



Recreation Mitigation Study

To support Cotswold District Local Plan

Cotswold District Council

Final report

Prepared by LUC

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Land Use Consultants Limited

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Chapter 1

Introduction

1.1 This study looks at how green spaces and natural features across Cotswold District can support future growth in the Cotswold District Local Plan by helping to reduce recreation pressure on protected areas, by providing access to similar quality, attractive local alternative green spaces.

What is recreation mitigation?

1.2 Many protected habitats and species can be damaged or disturbed by high visitor numbers. Activities like dog walking, cycling or even repeated footfall can disturb wildlife, reduce breeding success and lead to the erosion of fragile ecosystems. National planning policy and environmental legislation (the Conservation of Habitats and Species Regulations 2017 (as amended), or 'Habitats Regulations') include provisions that seek to ensure that plans and projects (including applications for planning permission) are not approved where they could harm the integrity of certain designated sites, including Special Areas of Conservation (SACs). The process of determining the impact on these designated sites is known as a Habitats Regulations Assessment or HRA, and involves a screening stage and 'Appropriate Assessment' stage.

1.3 The Habitats Regulations establish that the local planning authority is the competent authority responsible for undertaking the relevant screening stage and, where relevant, the Appropriate Assessment, prior to adopting the Local Plan or issuing any planning permissions it determines. There is a statutory requirement for the competent authority to consult Natural England in relation to the Appropriate Assessment prior to a decision being made. A separate HRA Report is being prepared for Cotswold District Council in relation to the new Local Plan.

1.4 Mitigation needs to be considered in the Local Plan because without adequate mitigation provision, new development allocated in the plan could lead to increased recreational pressure on designated sites, and the Local Plan will not be able to be adopted. Identifying alternative green spaces forms a key part of the mitigation strategy for residential site allocations located near sensitive ecological sites and they need to be delivered alongside new housing development. Understanding existing alternative green space capacity and identifying opportunities for new provision helps ensure that growth can be accommodated while still protecting the designated sites and meeting Cotswold District Council's statutory requirements.

Within Cotswold District this mitigation comprises three main measures:

- Suitable Accessible Natural Greenspace (SANG): new or enhanced greenspace, designed to divert recreation trips **away from** designated sites.
- Alternative Natural Recreational Greenspaces (ANRG): new or enhanced greenspace, public right of way enhancements, and high quality green infrastructure, designed to divert recreation trips **away from** designated sites.
- Strategic Access Management and Monitoring (SAMM): measures to manage the residual impact **at the** designated sites.

Suitable Alternative Natural Greenspace

1.5 Suitable Alternative Natural Greenspaces (SANGs) are high-quality, accessible green spaces that are designed to attract people away from sites designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. They were initially developed in relation to heathland habitats (the Dorset Heathlands and Thames Basin Heaths SPAs) and the ground-nesting bird species within them that are sensitive to disturbance (nightjar, woodlark and Dartford warbler); but the development and use of SANGs is now applied to a much broader range of protected habitats and sites. They act as an alternative place for people to walk, exercise and enjoy nature, helping to reduce recreational pressure on the SACs and SPAs.

1.6 The objective of SANG delivery is to offer a naturalistic green space that is appealing and more conveniently located than the protected areas they relieve pressure from. They do not need to exactly replicate the sites they are diverting trips from but must be attractive and local enough to result in people choosing the SANG (for example for dog walking) over the more sensitive site. To do this, SANGs must meet certain quality standards, such as providing attractive walking routes, areas for dogs to be walked off lead, good signage, car parking where appropriate and a natural, enjoyable environment for visitors.

Alternative Natural Recreational Greenspaces

1.7 Alternative Natural Recreational Greenspaces (ANRG) is an approach to recreation mitigation where it has not been deemed necessary to apply the stricter SANG design requirements. ANRG can be of a more flexible design, resembling enhanced green infrastructure and open spaces as opposed to the key requirements for naturalness and a variety of habitats in SANG.

1.8 For the purposes of this strategy, ANRG forms part of the wider green infrastructure network but is specifically intended to provide recreational mitigation for Habitats Regulations purposes.

Strategic Access Management and Monitoring

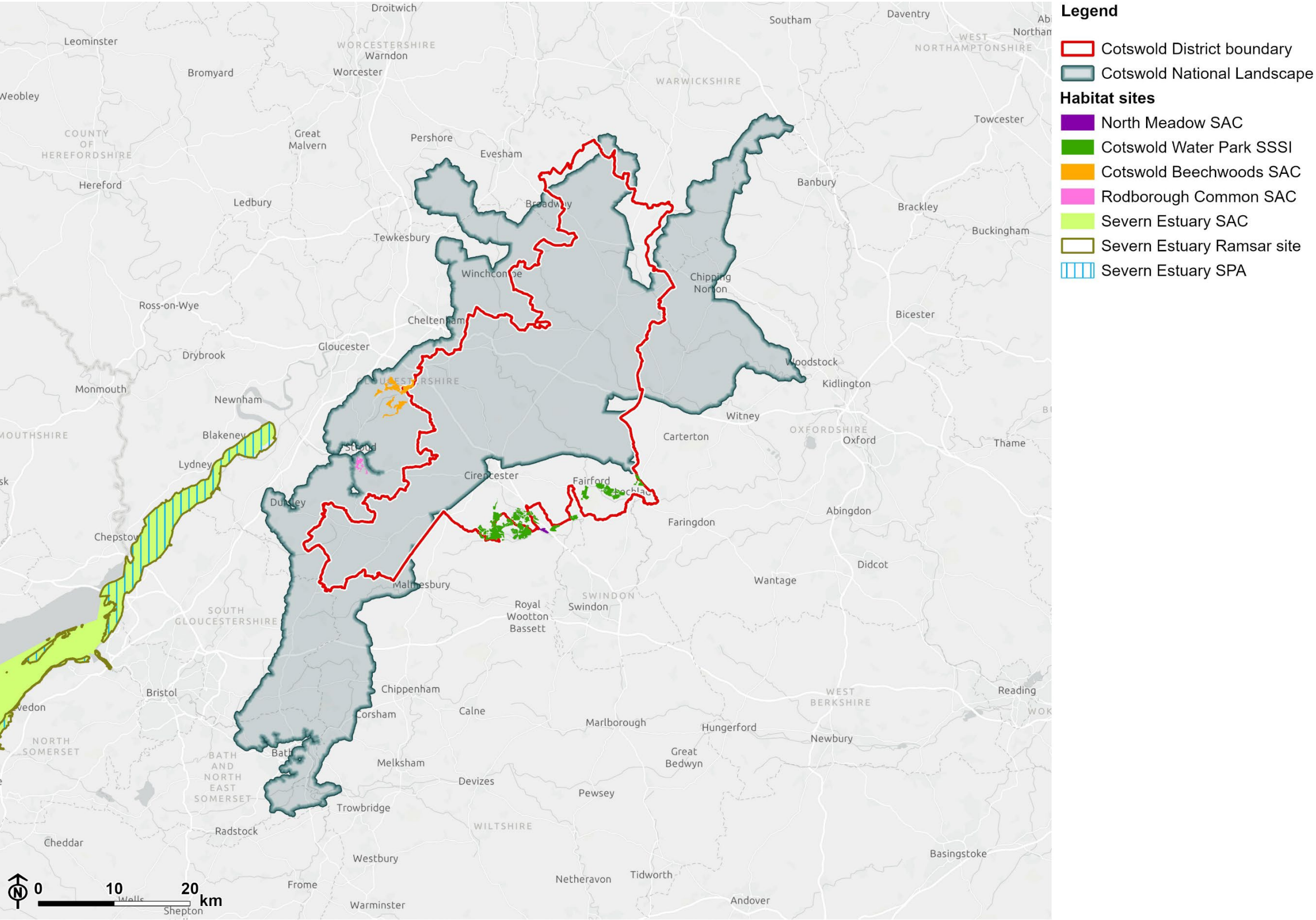
1.9 Recognising that not all visitors will be diverted through the use of additional green spaces outside of the designated sites; the overall mitigation package incorporates measures to address residual impacts at the designated sites. Strategic Access Management and Monitoring (SAMM) measures include engagement and awareness raising, including through ranger time, better information and interpretation and education campaigns, and monitoring of visitors and the integrity of the habitats and species of the designated site to assess the effectiveness of the relevant mitigation measures.

Why does Cotswold District Council need this study?

1.10 This Study will help to shape and support the delivery of Cotswold District Council's (CDC) emerging Local Plan which will guide development from 2026 to 2043. With significant population growth and need for new homes to be built, the new developments within the district have the potential to impact on internationally important biodiversity sites (Habitats sites), in particular the Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as shown in **Figure 1.1**. These sites are currently being damaged by visitors to the sites, and that damage (recreational impact) is likely to increase as more houses and holiday accommodation are built.

1.11 Cotswold District Council, as a 'competent authority', is legally obliged under the Habitats Regulations to consider whether planning applications would affect the biodiversity of any SAC; and can only approve a planning application where the proposals will not impact on the qualifying habitats and species of the SAC. This consideration is undertaken by a process called Habitats Regulations Assessment (HRA).

