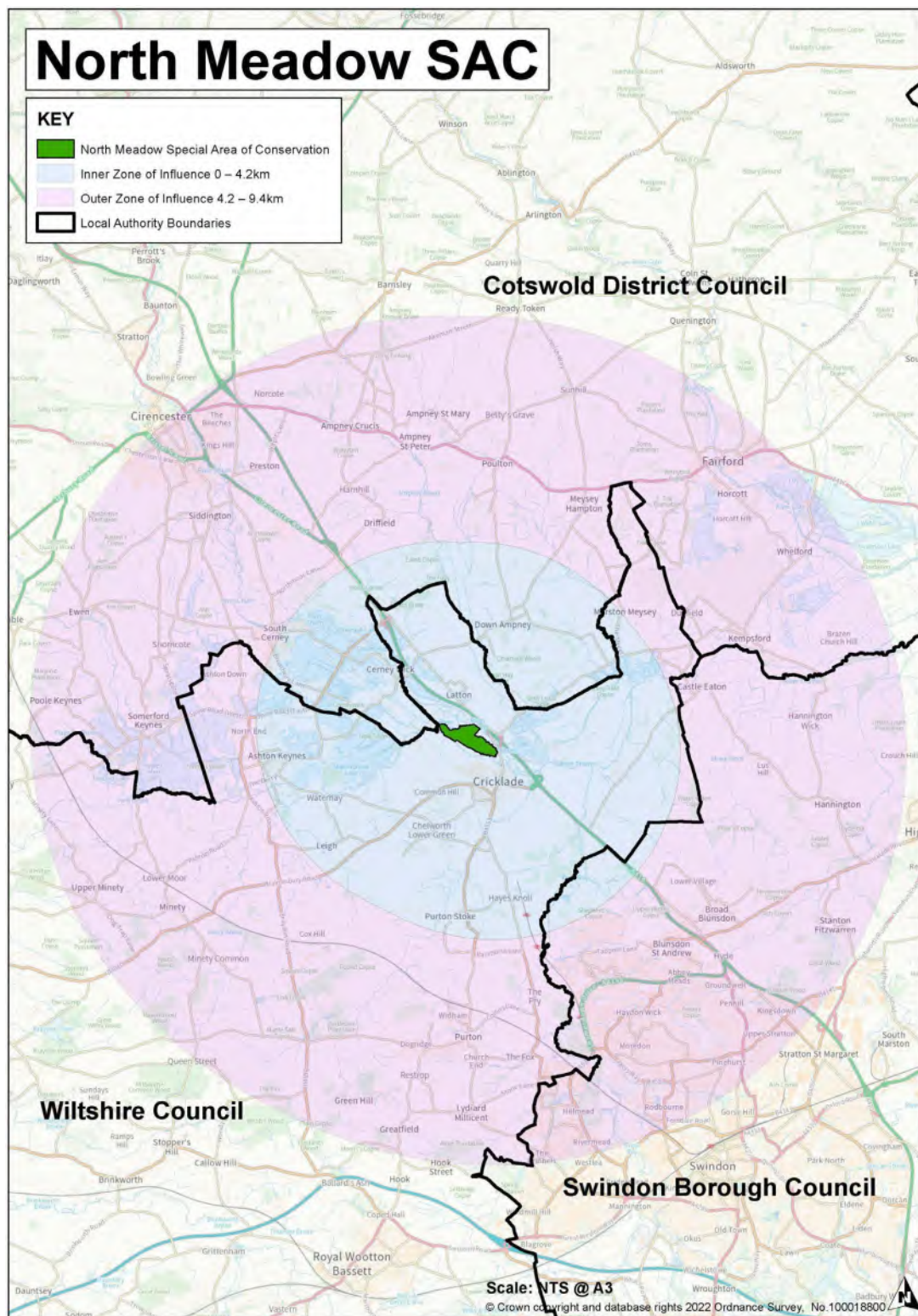
Appendix I: Map to show general location of North Meadow and Clattinger Farm



Appendix 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

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).

Appendix 8 – Illustrative Masterplan
(10542-RLA-XX-ZZ-DR-L-P8001_P02)



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Precedent Images



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