DRAFT Upper Nene Valley Gravel Pits Special Protection Area Guidance and Mitigation Strategy

February 2026

North Northamptonshire Council

West Northamptonshire Council

Statutory status of the Upper Nene Valley Gravel Pits Special Protection Area Guidance

This Guidance applies to the two Local Planning Authorities which cover the Upper Nene Valley Gravel Pits Special Protection Area (SPA) (North Northamptonshire and West Northamptonshire) but will be adopted by each Local Planning Authority individually. It has been produced to help Local Planning Authorities, developers and others ensure that development has no significant adverse effect on the integrity ('AEOI') of the SPA, in accordance with the legal requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations').

The Guidance will replace a previous Supplementary Planning Document (SPD) adopted by the Borough Council of Wellingborough and East Northamptonshire Council in 2015 and a mitigation strategy addendum adopted in 2016. The Guidance will also work in place of a previous SPD adopted by West Northamptonshire Council in 2021 and a mitigation strategy addendum adopted in 2022. The Guidance takes account of new evidence available since the adoption of these previous documents.

This Guidance will supplement policies within the North Northamptonshire Joint Core Strategy, adopted July 2016 and West Northamptonshire Joint Core Strategy Local Plan (Part 1), adopted December 2014.

Both councils are preparing their new Local Plans which will supersede the above Joint Core Strategies. The North Northamptonshire Local Plan is currently being prepared and is expected to be adopted in November 2028. The West Northamptonshire Local Plan went out for Regulation 18 consultation on 28 January 2026 and is expected to be adopted in November 2027. These plans and their policies carry more weight as they progress through the plan process and this Guidance is expected to supplement the emerging policies within the Local Plans.

Guidance Consultation process and timeline

If you wish to make comments on the Draft Upper Nene Valley Gravel Pits SPA Guidance, please set out clearly in your response which part of the document you are commenting on. If you think the document should be changed to address your comments please provide details of your proposed changes. Your comments should cover succinctly all the information, evidence and supporting information necessary to support or justify the comment and the suggested change. You should not assume that there will be an opportunity to add further information.

All comments must be submitted by **23.59 on 21st April 2026**.

by email to: planningpolicy@northnorthants.gov.uk

or by post to:

SPA Guidance
Planning Policy and Place Making
North Northamptonshire Council
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

Please note that late representations will not be accepted.

If you wish to be notified of the adoption of the Guidance please include this in your comments.

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Introduction

The Upper Nene Valley Gravel Pits Special Protection Area (SPA)/Ramsar site is legally protected by the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations').

Northamptonshire's main towns are earmarked for major urban growth until 2045 through the emerging Local Plans. This generates particular pressures from built development, demand for public access and recreation opportunities. There is a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected sites, can have negative effects on these sites.

In addition to direct threats to the SPA from poorly located or designed development, Natural England considers the SPA to be 'at risk' from increasing recreational disturbance. A difficult balancing act is required to resolve impacts associated with recreation without compromising the ability of people to be outside and enjoying the green spaces near their homes.

This Guidance has been produced to help Local Planning Authorities, developers and others ensure that development has no significant adverse effect on the integrity ('AEOI') of the SPA, in accordance with the legal requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations'). The Guidance outlines a consistent approach to both consulting Natural England and identifying potential significant effects on the SPA's qualifying features. It provides detailed advice and guidance on implementing local plan policies relating to the SPA, in particular North Northamptonshire Joint Core Strategy Policy 4 (Biodiversity and Geodiversity) and West Northamptonshire Joint Core Strategy Local Plan Part 1 Policies BN2 (Biodiversity) and BN4 (Upper Nene Valley Gravel Pits Special Protection Area). It will also support new policies in the emerging local plans once adopted.

Nature conservation designations in the Upper Nene Valley Gravel Pits area

The Upper Nene Valley Gravel Pits span a number of statutory and non-statutory nature conservation sites which are protected through a range of legal and policy mechanisms (Table 1). Local Planning Authorities and other Competent Authorities must take these designations into account when carrying out their functions.

Table 1 Types of nature conservation designations in the Nene Valley

Designation	Protection mechanism	'Level'
Special Protection Area (SPA)	Conservation of Habitats and Species Regulations 2017	Statutory

Designation	Protection mechanism	'Level'
Wetland of International Importance (Ramsar site)	The Planning and Infrastructure Act 2025 affords the same protection to designated Ramsar sites as to habitats sites (Special Protection Areas (SPA) and Special Areas for Conservation (SAC), designated under the Birds Directive and Habitats Directive, respectively).	Statutory
Site of Special Scientific Interest (SSSI)	Wildlife and Countryside Act 1981 as amended	Statutory
Local Wildlife Site (LWS)	Local and national planning policy and guidance	Non-statutory

The SPA and Ramsar site boundaries are identical; the qualifying features are only slightly different (see below). All further references to the SPA should therefore be interpreted as including the Ramsar site.

The SSSI includes an additional 20ha of land at Earls Barton Carr and Ringstead Gravel Pits.

Further information regarding these sites can be found in Appendix 1. Please note that while the SPA's qualifying features are present in the non-breeding season, the features of interest of the SSSI and non-statutory sites may be present at any time of year.

Copies of citations for the site designations can be found at:

- SPA: European Site Conservation Objectives for Upper Nene Valley Gravel Pits SPA - UK9020296
- Ramsar site: Upper Nene Valley Gravel Pits | Ramsar Sites Information Service
- SSSI: Natural England Designated Sites View - Upper Nene Valley Gravel Pits SSSI.

Further information on Local Wildlife Sites can be obtained from the Wildlife Trust:

The Wildlife Trust BCN
Lings House, Lings Way
Lings, Northampton
NN3 8BE

Tel: 01604 405285
Email: northamptonshire@wildlifebcn.org
Web: www.wildlifebcn.org

The Upper Nene Valley Gravel Pits Special Protection Area

The SPA was formally classified by the UK Government in 2011. It covers 1358 hectares in two local authorities in Northamptonshire (Figure 1). It is a composite site comprising 20 separate blocks of land and water fragmented by roads and other features, and located adjacent or close to urban areas.

The site qualifies under **article 4.1** of Directive 2009/147/EC as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex 1 in any season:

Annex 1 species	Count and season	Period	% of GB population
Bittern Botaurus *stellaris*	2 individuals – wintering	5-year peak mean 1999/2000 – 2003/04	2.0%
Golden plover *Pluvialis apricaria*	5,790 individuals – wintering	5-year peak mean 1999/2000 – 2003/04	2.3%

The site qualifies under **article 4.2** of Directive 2009/147/EC, and under Criterion 6 for the identification of Wetlands of International Importance, as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season:

Migratory species	Count and season	Period	% of subspecies/ population
Gadwall *Anas strepera*	773 individuals – wintering	5 year peak mean 1999/2000 – 2003/04	2.0% *strepera*, NW Europe (breeding)

The site qualifies under **article 4.2** of Directive 2009/147/EC, and under Criterion 5 for the identification of Wetlands of International Importance, as it is used regularly

by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season:

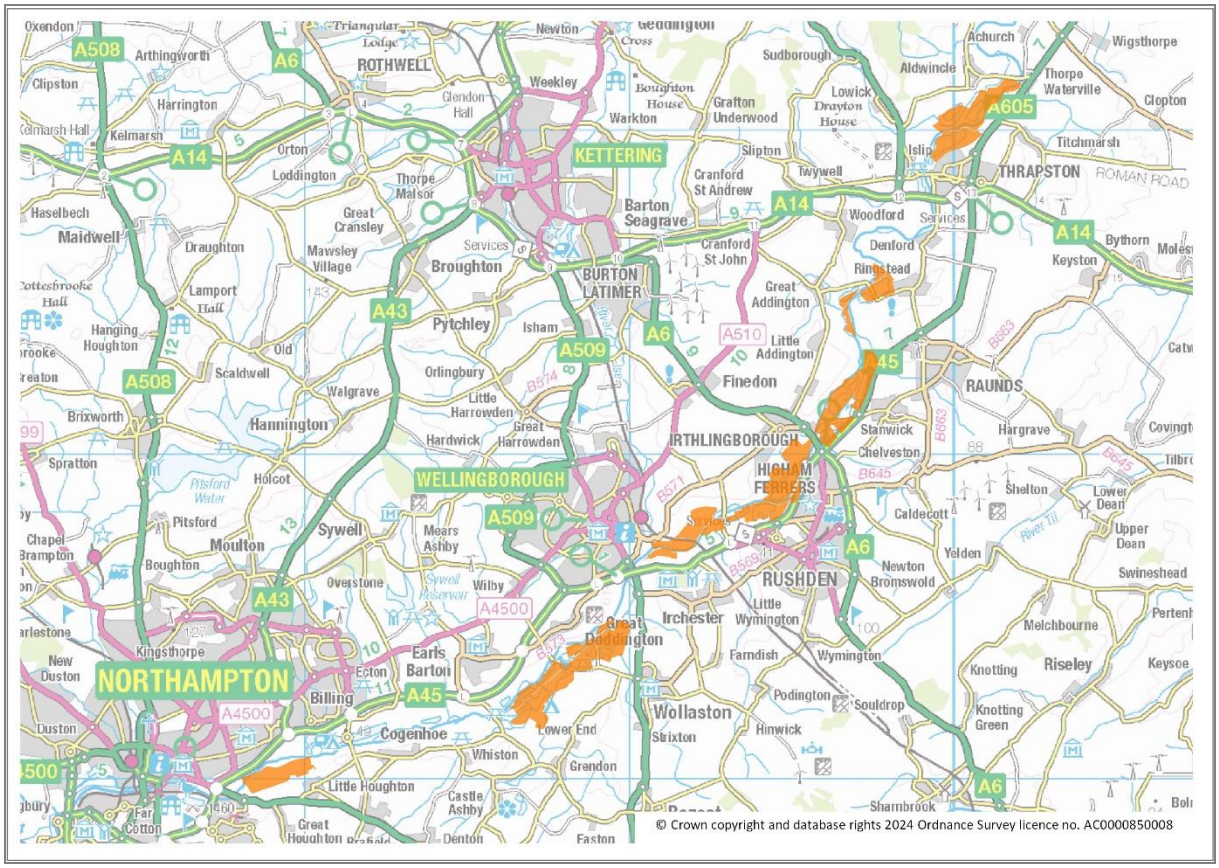
In the non-breeding season, the area regularly supports 23,821 individual waterbirds (5 year peak mean 1999/2000 – 2003/04), including wigeon *Anas Penelope*, gadwall *Anas strepera*, mallard *Anas platyrhynchos*, shoveler *Anas clypeata*, pochard *Aythya farina*, tufted duck *Aythya fuligula*, great crested grebe *Podiceps cristatus*, cormorant *Phalacrocorax carbo*, bittern *Botaurus stellaris*, golden plover *Pluvialis apricaria*, lapwing *Vanellus vanellus* and coot *Fulica atra*.[1]

The site further qualifies under **Criterion 6** for the identification of Wetlands of International Importance because it regularly supports 1% of the individuals in the populations of the following species or subspecies of waterbird in any season:[2]

Species	Count and season	Period	% of subspecies/ population
Mute swan *Cygnus olor*	629 individuals – wintering	5 year peak mean 1999/2000 – 2003/04	1.7% Britain

Figure 1 Location of the Upper Nene Valley Gravel Pits SPA (in orange)

[1] Natural England. 2011. Citation for Upper Nene Valley Gravel Pits Special Protection Area Site Code: UK9020296. Peterborough: Natural England.
[2] Joint Nature Conservation Committee. 2011. Information Sheet on Ramsar Wetlands (RIS): Upper Nene Valley Gravel Pits. Peterborough: Joint Nature Conservation Committee.



Requirements for plans, permits and planning applications

Consultation: when and how to engage with Natural England

Planning authorities must consult Natural England regarding proposals that could affect the Upper Nene Valley Gravel Pits SPA. The Impact Risk Zones (IRZ) are a Geographical Information System (GIS) tool developed by Natural England to make a rapid initial assessment of the potential risks to terrestrial SSSI and habitats sites posed by development proposals. They define zones around each site which reflect the sensitivities of the features for which the site is notified and indicate the types of development proposal which could potentially have adverse impacts and need further consideration. Impact Risk Zones have been published for all SSSIs and habitats sites in England. They can be viewed at the MAGIC website www.magic.gov.uk or downloaded from the Natural England website.[3]

Developers, consultants and members of the public, who are preparing to submit a planning application, can also use the IRZ to help them consider whether a proposed

[3] Natural England. 2023. SSSI Impact Risk Zones (England) [ONLINE]. Available at https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::sssi-impact-risk-zones-england/about. Accessed 8 January 2026.

development is likely to affect the SPA and choose whether to seek pre-application advice from Natural England.

Applications that fall outside the Impact Risk Zones may still require consultation with Natural England for other reasons, *e.g*. Environmental Impact Assessment applications.