Figure 1.1: Cotswold District Council Designated Site Context



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1.12 In the coming years, future CDC Local Plans will be shaped by the emerging Spatial Development Strategy (SDS). This follows national planning reforms that introduce mandatory sub-regional SDSs to guide long-term strategic growth across England. Cotswold District lies entirely within Gloucestershire which is currently considered an area of the country where there are a range of plausible SDS geographies, and/or where possible future devolution arrangements are particularly uncertain. For these areas, consultation is ongoing regarding the potential SDS geographies, as well as the prospective alignment of public service delivery boundaries.

What is the status of the Local Plan and its evidence base?

Cotswold District Local Plan (2011–2031)

1.13 The adopted Cotswold District Local Plan (2011–2031) is supported by a comprehensive evidence base which underpins its spatial strategy, policies and site allocations. This evidence comprises a wide range of demographic, economic and technical information, including population projections, economic forecasts, land supply data and analysis of existing planning commitments. The Local Plan policies have been monitored since the plan was adopted, and further data has become available through this process.

1.14 A suite of topic-specific technical studies underpins individual policy areas within the Plan. These include, inter alia, evidence relating to:

- economic growth and employment land requirements;
- retail need and town centre performance;
- infrastructure provision, through the Infrastructure Delivery Plan (IDP);
- transport and movement; and
- environmental constraints and capacity, including flood risk, water infrastructure and ecological impacts.

1.15 In addition, the evidence base incorporates detailed environmental and heritage assessments, including landscape character studies, conservation area appraisals and archaeological evidence. This reflects the particular sensitivities of the District, including the extensive coverage of the Cotswolds Area of Outstanding Natural Beauty (AONB).

1.16 The Local Plan is supported by a Sustainability Appraisal (SA), undertaken at each stage of plan preparation, which tests the environmental, social and economic impacts of the strategy and proposed allocations.

1.17 In 2020, Cotswold District Council began work on a Partial Update to the Local Plan, with consultation on the Local Plan Partial Update (LPPU) 'Issues and Options' (Reg.18) taking place in 2022. The Council subsequently began an update to the Local Plan development strategy. In early 2024, the Council consulted on development strategy, partial update to policies, and an 'initial ideas' document. In July 2025, the Council merged the LPPU and the ongoing work on the development strategy into a Full Local Plan Review (FLPR). In November 2025, the Council undertook a further Regulation 18 "Preferred Options" consultation on the FLPR, marking a more advanced stage in the preparation of the replacement Local Plan, which is intended to guide development between 2026 and 2043.

Cotswold District Local Plan (2026-2043) Regulation 19 Submission (August 2026)

1.18 The Cotswold District Local Plan (2026-2043) Regulation 19 Submission (August 2026) (the Submission Local Plan) sets out policies and proposals to meet the challenges facing the area over the period 2026-2043. The Regulation 19 Local Plan builds upon the earlier Regulation 18 draft, incorporating consultation feedback and presenting the final proposed plan for submission and examination. The Submission Local Plan has been prepared taking account of the National Planning Policy Framework (NPPF) (December 2024) and other relevant national policy and guidance, alongside an evolving evidence base.

1.19 The Submission Local Plan aims to deliver a diverse range of housing, including a significant increase in socially rented and affordable homes, enabling residents of all ages and backgrounds to live securely and sustainably. New development will offer high-quality homes, employment opportunities, and essential services, all supported by integrated infrastructure and sustainable transport networks.

1.20 The Submission Local Plan presents a Spatial Vision for Cotswold District up to 2043 with development guided by a Spatial Strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the District's unique landscape, heritage, and character.

1.21 The Vision is supported by 6 Strategic Objectives. The Strategic Objectives set out in the Submission Local Plan are:

- SO1: Ensure infrastructure and services support sustainable communities

- SO2: Respond to the climate crisis through adaptation and mitigation
- SO3: Conserve and enhance the natural, built, and historic environment
- SO4: Deliver inclusive, healthy, and affordable housing
- SO5: Enable a vibrant, low-carbon local economy
- SO6: Promote sustainable transport use and connectivity

1.22 The Spatial Strategy (below) is underpinned by 6 Core policies:

- Core Policy 1: Addressing Climate Change
- Core Policy 2: Meeting Housing Needs in Cotswold District: Strategic Sites
- Core Policy 3: Meeting Housing Needs in Cotswold District: Non-Strategic Sites
- Core Policy 4: Settlement Hierarchy
- Core Policy 5: Meeting Business and Employment Needs in Cotswold District
- Core Policy 6: Infrastructure Delivery

1.23 The Submission Local Plan also sets out three Area Strategies to support the appropriate development of different parts of the district, which are set out in Chapters 5-7 of the Plan. The Area Strategies are as follows:

- Cirencester and Surrounding Villages Area Strategy
- South Cotswold Area Strategy
- North Cotswold Area Strategy

1.24 The Submission Local Plan designates site allocations for residential and employment sites across the District. Residential site allocations relevant to this study are discussed further in Chapter 3.

Residential

1.25 Core Policy 2 sets out that the housing requirement for the Cotswold District is for 17,935 homes to be delivered in the Plan period between 2026 and 2043. The Plan makes provision for around 19,000 dwellings by 2043.

1.26 Around 11,500 dwellings will be delivered through 10 strategic allocations and one saved strategic allocation from the previous Local Plan 2011-2031. Around a further 1,500 dwellings will be delivered through non-strategic allocations (addressed in Core Policy 3). Additional dwellings will also be delivered through Neighbourhood Development Plans or the Development Management process.

Employment

1.27 Core Policy 5 establishes that to meet the land requirement of 10.4ha for office and R&D development, and 39.2ha for industrial development over the Plan period (2026 to 2043), a further 29 ha is needed beyond known completions and commitments.

1.28 The Plan identifies 29ha for future development across 5 strategic employment allocations. Additional employment land will also be delivered through the Development Management process.

Chapter 2

Habitat Sites

2.1 There are two designated sites that are the focus of this study, the Cotswold Beechwoods Special Area of Conservation (SAC) and the North Meadow and Clattinger Farm SAC. This chapter provides a description of each site, their qualifying features (i.e. habitats and species for which they are designated), relevant conservation objectives and key vulnerabilities. This information is taken from Standard Data Forms and Natural England's Site Improvement Plans [\[See reference 1\]](#).

Cotswold Beechwoods SAC

Site description

2.2 The Cotswold Beechwoods represent the most westerly extensive blocks of *Asperulo-Fagetum* beech forests in the UK. The woods are floristically rich, and rare plants include red helleborine *Cephalanthera rubra*, stinking hellebore *Helleborus foetidus*, narrow-lipped helleborine *Epipactis leptochila* and wood barley *Hordelymus europaeus*. There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice.

Qualifying features

2.3 Annex 1 habitats that are a primary reason for the selection of this site:

- 9130 *Asperulo-Fagetum* beech forests

2.4 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (important orchid sites)

Conservation objectives

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

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

Key vulnerabilities

2.6 The main current threats to the site include:

- Invasive Species - The dumping of garden waste and the consequent spread of invasive plants is an on-going threat. The spread of the non-native sycamore provides a challenge and has made particular use of canopy gaps created by storm damage. Although sycamore is considered an acceptable component of woodlands, including beechwoods, on the continent, in the Cotswold it tends to dominate understorey and canopy to the detriment of other (native) tree species.
- Deer - Deer browsing of regenerating trees (and possibly ground flora) remains a major threat to favourable condition throughout the beechwoods.
- Invasive Species - Grey squirrel numbers have increased sharply over the past decade or so and now cause significant damage to tree species, in particular beech. In places, this can lead to pole stage beech being systematically ring barked and killed.
- Disease - Although not known to be present in the Cotswold as yet, Chalara (ash disease) is a major future threat to the beechwoods.
- Public Access/Disturbance - A particular increase has been the use of mountain bikes and horse-riding which use the woods far beyond the limited network of bridleways. This has created numerous additional trackways and so increasing the erosion of the ground flora and potentially opportunities for water erosion. Although the routes away from bridleways are not usually permitted, much of the SAC woodland is NNR or has public access by foot. Additionally, dog walking has increased within the SAC especially at Coopers Hill where car parking is available. This has become a particular issue where professional dog walkers release large numbers of dogs (up to 12) to run uncontrolled through the woods. This causes disturbance to wildlife as well as local nutrification through dog faeces.
- Changes in Species Distributions - There is a risk that global warming will increase the risk of drought to beech trees (which are shallow rooted).

- Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads. High atmospheric nitrogen levels could affect the SAC features through changes in ground vegetation and mycorrhiza; nutrient imbalance; changes to soil fauna; increase in tall grasses; decline in diversity; increased mineralisation; nitrogen leaching; or surface acidification.

