

<b>Cabinet Meeting Date</b> 18 <sup>th</sup> April 2024	<b>Classification</b> Public
<b>Wards Affected</b> All	<b>Key Decision</b> Yes
<b>From</b> The Cabinet Member for Planning and Economic Growth to the Cabinet	
<b>Overview Committee</b> 15 <sup>th</sup> April 2024	<b>Title Of Report</b> Natural Greenspace Improvement Strategy for Redbridge Suitable Accessible Natural Greenspace (SANGs)

## 1 Executive Summary

- 1.1 The London Borough of Redbridge is a Competent Authority under the Conservation of Habitats and Species Regulations 2017 which has a duty to ensure that planning application decisions comply with those Regulations and do not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC).
- 1.2 Because Redbridge is a Competent Authority and falls within the recreational Zone of Influence for Epping Forest, it must provide two types of mitigation measures. The first is to contribute financially towards the Strategic Access Management Measures (SAMMs), delivered by the City of London Conservators of Epping Forest, to mitigate the harmful impact of visitors upon Epping Forest (SAC). The second is to provide appropriate Suitable Alternative Natural Greenspace (SANGs) within Redbridge as a measure to divert visitors away from using Epping Forest. This is done by making improvements to the access to and through, the chosen SANGs green spaces.
- 1.3 This report introduces a new Natural Greenspace Improvement Strategy (NGIS) for Redbridge which will serve as a coherent SANGs strategy for mitigating the impacts of increased visitors to Epping Forest SAC.

## 2 Recommendations

**The Cabinet Member/Cabinet is recommended to: -**

- 2.1 Approve the implementation of the Natural Greenspace Improvement Strategy as a Redbridge SANGs mitigation measure for Epping Forest Special Area of Conservation.
- 2.2 Approve the introduction and implementation of a new SANGs payment tariff and administration fee on qualifying new residential development in the borough from 1<sup>st</sup> May 2024 onwards.
- 2.3 Approve the proposed governance arrangements for the detailed financial reporting and expenditure of the SANGs monies.
- 2.4 Note that the SANGs requirement in the Planning Obligations Supplementary Planning Document will be superseded by the introduction of the Natural Greenspace Improvement Strategy and new SANGs payment tariff.
- 2.5 Delegate authority to the Corporate Director of Regeneration and Culture in consultation with the Cabinet Member for Planning and Economic Growth to:
  - Decide on and approve the detailed spend of collected SANGs monies in accordance with Council priorities and the facilitation and delivery of SANGs interventions as outlined in the Natural Greenspace Improvement Strategy, or appropriate alternatives.
- 2.6 Delegate authority to the Planning Policy, Urban Design and Infrastructure Manager in consultation with the Cabinet Member for Planning and Economic Growth to:
  - Review, update and amend the Natural Greenspace Improvement Strategy including review and update of the intervention costs and SANGs payment tariff and administration fee as necessary.
  - Consider and aggregate alternative sources of funding for SANGs and update the payment tariff and Natural Greenspace Improvement Strategy.
  - Agree any corrections and/or clarifications and/or minor updates to the Natural Greenspace Improvement Strategy and SANGs payment tariff.

### **3 Reasons for Recommendations**

- 3.1 The Natural Greenspace Improvement Strategy (NGIS) is the Council's strategy to address its statutory requirement under the Conservation of Habitats and Species Regulations 2017 to mitigate against the harmful recreational and air quality impacts created by increased visitors from new residential developments.
- 3.2 The Natural Greenspace Improvement Strategy lists several accessibility improvement interventions designed to displace and divert visitors away from Epping Forest SAC towards 4 parks in Redbridge.
- 3.3 The Council applies the Polluter Pays Principle meaning that developers of new residential developments must pay a financial contribution towards Suitable Alternative Natural Greenspace (SANGs) interventions or provide on-site mitigation where appropriate. The SANGs payment tariff applies to, and impacts, a significant

proportion of the borough and new residential development proposals which falls in the 0-6.2km Zone of Influence of Epping Forest SAC.