Natural England should also be consulted on the following:

All spatial/community development plans, guidance or strategies relating to Northamptonshire/Nene Valley *e.g*. Local Plan, Development Plan Document, Minerals and Waste Local Plan, Rights of Way Improvement Plan, Neighbourhood Plan

Environmental permits:

- Land drainage consent: within SPA or on River Nene between Northampton and Thorpe Waterville
- Fisheries: all applications within SPA
- Water discharge/abstraction: all applications which may affect the SPA
- EA CAMS/Flood Management Plan/Nene Navigation Plans: all within Nene catchment

Please send consultation requests to by email (preferred) to ***consultations@naturalengland.org.uk***. Otherwise correspondence should be sent by post to:

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ

Outline applications: additional information required

Outline planning applications do not typically include the amount of detail needed to evaluate potential effects on the SPA. For this reason, outline applications should include some information which would normally only be required of a full application. This includes:

Residential and institutional applications, and other applications for overnight accommodation:

- A statement of the maximum number of units proposed
- Proposed greenspace provision: its extent, location, connections to other nearby greenspaces, and indicative information regarding its design and function, for example whether it will provide a safe and attractive place for people to exercise dogs, and
- Existing and proposed links to the SPA footpath/Rights of Way network, including permissive Rights of Way and commonly used pedestrian routes/access points, even where these have not been classified as Rights of Way.

Industrial applications:

- Building height and distance from SPA
- Proposed external surface materials, and
- Viewpoint photographs from ground level (i.e. birds' perspective) – locations to be agreed with Natural England.

Habitats Regulations Assessment

The Habitats Regulations include a stringent assessment process (Habitats Regulations Assessment (HRA)) which Competent Authorities must follow when considering plans or projects that could have significant effects on habitats sites, either individually or in combination with other plans or projects.[4,5]

The relevant competent authority (Table 3) will be able to advise whether HRA will be needed. Applicants may be required to provide additional information or carry out survey work before an assessment of the proposal can be made.

Table 3 Competent Authorities for plans and projects related to the Upper Nene Valley Gravel Pits SPA

[4] Refer to European Commission. 2001. Assessment of plans and projects significantly affecting Natura 2000 Sites: methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxembourg: Office for Official Publications of the European Communities.
[5] Refer to Tyldesley D, Chapman C. 2013. The Habitats Regulations Assessment Handbook (January 2021 edition). Wokingham: DTA Publications Ltd.

Example of Plan/Project	Competent Authority
Proposal to change habitat management or to introduce a new recreational activity, *e.g.* sailing, fishing (where no planning consent is required)	Natural England
Land drainage consent; consents for discharge, abstraction, fish stocking	Environment Agency
Proposals requiring planning consent	The relevant planning authority
National infrastructure projects	The relevant Government department

Significant adverse effects can arise from any of the following causes, alone or in combination with the effects of other plans or projects:

- **Physical loss of habitats** within the SPA through conversion to other land uses
- **Habitat fragmentation within the SPA**, which isolates waterbirds in small habitat patches and impedes waterbird movement through the site
- **Loss of usable habitat within the SPA** in which the physical extent of habitat remains, yet factors like disturbance or visual barriers reduce the amount of habitat that is actually suitable for waterbirds
- **Increased disturbance to waterbirds** from human activity (*e.g.* recreational uses), domestic pets, noise, light and other factors that cause birds to spend less time feeding and more energy avoiding the disturbance, compromising long term survival
- **Changes in ecological condition**, *e.g.* due to lack of management, ecological succession or deteriorating water quality, which render the habitat unsuitable for waterbirds
- **Direct waterbird mortality**, *e.g.* from collision with structures
- **Loss of functionally linked land** through conversion to other land uses.

The effects of development will vary from lake to lake, and similar proposals may have different effects on different lakes. The effects of a proposal must be considered in relation to both individual parts of the SPA and the entire SPA.

Applicants who are unsure whether their proposal could have a significant effect on the SPA are advised to contact Natural England as early as possible.

Appropriate Assessment

If after the initial HRA screening of likely significant effects (LSE), a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken.[6] As set out in the European Court of Justice judgement known as People Over Wind[7], any mitigation provided can only be considered at the appropriate assessment stage, not at the initial screening.

The assessment should be completed by the planning authority once it receives information from the applicant on the effects of the proposed development on the SPA's qualifying features. Natural England are a statutory consultee when it comes to appropriate assessments. If there is not enough information to provide certainty of no adverse effect on integrity, then the planning authority – as the competent authority – may be obliged to refuse permission.

Where it is shown that there will be an adverse effect on site integrity *or* where the possibility of an adverse effect on site integrity cannot be ruled out, appropriate avoidance or mitigation measures must be incorporated into the proposals. Where avoidance is not possible, and where (despite mitigation measures) the risk of an adverse effect on site integrity cannot be ruled out, plans and projects can only be permitted if:

- There are no alternative solutions
- There are imperative reasons of overriding public interest (IROPI) why the plan or project must proceed
- Habitat compensation is provided, *and*
- Approval is given by the Secretary of State.

Applicants are advised that most plans and projects are very unlikely to be able to demonstrate that they meet all of these requirements.

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[6] Ministry of Housing, Communities and Local Government. 2024. Planning Practice Guidance: Appropriate Assessment [ONLINE]. Available at https://www.gov.uk/guidance/appropriate-assessment. Accessed 8 January 2026.

[7] Judgement of 12 April 2018, *People Over Wind and Peter Sweetman v Coillte Teoranta*, C-323/17, EU:C:2018:244. Available at https://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN. Accessed 10 February 2026.

Assessing development impacts on the SPA

Recreational disturbance

Recreational disturbance is the most significant threat to the Upper Nene Valley Gravel Pits SPA. Research shows that disturbance from human recreational activities in wetlands can cause problems for wildlife.[8] Detailed local studies of the effects of visitor behaviour on bird behaviour and numbers have shown that people and dogs can disturb the SPA's birds as they feed and roost.[9]

Birds react to disturbance in different ways. They will often fly, walk or run away, which uses valuable energy. They may also simply lift their heads and watch or become vigilant to potential danger. All of these behaviours interrupt the birds' feeding. Birds' responses to disturbance can vary with factors like species, weather conditions, type of disturbance, the health and previous experiences of individual birds, and their ability to compensate for the disturbance (*e.g.* by feeding at night). Effects of disturbance can therefore be subtle and difficult to assess.

Birds will avoid areas that are continually disturbed. Unfortunately, these are sometimes the best feeding areas. Repeated disturbance can also cause stress and loss of energy, which affects the birds' health and breeding potential. In extreme cases it can lead to their death.

A 2023 study of visitor and access patterns across the SPA showed that most visits during winter are made by people who live within 5.9km of the SPA, who visit very frequently for relatively short periods of time.[10] New residential units and overnight accommodation within this 5.9km zone of influence (ZoI) (Figure 2) will be required to mitigate in-combination effects of the development through contributions to the SPA Strategic Access Management and Monitoring (SAMM) Strategy (Appendix 2). Where development is considered likely to have an 'alone' effect on the SPA due to its size, location and availability (or lack thereof) of surrounding semi-natural greenspace, Suitable Alternative Natural Greenspace (SANG) (Appendix 3) may also be required. Developments of approximately 500 dwellings and greater should consider the possibility of 'alone' effects: applicants for these large proposals are

[8] For example, see Kirby J, Davidson N, Giles N, Myrfyn O and Spray C. 2004. Waterbirds and Wetland Recreation Handbook – a Review of Issues and Management Practice. Slimbridge: The Wildfowl and Wetlands Trust.

[9] Wild Frontier Ecology. 2023. Upper Nene Valley Gravel Pits SPA Disturbance Study. Report to West Northamptonshire Council. Available at https://www.westnorthants.gov.uk/planning-policy/new-local-plan-west-northamptonshire. Accessed 8 January 2026.

[10] Panter C, Bishop E, Liley D. 2023. Upper Nene Valley Gravel Pits Visitor Access Study. Report by Footprint Ecology for West Northamptonshire, North Northamptonshire and Bedford Borough Councils.

advised to contact Natural England through its Discretionary Advice Service as early as possible.

Functionally linked land

Functionally linked land (FLL) is a term used to describe areas of land or sea occurring outside a designated site and which is considered to be critical to, or necessary for, the ecological or behavioural function in a relevant season of a qualifying feature for which a Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site has been designated. These habitats are frequently used by SPA species and support the functionality and integrity of the designated sites for these features.

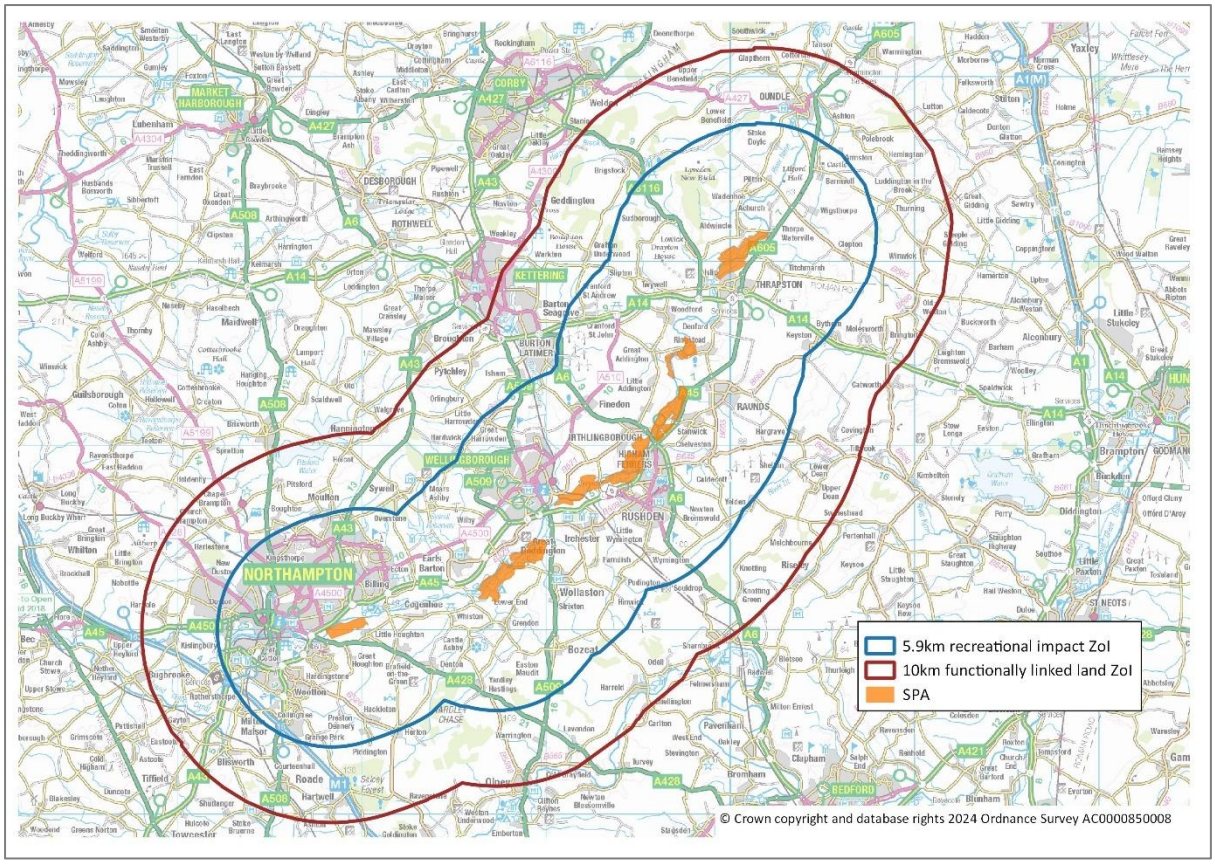
In the case of the Upper Nene Valley Gravel Pits SPA, the relevant qualifying feature is the wintering bird assemblage, in particular golden plover *Pluvialis apricaria* and lapwing *Vanellus vanellus*. Golden plover and lapwing spend part of their time feeding or roosting on grassland and arable land, often outside the SPA. These feeding and roosting areas can be located more than 10km from the SPA (Figure 2) and may be considered 'functionally linked' to the SPA.

Competent Authorities must consider the importance of functionally linked habitats in Habitats Regulations Assessments (HRA) when assessing new plans or projects to ensure the Conservation Objectives for the site can still be delivered. **Before submitting an application, planning applicants should consult Appendix 4 to find out whether functionally linked land may be relevant to their application.**

Interrupted sightlines

The SPA supports wintering waterbirds in part due to its open nature and good sightlines. It is important to maintain an unobstructed line of sight for golden plover and lapwing in particular, to enable them to detect predators. Development near habitat used by these species can obstruct lines of sight and therefore the habitat suitability for feeding or roosting. Development proposals within 250m of the SPA may be required to provide evidence demonstrating that sightlines will not be interrupted.