North Meadow and Clattinger Farm SAC

Site description

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

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

Qualifying features

2.9 Annex I habitats that are a primary reason for selection of this site:

- 6510 Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

Conservation objectives

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

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

Key vulnerabilities

2.11 The main current threats to the site include:

- **Inappropriate Water Levels** - An effective WLMP needs to be in place in order to protect the integrity of the site. There have been several unseasonal floods over the last six years which are beginning to cause changes and losses in the vegetation communities on the site.
- **Water Pollution** - Both sediment and nutrient input are of concern. A diffuse pollution plan is in place and catchment sensitive farming initiative covers the catchment. Diffuse pollution has the potential to affect aquatic habitats and species as well as habitat quality in areas of riverside habitat supporting *Vertigo moulinsiana*. Diffuse pollution is arising from highway runoff as well as from farmland. Pollution also results from overflowing sewers (a result of high groundwater levels infiltrating sewers) with ongoing/recurring incidents at numerous locations on the River Lambourn.
- **Habitat Fragmentation** - The two component SSSIs are located 8km apart. Inclusion and restoration of a number of intervening sites locally would increase the habitat, thereby making it more resilient to fluctuating water levels in the face of climate change. The NNR team at North Meadow has, over a number of years, been working to achieve this aim. Also, one option is that additional land should be included within the North Meadow SSSI for this purpose. This would help buffer the site, possibly provide space for adaptation in anticipation of the effects of climate change, and better manage visitor impacts.
- **Commons Management** - Fencing is required to keep livestock from straying off site. North Meadow NNR is common land and it is the responsibility of neighbouring landowners to erect fences. There are a number of problems involved in achieving this.
- **Public Access/Disturbance** - There is increasing visitor pressure especially during the flowering time of Snake's-head Fritillary leading to localised damage on sites in the SAC.
- **Water Pollution** - The SAC's hay meadow vegetation communities are sensitive to elevated nutrient levels. With increasing flooding there is an increased risk of flood water carrying diffuse pollution onto the site and causing soil enrichment with negative consequences for the species richness of the meadows.

Zone of Influence

2.12 A Zone of Influence (Zol) is a designated buffer radius around a protected ecological site (such as a Special Protection Area or Special Area of Conservation). In the District, any new residential development within these zones must provide or fund mitigation in the form of SANG or ANRG, and SAMM.

2.13 Using data from visitor surveys, the 75th percentile has become a standard metric for defining a zone of influence for recreation, as it represents the area from which most visitor originate. Such a figure is typically used for catchment analysis in most SAC recreation mitigation strategies because it excludes the upper distances travelled by only a few visitors that skew calculated averages, providing a more representative understanding of travel patterns.

Cotswold Beechwoods SAC Zol

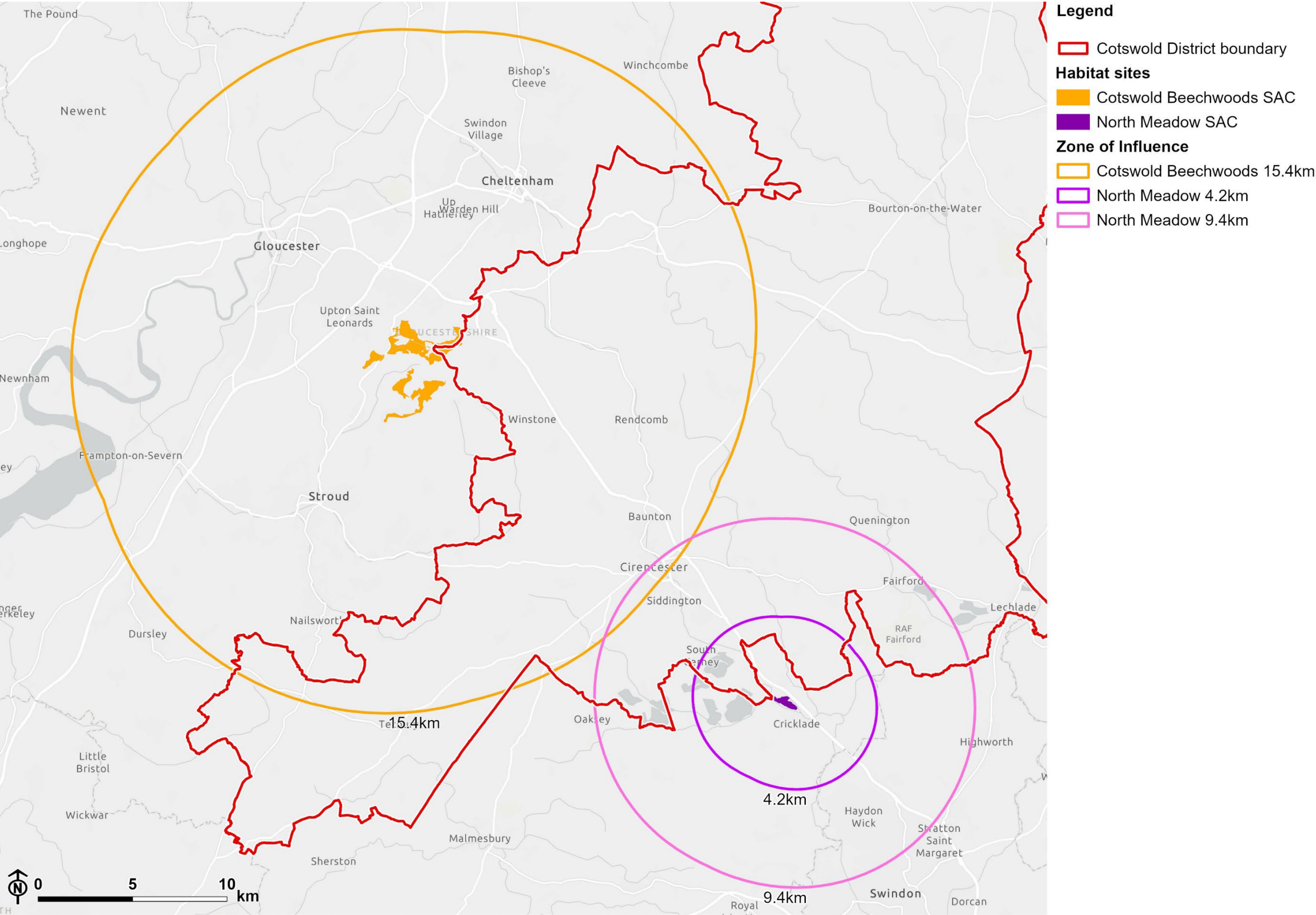
2.14 To ensure that there is a strategic approach to delivering mitigation for recreational impacts at the Cotswold Beechwoods SAC, in 2022 the relevant Local Authorities engaged Footprint Ecology to prepare a Recreation Mitigation Strategy for the Cotswold Beechwoods SAC [\[See reference 2\]](#).

2.15 The Strategy applies to a zone of influence of 15.4km from the Cotswold Beechwoods SAC, with the boundary of the zone adjusted slightly to reflect the local geography, accessibility and local authority boundaries. The zone therefore encompasses all of Cheltenham and Gloucester administrative boundary and part of Cotswold, Stroud and Tewkesbury.

2.16 Within the entirety of the 15.4km zone of influence, all new residential growth will be expected to provide mitigation in the form of SANG and SAMM.

2.17 The Cotswold Beechwoods SAC Zol is shown in Figure 2.1

Figure 2.1: Zones of Influence for Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC



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North Meadow and Clattinger Farm SAC Zol

2.18 To mitigate recreational impacts associated with new development on the North Meadow part of the North Meadow and Clattinger Farm SAC, an interim strategy was prepared by Cotswold District Council, Swindon Borough Council, and Wiltshire Council in partnership with Natural England [\[See reference 3\]](#).

2.19 The 2023 interim recreation mitigation strategy identifies two groups of visitors to the SAC: local year-round users, and fritillary visitors. These groups were shown to have different starting origins, exhibit different behaviours, and have different reasons for visiting, necessitating two Zols, within which different forms of mitigation are appropriate:

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

2.20 Given the differences between the users, a different range of mitigation measures is required in each Zol:

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

2.21 The North Meadow and Clattinger Farm SAC Zols are shown in Figure 2.1

Development within a Zol

2.22 The requirement to consider the possibility of likely significant effects on the SACs applies to all types of residential development. This Recreation Mitigation Study focuses on the effects arising from the types of residential developments listed below:

- Houses in Multiple Occupation (sui generis);

- Residential institutions within the C2 Use Class where the residents are not severely restricted by illness or mobility;
- Student accommodation;
- Sites for gypsy, travellers and travelling showpeople;
- Tourist accommodation, including self-catering, caravan and touring holiday accommodation; and
- Residential annexes and other ancillary accommodation.

Chapter 3

Mitigation Requirements

How much mitigation is required?

3.1 Natural England guidance requires that for a minimum quantity provision of 8 ha of SANG per 1,000 new residents should be provided [See reference 4], this quantity standard has also been to ANRG. CDC has provided details of the proposed residential site allocations identified as part of the emerging Local Plan, and those saved from the previous Local Plan. In total, 22 allocations are within the Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC Zols and will need to provide or contribute to strategic mitigation for recreation pressure.