- 3.4 SANGs monies collected from qualifying developments will be reported to Land and Property Board and published in the annual Infrastructure Funding Statement which is subject to an annual Cabinet Report.
- 3.5 The NGIS will be placed on the Capital Programme; however interventions will only be funded when sufficient SANGs income is received.
- 3.6 The specific detailed allocation of SANGs funding will be decided under delegated authority to the Corporate Director of Regeneration and Culture in consultation with the Cabinet Member for Planning and Economic Growth. As interventions need to be in place before first occupation of the new development, delegated authority approval will be a more efficient and less resource intensive process enabling faster delivery of specific interventions to meet timescales.
- 3.7 This strategy ensures the Council has a sufficient pipeline of projects to match an optimistic level of housing growth.
- 3.8 The Council does not expect to achieve the optimistic levels of housing growth and development as set out in the Redbridge Local Plan 2015-2030 opportunity sites due to the recent trend for lower levels of housing delivery. Therefore, the Council expects to be collecting corresponding levels of SANGs tariff payments which means that it does not expect to be delivering as many SANGs interventions as identified in the Natural Greenspace Improvement Strategy.

## THE DECISIONS PROPOSED IN THE RECOMMENDATIONS TO THIS REPORT

### MAY BE CALLED IN

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## 4 Background

- 4.1 Epping Forest is a Natura 2000 site forming part of a European network of protected sites for habitats and threatened species and is a Site of Special Scientific Interest (SSSI) designated for its nature conservation importance. A significant portion of Epping Forest is designated as a Special Area of Conservation (SAC) providing a high level of protection under the EU's Habitats Directive (92/43/EEC) which is transposed into UK law by the Conservation of Habitats and Species Regulations 2017.
- 4.2 Epping Forest receives approximately, 4.8 million visitors per year as evidenced by the City of London Corporation's Epping Forest Management Strategy 2021. The Epping Forest Visitor Survey 2017 Results Report investigating visitor access patterns at Epping Forest found that most visitors (75%) of visitors originated from a 6.2km distance from Epping Forest. The 6.2km distance from the forest boundary is known as the Zone of Influence (ZOI).
- 4.3 Epping Forest SAC lies within Epping Forest District Council, the London Borough of Waltham Forest, and the London Borough of Redbridge administrative areas. These local authorities have a duty, as Competent Authorities under the Conservation of Habitats and Species Regulations 2017, to ensure that planning application decisions comply with those Regulations and do not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation.
- 4.4 Redbridge Planning Service is required to conduct a Habitat Regulations Assessment (HRA) Screening for new residential developments within the ZOI. The HRA mitigation requirements are met through the provision of Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspace (SANGs).
- 4.5 At Redbridge, this is currently met by collecting financial contributions from developers who pay a cash in lieu contribution for Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspace (SANGs) measures if their new development falls within the 0 - 6.2km ZOI from Epping Forest SAC. SAMMS monies are collected and paid to City of London Corporation who are responsible for delivering SAMMs mitigation measures in Epping Forest. Developers currently pay a SAMMs tariff of £255.84 per new residential unit plus a monitoring fee in accordance with the *Epping Forest SAC SAMM Strategy Partnership Agreement*.
- 4.6 Redbridge is also required to identify Suitable Alternative Natural Greenspace (SANGs) sites and projects in the borough to displace the recreational pressure at Epping Forest from visitors. The aim is to divert visitors towards using parks and green spaces within the Redbridge boundary.
- 4.7 In accordance with the Redbridge Planning Obligations Supplementary Planning Document, large scale developments (over 100 units) falling within the Zone Of Influence (ZOI) need to provide a package of SANGs measures which can include improving access and facilities to our open spaces, green infrastructure and SANGs sites. This is funded through S106 SANGs contributions from developers or can be

provided on-site where appropriate. However, this is an interim Habitats Regulations Assessment (HRA) measure.

4.8 In 2022, Natural England advised Redbridge that “*all net increases of residential development within the 6.2km [ZOI] will require both SAMM and SANG toolbox mitigation*” [See Appendix D].

4.9 To address this requirement, the Council has produced a coherent strategy and will introduce a new SANGs payment tariff to be paid by qualifying new residential developments in the ZOI. This strategy is called the Natural Greenspace Improvement Strategy. The purpose of the strategy is to ensure we have sufficient pipeline of projects to match an optimistic/maximum level of housing growth. In the event housing growth is lower than this, it is acceptable to fund fewer projects from the strategy. If no new housing is delivered, then there will be no need for SANGs provision as there will be no new residents and therefore no additional visitor pressure or air quality impacts to Epping Forest SAC. The amount of money we need to spend on the interventions is in direct proportion to the amount of housing development which commences.