Figure 2 Upper Nene Valley Gravel Pits SPA recreational impact and functionally linked land zones of influence (ZoI)



Information requirements

Surveys may be needed to enable a proposal's impacts to be assessed. Planning applications must include the required survey results and other information, to the correct standard, for the planning authority to determine applications within the statutory timeframes. Surveys can include (but are not limited to):

- Desk study, scoping and Phase I habitat surveys
- Specific species population counts (selected locations only)
- Wintering bird surveys
- Breeding bird surveys
- Access/disturbance survey: an assessment of existing public access levels and their effects on birds under a range of conditions (in specific circumstances only, *e.g.* new tourism infrastructure, visitor centres)
- Flight line/vantage point surveys (wind turbine proposals and large-scale developments only)
- Air and/or water quality modelling
- Water quantity/flood modelling (in specific circumstances, to ensure adequate grassland forage is available)

- Other protected species surveys
- Surveys of land outside the SPA but which ecologically is functionally linked to the habitats site (*e.g.* farmland that provides off-site feeding habitat for birds which only use the SPA for roosting)
- Fish survey (fish stocking proposals only).

Prescribed survey methodologies are presented in Appendix 5. Not all of the above surveys will be required in every instance.

Applicants are advised that in many cases survey work will take up to 24 months as two seasons of wintering bird surveys, including nocturnal surveys, will be required in addition to any protected species surveys. This should be taken into account when planning surveys and application submission dates.

As set out in recent appeal decisions, [11] surveys must be completed pre-determination. The competent authority will not be able to carry out an Appropriate Assessment, and therefore the application cannot be determined if it does not include sufficient evidence. **The application will not be determined until the necessary survey information is provided. Failure to provide the necessary information may result in refusal.**

Once surveys have been completed, applicants should discuss the results with Natural England and the planning authority so that the next steps can be determined; this might or might not include the requirement for functionally linked land mitigation.

SPA sensitivity to impacts

All parts of the SPA receive equal protection and are equally important, although some are more or less sensitive to disturbance. Therefore, the same proposal may require a different type or degree of mitigation depending on the location.

There are several factors which influence sensitivity, all of which must be considered when assessing a proposal's impact.

Distribution of birds

The distribution of bird species varies across the SPA. Some species like tufted duck are spread evenly at low numbers across the whole site whereas other species like golden plover, shoveler and bittern are concentrated in certain locations. Similarly, a large percentage of the overall assemblage may be present in a small number of

[11] Appeal reference APP/X1545/W/25/3369961 EJ Latchington Ltd against Maldon District Council was dismissed in part because the appellant had not provided required ecological survey reports related to impacts on the Essex Coast designated sites. As a result the Inspector was not satisfied from the information before them that likely significant effects could be ruled out or adequately and appropriately mitigated or compensated.

lakes. All notified species present on a lake must be considered for any planning application.

A proposal affecting a lake with a widely distributed species is likely to have less impact than the same proposal on a lake with a large concentration of a single species.

Seasonality

Some lakes are of interest for their wintering birds only and have little or no breeding bird interest. Others are important for their breeding bird *and* wintering interest. On lakes that are only of interest for wintering birds, it may be that a proposed use can be permitted during the summer (subject to there being no significant impact on the features of interest of the Upper Nene Valley Gravel Pits SSSI). Applicants should check to find out whether the lake supports significant post-breeding (August – September) flocks of gadwall or shoveler, which may require use restrictions during these months. Some specific surveys may be required.

Screening

The degree of screening around a lake influences the impact of visual disturbance. On a heavily screened lake (*e.g.* Higham Ferrers), visual disturbance will be limited to all or part of that lake. Disturbance may affect a larger area in a more open area like Irthlingborough Lakes and Meadows. Screening can be used to minimise visual impact but needs to be balanced with the habitat needs (*e.g.* sight lines for take off) of the birds using the site.

Species' tolerance of disturbance

It is important to understand how various species react to disturbance. Some species like coot, mute swan and tufted duck are normally quite tolerant of disturbance. Others like shoveler, wigeon and golden plover are more sensitive. These tolerances are largely reflected in how species distribute themselves around the site.

A proposal on a lake with tolerant species is likely to have less of an impact than the same proposal on a lake with species sensitive to disturbance. Most types of disturbance are indiscriminate in their effects. Any mitigation must therefore be designed to meet the needs of the least tolerant species present on site.

Mitigating significant effects

Within the Upper Nene Valley Gravel Pits SPA it will be very difficult to implement mitigation for proposals causing physical loss or fragmentation of habitats. Please note that providing new habitat outside the SPA boundary (even adjacent to it) is considered compensation, not mitigation. Likewise, following a European Court of

Justice ruling, habitat creation inside the SPA boundary cannot be considered mitigation (Case C-521/12 TC Briels and Others v Minister van Infrastructuur en Milieu [2014], Opinion of E Sharpston). In rare circumstances, habitat enhancement inside the SPA may offer mitigation, but all such proposals must be discussed with Natural England at the earliest possible stage. Under the HRA process, compensation for damage can only be considered – and the plan or project approved – if it can first be shown that there are no alternative solutions and there are also imperative reasons of overriding public interest. Such cases are rare.

It may be possible to mitigate other types of impact like loss of usable habitat, changes in ecological condition or increased disturbance to waterbirds.

Mitigation measures on the Upper Nene Valley Gravel Pits SPA will often include the following:

- Management of recreational activities
- Access/visitor management
- Wardening and community engagement
- Monitoring

These measures are collectively known as ‘strategic access management and monitoring’, or SAMM.

The Upper Nene Valley Gravel Pits SPA SAMM Strategy (Appendix 2) is a framework of measures which provide a strategic and coordinated approach to delivering access management and monitoring throughout the SPA. These measures will be funded through developer contributions. The SAMM fee is a financial contribution towards recreational access management and monitoring of visitor pressure on the SPA. The fee applies to every new residential unit and most new overnight accommodation within the SPA zone of influence (ZoI) for recreational impacts.

It is important to note that SAMM is designed to mitigate the in-combination effects of multiple developments. Small-scale developments will usually be expected to contribute to SAMM only. Larger-scale developments may **also** be required to provide Suitable Alternative Natural Greenspace (SANG) on- or off-site and/or an uplift to an existing accessible greenspace, *e.g.* a country park, to SANG standard. Sites of Special Scientific Interest (SSSIs) will not normally be suitable for uplifting to SANG standard as the majority of SSSIs are already under recreational pressure.

[BOX] Suitable Alternative Natural Greenspace (SANG)

Suitable Alternative Natural Greenspace (SANG) is the name given to greenspace that is of a quality and type suitable to be used as mitigation in the context of

sensitive sites such as Special Protection Areas (SPA). SANGs are intended to provide alternative open space to divert visitors from visiting the SPA. The effectiveness of SANGs as mitigation will depend upon the location and design. These must be such that the SANG is more convenient and/or attractive than the SPA to users of the kind that currently visit the SPA.

SANG/uplift to existing accessible greenspace will be required where it is considered that a development would have an 'alone' likely significant effect on the SPA. The need for SANG will be identified through discussion with Natural England, and will be based on a range of factors including (but not limited to):

- Number of dwellings/overnight accommodation
- Proximity to the SPA
- Proximity to other areas of accessible natural or semi-natural greenspace.

SANG will be expected to meet the Natural England SANG Guidelines (2021). These are presented in Appendix 3. Please note that this section currently only applies to the Thames Basin Heaths (TBH) strategic mitigation project, as it is the only strategic solution that has a large number of mature SANG, such that linear and small SANG could be added to the offer in a meaningful way. Newer strategic solutions with few, disparate SANG will not be able to rely on small or linear SANG for mitigation until such time as the overall mitigation strategy has matured sufficiently. Note that the TBH strategic solution is almost 20 years old. **END BOX**

In some situations, bespoke mitigation may be required. Bespoke mitigation will be considered on a case-by-case basis, and a mitigation plan may contain a combination of mitigation measures. Mitigation measures will only be acceptable where:

1) there is a reasonable certainty they will be successful
2) they are in place and created in time to prevent the anticipated adverse effect arising, and
3) they will be maintained and managed in perpetuity (i.e. a minimum of 80 years).

In some cases proposals for monitoring and reporting on the performance of mitigation measures may be required.

As well as impacts relating to the SPA, a proposal may have separate adverse impacts on the Upper Nene Valley Gravel Pits SSSI, Local Wildlife Sites, protected species and on priority habitats and species. These impacts will also need to be

mitigated. Applicants should refer to the Northamptonshire Biodiversity SPG for more information on addressing biodiversity within developments.

The mitigation scheme should be an integral part of any plan or project. Natural England should be consulted at the earliest opportunity, following an initial ecological evaluation. The mitigation scheme should be developed alongside the plan or project, and be available at the consultation stage. Where an Appropriate Assessment shows that a plan or project – with mitigation – is still likely to have a significant adverse effect on site integrity, the competent authority will be obliged to refuse the application unless a case for IROPI (Imperative Reasons of Overriding Public Interest) is made.

Glossary

Appropriate Assessment: the second stage of a Habitats Regulations Assessment, the consideration of the impact on the integrity of a habitats site of a plan or project, either alone or in combination with other plans or projects, with respect to the site's structure and function and its conservation objectives.

Competent authority: any body that has the power to undertake or give any consent, permission or other authorisation for a plan or project. In England, any Minister of the Crown (as defined in the Ministers of the Crown Act 1975(1)), government department, statutory undertaker, public body of any description or person holding a public office; and any person exercising any function of such a person.

Functionally linked land: a term used to describe areas of land or sea occurring outside a designated site and which are critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site has been designated. These areas are frequently used by qualifying features and support the functionality and integrity of the designated site.

Habitat fragmentation: the process by which habitat loss results in the division of larger, continuous habitats into smaller, more isolated remnants. Fragmentation disrupts ecological processes, isolates species populations and leads to reduced species richness (i.e. reduced biodiversity).

Habitats Regulations Assessment (HRA): required under Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (The Habitats Directive), the process of determining likely significant effects and (where appropriate) assessing adverse impacts on the integrity of a habitats site.

Habitats site: formerly known as European sites, one of two types of statutory nature conservation designations designated under European legislation. Special Protection Areas (SPA) are classified under Council Directive 2009/147/EC on the conservation of wild birds (this is the codified version of Council Directive 79/409/EEC as amended). This is generally known as the Birds Directive and protects rare, threatened or vulnerable birds listed in Annex I of the Directive. Special Areas of Conservation (SAC) are classified under Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (known as the Habitats Directive) which protects habitats (annex I) and species (annex II) of the Directive. Northamptonshire's only habitats site is the Upper Nene Valley Gravel Pits SPA.

Mitigation: measures that aim to reduce and/or minimise the risk of an impact on wildlife, for example changes to timing, engineering design or technique. Depending

on the kind of impact and the location of the development, mitigation may be necessary outside the site boundary.

Ramsar site: a wetland of international importance, designated under the Convention on Wetlands of International Importance, especially as Waterfowl Habitat (known as the Ramsar Convention after the Iranian city where it was drawn up and adopted in 1971). As a matter of policy, Ramsar sites in the UK are protected as habitats sites. The Upper Nene Valley Gravel Pits SPA is also a Ramsar site.

Residential unit: a dwelling or any other unit of living accommodation. Examples of a residential unit are a flat, studio flat, a home of multiple occupation, shared accommodation within university halls (*e.g.* a bedroom with shared kitchen and bathroom) or a unit within a supported accommodation building. A short-term let (for example, a short-term rental property let online) is considered a residential unit. A residential unit can be found in any type of building and could have any tenure.

Screening: the first stage of Habitats Regulations Assessment (HRA), to check if a proposal is likely to have a significant effect on a habitats site's conservation objectives. If not, appropriate assessment and derogation stages are not required.

Suitable Alternative Natural Greenspace (SANG): greenspace that is of a quality and type suitable to be used as mitigation in the context of sensitive sites such as Special Protection Areas (SPA). SANGs are intended to provide alternative open space to divert people from visiting the SPA.

Zone of influence (ZoI): the area within which development impacts will result in adverse effects on the integrity of the SPA. The current 5.9km recreational impact ZoI is based on the most recent visitor access survey, which showed that 75% of winter visitors to the SPA live within 5.9km of the site. The 10km functionally linked land ZoI is based on current knowledge of golden plover and lapwing foraging ecology.

Appendix 1 Description of the Upper Nene Valley Gravel Pits

In 2005, 1,370ha of Northamptonshire's Nene Valley was first notified as a Site of Special Scientific Interest (SSSI). Much of the land was subsequently classified as a Special Protection Area (SPA) and Ramsar site. The area comprises a chain of exhausted sand and gravel pits, extending for approximately 35km along the alluvial deposits of the River Nene floodplain from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of Thrapston.

The Upper Nene Valley Gravel Pits SPA was designated under the EC Birds Directive (Council Directive 79/409/EEC) for its wintering habitat for wildfowl and wading birds (in particular bittern, gadwall and golden plover) and its assemblage of over 20,000 non-breeding waterbirds. These are known as the site's 'qualifying features'.

In England & Wales, SPAs are protected through the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), often referred to as the 'Habitats Regulations' or 'Habs Regs'. The Habitats Regulations protect rare or vulnerable wildlife in the European Union and help safeguard characteristic European biodiversity within a sustainable development framework. They also provide a stringent assessment process (Habitats Regulations Assessment or HRA) to be used when considering plans or projects that may have significant effects on habitats sites.