3.2 The locations of the site allocations and presence within Zols are shown in **Figure 3.1**.

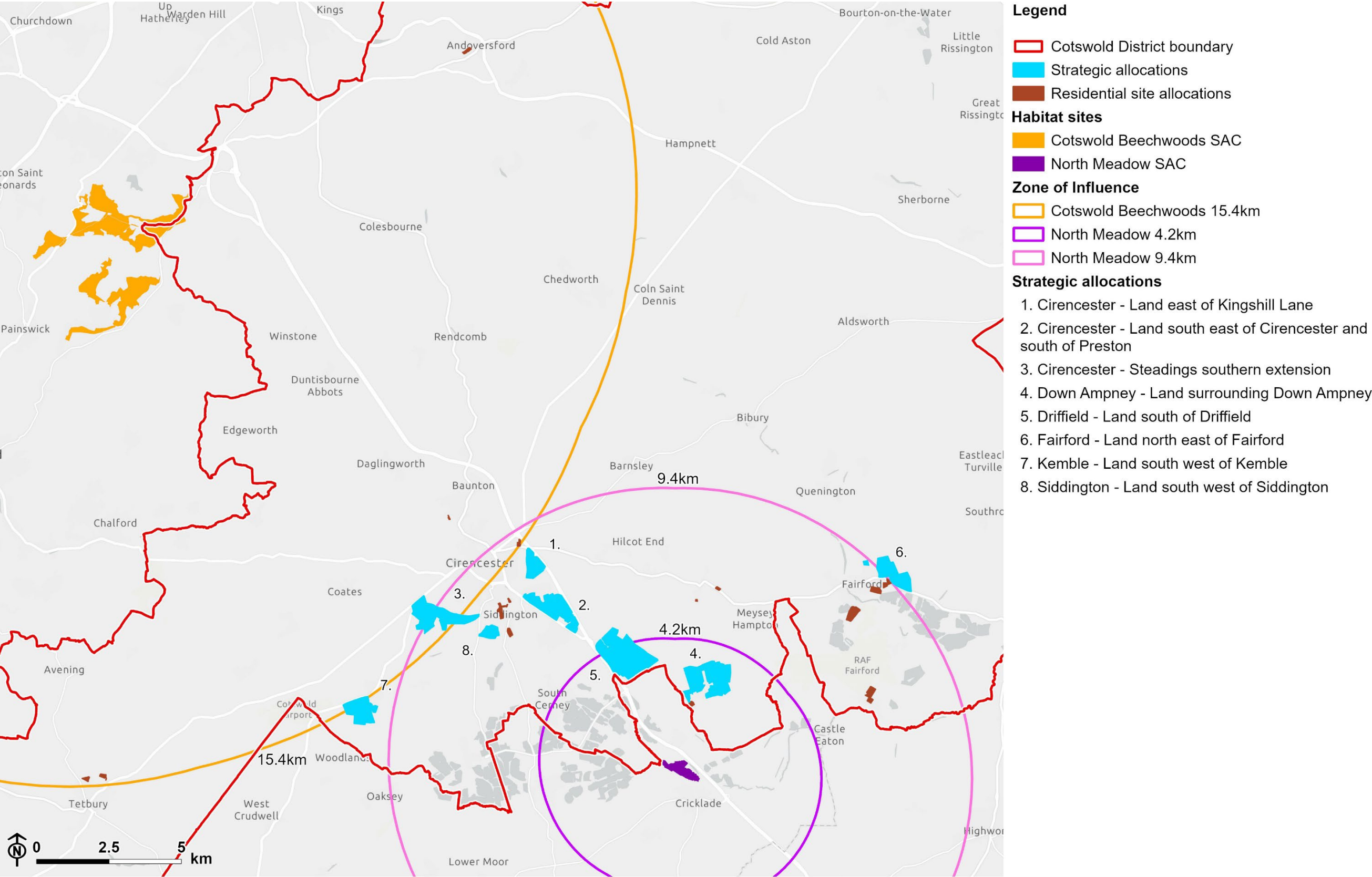
Types of development

3.3 Residential site allocations have been categorised as follows:

- Strategic sites;
- Non-strategic sites in principal settlements;
- Non-strategic sites in non-principal settlements; and
- Saved allocations from 2011-2031 Local Plan.

3.4 In addition to residential site allocations, windfall development figures over the Local Plan period for the parishes that fall within the Zols have been provided by CDC and included within this study.

Figure 3.1: Residential site allocations within the Zones of Influence



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Assumptions

3.5 The basis of this approach and the assumptions underpinning it were developed in consultation with Natural England and CDC. To calculate the area of mitigation required, the following assumptions have been applied:

- An average household size of 2.2 persons per dwelling has been applied across the whole Local Plan period and beyond as shown in the Population uplift columns in **Table 3.1**. Current population growth figures provided by CDC use an average household figure of 2.20 for 2026, a figure that is projected to decrease to 2.06 by 2043. ONS data for 2021 gives a figure of 2.24 for Cotswold District, against an England average of 2.42 [\[See reference 5\]](#).
- For sites that lie within two Zols, the sites will need to contribute financially to both on-site mitigation packages (SAMM).

Total mitigation requirements

3.6 In total, there is the potential for 11,675 new dwellings delivered across the new Local Plan Period within the Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC zones of influence. Using the CDC occupancy rate of 2.2, this development will result in a population uplift of 25,685 persons.

3.7 The associated increase in recreational impacts on the Cotswold Beechwoods SAC and North Meadows SAC will require mitigation in the form of an additional 60.80 hectares of SANG and 70.08 hectares ANRG as shown in **Table 3.1**. Note that the total mitigation requirements do not include developments solely within the 9.4km North Meadow and Clattinger Farm SAC ZoI, as development here is only required to make a SAMM contribution to the SAC.

Table 3.1: Total mitigation requirements by development type

Development type	Housing delivery	Population uplift	Area of SANG required (ha)	Area of ANRG required (ha)
Non-strategic; non-principal settlements	-	-	-	-
Non-strategic; principal settlements	91	200.20	1.61	-

Development type	Housing delivery	Population uplift	Area of SANG required (ha)	Area of ANRG required (ha)
Saved allocations from 2011-31 Local Plan	96	211.20	1.69	-
Strategic site allocation	6,264	13,780.00	41.94	68.29
Windfall	985	2,167.00	15.54	1.80
Grand Total	5,524	12,152.80	60.77	70.08

Strategic site allocations

3.8 The bulk of the housing will be delivered by strategic site allocations, and it is expected that, where required, these sites will also provide for all of their SANG and ANRG requirements as bespoke onsite mitigation. High level masterplanning works has shown the amount of land available for onsite SANG and ANRG at these strategic allocations. **Table 3.2** shows the strategic allocations mitigation needs and area of mitigation drawn in the masterplans.

Table 3.2: Total Strategic Site Allocation mitigation needs vs delivery

Area of SANG required (ha)	Masterplan SANG drawn (ha)	Area of ANRG required (ha)	Masterplan ANRG drawn (ha)
41.94	45.90	68.29	83.70

3.9 **Tables 3.3 and 3.4** detail the Zol in which a specified strategic site allocation falls, the mitigation requirements, and the amount of mitigation currently identified in the strategic site allocation masterplans. The mitigation strategy and associated capacity assumptions remain subject to agreement through future Habitats Regulations Assessment work and consultation with Natural England.

Table 3.3: Strategic site allocation context

Development details		Population uplift in Local Plan Period		Zone(s) of Influence		
Settlement	Site Name	New homes proposed	Occupation (2.2)	Cotswold Beechwoods SAC	North Meadow and Clattinger Farm SAC 4.2km	North Meadow and Clattinger Farm SAC 9.4km
Cirencester	Land east of Kingshill Lane	613	1,349			y
Cirencester	Land southeast of Cirencester and south of Preston	1,368	3,010			y
Cirencester	Steadings southern extension	585	1,287	y		y
Down Ampney	Land surrounding Down Ampney	1,658	3,648		y	
Driffield	Land south of Driffield	1,090	2,398		y	
Fairford	Land northeast of Fairford	1,141	2,510			y
Kemble	Land southwest of Kemble	1,019	2,242	y		
Siddington	Land southwest of Siddington	372	818			y

Table 3.4: Amount of SANG and ANRG proposed in Masterplan for each strategic site allocation

Development details		Mitigation required in Local Plan Period		Mitigation drawn	
Settlement	Site Name	Area (ha) of SANG required	Area of ANRG required (ha)	SANG (ha)	ANRG (ha)
Cirencester	Land east of Kingshill Lane	0	0	0	0
Cirencester	Land southeast of Cirencester and south of Preston	0	0	0	0
Cirencester	Steadings southern extension	10.30	0	26.60	0
Down Ampney	Land surrounding Down Ampney	0	29.18	0	32.00
Driffield	Land south of Driffield	0	19.18	0	51.70
Fairford	Land northeast of Fairford	0	0	0	0
Kemble	Land southwest of Kemble	17.93	0	19.3	0
Siddington	Land southwest of Siddington	0	0	0	0

Additional SANG needs

3.10 Tables 3.1 and 3.2 show that the onsite mitigation at Strategic Allocations will be able to meet the SANG and ANRG requirements for the Strategic Allocations, and the wider ANRG requirements for non-strategic and windfall development. However, there is a need to secure an additional 18.84 ha of SANG for the 1,070 dwellings delivered by non-strategic residential and windfall development within the Cotswold Beechwoods Zol.

3.11 Not all development proposals will be capable of delivering bespoke onsite mitigation. In particular, smaller schemes and windfall developments may find opportunities to provide new SANG within the site boundary to be limited. To maintain flexibility and support sustainable growth, financial contributions may therefore be secured in lieu of on-site provision and used to purchase units or capacity at a Strategic SANG or capacity at other mitigation sites.