4.10 SANGs interventions must be in place before first occupation of the development and maintained in perpetuity (80 years).

## **5 Options and Proposals for Natural Greenspace Improvement Strategy**

5.1 The Planning Service commissioned consultants, Place Services, to produce a new Natural Greenspace Improvement Strategy (NGIS) to provide coherent and borough wide SANGs mitigation measures plan. Using Natural England’s toolbox approach, several parks in Redbridge were assessed as potential SANGs however only 4 sites satisfied the criteria. The 4 SANGs sites are: Roding Valley, Claybury Park, Hainault Forest Country Park and Fairlop Waters Country Park. Corresponding catchment zones for the SANGs sites have been created and developments falling into the corresponding SANGs catchment, pay towards measures in that SANGs site.

5.2 Place Services first calculated the level of SANGs mitigation interventions required for delivery in the 0-6.km ZOI. This involved accounting for the numbers of potential new dwellings in the borough (or housing growth) from the *Redbridge Local Plan Appendix 1: Opportunity Sites*; the numbers of new residents (visitor number uplift); the average number of visits made per resident; using Natural England’s Accessible Natural Greenspace Standards (ANGSt) for catchments.

5.3 Place Services, with input from Vision RCL (the Council’s parks operator), developed a list of costed interventions in the 4 SANGs sites designed to improve access to and within, the greenspaces. The types of interventions include [but are not limited to] signage and information boards; boundary / gate infrastructure; and upgrading cycle/footpaths.

5.4 A SANGs tariff was subsequently developed which will pay for the delivery of the SANGs interventions, ecological monitoring, and 80 years in perpetuity maintenance costs. The SANGs tariff will be paid by qualifying new residential developments within

the 0-6.2km ZOI within the London Borough of Redbridge Local Planning Authority boundary.

- 5.5 The estimated SANGs costs include the capital costs, delivery/implementation/contractor costs, planning/Environment Agency/Highways consents, various assessments & surveys, design, preliminaries, management, legal, in perpetuity maintenance, monitoring and ecologist for 5 years, which total £11.105m. The baseline capital and delivery costs for the SANGs interventions are £1.081m.
- 5.6 The costs of the interventions have been independently reviewed by a quantity surveyor cost consultant to confirm/justify the mitigation measure costs and subsequently the tariff. Rates for landscape maintenance have been informed by Spon's External Works and Landscape Price book.
- 5.7 The list of interventions has been prioritised to achieve greatest uplift in visitor numbers. The interventions will be delivered mainly by the Council's Parks Operator.
- 5.8 The proposed SANGS payment tariff is currently £1892.20<sup>1</sup> per new residential unit. The tariff will be subject to indexation and change following review.
- 5.9 The tariff will be indicatively split 4 ways: 1) ecologist/ecology service (10%), 2) 4 x SANGs catchment sites (60%), 3) Parks Operator fee (10%), 4) priority/maintenance pot (20%). However, the Council reserves the right to spend the SANGs monies according to its priority SANGs interventions.
- 5.10 The Planning Service will charge a combined administration monitoring fee for Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspace (SANGs) on top of the tariff. The fee will be £135 per application but for major developments where payments are secured via Section 106 agreements, it is 5% of the chargeable amount, or £135, whichever is higher. This administration fee is added to the Section 106 Monitoring Fee to cover the cost of monitoring and reporting on delivery of that Section 106 obligation.
- 5.11 SANGs payments will be secured via a Unilateral Undertaking Agreement required for submission at the planning validation stage. This agreement will state the amounts of Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspace (SANGs) payments the developer will need to pay the Council to fulfil their Habitats Regulations Assessment (HRA) requirements. If planning permission is granted and the developer proceeds with that development proposal, then the SANGs payments must be paid prior to commencement of the development by the developer. This is to ensure there is sufficient monies and time to deliver SANGs interventions prior to occupation.
- 5.12 If the planning permission is granted but the development does not proceed (commence) with build out within the 3-year permission time limit (a lapsed application), it will not need to pay for the SANGs tariff or SAMMs payments for that

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<sup>1</sup> The SANGs payment tariff value is subject to change as SANGs interventions and costs are finalised and updated.

application. This is because there will be no new residential development and so no additional visitor or air quality impacts to mitigate for.