The SPA and Ramsar site boundaries are identical. The SSSI includes an additional 20ha of land at Earls Barton Carr and Ringstead Gravel Pits (Figure 1, main report).

Interest features

Notified features for each of the three designations are slightly different and are presented in Table 4. Please note that while the features of interest of the SPA are all wintering birds that occur in the non-breeding season (generally, from October to March), the SSSI encompasses features of interest – including wintering birds, breeding birds and an example of wet woodland – that may be present at any time of year.

Table 4 Notified features of the Upper Nene Valley Gravel Pits SSSI, SPA and Ramsar site. (An asterisk (*) indicates species which are not SPA features in their own right but form a named part of the 20,000 wintering waterbird assemblage and should be taken into account when carrying out a Habitats Regulations Assessment)

Notified feature	SSSI	SPA	Ramsar
>20,000 Non-breeding waterbirds	Y	Y	Y

Notified feature	SSSI	SPA	Ramsar
Aggregations of breeding birds: grey heron *Ardea cinerea*	Y	n/a	n/a
Aggregations of non-breeding birds: bittern *Botaurus stellaris*	Y	Y	n/a
Aggregations of non-breeding birds: coot *Fulica atra*	Y	*	n/a
Aggregations of non-breeding birds: cormorant *Phalacrocorax carbo*	Y	*	n/a
Aggregations of non-breeding birds: gadwall *Anas strepera*	Y	Y	Y
Aggregations of non-breeding birds: golden plover *Pluvialis apricaria*	Y	Y	n/a
Aggregations of non-breeding birds: great crested grebe *Podiceps cristatus*	Y	*	n/a
Aggregations of non-breeding birds: mute swan *Cygnus olor*	Y	*	Y
Aggregations of non-breeding birds: pochard *Aythiya farina*	Y	*	n/a
Aggregations of non-breeding birds: shoveler *Anas clypeata*	Y	*	n/a
Aggregations of non-breeding birds: tufted duck *Aythya fuligula*	Y	*	n/a
Aggregations of non-breeding birds: wigeon *Anas penelope*	Y	*	n/a
Assemblages of breeding birds: lowland open waters and their margins	Y	n/a	n/a
W6: *Alnus glutinosa* – *Urtica dioica* woodland	Y	n/a	n/a

Conservation objectives

The habitats site conservation objectives for the SPA are to:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes upon which the habitats of the qualifying features rely
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.[12]

[12] Natural England. 2014. European Site Objectives for Upper Nene Valley Gravel Pits Special Protection Area Site Code: UK9020296. Peterborough: Natural England.

Appendix 2 Upper Nene Valley Gravel Pits SPA Strategic Access Management and Monitoring (SAMM) Strategy 2026

Background

In 2005, 1,370ha of Northamptonshire's Nene Valley was notified as a Site of Special Scientific Interest (SSSI). In 2011 most of the SSSI was classified as a Special Protection Area (SPA) and Ramsar site. The Upper Nene Valley Gravel Pits SPA comprises a chain of exhausted sand and gravel pits, extending for approximately 35km along the alluvial deposits of the River Nene floodplain from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of Thrapston. The SPA and Ramsar site boundaries are identical. The SSSI includes an additional 20ha of land at Earls Barton Carr and Ringstead Gravel Pits.

The Upper Nene Valley Gravel Pits SPA was designated under the EC Birds Directive (Council Directive 79/409/EEC) for its wintering habitat for wildfowl and wading birds (in particular bittern, gadwall and golden plover) and its assemblage of over 20,000 non-breeding waterbirds. These are known as the site's 'qualifying features'.

The disused sand and gravel pits form an extensive series of shallow and deep open waters which occur in association with a wide range of marginal features, such as sparsely-vegetated islands, gravel bars and shorelines, and habitats including reedswamp, marsh, wet ditches, rush pasture, rough grassland and scattered scrub. This range of habitat and the varied topography of the lagoons provide valuable resting and feeding conditions for major concentrations of wintering waterbirds, especially ducks and waders. Species such as golden plover *Pluvialis apricaria* and lapwing *Vanellus vanellus* also spend time feeding and roosting on surrounding agricultural land outside the SPA.

SPA are protected in UK law by the Habitats Regulations (2017). Under the Habitats Regulations, development proposals must not give rise to adverse effects on the integrity of the SPA, either alone or in combination with other plans and projects, and if they are likely to, measures must be secured to remove this impact, otherwise the competent authority is obliged to refuse permission (subject to the exception tests set out in Regulation 64 (1)).

The legislation sets out that a Habitats Regulation Assessment (HRA) must be undertaken where a land use plan, either alone or in combination, is likely to have a significant effect on an internationally important site. This applies to Local Plans produced by local authorities, as well as Neighbourhood Plans produced by local communities. Such plans set out a broad quantum of housing growth. HRA work must therefore consider the overall impacts of such growth – in combination with

neighbouring authorities – and where there are any likely significant effects, adverse effects must be ruled out (subject to the same exception tests mentioned above).

Concerns relating to recreational pressure

Natural England considers the SPA to be 'at risk' from increasing recreational disturbance. Northamptonshire's main towns are earmarked for major urban growth until at least 2043. Studies of visitor and access patterns across the SPA have showed very clearly that visit rates to the SPA tend to increase with proximity to residential areas. Most visits are made by people who live within 5.9km of the SPA, who visit very frequently for relatively short periods of time.[13]

Access by people and dogs can be a significant cause of disturbance in some parts of the SPA. The site is also subject to a range of recreational activities including fishing and water sports. Demand for access and recreational activities (both formal and informal) within the Nene Valley is increasing along with disturbance to the birds for which the SPA is designated.

Disturbance effects are cumulative. Without mitigation, any net increase in the number of residential units near the SPA has the potential to increase the significance of the effect by increasing the number of visits to the habitats site. Those visitors may increase levels of disturbance to the wintering waterbirds or the habitats they depend on.

Evidence of visitor pressure in the SPA

The first visitor access survey of the SPA was done in 2014[14]; this was updated in 2023 to identify changes in visitor numbers and access patterns. Studies of bird responses to disturbance were undertaken in 2018[15] and 2022.[16]

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[13] Panter C, Bishop E, Liley D. 2023. Upper Nene Valley Gravel Pits Visitor Access Study. Report by Footprint Ecology to West Northamptonshire, North Northamptonshire and Bedford Borough Councils [ONLINE]. Available at https://northnorthants.moderngov.co.uk/documents/s24657/Appendix%20C%20-%20Upper%20Nene%20Valley%20Gravel%20Pits%20Visitor%20Access%20Study.pdf. Accessed 6 January 2026.

[14] Liley D, Floyd L, Cruickshanks K, Fearnley H. 2014. Visitor Access Study of the Upper Nene Valley Gravel Pits SPA. Report by Footprint Ecology for the Nene Valley NIA Partnership [ONLINE]. Available at https://www.footprint-ecology.co.uk/reports/Liley%20et%20al.%20-%202014%20-%20Visitor%20Access%20Study%20of%20the%20Upper%20Nene%20Valley%20SPA.pdf. Accessed 6 January 2026.

[15] McKinnon P. 2019. Upper Nene Valley Gravel Pits Disturbance Study. Unpublished report by Wild Frontier Ecology Ltd for the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire.

[16] McKinnon P. 2023. Upper Nene Valley Gravel Pits SPA Bird Disturbance Study. Report by Wild Frontier Ecology Ltd for West Northamptonshire Council [ONLINE]. Available at

The most recent visitor access survey results show that 75% of winter visitors to the SPA live within 5.9km of the site. Other strategic mitigation schemes have typically used the 75th percentile to define a zone of influence (ZoI), where new housing may trigger significant effects on a habitats site and therefore the need to provide mitigation. The 75th percentile reflects the distance from the site within which most winter visitors live. Typically post code data show most people coming from relatively close proximity while there are always a few who travel much further. The 75th percentile essentially discounts these few when determining the zone of influence and ensures any ZoI is not skewed by a few people visiting from far away.

The zone of influence includes West Northamptonshire and North Northamptonshire, which contribute approximately 19% and 81% of winter visitors, respectively. Housing delivery within the ZoI is expected to generate an 8.15% increase in visitor pressure.

Coordination between the two authorities is provided through a SPA working group consisting of officers from both councils, the Wildlife Trust and Natural England. The working group develops the SPA mitigation strategy and oversees the implementation of Strategic Access Management and Monitoring (SAMM) measures to mitigate the impact of new development. Any Suitable Alternative Natural Greenspace (SANG) (*e.g.* at The Green at Great Houghton, Rushden East) is dealt with by the individual local planning authority in consultation with Natural England.

SAMM Programme

The proposed SAMM measures have been reviewed by both authorities (in their role as competent authority) and by Natural England (as the government's advisor for the natural environment in England). This has ensured that the measures identified in this Strategy are those necessary to mitigate the effects of future development on the Upper Nene Valley Gravel Pits SPA. As such they do not seek to address existing issues or include measures that are the responsibility of the landowner(s). The measures in Table 5 below are those for which financial contributions should be secured from all relevant development. The measures are compliant with the Habitats Regulations and accord with paragraph 58 of the National Planning Policy Framework 2024 as being:

a) necessary to make the development acceptable in planning terms;

b) directly related to the development; and

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https://www.wildlifebcn.org/sites/default/files/2024-03/Upper%20Nene%20Valley%20Gravel%20Pits%20Special%20Protection%20Area%20%E2%80%93%20Bird%20Disturbance%20Study%20%E2%80%93%20March%202023.pdf. Accessed 6 January 2026.

c) fairly and reasonably related in scale and kind to the development.

The measures set out here supersede the 2016 Addendum to the SPA SPG: Mitigation Strategy. They provide a comprehensive approach to mitigating the effects of future development, and comprise three key strands:

- **Access management:** measures focused on a) screening the SPA's qualifying features from disturbance, b) redirecting visitor access away from highly sensitive areas towards less sensitive parts of the SPA, and c) encouraging visitors to stay on designated paths. Some interpretation is also included to explain the reasoning behind these measures and help visitors to continue to enjoy using the site while protecting its conservation value.

- **Wardening and community engagement:** in addition to change management, education and enforcement, may be able to facilitate measures like car park charging and seasonal zoning/access management.

- **Monitoring:** under the Habitats Regulations it is not permissible to monitor the effectiveness of mitigation measures, as this presupposes the possibility of their failure. Implementation of the mitigation strategy itself must be monitored however to ensure it progresses on schedule. Patterns of access to and around the SPA must be monitored for any significant changes that could require adjustments to access management.

The Strategy also includes project management for the oversight of the Strategy's implementation. This includes regular reporting back to the competent authorities to ensure that the monies collected are being spent in accordance with the agreed strategy. This service is provided by the Wildlife Trust BCN, the main delivery partner for the Strategy.

The Strategy accounts for the need to ensure the SAMM measures continue to be provided over the long term. This reflects the fact that the new homes will result in additional SPA visits on an ongoing basis. Consequently, the financial contributions being secured include an 'in perpetuity' factor to ensure the ongoing management and maintenance of the measures is considered and is based on an 80-year period. This is considered to appropriately reflect the lifespan of the relevant developments.

The total cost of the proposed SAMM programme is £12,493,130.40. The costs are taken from a base year of 2025 . This sum is to be met through SAMM contributions from both local authorities within 5.9km of the SPA.

Table 5 Strategic access management and monitoring (SAMM) measures

Site name	Description	Capital cost (year 1 and every 10 years)	Annual cost	80-year maintenance	Further comments
Washlands	Ditching to deter off-path activity	£40,000.00	£4,000.00	£320,000.00	V-ditch approximately £5.60/m. Assume 10-year maintenance cycle as with paths
Washlands	Surface path (approx. 3500m)	£114,500.00	£11,450.00	£916,000.00	Assume: 1.5m wide, whinstone/granite dust for drainage, full tray with geotec, all new, no upgrade. Assume 10-year maintenance/repair cycle
Summer Leys	Screening along disused railway	£8,000.00	n/a	£56,000.00	Measured as 1.25km. Assume 10-year lifespan so will need replacing 7 times in 80 years
Nene Wetlands	Wardening	n/a	£20,000.00	£1,600,000.00	To accommodate disproportionate visitor pressure predicted due to location, amenities and honeypot status
All	Signage	£15,000.00	n/a	£105,000.00	Lifespan 10 years so need replacing 7 times in 80 years

Site name	Description	Capital cost (year 1 and every 10 years)	Annual cost	80-year maintenance	Further comments
All	Wardening	n/a	£72,312.33	£5,784,986.40	8.15% uplift on existing resource to reflect uplift in visit numbers
All	Community engagement	n/a	£23,793.00	£1,903,440.00	8.15% uplift on existing resource to reflect uplift in visit numbers
All	Project management	n/a	£21,846.30	£1,747,704.00	8.15% uplift on existing resource to reflect uplift in visit numbers
All	Annual WeBS count	n/a	£750.00	£60,000.00	Survey coordination fee
n/a	**Total**	**£177,500.00**	**£142,305.33**	**£11,384,426.40**	n/a

Total initial capital cost plus seven replacement cycles: £1,420,000.00

Total 80-year maintenance cost: £11,384,426.40

Total SAMM cost over 80 years: **£12,804,426.40**

Apportioning SAMM costs

Mitigation costs can be apportioned in different ways. For example they can be spread evenly among all new dwellings (Appendix 2a) or targeted such that developments which generate the greater impact pay the greater share of the costs. Using the costs above as an example, basic 'even' and 'proportional' apportioning would yield the following results:

- **'Even' cost distribution:** Dividing the sample total mitigation costs (£12,493,130.40) by the total number of dwellings produces an average per dwelling cost of £764.39.
- **'Proportional' cost distribution:** In this example, SAMM costs are allocated based on the expected number of SPA visits originating from the different planning authorities. Therefore the mitigation fee in an authority which generates 30% of the visits would be expected to pay 30% of the total mitigation costs.