3.12 Although there is no minimum size specified for SANG or ANRG, work undertaken in relation to the Thames Basin Heaths SPA established a minimum size of 2ha for 'small SANG'. However, small SANG sites of this size cannot accommodate the necessary SANG features such as the required length of circular walk and therefore would need to be linked to other larger SANG sites that do provide that feature. The Cotswold Beechwoods SAC Recreation Mitigation Strategy advises that small SANGs are generally unsuitable for mitigating the recreational impacts on the SAC stating that "SANGs should be large sites of at least 40ha (which will accommodate suitably long routes), however smaller sites (15ha and above) may work, depending on the location and quality".

Strategic SANG site

3.13 A site to the south of the Kemble Strategic site allocation has been identified within the Masterplanning work to be available and capable of providing sufficient SANG capacity. It is located within the vicinity of the majority of the proposed development within the district and has a reasonable prospect of being delivered to meet the SANG needs.

3.14 This site would be designated as a Strategic SANG, and, with the agreement of NE, would need to be brought up to SANG standard. The key SANG enhancements required by such a site are discussed in **Chapter 6**.

3.15 The new strategic SANG will require a Management Plan which has been agreed with NE, and should detail the open space works required to enhance the land to full SANG status, its ongoing management, and in-perpetuity maintenance. Enhancement works can be carried out on an incremental basis in advance of development coming forward and will need to include measures such as new footpaths, planting, signage, interpretation boards and bins.

3.16 Developments using the new strategic SANG capacity as mitigation will be required to make financial contributions towards the enhancement and in-perpetuity management and maintenance through a combination of s106 agreements and the Community Infrastructure Levy (CIL).

3.17 Each development using the Strategic SANG cannot be occupied until the relevant enhancement works are provided at the SANG. This can be delivered via a s106 obligation to restrict occupation, which would be required to be entered into by the developer. The Council or developer/SANG management company should not wait for the CIL receipts to come in but instead 'pump prime' SANG enhancement works, the cost of which is then paid back by an equivalent amount from CIL receipts. This enables occupation of development sites to take place in a timely manner.

3.18 Currently, the proposed Strategic SANG site has been drawn at 30ha which would give it a SANG mitigation capacity of 3,750 dwellings, a surplus of 11.16ha on top of the 18.84 ha need as discussed above in **3.10**.

Chapter 4

Mitigation Sites and Catchments

Mitigation sites

4.1 The location and quantity of proposed recreation mitigation sites is shown below in **Table 4.1**. The total uplift in population that will increase recreational pressure on the Habitats Sites is 12,152.80. The mitigation currently identified in the strategic site masterplans and the additional strategic SANG has the potential to deliver a surplus of capacity for a population of 7,825.20 persons which equates to 3,556 homes.

4.2 The mitigation areas listed in Table 4.1 are identified within strategic site masterplans and represent indicative provision. The mitigation areas will require detailed design, ecological assessment and agreement with Natural England at the planning application stage.

Table 4.1: Recreation mitigation sites

Site name	Mitigation type	Mitigation size (ha)	Population capacity
Steadings southern extension	SANG	28.70	3,587.50
Land surrounding Down Ampney	ANRG	32.00	4,000.00
Land south of Driffield	ANRG	51.70	6,462.50
Land southwest of Kemble	SANG	19.30	2,412.50
Strategic SANG site	SANG	30.00	3,750.00
Total			19,950.00

4.3 The maximum capacity shown in the final column of Table 4.1 is an estimate based on the area of the sites and would need to be reviewed at the time of a planning application. The capacity could reduce, for example, if parts of the site are found to be unsuitable as mitigation, or if the mitigation area is reduced.

4.4 The surplus mitigation capacity delivered by the Strategic SANG site provides flexibility to accommodate windfall development and potential future growth beyond current allocations. The mechanism by which surplus capacity will be allocated, reserved and monitored should be agreed and maintained through the Council's monitoring framework.

Mitigation catchments

SANG catchments

4.5 The catchment of SANG will depend on the individual site characteristics and location, and their location within a wider green infrastructure network. Where a SANG does not include a car park, the catchment area is considered to be 400m, in all other cases the catchment area is determined by the overall size of SANG, as shown in **Table 4.2** below:

Table 4.2: SANG catchments

SANG size	Catchment area
Any size but without car parking	400m
2 to 12 hectares	2 km
12 to 20 hectares	4 km
Greater than 20 hectares	5 km

4.6 Residential developments with a net increase of 10 or more units that are allocated to a SANG should ideally be located within a specified SANG catchment area. Developments with a net increase of less than 10 units generally do not need to be within a specified SANG catchment provided that there is sufficient overall SANG capacity.

ANRG catchments

4.7 Cotswold District Council does not currently specify the distance that an ANRG should be from the development that it serves. However, for the purposes of this study (and in line with approaches used elsewhere), the ANRG catchments in **Table 4.3** have been applied to align with the Natural England Green Infrastructure Framework (NEGIF) Accessible Greenspace Standard [\[See reference 6\]](#):

Table 4.3: ANRG catchments

Access standard criteria	Minimum size (ha)	Catchment radius (km unless otherwise stated)
Local	2	300m
Neighbourhood	10	1

Access standard criteria	Minimum size (ha)	Catchment radius (km unless otherwise stated)
Wider neighbourhood	20	2
District	100	5
Sub-regional	500	10

Site Allocations and catchments

4.8 The site allocations that could be served by the mitigation sites depends on their location and the capacity of the SANG or ANRG. The site allocations that could be served by each potential SANG or ANRG, based on the catchments discussed above, are shown in **Figure 4.1 and 4.2**.

4.9 As discussed In **Chapter 3**, with the addition of a new Strategic SANG site, the overall provision of SANG would be greater than the total SANG requirement. Additionally, as shown in **Figures 4.1 and 4.2**, the total combined mitigation has the potential to form a mitigation network. As defined in NE guidance [\[See reference 7\]](#) and the TBH Delivery Framework [\[See reference 8\]](#), where several SANG/ANRG sites are in proximity or adjacent, they can be used and visited as one single entity. This approach allows for the use of links between mitigation units to deliver a circular walk and meet all the requirements in combination

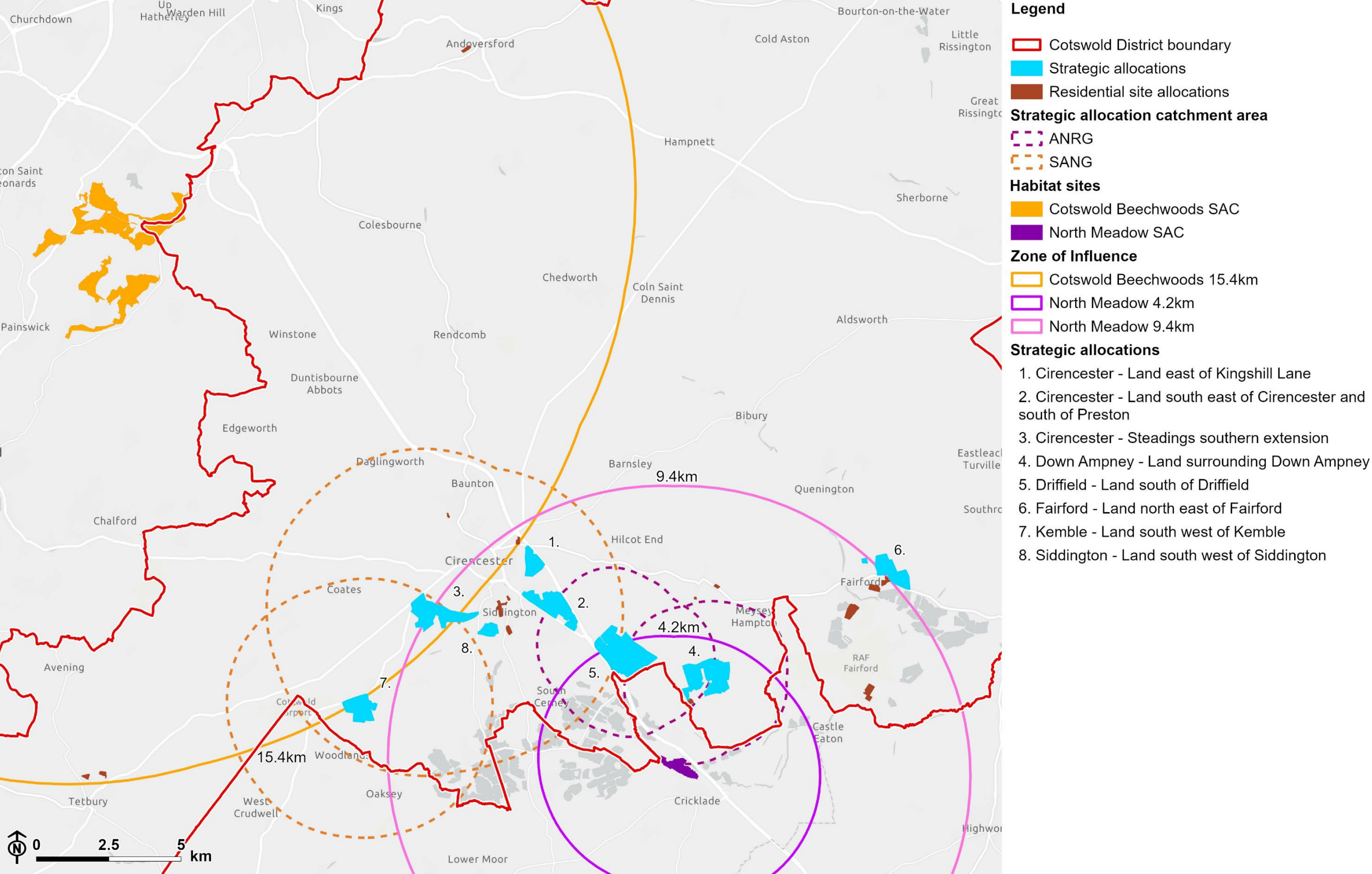
4.10 The following site allocations are not within the catchments of any of the potential SANG or ANRG:

