

SANG Design: Our Experience of Avoidance of Recreational Effects to European Protected Sites

What are SANGs and When are they Required?

The potential effects of housing development and resulting increased recreational pressure on Special Protection Areas (SPAs) for birds is well known. Ground nesting birds on heathland sites, and wetland birds that feed and roost at high tide on land surrounding coastal sites are particularly vulnerable to such effects. Other types of European protected site, namely Special Areas of Conservation (SACs) support habitats that can also be vulnerable to increased visitor pressure and disturbance. Such effects, if not avoided, would trigger the Conservation of Habitats and Species Regulations 2010 (as amended), (i.e. the Habitats Regulations) and hence are a major consideration for residential development in affected areas.

The creation of 'Suitable Alternative Natural Greenspaces' (SANGs) is now widely accepted as the mechanism for directing visitors away from SPAs SACs. Its role is to provide alternative green space to divert visitors from visiting the European protected site, thereby avoiding an increase in visitor pressure. The effectiveness of SANGs as mitigation will depend upon the location and design.



Most planning authorities have adopted planning guidance that specifies the design criteria for SANGs, together with Strategic Access Management and Maintenance (SAMM) contributions to maintain them, and monitor the respective European protected site. So, for those sites that must provide SANGs, the approach can often be relatively straightforward, with clear design guidance for provision of SANGs, or tariffs for contributing to strategic SANGs identified in development plans.

Selected Project Experience

The examples provided below demonstrate our track record of agreeing strategies that were not in all cases straightforward, either because the planning authorities did not at the time have the mechanism in place for controlling SANG provision at a strategic level, or where there was insufficient land available to meet the strict SANG design criteria, requiring a more novel approach.

1. Land at northeast Verwood, East Dorset (Linden Homes)

Tyler Grange advised on the promotion and then a successful planning application for up to 65 units on land 600m from the Dorset Heaths SSSI, SPA and SAC. The site is also adjacent to Ringwood Forest, which would qualify as an SPA and, according to recent case law, for the purposes of the ecological assessment was to be treated as such.



The site was insufficiently large to provide its own SANG and there were no strategic SANGs within the district that the developer could contribute to. Tyler Grange devised a bespoke strategy involving creation of a SANG on land within Ringwood Forest owned by the Forestry Commission. The creation of the SANG would in itself result in impacts as a result of increased disturbance to the species for which the nearby SPA and SAC was notified, so to overcome these issues, habitat creation and enhancement was devised to increase the resilience of populations of these sensitive species to such impacts. It was agreed that overall the development would result in biodiversity benefits and hence planning gain.

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Tyler Grange appeared at the local plan examination to reassure the planning inspector that there was confidence the SANG could be delivered and over the course of several meetings, we persuaded Natural England to withdraw a holding objection.

2. Land at Farnham, Surrey (Danescroft)

Tyler Grange advised on the proposed residential development for up to 200 units at a site within 1km of the Thames Basin Heaths SSSI, SPA and SAC. The land available to the developer was of sufficient area to meet the SANG design criteria set out in the Thames Basin Heaths Avoidance Strategy 2010-2015, though the requisite footpath lengths could not be provided owing to need to cross major roads. We agreed a strategy with Natural England that overcame this issue by providing links to the adjacent Farnham Park.



3. Land at Hayling Island, Havant (Gillenden Development Co Ltd)

Proposed residential development close to the Solent and Southampton Water Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site was confirmed as likely to have resulted in increased recreational use and hence disturbance of surrounding fields used by birds from the nearby protected site. At the time of the application, no strategy in the district had been adopted that would avoid such recreational effects as a result of residential development. Tyler Grange designed improvements to the local footpath network to direct people away from fields that we identified as being important to the birds at high tide to offset potential increased disturbance elsewhere. Because the development site was also found to support the birds at high tide, a package of compensatory habitat provision on nearby farmland was also devised. The strategy was subsequently accepted by the county ecologist, Natural England and RSPB.

4. Land at West Byfleet, Surrey (Gillenden Development Co Ltd)

Tyler Grange prepared an ecological appraisal report to inform the promotion of the site for 600 residential units in the Site Allocations Development Plan DPD. The site is 1.6km from the Thames Basin Heaths SSSI, SPA and SAC. We argued that, owing to the size of the site, it was not reliant on strategic SANGs being promoted elsewhere and that there could be confidence that it could provide its own SANG, designed in accordance with the principles set out in the Thames Basin Heaths Avoidance Strategy 2010-2015.

5. Land at North Newbury, West Berkshire

The site, proposed for up to 650 residential dwellings, is 750m from Snelsmore Common SSSI, which, whilst not being an SPA, supports species for which the Thames Basin Heaths SPA is notified. For this reason, the county ecologist sought provision of informal open space within the development that would meet the SANG design criteria.

Tyler Grange argued successfully that, notwithstanding the costs associated with the area of development land that would be required, this was disproportionate to the significance of the impact and a smaller area could be provide, given the protected site is not an SPA and the SSSI was not notified for ground nesting birds. Together with our landscape colleagues, we agreed a strategy with the county ecologist that utilised land that was constrained for other reasons to create multi-functional green infrastructure that provided informal open space, habitat creation, landscape and flood mitigation.



6. Pye Green Road, Cannock (Barratt West Midlands)

Tyler Grange addressed ecology issues associated with proposed residential development. The site is 850m from Cannock Chase SAC and is insufficiently large to deliver its own SANG. We advised on the development design to enable residents of the new development to access the SANG provided on an adjacent site, thereby avoiding the need to provide a bespoke SANG. The strategy was subsequently agreed with Natural England and the county ecologist.