Unit 1 (West Northamptonshire) receives fewer visits than Units 2-8 (North Northamptonshire). However due to its open nature and highly urban setting, it requires significant wardening, community outreach and access management measures. As a result the two authorities agreed that the 'even' cost distribution approach was appropriate in this case.

Discounting

The SAMM fee must be discounted to allow for the fact that it will be earning interest that will make up part of the payment when it is required, and this must be offset against the inflation rate which reduces the value of the fee over the 80-year 'in perpetuity' period. It is therefore necessary to determine the net present value (NPV) of a future expense. The following formula has been used to calculate the SAMM fee:

Net present value sum = $\sum Mp / 1+(D/100)T(x-y)$, where

Mp = Annual Asset Maintenance Cost estimated over the period of maintenance T(x-y)

D = discount rate = 2.20% = [(Interest Rate/Inflation Rate) -1]x100

T(x-y) = time period for commuted sum (starting in year x and finishing in year y, *e.g.* 1-80).

- Table 6 sets out the NPV calculation for the SAMM fee, using the following parameters: Mp = annual costs (asset maintenance, wardening, community engagement, project management and WeBS count coordination) = £142,305.33

- Asset lifespan for replacement = 10 years
- Mp_{10} = asset replacement cost at 10 year intervals (for ditching, path surfacing, screening and signage) = £177,500.00 additional cost at years 1, 11, 21, 31, 41, 51, 61 and 71
- T = time period for SAMM fee calculation = 1 to 80 years
- D = real discount rate = 2.20% (D/100 = 0.022)

Table 6 Net present value calculation for SAMM fee over 80 years

Year	Real cash flow (£) Revenue	Real cash flow (£) Capital	Total	Real Discount Rate	Discount Factor	Present Value
1	£142,305	£177,500	£319,805	2.20%	0.978473581	£312,921
2	£142,305	£0	£142,305	2.20%	0.957410549	£136,245
3	£142,305	£0	£142,305	2.20%	0.936800929	£133,312
4	£142,305	£0	£142,305	2.20%	0.91663496	£130,442
5	£142,305	£0	£142,305	2.20%	0.896903092	£127,634
6	£142,305	£0	£142,305	2.20%	0.87759598	£124,887
7	£142,305	£0	£142,305	2.20%	0.858704481	£122,198
8	£142,305	£0	£142,305	2.20%	0.840219649	£119,568
9	£142,305	£0	£142,305	2.20%	0.822132729	£116,994
10	£142,305	£0	£142,305	2.20%	0.804435156	£114,475
11	£142,305	£177,500	£319,805	2.20%	0.787118548	£251,725
12	£142,305	£0	£142,305	2.20%	0.770174704	£109,600
13	£142,305	£0	£142,305	2.20%	0.753595601	£107,241
14	£142,305	£0	£142,305	2.20%	0.737373386	£104,932
15	£142,305	£0	£142,305	2.20%	0.721500378	£102,673
16	£142,305	£0	£142,305	2.20%	0.705969059	£100,463
17	£142,305	£0	£142,305	2.20%	0.690772073	£98,301

Year	Real cash flow (£) Revenue	Real cash flow (£) Capital	Total	Real Discount Rate	Discount Factor	Present Value
18	£142,305	£0	£142,305	2.20%	0.675902224	£96,184
19	£142,305	£0	£142,305	2.20%	0.66135247	£94,114
20	£142,305	£0	£142,305	2.20%	0.64711592	£92,088
21	£142,305	£177,500	£319,805	2.20%	0.633185831	£202,496
22	£142,305	£0	£142,305	2.20%	0.619555608	£88,166
23	£142,305	£0	£142,305	2.20%	0.606218795	£86,268
24	£142,305	£0	£142,305	2.20%	0.593169075	£84,411
25	£142,305	£0	£142,305	2.20%	0.580400269	£82,594
26	£142,305	£0	£142,305	2.20%	0.56790633	£80,816
27	£142,305	£0	£142,305	2.20%	0.55568134	£79,076
28	£142,305	£0	£142,305	2.20%	0.543719511	£77,374
29	£142,305	£0	£142,305	2.20%	0.532015177	£75,709
30	£142,305	£0	£142,305	2.20%	0.520562796	£74,079
31	£142,305	£177,500	£319,805	2.20%	0.509356943	£162,895
32	£142,305	£0	£142,305	2.20%	0.498392312	£70,924
33	£142,305	£0	£142,305	2.20%	0.48766371	£69,397
34	£142,305	£0	£142,305	2.20%	0.477166057	£67,903
35	£142,305	£0	£142,305	2.20%	0.466894381	£66,442
36	£142,305	£0	£142,305	2.20%	0.456843817	£65,011
37	£142,305	£0	£142,305	2.20%	0.447009605	£63,612
38	£142,305	£0	£142,305	2.20%	0.437387089	£62,243
39	£142,305	£0	£142,305	2.20%	0.427971712	£60,903
40	£142,305	£0	£142,305	2.20%	0.418759014	£59,592
41	£142,305	£177,500	£319,805	2.20%	0.409744632	£131,039

Year	Real cash flow (£) Revenue	Real cash flow (£) Capital	Total	Real Discount Rate	Discount Factor	Present Value
42	£142,305	£0	£142,305	2.20%	0.400924297	£57,054
43	£142,305	£0	£142,305	2.20%	0.392293833	£55,826
44	£142,305	£0	£142,305	2.20%	0.383849151	£54,624
45	£142,305	£0	£142,305	2.20%	0.375586254	£53,448
46	£142,305	£0	£142,305	2.20%	0.367501227	£52,297
47	£142,305	£0	£142,305	2.20%	0.359590242	£51,172
48	£142,305	£0	£142,305	2.20%	0.351849551	£50,070
49	£142,305	£0	£142,305	2.20%	0.344275491	£48,992
50	£142,305	£0	£142,305	2.20%	0.336864472	£47,938
51	£142,305	£177,500	£319,805	2.20%	0.329612987	£105,412
52	£142,305	£0	£142,305	2.20%	0.322517599	£45,896
53	£142,305	£0	£142,305	2.20%	0.31557495	£44,908
54	£142,305	£0	£142,305	2.20%	0.308781752	£43,941
55	£142,305	£0	£142,305	2.20%	0.302134787	£42,995
56	£142,305	£0	£142,305	2.20%	0.295630907	£42,070
57	£142,305	£0	£142,305	2.20%	0.289267032	£41,164
58	£142,305	£0	£142,305	2.20%	0.283040149	£40,278
59	£142,305	£0	£142,305	2.20%	0.276947308	£39,411
60	£142,305	£0	£142,305	2.20%	0.270985624	£38,563
61	£142,305	£177,500	£319,805	2.20%	0.265152274	£84,797
62	£142,305	£0	£142,305	2.20%	0.259444495	£36,920
63	£142,305	£0	£142,305	2.20%	0.253859584	£36,126
64	£142,305	£0	£142,305	2.20%	0.248394897	£35,348
65	£142,305	£0	£142,305	2.20%	0.243047844	£34,587

Year	Real cash flow (£) Revenue	Real cash flow (£) Capital	Total	Real Discount Rate	Discount Factor	Present Value
66	£142,305	£0	£142,305	2.20%	0.237815894	£33,842
67	£142,305	£0	£142,305	2.20%	0.23269657	£33,114
68	£142,305	£0	£142,305	2.20%	0.227687446	£32,401
69	£142,305	£0	£142,305	2.20%	0.222786151	£31,704
70	£142,305	£0	£142,305	2.20%	0.217990363	£31,021
71	£142,305	£177,500	£319,805	2.20%	0.213297811	£68,214
72	£142,305	£0	£142,305	2.20%	0.208706273	£29,700
73	£142,305	£0	£142,305	2.20%	0.204213574	£29,061
74	£142,305	£0	£142,305	2.20%	0.199817587	£28,435
75	£142,305	£0	£142,305	2.20%	0.19551623	£27,823
76	£142,305	£0	£142,305	2.20%	0.191307466	£27,224
77	£142,305	£0	£142,305	2.20%	0.187189301	£26,638
78	£142,305	£0	£142,305	2.20%	0.183159786	£26,065
79	£142,305	£0	£142,305	2.20%	0.179217012	£25,504
80	£142,305	£0	£142,305	2.20%	0.175359111	£24,955
	£11,384,426	**£1,420,000**	**£12,804,426**			**£6,066,482**

Total: £6,066,481.80

Per dwelling: £371.17

Please note that the SAMM fee will also be subject to an £85 administration fee per application.

Appendix 2a Calculation of visits to be mitigated from new development within the 5.9km recreation impacts ZoI

Step	Description	Number	How calculated
A	Total visits/year (per Panter et al 2023)	1,300,000	
A1	Total visits/year 75th percentile/5.9km Zone of Influence (ZoI)	975,000	A x 0.75
B	Population within 5.9km (per ONS website)	360,800	
C	Visits/person/year	2.70232816	A1 ÷ B
C1	Visits/person/day	0.00740364	C ÷ 365
D1	WNC planned dwellings within 5.9km	8421	Draft WNC Local Plan
D2	NNC estimated dwellings within 5.9km	31,202	Known delivery plus estimated residual requirement as set out below
E1	WNC dwellings with permission/paid mitigation/planned SANG	867	
E2	NNC dwellings with permission/paid mitigation/planned SANG	22,412	
F	Total remaining dwellings to mitigate for	16,344	(D1 + D2) – (E1 + E2)
G	Average residents per dwelling	2.4	
H	Number of residents to mitigate for	39,225.6	F x 2.4
J	Number of daily visits to mitigate for	**290.4**	H x C1

An estimated dwellings figure has been used for NNC as the local plan is not yet at a stage where allocations have been identified. The figure has been derived as set out below:

Local Housing Need 2024-2045 using the standard methodology (2002 pa)	42042
Completions 2024-25	2185
Anticipated delivery (2025-2045) from current consents as at 31 March 2025	14644
Significant applications in progress as at 31 March 2025 not contributing SAMMs	5583
Residual requirement for NNC area	19630
Number of households in parishes at 2021 Census within 5.9km of the SPA	66716
Total number of households in NNC	148992
Proportion of households within 5.9km of SPA	44.78%

Appendix 2b S111 Template

The following template would need to be submitted at the planning application stage. A signed copy of this form and the correct payment must accompany the relevant application as a contribution towards mitigation of the effect of proposed development on the Upper Nene Valley Gravel Pits SPA. This amount must be the sum of £XXXX for each dwelling to be developed.

Strategic Access Management and Monitoring Contribution Agreement (**draft**)

To the Planning Manager,

West Northamptonshire Council/North Northamptonshire Council

Application Reference Number: Click or tap here to enter text.

Address of Planning Application: Click or tap here to enter text.

I am contributing a sum of **£**Click or tap here to enter text. towards the cost of measures to mitigate the impact of the proposed residential development at the above address on the Upper Nene Valley Gravel Pits Special Protection Area (SPA) – known as the 'Strategic Access Management and Monitoring contribution'.

I hereby acknowledge and agree that:

a) The Strategic Access Management and Monitoring contribution has been paid to West Northamptonshire Council/North Northamptonshire Council as a contribution towards mitigation of the 'in combination' effect of the proposed development on the Upper Nene Valley Gravel Pits SPA;

b) No refund of this Strategic Access Management and Monitoring contribution will be made unless the application does not receive approval or is later withdrawn.

c) In respect of any refund (including where an application is withdrawn) I further acknowledge that:

    - A request for a refund will be made to the Local Planning Authority in writing;

- The total amount refunded will be the sum of the original Strategic Access Management and Monitoring contribution payment less the service charge of £85;
- No interest will accrue to be refunded; and,
- No refund will be made until the period for appeal has passed or an appeal has been dismissed or six months has elapsed since the date of withdrawal.

Signature of applicant/agent: .....

Date: Click or tap here to enter text.

Full name of applicant/agent: Click or tap here to enter text.

West Northamptonshire Council/North Northamptonshire Council

Signed:

West Northamptonshire Council/North Northamptonshire Council Planning Manager

This receipt signifies the agreement on behalf of West Northamptonshire Council/North Northamptonshire Council to the terms in which the Strategic Access Management and Monitoring contribution is made by the applicant as set out in this form and in accordance with Section 111 Local Government Act 1972.