- Land adjacent to Blind Lane, (draft policy T31B), 44 homes in the Cotswold Beechwoods SAC Zol requiring 0.77 ha of SANG mitigation. The nearest SANG provision would be at Steadings southern extension which is approximately 18.5 km away.
- Land north-west of Highfield Cottage, (draft policy T71A), 50 homes in the Cotswold Beechwoods SAC Zol requiring 0.88 ha of SANG mitigation. Residents may be willing to travel to the new Kemble SANG which is approximately 8.5 km away.
- Land to rear of Templefields and Crossfields, (draft policy A2), 52 homes in the Cotswold Beechwoods SAC Zol requiring 0.92 ha of SANG mitigation. Residents may be willing to travel to the new Kemble SANG which is approximately 9 km away.

4.11 Further consideration should be given to how developments outside identified catchments will be effectively mitigated, including whether alternative mitigation

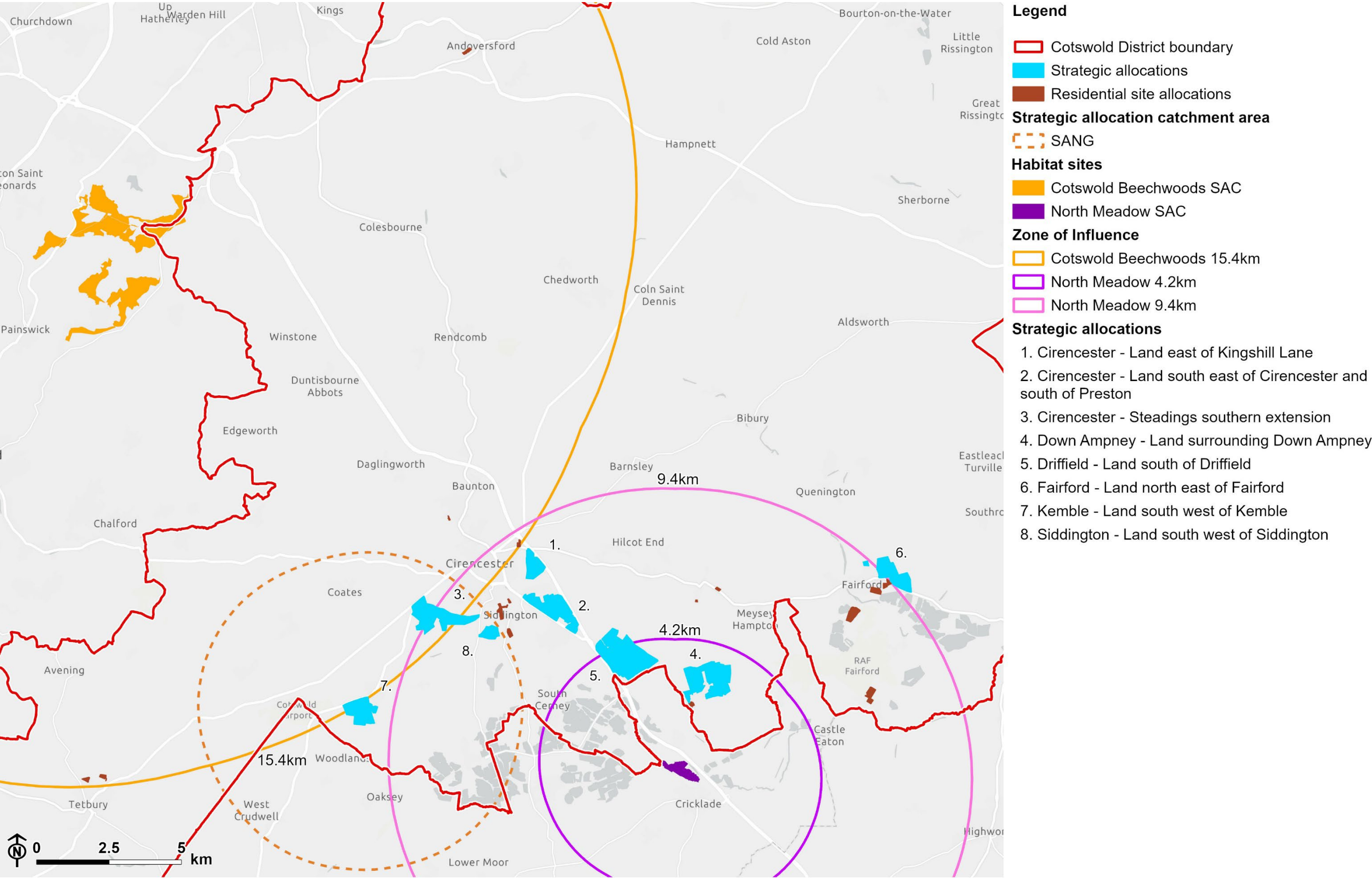
provision, revised catchments or financial contributions towards strategic mitigation are required.

Figure 4.1: SANG and ANRG catchments



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Figure 4.2: Strategic SANG catchment



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Chapter 5

SANG, ANRG, and SAMM Costs

What are the Council doing now?

Cotswold Beechwoods SAC

5.1 Current mitigation measures (on-site e.g. rangers and signage; off-site e.g. the provision of suitable alternative natural greenspaces) are secured through financial contributions using a Section 111 legal agreement, which states that the applicant will pay the Council a £771.79 mitigation contribution for each unit of accommodation plus a £130 administration fee per S.111 agreement which consists of:

- Onsite measures (SAMM contributions) – £221.33 per unit
- Off-site measures – £550.46 per unit (in some limited instances developments may provide their own SANG instead.)

North Meadow and Clattinger Farm SAC

5.2 Current mitigation measures (on-site e.g. rangers and signage; off-site e.g. the provision of suitable alternative natural greenspaces) are secured through financial contributions using a Section 111 legal agreement, which states that the applicant will pay the Council a mitigation contribution for each unit of accommodation (shown below) plus a £130 administration fee per S.111 agreement:

- Inner zone – £836.21/unit, and
- Outer zone - £356.21/unit.

5.3 ANRG provision is required for developments of 50 units and above within the inner zone, for these developments the level of contribution may be amended and is resolved on a case-by-case basis.

Indicative costings

5.4 The costings below have been based on a series of cost models developed for the delivery of the Strategic SANG. The SANG cost per dwelling is based on:

- Land purchase;

- Creation of SANG features; and
- In perpetuity (80 year) maintenance costs.

Land purchase

5.5 The land purchase price used is £28,000 per ha for agricultural land in the South West of England as defined by the Ministry of Housing, Communities & Local Government (MHCLG) and is based on a residual land valuation model which utilises a mix of large-scale datasets and published government statistics [\[See reference 9\]](#).

Creation of SANG features

5.6 A model site has been costed based upon the required SANG characteristics as set out by Natural England [\[See reference 10\]](#). Interventions have been costed using Spon's External Works and Landscape Price Book 2026 [\[See reference 11\]](#).

5.7 The total per hectare cost for the creation of an appropriate SANG site has been calculated to be £17,615.64.

In perpetuity maintenance

5.8 The maintenance activities and associated costs have been calculated using Spon's External Works and Landscape Price Book 2026. Mitigation sites need to be guaranteed 'in perpetuity' which in this instance is taken to be a period of at least 80 years.

5.9 The total per hectare in-perpetuity maintenance cost has been calculated as £472,040.

5.10 **Table 5.1** shows the calculation used to estimate the SANG contribution for the new Strategic SANG:

Table 5.1: Estimated SANG/ANRG contribution

Item	Cost
Land purchase (per ha)	28,000.00
Intervention (per ha)	17,615.64
Maintenance (per ha in perpetuity)	472,040.00
Total (per ha)	517,655.64

Item	Cost
Total Strategic SANG cost (18.84 ha)	£9,752,655.64
Cost per dwelling (assume 1,070 houses)	£9,114.61

Total estimated Strategic SANG contribution required

The total contribution per dwelling on those developments that fall within the relevant Zols and are not provided for by the onsite SANG/ANRG delivered by the Strategic Allocations has been calculated to be **£9,114.61**.

SAMM contributions

5.11 Developments that provide bespoke SANG/ANRG will not need to pay a recreation mitigation tariff but must still pay SAMM contributions. For SANG/ANRG mitigation, the contribution will be set by, and paid directly to, the provider and owner of the private SANG/ANRG. In this case, 'private' refers to ownership only and does not indicate a restriction on public access; all SANG/ANRGs must be publicly accessible. The SAMM contribution will continue to be paid to the Council and passed on to the administrative body.

5.12 Table 5.2 shows the estimated total contributions that will be collected for all development types. Note that the contributions calculated do not include the Council's admin fee which is charged on a per application basis.

Table 5.2: Total SAMM contributions

Development Type	Dwellings	Total Beechwoods SAMM contribution (£221.33 per dwelling)	Total North Meadow SAMM contribution (£356.21 per dwelling)
Non-strategic; non-principal settlements	169		£60,199.49
Non-strategic; principal settlements	388	£20,141.03	£138,209.48

Development Type	Dwellings	Total Beechwoods SAMM contribution (£221.33 per dwelling)	Total North Meadow SAMM contribution (£356.21 per dwelling)
Saved allocations from 2011-31 LP; no planning permission	96	£21,247.68	
Strategic Site	9,758	£527,650.72	£3,112,562.98
Windfall	1,264	£195,434.39	£135,716.01
Grand Total	11,675	£764,473.82	£3,446,687.96

Chapter 6

SANG and ANRG Delivery

What characteristics should a SANG have?

6.1 SANGs should divert trips away from the SACs, and this is best achieved by diverting local trips e.g. dog walks, rather than by trying to directly recreate the appeal of the SACs elsewhere. The Footprint Ecology Cotswold Beechwoods SAC Recreation Mitigation Strategy [See reference 12] sets out the required features of SANG as a checklist, referencing Natural England guidance. Characteristics include:

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 SAC.
- 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 have

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

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.

What characteristics should ANRG have?

6.2 Discussions with Natural England during this study yielded the recommendation that for offsite mitigation within the inner North Meadow and Clattinger Farm SAC Zol, it would be more proportionate and pragmatic to look at the wider green infrastructure provision as a whole, rather than a SANG, and the accompanying requirements. It has been agreed that the flexibility of ANRG and viewing green infrastructure as a whole will deliver more functionality and better protect North

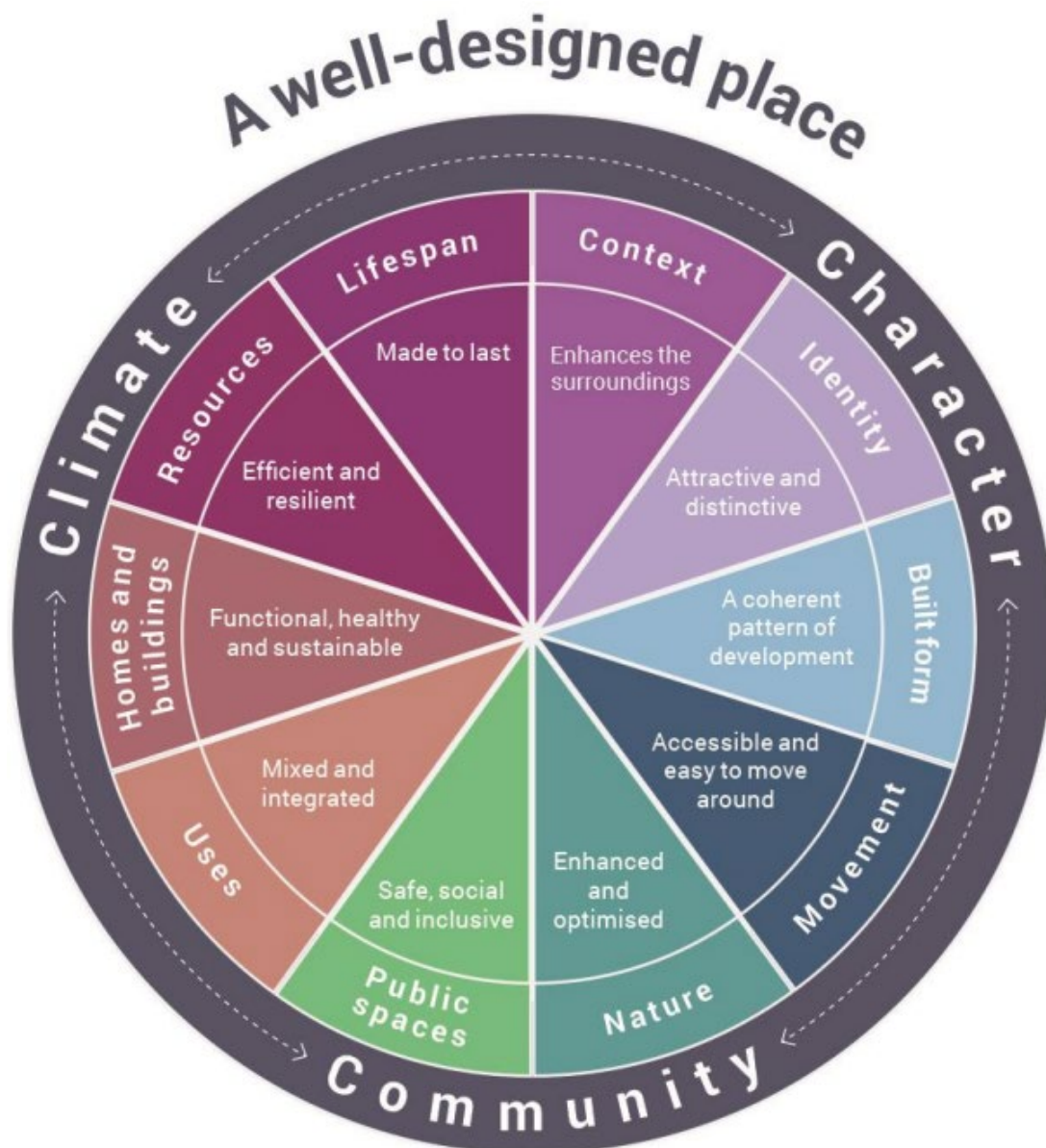
Meadow and Clattinger Farm SAC from the recreational impacts of growth in the area.

6.3 The green infrastructure that ANRG will look to deliver is essential and integral to well-designed places and should not be regarded as an optional enhancement. Green infrastructure and its ecosystem functions are essential for successful urban, or rural environments. The National Planning Policy Framework makes it clear that the creation of high-quality buildings and places should be fundamental to the planning and development process **[See reference 13]**.

6.4 The National Design Guide, the National Model Design Code (NMDC) and Guidance Notes for Design Codes, illustrate how places that are beautiful, healthy, greener, more biodiverse, enduring, and successful, can be designed. The National Design Guide considers how we recognise well-designed places, by outlining and illustrating ten characteristics that should form the basis for the design of ANRG, see Box below and **Figure 5.1**:

- Context – enhances the surroundings.
- Identity – attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social, and inclusive.
- Uses – mixed and integrated.
- Homes and buildings – functional, healthy, and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

Figure 5.1: The ten characteristics of well-designed places [See reference 14]



Delivery recommendations for SANG and ANRG

SANG and ANRG contributions

6.5 Contributions should be in proportion to the proposed development and sufficient to avoid and mitigate adverse effects. The level of the financial contribution depends upon the number of bedrooms in a dwelling and are secured through S106 agreements. These contributions are pooled to ensure the mitigation strategy can respond to changing opportunities.

6.6 SANG and ANRG contributions will fund the creation or upgrade of existing sites to SANG or ANRG status and will deliver:

- **SANG enhancements** and infrastructure works to upgrade a site to SANG status in accordance with the relevant SANG Management Plan.
- **ANRG enhancements** and infrastructure works to upgrade a site to ANRG status in accordance with the relevant ANRG Management Plan.
- **In perpetuity maintenance** ensuring that the SANG is maintained and managed for the in-perpetuity period (80+ years). This comprises matters such as repairs, planting, SANG wardens and staff.
- **Monitoring** of visitors and the integrity of the habitats and species of the designated site to assess the effectiveness of the relevant mitigation measures.

6.7 The package of strategic measures that SANG contributions will fund is to be kept under review, items that the contributions should also look to enable include:

- **Administration and education** including the production of SANG/ANRG management plans, project management of enhancement and repair works, and local promotion of SANG and ANRG.
- **Facilitation** efforts such as priming future SANG enhancement works to meet additional need, operating and reviewing the strategy, and paying any service costs.

Management and monitoring

6.8 Regular monitoring of each mitigation project is essential to ensure that it is effective in achieving its aim to provide a realistic alternative recreational space for new residents delivered through the Local Plan Period. This will also provide transparency to the process and help inform future Recreation Mitigation Strategy reviews. Monitoring proposals are summarised in **Table 6.1**.

6.9 Of particular importance is the ability of each project to achieve its mitigation potential and effectively attract new visitors from the SACs. Baseline quantitative visitor surveys should be undertaken on currently publicly accessible sites prior to the commencement of enhancement works and 3-6 months following completion of works. Detailed visitor surveys should be completed every 5 years thereafter and should follow a clear methodology prepared in consultation with Natural England.

6.10 Monitoring of the integrity of the habitats and species of the SANG site should be undertaken to ensure that the infrastructure interventions are successful in that there are no adverse effects on the SANG site due to the increase in recreational

visitor pressure. Pre-delivery ecological surveys should be used to baseline future surveys conducted at intervals of no more than 5 years.