Appendix 2c s106 template

Wording for SAMMs contributions to be included in any legal agreement:

To pay to the Council (NNC or WNC) on or before commencement of development the following sums Indexed Linked:

The Strategic Access Management and Monitoring contribution in the sum of [ ] pounds and [ ] pence (£) for use by the Council for providing strategic access management and monitoring arrangements in relation to the Upper Nene Valley Gravel Pits Special Protection Area to mitigate any adverse significant effect arising from the development.

Appendix 3 Guidelines for the Creation of Suitable Alternative Natural Greenspace (SANG) (Natural England, 2021)

Please note: while the following guidelines were developed for use within the Thames Basin Heaths SPA zone of influence, they are considered by Natural England to apply throughout the country. The guidelines are presented as set out in 2021 however the supporting text has been adapted for the Upper Nene Valley Gravel Pits SPA. Case studies have been removed but can be reviewed in other versions of the guidelines, for example at Woking 2027 - Natural England updated SANG guidance August 2021.[17]

Introduction

'Suitable Alternative Natural Greenspace' (SANG) is the name given to green space that is of a quality and type suitable to be used as mitigation in the context of sensitive sites like Special Protection Areas (SPA).

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

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

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

These guidelines relate specifically to the means to provide mitigation for significant impact arising from new housing within the Upper Nene Valley Gravel Pits SPA zone of influence. They do not address nor preclude the other functions of green space. Other functions may be provided within SANG, if this does not conflict with the specific function of mitigating visitor impacts on the SPA.

SANG may be created from:

[17] Woking 2027. Natural England updated SANG guidance August 2021. [ONLINE] https://www.woking2027.info/supplementary/tbhspaSPG/updated_sang_guidance_August_2021. Accessed 22 January 2026.

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

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

SANG continue to need to be delivered in advance of any associated housing stock being occupied. They should also be funded for in perpetuity (i.e. for a minimum of 80 years) as is the current process.

The Character of the SPA and its Visitors

The Upper Nene Valley Gravel Pits SPA/Ramsar site spans several statutory and non-statutory nature conservation sites. The SPA and Ramsar site boundaries are identical; the Upper Nene Valley Gravel Pits SSSI includes an additional 20ha of land at Earls Barton Carr and Ringstead Gravel Pits. The site consists of a chain of exhausted sand and gravel pits extending for approximately 35km along the alluvial deposits of the River Nene in Northamptonshire. The pits form an extensive series of shallow and open waters which occur in association with a range of habitats including reedswamp, marsh, wet ditches, rough grassland and scattered woodland.

Survey effort in 2022 showed that 75% of winter visitors on a short visit, directly from home, lived within 5.9km of the site. ‘Close to home’ was the most common reason cited (62%) for visiting the site. Ninety-nine percent of winter visitors were visiting directly from home; 94% of these visitors lived in West or North Northamptonshire. The two most common main activities were dog walking (40%) and walking (39%), and 59% of visitors visit ‘most days’ (i.e. at least 180 visits/year), including 18% who visit at least once a day. The average route length was 3.8km.

Guidelines for the Quality of SANG

The quality guidelines have been grouped into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from

visitor surveys carried out at heathland sites within the Thames Basin Heaths area or within the Dorset heathlands.

The principal criteria contained in the Guidelines have also been put into a checklist format which are contained in Appendix 3a.

Accessibility

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

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

Target groups of Visitors

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

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

Networks of sites

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

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

Paths, Roads and Tracks

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

Paths must be of a width acceptable to visitors.

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

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

Artificial Infrastructure

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

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

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

Landscape and Vegetation

SANG do not have to contain wetlands or wetland vegetation to provide an effective alternative to the SPA.

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

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

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

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

Restrictions on usage

A significant percentage of visitors to the SPA came to exercise their dogs and so it is imperative that SANG allow for pet owners to let dogs run freely over a significant part of the walk. Access on SANG should be largely unrestricted, with both people and their pets being able to freely roam along most routes. This means that sites where freely roaming dogs will cause a nuisance or where they might be in danger (from traffic or such like) should not be considered for SANG.

Assessment of site enhancement as mitigation

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

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

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

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

Practicality of enhancement works

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

TBH SPA Mitigation Project – January 2021

Please note: this section currently only applies to the Thames Basin Heaths (TBH) strategic mitigation project, as it is the only strategic solution that has a large number of mature SANGs, such that linear and small SANG could be added to the offer in a meaningful way. Newer strategic solutions with few, disparate SANG will not be able to rely on small or linear SANG for mitigation until such time as the overall mitigation strategy has matured sufficiently. Note that the TBH strategic solution is almost 20 years old at the time of writing.

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

To be made very clear from the outset. There remains a hierarchy of SANG provision. Great weight will be given to those SANGS meeting all the existing quality criteria (shown in Appendix 3a) which should be delivered in the first instance. Only if this is **not possible**, **for clearly established reasons**, should the delivery of the options outlined in the section below be considered. If any proposed SANGS do not meet all the Appendix 3a quality criteria, then these SANGS will continue to be assessed on a case-by-case basis and should be **agreed** with both the competent authority and Natural England. The proposal will need to demonstrate equivalent effectiveness of mitigation being provided to ensure a robust, consistent approach continues. Any shortfall in SANG criteria should be offset by other complementary means, such as an elevated provision rate, size or high-quality features.

The evidence shows that the use of SANG networks, linear orientated sites and small sites of no smaller than two hectares have potential to provide effective mitigation where traditional SANG is unavailable. These SANG areas will be linked and/or in proximity to an already established SANG. If effectiveness can be

demonstrated of small or linear SANGs working alone, then we will assess this on a case-by-case basis, taking in to account the site's context amongst the wider greenspace network.

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

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

Appendix 3a SANG Site Quality Checklist

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

Must haves

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

Should haves

- SANG should be clearly sign-posted or advertised in some way.
- SANG should have leaflets and/or websites advertising their location to potential users. It would be desirable for social media to be used as well, with the goal of reducing paper use.

Desirable

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

Appendix 3b Further clarification on the TBH Project 2021

Please note: this section currently only applies to the Thames Basin Heaths (TBH) strategic mitigation project, as it is the only strategic solution that has a large number of mature SANGs, such that linear and small SANG could be added to the offer in a meaningful way. Newer strategic solutions with few, disparate SANG will not be able to rely on small or linear SANG for mitigation until such time as the overall mitigation strategy has matured sufficiently. Note that the TBH strategic solution is almost 20 years old at the time of writing.

Reliance on the length of circular walk could be given less weight in specific circumstances on individual SANG sites. A circular route is still required. This will be agreed on a case-by-case basis by Natural England and the relevant Local Planning (Competent) Authority and only where equivalence can be effectively demonstrated. Sites will also only be accepted where most of the other criteria from Appendix 3a are met, either individually or as part of a group of sites.

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

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

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

Equivalence – This will be required on all SANG sites not meeting the guidelines in Appendix 1. There will have to be an over provision of something else to offset the lack of the full circular walk. This would be likely to incorporate an increased provision rate, for example providing 12 hectares of SANG per thousand head of

population. A significant high quality SANG in terms of amenities and habitats could also demonstrate this requirement. We are happy to discuss this matter further on a case-by-case basis, either through our DAS Service for developers or our Local Plan Service for Local Planning Authorities.

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

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

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

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

It is essential that Natural England visits and agrees a SANG, before any housing development can be attributed towards it. For SANG development advice please contact Natural England's Discretionary Advice Service.[18]

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

Naming of SANG:

1. Use a name which highlights any attractive features within the site. *e.g.* meadow, copse, lake.
2. Avoid the use of the term 'SANG' in the site name.
3. Keep the name relevant to the location but dissimilar to nearby SANGs.
4. The name should be different to any associated development.

Location of SANG:

[18] GOV.uk. Developers: get environmental advice on your planning proposals [ONLINE]. https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals. Accessed 22 January 2026.

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

Biodiversity:

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

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

Through appropriate design and implementation BNG can complement the purpose of SANG. These are designed to provide more natural and diverse green space for communities to benefit from and, consequently, delivering more effective mitigation to alleviate pressure on SPAs.

SANG is not an automatic delivery mechanism for BNG but the two can exist on the same site. BNG on SANG is only attributable to such habitat creation or enhancement that proves measurable additionality over and above the minimum requirements of the SANG, demonstrated through use of the Biodiversity Metric stipulated by the consenting body.

For BNG to be delivered on SANG, the SANG should achieve nature conservation outcomes that demonstrably exceed existing obligations under the SANG guidance, as quantified through the metric. It is encouraged that, where applicable, additional or enhanced features at SANGs are informed by local nature or wildlife strategies and priorities, such as Local Nature Recovery Strategies (LNRS). It is recommended that the BNG calculations for the SANG are done separately from the rest of the project calculations, to ensure a clear audit trail and allow for simple demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements.

Any additional features provided for BNG purposes should not conflict with the principal purpose of the SANG. Consideration should be given for other ecosystem services provided by the SANG and design should ensure BNG does not compete with these but delivers alongside them. For example, a wildflower rich grassland area created for biodiversity benefits would provide additional ecosystem services but could potentially also conflict with recreational services provided by the SANG. Careful consideration should be given to the design of any additional biodiversity features introduced into the SANG to ensure they did not conflict with the SANGs principal purpose.

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

Further information on BNG is set out in the following guidance and standards

1. CIEEM, CIRIA, IEMA. 2016. Biodiversity Net Gain: Good Practice Principles for Development. Available at: https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/
2. British Standards Institution. 2021. BS 8683 Process for designing and implementing Biodiversity Net Gain. Specification. Available at: https://knowledge.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification

Equality Act 2010 Compliance:

Natural England will not provide bespoke advice on this subject in pre application discussions. However, Natural England urges developers and local planning authorities alike to consider Equality Act 2010 compliance when designing their SANG solutions.

Paths:

1. We are concerned about sections of the circular route that seasonally are wet, muddy or flooded, and could put visitors off from visiting. In these cases, we recommend boardwalk or paths are built up, for them to remain as compliant SANG. Relating to this, if applying grip to surfaces, avoid wire netting as it can trap dog claws.
2. Path surfacing needs to remain semi natural. The highest specification surface we would accept is resin bound hoggin.
3. Avoid convoluted paths and pinch points in SANG design. By maintaining a minimum width between paths of 100 m in open ground and 50 m in dense woodland. If necessary, look to extend the area of the SANG, or look at a local SANG Network.
4. Avoid paths running through areas adjacent to major infrastructure with prolonged loud noise. For example, adjacent dual carriageways or motorways. Natural England look at a maximum decibel limit of 60, before requiring discounting of SANG area.

Waymarking and signage:

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

Bins and dog fouling:

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

Car park standard:

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

Safety and security:

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

Amenities:

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

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

To conclude

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

Appendix 3d SANG Information Form

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

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

Background information: name and location of proposed SANG

Name: Click or tap here to enter text.

Address: Click or tap here to enter text.

Grid reference: Click or tap here to enter text.

Please attach a map of the site with the boundaries clearly marked. Please also indicate any car parks, parking spaces and existing routes or paths on site:

Size of the proposed SANG (hectares), excluding water features: Click or tap here to enter text. hectares

Any current designations on land, *e.g.* LNR/SNCI: Click or tap here to enter text.

Current owners' name and address (If there is more than one owner then please attach a map): Click or tap here to enter text.

Who manages the land? Click or tap here to enter text.

Legal arrangements for the land – e.g. how long is the lease? Click or tap here to enter text.

Is there a management plan for the site (if so, please attach)? Choose an item.

Current visitor arrangements

Is the site currently accessible to the public? Choose an item.

Does the site have open access? Choose an item.

Has there been a visitor survey of the site (If so, please attach)? Choose an item.

If there has been no visitor survey, please give an indication of the current visitor levels on the site: Click or tap here to enter text.

Does the site have existing car parking? Choose an item.

How many car parks? Click or tap here to enter text.

How many parking spaces? Click or tap here to enter text.

Are there any signs to direct people to the site (Please indicate where and what type of sign)? Click or tap here to enter text.

Site quality checklist

Table 7 Must haves: these criteria are essential for all SANG

No.	Criterion	Current	Future
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)	☐	☐
2	Circular walk of 2.3-2.5km	☐	☐
3	Car parks easily and safely accessible by car and clearly signposted	☐	☐
4	Access points appropriate for particular visitor use the SANG is intended to cater for	☐	☐

No.	Criterion	Current	Future
5	Safe access route on foot from nearest car park and/or footpath	☐	☐
6	Circular walk which starts and finishes at the car park	☐	☐
7	Perceived as safe: no tree and scrub cover along walking routes	☐	☐
8	Paths easily used and well maintained but mostly unsurfaced	☐	☐
9	Perceived as semi-natural with little intrusion of artificial structures	☐	☐
10	If larger than 12ha then a range of habitats should be present	☐	☐
11	Access unrestricted: plenty of space for dogs to exercise freely and safely off the lead	☐	☐
12	No unpleasant intrusions (*e.g.* sewage treatment plant smells)	☐	☐

Table 8 Should haves: these criteria are desirable for all SANG

No.	Criterion	Current	Future
13	Clearly signposted or advertised in some way	☐	☐
14	Leaflets or website advertising the location to potential users	☐	☐
15	Dog owners can take dogs from the car park to the SANG safely off lead	☐	☐
16	Gently undulating topography	☐	☐
17	Access points with signage outlining the layout of the SANG and routes available to visitors	☐	☐
18	Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable.	☐	☐
19	Focal point such as a viewpoint or monument within the SANG	☐	☐

Appendix 4 Functionally linked land

Frequently asked questions

What is functionally linked land?