6.11 Monitoring indicators have also been proposed for the provision of SANG contribution collections to enable an assessment of the performance of the Strategy in the delivery of its financial objectives and to provide transparency on income and expenditure. The income and expenditure information should be presented in the Council's annual statements, and the performance of the strategy should be reported as part of the Council's planning policy monitoring. The Council should periodically review mitigation tariffs and cost assumptions to ensure contributions remain sufficient to deliver mitigation and long-term management requirements.

Table 6.1: Proposals for SANG monitoring

Area	Indicator	Data source	Frequency
Funding	Total value of SANG/ANRG contributions collected	S106 monitoring and reporting	Ongoing internal monitoring and annual reporting
Delivery	Total expenditure on SANG/ANRG projects	Internal monitoring of capital and management works	Annual reporting
SANG/ANRG use	Visitor numbers	Quantitative visitor survey	Prior to works. 3-6 months following completion. Every 5 years thereafter
SANG/ANRG resilience	Ecological surveys	Observations and recording on-site	Prior to works. Every 5 years thereafter

Governance options

6.12 There are several different governance models under which on- and off-site SANG can be delivered and managed, and each option has benefits and drawbacks. Governance models with clearer long-term accountability, for example Council ownership, trusts, or third-party provider with a proven track record, generally carry

less risk. Additionally, the more the governance structure relies on future revenue streams, the greater need is for strong protections, ring-fencing, and enforceable legal mechanisms to demonstrate long-term security.

6.13 Where mitigation capacity delivered by strategic allocations is intended to mitigate impacts arising from other developments, appropriate legal and governance mechanisms will be required to secure access to that capacity and ensure its long-term management.

6.14 Mitigation must be in place before occupation and the SANG needs to be available in time for first occupation, although phasing may be possible by agreement. If the build programme is tight, governance models that allow faster mobilisation (for example developer-controlled build with later transfer to the Council, or third-party capacity purchase) can reduce this time risk.

6.15 Where the developer does not transfer to the Council, it is essential that a fallback, such as Council step-in rights with full cost recovery, is guaranteed so that if the alternative management arrangement fails, the SANG continues to function as mitigation for the full in-perpetuity period.

6.16 Governance options include:

Strategic SANG delivered and managed by the Local Authority (developer pays tariffs – Council delivers)

6.17 Instead of building a bespoke on-site SANG, the developer will pay into the Authority's strategic SANG programme. The Council then delivers enhancements and long-term management. The strategic SANG mitigation package should also incorporate measures to address residual impacts at the designated site (referred to as Strategic Access Management and Monitoring (SAMM)).

6.18 Benefits:

- Reduced technical burden. The Council controls design standards and delivery, which can reduce developer risk of non-compliance.
- Consistency. Strategic sites usually have agreed management plans and an established visitor offer.
- Useful for smaller schemes. Particularly where bespoke SANG is not realistic.

6.19 Drawbacks:

- Delivery constraints. Strategic SANG, are allocated incrementally and developed either through an up-front capital investment or in phases as S106 funds are collected.
- Geographic constraints. Developments often (unless otherwise agreed with NE) must be within the strategic SANG catchment buffers.
- Less place-based benefit. A strategic site may be less effective at diverting the specific residents of a particular scheme than an on-site/near-site SANG.

Local Authority ownership and management (transfer to the Council)

6.20 SANG land is transferred to the Council (freehold or long lease), and the Council becomes the long-term owner and/or manager, funded by a commuted sum for in-perpetuity management (80+ years).

6.21 Benefits:

- High confidence for sign-off. Councils are familiar competent authority partners and can provide governance certainty, which helps demonstrate mitigation will operate for the required in-perpetuity period.
- Operational resilience. Councils typically have established parks or countryside teams and procurement routes for maintenance, inspections, and public liability controls.
- Clear accountability. Ownership, management responsibility, and public access duties sit with one body, reducing ambiguity in enforcement and reporting.

6.22 Drawbacks:

- Higher upfront cost. Commuted sums can be significant, particularly when based on per-hectare rates plus monitoring and administration and may affect viability compared to private management options.
- Adoption is discretionary. Councils are under no obligation to accept transfers, and will prioritise allocations in line with strategic objectives, so acceptance cannot be assumed.
- Delivery programme dependency. If the Council is delivering enhancement works, occupation controls still require works to be delivered before occupancy therefore project timing may sit outside the developer's direct control.

Developer retains ownership but contracts management to a managing agent

6.23 In this scenario, the developer or a successor landholding company keeps the land but appoints a professional land manager to deliver the management plan, funded through ring-fenced arrangements secured via S106 and/or a dedicated management fund.

6.24 Benefits:

- Programme control. The developer can mobilise works quickly, align phasing with occupations, and avoid adoption delays.
- Professional delivery. A specialist manager can be procured for the precise skill sets needed (i.e. visitor infrastructure, habitat management, dog management, access safety).
- Potential cost efficiency. If structured and managed well, lifecycle maintenance costs can be lower than local authority commuted sums.

6.25 Drawbacks:

- Long-term governance risk. The key management consideration is that mitigation is secured and effective in perpetuity. Ensuring durable funding and accountability over decades can be more complex for a private organisation than a public body.
- Approval scrutiny. Authorities will typically require assurance that the organisation has the skills and resources to manage in perpetuity and often require fallback mechanisms.
- Enforcement complexity. If ownership changes hands, the Council must rely on legal covenants or S106 provisions to enforce standards, meaning that the drafting of any agreement must be a robust process.

Management Company funded by service charges (resident-funded estate management)

6.26 Here, a private management company is established or appointed and funded via estate charges or service charges on the development, managing the SANG under a secured management plan.

6.27 Benefits:

- Reduces upfront commuted sum. This model shifts a portion of long-term cost from upfront developer payment to ongoing estate funding.
- Local stewardship and engagement. If well governed, residents can influence quality standards and take ownership of outcomes.

6.28 Drawbacks:

- Credibility with in-perpetuity mitigation: Mitigation funding needs to be secured for 80+ years. Here the reliance on future service charge collection can be seen as higher risk unless strongly protected.
- Resident contribution collection risk. Service charge arrears, disputes, or future cost inflation can undermine the delivery of required management outcomes.
- Governance stability. Company failure, sale, or re-structuring needs strong fallback provisions to ensure continuity of management

Community Trust / Charitable Trust / Community Interest Company (CIC)

6.29 In this model, the SANG is owned and/or managed by a non-profit body (i.e. trust or CIC) with a defined constitution, often with a dedicated endowment or commuted sum, delivering management in perpetuity.

6.30 Benefits:

- Goal alignment. A conservation or recreation trust can be highly aligned to visitor management, education, and habitat outcomes.
- Public acceptability. Trust models can be positively perceived, especially if the SANG functions as a community asset.
- Specialist governance. Boards can include ecological and community expertise, improving outcome delivery.

6.31 Drawbacks:

- Authority assurance needed. Where a developer proposes a body other than the Council, they must demonstrate or provide assurance the organisation will remain in existence and has resources and skills for in-perpetuity delivery. Fallback positions should also be set out.
- Set-up time and cost: Establishing a credible trust with proper governance, insurances, staffing, and reporting can add time and complexity to SANG delivery

- Funding robustness. Like other non-Council options, it will need to be clearly demonstrated that funding is secured for the full in-perpetuity (80+ year) period.

Third-party SANG provider (landowner sells SANG capacity)

6.32 Here a landowner brings forward a SANG and sells capacity to multiple developments via private contract, with the Council confirming catchment and capacity and securing obligations in S106 (including SAMM where relevant).

6.33 This model requires that the SANG is upgraded to the appropriate standard, has been assessed have the required mitigation capacity, made publicly accessible, and has in-perpetuity maintenance guaranteed.

6.34 Benefits:

- Fast route for constrained sites. Developers without land can secure mitigation quickly if capacity exists.
- Specialist land management. Some third-party providers are estates with strong land management capability.
- Scalability. One SANG can serve multiple schemes if capacity and catchment criteria are met.

6.35 Drawbacks:

- Less direct control. The developer relies on a third party to deliver and maintain the SANG standard and any required upgrades.
- Approval and timing risk. Occupation is typically restricted until capacity is secured, the SANG is open, and in-perpetuity maintenance is guaranteed, so any delay in the third-party programme can delay occupations.
- Contract complexity. A contract with the SANG owner is needed, as is an S106 agreement tying the mitigation to the development and securing any strategic monitoring and management contributions.

References

- 1 Obtained from Natural England website: [Site Search](#)
- 2 Cotswold Beechwoods SAC Recreation Mitigation Strategy (2022).
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Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 389 0700

Cardiff

Room 1.12, 1st Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 254 0920

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 326 0900

Glasgow

5th Floor, The Garment Factory, 10 Montrose Street, Glasgow G1 1RE
0141 403 0900

London

250 Waterloo Road, London SE1 8RD
020 7199 5801

Manchester

4th Floor, 57 Hilton Street, Manchester M1 2EJ
0161 802 2800

Sheffield

32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366

Email address for general enquiries: hello@landuse.co.uk

landuse.co.uk

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