Functionally linked land (FLL) is a term often used to describe areas of land or sea occurring outside a designated site and which is critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site has been designated. These areas are frequently used by qualifying features and support the functionality and integrity of the designated site. In the case of the Upper Nene Valley Gravel Pits SPA, the relevant qualifying feature is the wintering bird assemblage, in particular golden plover *Pluvialis apricaria* and lapwing *Vanellus vanellus*. Golden plover and lapwing spend part of their time feeding or roosting on grassland and arable land, often outside the SPA. These feeding and roosting areas can be located up to 10km from the SPA and may be considered 'functionally linked' to the SPA.

What are the implications of functionally linked land for planning applications?

Standard wintering bird surveys often fail to identify numbers of foraging and roosting golden plover and lapwing. Some applicants for sites that are within 10km of the SPA will be required to provide wintering bird survey information for the site and adjacent fields to determine suitability for, and level of use by golden plover and lapwing. This information will be required prior to determination. A minimum of two winters' counts will be required with diurnal and nocturnal surveys of the site and surrounding fields carried out between September and March, with at least two visits per month. Survey specifics must be agreed with Natural England. The decision tree below has been produced to help applicants determine whether FLL may be relevant to their application.

Why might habitat to mitigate the loss of FLL be needed?

Incremental losses of land functionally linked to the SPA are, over time, becoming more significant and detrimental to the SPA, making it more difficult for development proposals to satisfy the Habitats Regulations Assessment (HRA) tests. Providing compensatory habitat can help an application satisfy HRA tests and rule out a likely significant effect. Detail on what defines compensatory habitat will be determined by Natural England on a case-by-case basis.

Does this have anything to do with the Strategic Access Management and Monitoring (SAMM) payments?

SAMM payments relate specifically to impacts from recreational pressure on the SPA. This is a separate issue from the loss of functionally linked land. Therefore, if your application is within the Zone of Influence for recreational pressure, a SAMM contribution will be required. If your application is likely to affect functionally linked land, mitigation for loss of FLL may also be required.

Where can I find historical records and desk study survey data for FLL?

Wetland Bird Survey (WeBS) data were provided by the British Trust for Ornithology and the Northamptonshire Biodiversity Records Centre.

Where can I find further information?

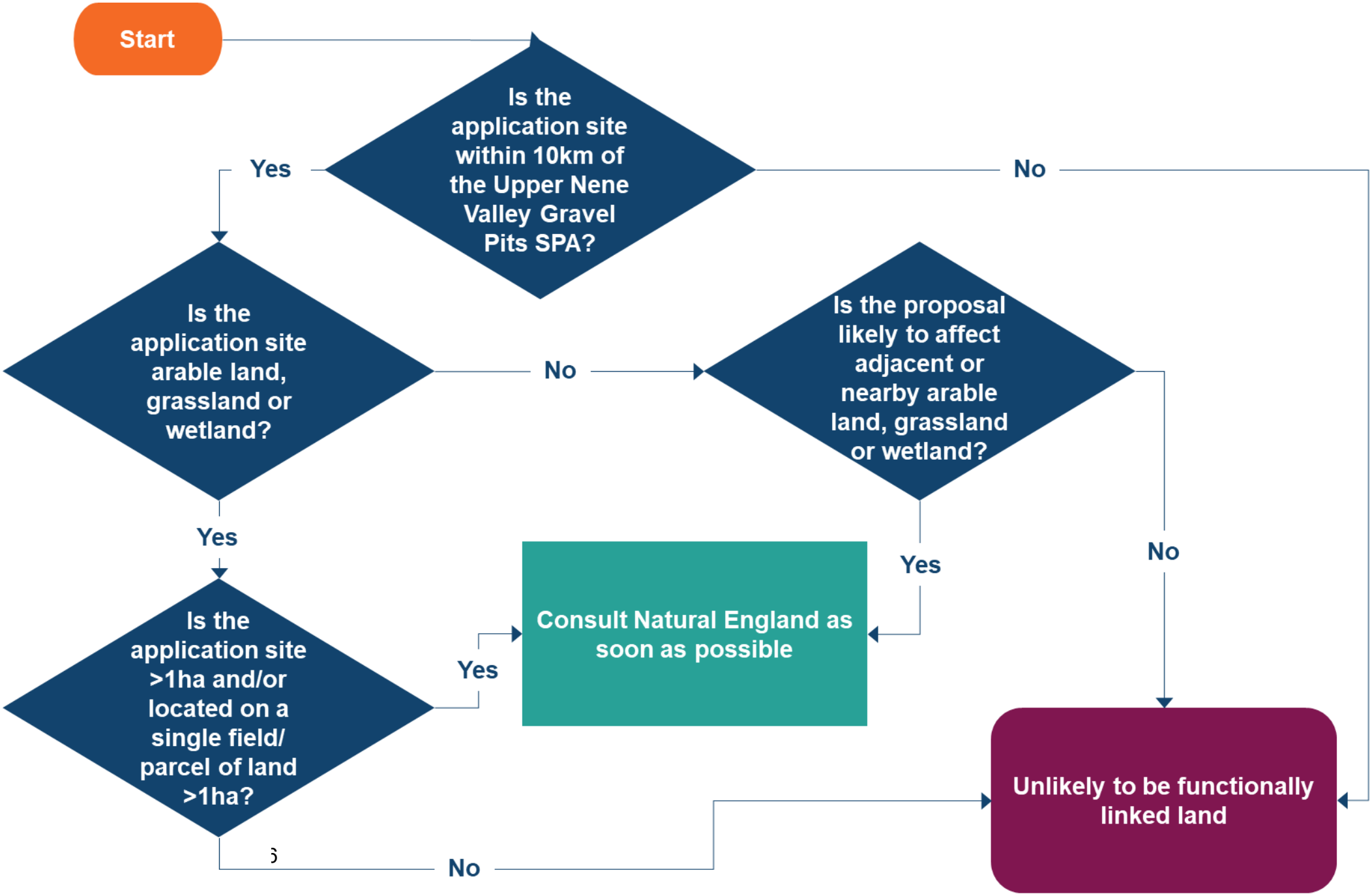
Natural England has published conservation advice for the Upper Nene Valley Gravel Pits SPA. This consists of the site conservation objectives and supplementary advice on the conservation objectives. Guidance for planning applicants can be found in the West Northamptonshire Supplementary Planning Documents | West Northamptonshire Council

My application doesn't clearly follow the decision tree: what should I do?

Contact Natural England through the Discretionary Advice Service by completing a charged service request form, sending it to consultations@naturalengland.org.uk.

Is the application site likely to be functionally linked land?

Please use the decision tree flowchart below to determine whether a site might be functionally linked to the SPA. A text version is provided on the following page.


Start
Is the application site within 10km of the Upper Nene Valley Gravel Pits SPA?
Yes
No
Is the application site arable land, grassland or wetland?
No
Is the proposal likely to affect adjacent or nearby arable land, grassland or wetland?
Yes
Yes
No
Is the application site >1ha and/or located on a single field/ parcel of land >1ha?
Yes
Consult Natural England as soon as possible
No
Unlikely to be functionally linked land

Process to determine whether a planning application may be on land functionally linked to the Upper Nene Valley Gravel Pits SPA

Question 1: Is the application site within 10km of the Upper Nene Valley Gravel Pits SPA?

1. If yes, go to Question 2
2. If no, site is unlikely to be functionally linked land.

Question 2: Is the application site arable land, grassland or wetland?

1. If yes, go to Question 3
2. If no, go to Question 4

Question 3: Is the application site greater than one hectare in area, and/or located on a single field/parcel of land larger than one hectare?

1. If yes, consult Natural England as soon as possible.
2. If no, site is unlikely to be functionally linked land.

Question 4: Is the application proposal likely to affect adjacent or nearby arable land, grassland or wetland?

1. If yes, consult Natural England as soon as possible.
2. If no, site is unlikely to be functionally linked land.

Appendix 5 Survey guidelines for the Upper Nene Valley Gravel Pits SPA (Natural England, 2022)

Introduction

This section provides guidance on the requirements and methodology for survey work to be undertaken to determine the effects of a plan or project and allow the competent authority to carry out an Appropriate Assessment. It is important to follow the guidelines closely. In certain cases, a plan or project may need to be considered in combination with others: surveys therefore **must** be done to the same standard and using the same methodologies.

This document sets out the main surveys that may be required, but it is not exhaustive and not every survey may be required in each instance. Natural England should be consulted at the earliest opportunity to agree the full scope of surveys to be undertaken. Where a plan or project is not directly connected with, or necessary to site management for nature conservation purposes, and is likely to have a significant effect on the features of interest of the site, an Appropriate Assessment of the impacts of those proposals is required. This will apply to:

- Proposals entirely new to the SPA and occurring within the SPA boundary
- Proposals involving existing activities occurring elsewhere in the SPA, but new to the specific location within the SPA boundary
- Variation of an activity currently occurring at a specific location *e.g.* increased intensity/duration
- Proposals outside the SPA that may impact on the site, *e.g.* housing development, wind farm
- Proposals within the SPA that are not connected with nature conservation management and do not require planning consent but are listed within the SSSI notification package as an Operation Requiring the Consent of Natural England.

Methodology to identify biodiversity interests

General surveys

These include desk study, scoping and habitat surveys. A UK Habitat Classification (UKHab) or extended Phase I Habitat Survey should be carried out to provide a high-level assessment of the ecological interest of the area and its surroundings.[19] [20]

- Undertake a desk study to identify all relevant statutory and non-statutory nature conservation sites and features of ecological significance that may be affected by the project proposal.
- Undertake a habitat survey of the site in accordance with UKHab or Phase I Habitat Survey methodology.
- Identify the presence of protected species and species/habitats of conservation importance, within the site and surrounding it, and provide recommendations for further survey work.

Wintering bird surveys

More than 20,000 migratory waterbirds use the Upper Nene Valley Gravel Pits SPA during the non-breeding period. Population surveys are required to determine the numbers, distribution, and behaviour (feeding, roosting) of birds within the part of the site that could be affected by the plan or proposal. Although some Wetland Bird Survey (WeBS) data are available for the Upper Nene Valley Gravel Pits SPA, not all pits are counted regularly. Wintering bird surveys are still required to supplement WeBS data.

Wintering bird survey areas should include the whole application site and include surrounding land that may be impacted by the development. In-combination effects will also be required to be considered.

Methodology: general wintering bird surveys

- Counts should use the standard Wetland Bird Survey (WeBS) methodology and be undertaken at two- to three weekly intervals throughout the defined survey period. Surveys should be at least 10 days and no more than 21 days apart.[21]

[19] UKHab Ltd. 2025. UK Habitat Classification. https://www.ukhab.org/. Accessed 23 January 2026.
[20] Joint Nature Conservation Committee. 2016. Handbook for Phase 1 Habitat Survey – a technique for environmental audit. Peterborough: Joint Nature Conservation Committee. Available at http://jncc.defra.gov.uk/page-2468. Accessed 23 January 2026.
[21] British Trust for Ornithology. Date unknown. Core Counts Methods [ONLINE]. https://www.bto.org/our-science/projects/wetland-bird-survey/taking-part/core-counts-methods#:~:text=WeBS%20Core%20Counts%20are%20made,whole%20of%20a%20predefined%20area. Accessed 8 January 2026.

- Counts should be recorded on a pit-by-pit basis to allow comparison with existing data. Standard count units, corresponding to WeBS sectors, will be supplied by Natural England.

- Counts should be undertaken from the beginning of September to the end of March, and a minimum of **two** winters counts will be required. Counts may be undertaken over the course of one winter period, *e.g.* September 2023 – March 2024 (preferred option), or over one calendar year, e.g. January – March 2023 and September – December 2023.

- Additional August counts may be required in areas where there are known to be significant post-breeding flocks of species like gadwall, great crested grebe and shoveler. This will be advised in advance on a case-by-case basis.

- Brief details of any recreational disturbance incidents should be recorded, including date, location, type of disturbance and response of birds to the disturbance, in accordance with WeBS methodology.

- Any variation from the above must be agreed with Natural England before surveys begin.

Breeding bird surveys

The Upper Nene Valley Gravel Pits SSSI supports more than 27 species defined as breeding birds of open water and marginal wetland vegetation. Many other species of high conservation concern also occur. Surveys are required to estimate breeding bird numbers and distribution.

Methodology: general breeding bird surveys

- A general breeding bird survey using a modified version of the Common Bird Census methodology[22] should be undertaken. This should consist of not less than four visits during the period April to July (one visit per month, ideally on or around the middle of the month).

- Surveys should be carried out in good weather, between dawn and 1100 hours or (where necessary) in the three hours prior to dusk.

- Surveyors are encouraged to record all bird species. However, special attention should be paid to recording the numbers, distribution and breeding status[23] of those waterbird species included in the Guidelines for Selection for

[22] Available at: British Trust for Ornithology. Date unknown. Common Birds Census [ONLINE]. Common Birds Census (CBC) | BTO. Accessed 8 January 2026.
[23] Refer to British Trust for Ornithology. Date unknown. Breeding Status Codes [ONLINE]. http://www.bto.org/sites/default/files/u36/downloads/breedingcodes.pdf. Accessed 8 January 2026.

Biological SSSIs[24] and which form the basis for the nationally important breeding bird assemblage found in the Upper Nene Valley Gravel Pits SSSI[25].

- In addition to these species, similar details should be recorded for turtle dove, oystercatcher, lapwing, sand martin, little egret and cormorant, where these are present.
- See Gilbert et al. (1998)[26] for further information on methodologies.
- Additional species/group surveys, *e.g.* dabbling and diving ducks, and waders, may also be required. See Gilbert et al. (1998) for further information on methodologies.
- Brief details of any recreational disturbance incidents should be recorded, including date, location, type of disturbance and response of birds to the disturbance, in accordance with WeBS methodology.

For context and comparison, 2003 and 2013/14 breeding bird survey results are available from Natural England for any lake in the Upper Nene Valley Gravel Pits SSSI.

Assessing bird disturbance due to recreational activities

Wintering and breeding birds using the SPA can suffer considerably because of disturbance from visitor access and recreational activities. An assessment of the type, source and intensity of disturbance, and the birds' response to it, is required to establish the current disturbance levels and evaluate the impact of increased levels of access and disturbance. This survey is **additional** to the disturbance incident recording within the breeding and wintering bird surveys.

Methodology: wintering birds

- Map all rights of way, permissive and informal paths and record their usage. This will include the frequency, type and time of use.
- Surveys should be undertaken between October and March, and a minimum of two winter's survey work will be required. Surveys may be undertaken

[24] Under the JNCC Guidelines for Selection of Biological SSSIs. Please note that these guidelines are under revision. Details are available at: [JNCC} Joint Nature Conservation Committee. 2024. Guidelines for selection of biological SSSIs [ONLINE]. http://jncc.defra.gov.uk/page-2303. Accessed 8 January 2026.

[25] See Table 28, 'Breeding bird assemblages of different habitats: lowland open waters and their margins' in: JNCC. 2023. Guidelines for Selection of Biological SSSIs. Chapter 17: Birds [ONLINE]. Available at Guidelines for the selection of biological SSSIs. Part 2: Detailed guidelines for habitats and species groups. Chapter 17. Birds (version 1.2). Accessed 8 January 2026.

[26] Gilbert G, Gibbons DW, Evans J. 1998. Bird Monitoring Methods: a manual of techniques for key UK species. Sandy: RSPB.

across the course of one winter period, e.g. October 2009 – March 2010, or across one calendar year, e.g. January – March 2010 and October – December 2010.

- As a rule, the interval between survey visits should not exceed 10 days; however the specific frequency and total number of survey hours should be agreed with Natural England before surveys begin. Surveys should be undertaken on a variety of days and times, *e.g.* dawn, dusk, daytime, weekends and when known recreational activities (*e.g.* shooting) occur.

On each visit:

- Record the type, and map the location of ALL recreational activities (potential disturbance incidents), *e.g.* sailing, walking (with or without dogs, and whether they are on/off lead).
- For each occurrence of recreational activity, record whether or not birds are disturbed.
- Where disturbance occurs, record the following:
    - Species/approximate number of birds affected
    - Approximate distance from birds to source of disturbance
    - Response of birds to disturbance, *e.g.* heads-up, stop feeding, swim away from disturbance, fly off, circle around and return immediately, fly off and return later (in which case also note duration of absence)
    - Incidents where recreational activity occurs, but the birds are not disturbed, should also be recorded.
- Record the weather conditions (*e.g.* temperature, icing conditions)

Methodology: breeding birds

- Where an area is also identified as being of importance for breeding birds, an additional 80 hours of breeding bird surveys are likely to be required from April through mid-June, to identify any additional seasonal disturbance.

Species-specific surveys within the SPA

This principally applies to golden plover *Pluvialis apricaria* and lapwing *Vanellus vanellus*, but may also be required for other species that feed or roost in large flocks. The SPA is of European importance for wintering golden plover. During the peak wintering period additional golden plover roost surveys may therefore be required at key roost sites, currently Clifford Hill, Earls Barton and Stanwick Gravel Pits.

Species-specific surveys outside the SPA

Golden plover *Pluvialis apricaria* and lapwing *Vanellus vanellus* spend a proportion of their time away from the SPA feeding or roosting on surrounding agricultural land or the River Nene. Standard wintering bird population surveys often fail to pick up numbers of foraging and roosting birds.

Ensuring that key areas are not affected by developments occurring outside the SPA is paramount. Additional surveys will be needed outside the SPA boundary to assess the impact of developments that could lead to the loss of feeding grounds, *e.g.* housing or industrial development on or near areas favoured by particular species.

Sites that are within 10km of the SPA will be required to provide wintering bird survey information for the site and adjacent fields to determine suitability for, and level of use by the golden plover and lapwing. A minimum of **two** winter's counts will be required with diurnal and nocturnal surveys of the site and surrounding fields carried out between September to March, with at least two visits per month.

- Counts of roosting golden plover (where relevant) should be undertaken every two weeks during afternoon/early evening between November and early March.
- Collation of existing species records in the area
- Desk-based assessments using agreed parameters to identify land use and the suitability of individual fields to support target species based on specific habitat preferences.
- Field surveys to locate foraging birds.

Flight line/vantage point surveys

Vantage point surveys may be required for proposals to erect large or tall structures next to the SPA (*e.g.* wind turbines, tall buildings) that could interfere with birds' flight paths or sight lines.

The following documents set out methodologies relating to flight line and vantage point bird surveys in more detail:

- GOV.uk. 2015. Wild birds: surveys and monitoring for onshore wind farms.
- Scottish Natural Heritage. 2005. Survey methods for use in assessing the impacts of onshore wind farms on bird communities. Inverness: Scottish Natural Heritage.[27]

[27] Available at https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms. Accessed 8 January 2026.

- Scottish Natural Heritage. 2000. Windfarms and birds: calculating a theoretical collision risk assuming no avoiding action. Inverness: Scottish Natural Heritage.[28]

Developers should contact Natural England at the earliest opportunity to discuss scoping proposals for these surveys; this will depend on the location of the proposal and distance from the SPA.

Protected species

Additional surveys should be undertaken where the extended Phase I survey highlights the potential presence of protected species. The methodology for these surveys should follow the current best practice guidelines for that species. The species/groups most likely to be encountered within the Upper Nene Valley Gravel Pits SPA include bats, great crested newt, badger, water vole, reptiles, otter and beaver.

Fish survey

Movement and stocking of fish is authorised by the Environment Agency under Section 30 of the Salmon and Freshwater Fisheries Act 1975. If undertaken in an ecologically sustainable way, fishing and nature conservation can be compatible. However, overstocking of fish, especially carp and bream, can lead to a change in water quality, which impacts on the aquatic plants and invertebrates that are a key food source for breeding and wintering birds within the SPA.

Applications to stock fish within the SPA should provide evidence of the current composition of fish populations within the lake. The Environment Agency can provide detailed advice on the most appropriate methods to obtain this information.

Survey results

Survey results should be discussed with Natural England who will determine if any additional work is required. If the surveys show that a plan or project is likely to result in an adverse impact on the SPA's features of interest, measures will be required to prevent the impact.

[28] Available at https://www.nature.scot/doc/wind-farm-impacts-birds-calculating-theoretical-collision-risk-assuming-no-avoiding-action. Accessed 8 January 2026.

Appendix 6 Policy background

International and national policy

The European Union (EU) has two pieces of legislation that deal with the protection of rare species and habitats. These are referred to as the Birds Directive[29] and the Habitats Directive[30]. The Birds Directive identifies rare species of European wild birds that need protection. Member States are required to take special measures to conserve the habitats of certain rare species of birds. In particular each Member State is required to classify the most suitable areas of such habitats as Special Protection Areas (SPA). Even if none of the qualifying species are there, the land must be protected and managed to achieve favourable condition.

The EU legislation was translated into UK legislation as the Habitat Regulations, which were most recently updated in 2017[31]. The Regulations deal with both the impact of developments and of development plans on habitats sites, which include SPAs. Local authorities are identified as a 'competent authority' for the purposes of determining whether or not a proposed development scheme or development plan document is likely to have a significant effect upon the SPA. The effect of the Regulations is to require Local Planning Authorities to ensure that any proposed development scheme or development plan will not adversely affect the integrity of the SPA.

Development can have direct and indirect impacts on natural resources. Ensuring that new development maintains, enhances, restores or adds to biodiversity is an overarching objective of UK national planning policy.[32]

This guidance and legislation together with the Natural Environment and Rural Communities Act 2006 and Environment Act 2021 imposes on local authorities a legal duty of care to protect biodiversity. Where a habitats site (such as an SPA) could be affected by a plan or project then a Habitats Regulations Assessment (HRA) must be undertaken. A HRA identifies the interest features of the site (*e.g.* birds, plants, animals), what they could be harmed by and assesses whether the proposed plan or project could cause that harm to occur. If at the end of the process local authorities are still not certain that harm, or a 'significant adverse effect on site integrity' will not occur then they are legally obliged not to approve the proposed plan

[29] Council Directive 2009/147/EC on the conservation of wild birds (this is the codified version of Council Directive 79/409/EEC as amended)
[30] Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora
[31] The Conservation of Habitats and Species Regulations, 2017
[32] Ministry of Housing, Communities and Local Government. December 2024. National Planning Policy Framework, paragraph 8.

or project, subject to the procedure outlined in Article 6(4) of the EC Habitats Directive regarding imperative reasons of overriding public interest.

Local policy

West Northamptonshire Local Plan – 2043 emerging policies include:

- BN9 Nature Conservation
- BN13 Green and Blue Infrastructure
- BN14 Green and Blue Infrastructure Corridors
- BN15 Upper Nene Valley Gravel Pits Special Protection Area
- BN17 River Corridors

West Northamptonshire Joint Core Strategy (adopted 2014) relevant policies include:

- BN2 Biodiversity
- BN4 Upper Nene Valley Gravel Pits Special Protection Area
- BN7a Water Supply, Quality and Wastewater Infrastructure
- BN8 The River Nene Strategic River Corridor

North Northamptonshire Joint Core Strategy 2011-2031 (adopted 2016) relevant policies include:

- 1 Sustainable Development
- 4 Biodiversity
- 7 Community Services and Facilities
- 10 Provision of Infrastructure
- 19 The Delivery of Green Infrastructure
- 20 The Nene and Ise Valleys
- 33 Rushden East Sustainable Urban Extension
- 35 Nene Valley Farm, Rushden

Legacy authority part 2 local plan policies include:

- South Northamptonshire Part 2 Local Plan 2011-2029 (adopted 2020):
    - NE1 Upper Nene Valley Gravel Pits Special Protection Area

    - NE3 Green infrastructure corridors
    - NE5 Biodiversity and Geodiversity
    - NE6 Sites of Special Scientific Interest and protected species
    - NE7 Development in the Nature Improvement Area
- Northampton Local Plan Part 2 2011-2029 (adopted 2023):
    - ENV1 Sustaining and enhancing existing, and supporting the creation of, Northampton's green infrastructure
    - ENV2 Providing open space
    - ENV3 Supporting and enhancing biodiversity
    - ENV4 Nature conservation
    - ENV5 Upper Nene Valley Gravel Pits Special Protection Area
    - A3 The Green, Great Houghton
- Wellingborough Local Plan (Part 2) (adopted 2019)
    - GI1 Local green infrastructure corridors
    - GI4 Enhancement and provision of open space
    - Policy Site 1 Wellingborough East
- East Northamptonshire Local Plan (Part 2) (adopted 2023):
    - EN5 Local green infrastructure corridors
    - EN6 The Greenway
    - EN8 Enhancement and Provision of Open Space
    - EN29 Rushden East Sustainable Urban Extension
- Kettering Site Specific Part 2 Local Plan (adopted 2021):
    - HWC3 Sport, Recreation and Physical Activity
    - NEH2 Borough Level Green Infrastructure Network
    - NEH4 Open Spaces
- Bedford Borough Local Plan 2030 (adopted 2020):
    - Policy 35S Green infrastructure

- Policy 42S Protecting biodiversity and geodiversity
- Policy 43 Enhancing biodiversity

Additional local strategies to be considered:

- West and North Northamptonshire Local Nature Recovery Strategies
- Northamptonshire Biodiversity Action Plan
- Ise Valley Strategic Plan
- River Nene Catchment Flood Management Plan
- Nene Valley Nature Improvement Area
- North Northamptonshire Greenway Strategic Masterplan