- 5.13 The Planning Service will be responsible for ensuring the developer is invoiced and the correct monies are received. Further details will be published on the Redbridge Planning webpages.

### **Qualifying Habitats Regulations Assessment Residential Development**

- 5.14 The SANGs tariff will be applicable to the following types of new residential developments but at different rates (please note this is not an exhaustive list):
- Standard residential (full planning, outline, prior approval change of use)
  - Care homes/residential institutions/co-living/hostels/ non-self-contained rooms (excluding nursing homes)
  - Student accommodation rooms
  - Change of use from existing non-residential to C4 small HMOs up to and including 6 people and new C4 Small HMOs up to and including 6 people
  - Change of use to Sui generis large HMOs over 6 people and new Sui Generis Large HMOs over 6 people
  - Residential caravan sites with permanent living (excluding holiday caravans and campsites)
  - Gypsies, traveller and travelling show people plots/pitches.

- 5.15 The SANGs tariff will be applicable to affordable housing.

### **Monitoring and Reporting**

- 5.16 The Natural Greenspace Improvement Strategy (NGIS) delivery will require monitoring of SANGs payment tariff monies agreed via Unilateral Undertakings, the monies due, invoicing, the monies received, the expenditure of the monies. This will be done by the Planning Policy and Infrastructure CIL & Section106 team in the Council. The financial information will be published in the Council's annual Infrastructure Funding Statement. The SANGs payment tariff will be reviewed and updated in line with indexation annually.
- 5.17 The Natural Greenspace Improvement Strategy SANGs sites will require monitoring to determine their impacts and success at displacing visitors away from Epping Forest SAC. This will be achieved through site visitor surveys and ecological surveys when required every 1-3 years. These will be undertaken by the Council's ecologist or commissioned where appropriate and will be paid from the SANGs monies collected.
- 5.18 Summaries and progress of the SANGs interventions will be reported in the Council's annual Authority Monitoring Report.

### **Review and Update of the Natural Greenspace Improvement Strategy (NGIS)**

- 5.19 The costs and NGIS should be reviewed at least every 5 years and/or when there are significant changes to governing legislation or Redbridge Local Plan review or material & delivery costs.
- 5.20 Interventions that will have been delivered in the period before a review should be removed from the updated NGIS list of SANGs interventions. Interventions recommended as future options can be fully added and/or new interventions can be considered and added.

### **Governance and allocation of spend of SANGs tariff**

- 5.21 The Natural Greenspace Improvement Strategy (NGIS) will be placed as an additional item on the Capital Programme in 2024/2025. Once the Council begins collecting monies from the SANGs tariff after the NGIS is adopted on 1<sup>st</sup> April 2024, the Council will have better information to forecast income from new developments and potential expenditure for SANGs. This will allow more detailed and informed financial information to be presented to Cabinet/Full Council.
- 5.22 The list of SANGs interventions have been prioritised to achieve greatest uplift in visitor numbers. The choice of intervention(s) to deliver depends on the amount of money available to spend in each SANGs site catchment, time restrictions for delivery, Council priorities and constraints following detailed assessments and permissions.
- 5.23 As per the usual process for reporting on planning obligations finances, the income and expenditure from SANGs payments will be reported to the Land and Property Board and published in the Council's annual Infrastructure Funding Statement.
- 5.24 The Planning Policy Team/Planning Ecologist, will seek advice from the appropriate Council Service areas, conduct and obtain necessary assessments and permissions relating to the potential SANGs interventions as identified in the Natural Greenspace Improvement Strategy. This will be funded from the collected SANGs monies and agreed by the Corporate Director of Regeneration and Culture and the Cabinet Member for Planning and Economic Growth via delegated authority.
- 5.25 The Planning Policy Team/ Planning Ecologist will present a range of appropriately prioritised SANGs interventions options to the Corporate Director of Regeneration and Culture and the Cabinet Member for Planning and Economic Growth, who will then decide via delegated authority, on the exact SANGs intervention(s) to deliver and allocate the appropriate money for that purpose from the collected SANGs monies.
- 5.26 The Planning Policy Team/Planning Ecologist will then manage and oversee the SANGs interventions are delivered. The interventions will be delivered mainly by the Parks Operator and/or Highways. The Council will report on the SANGs interventions in its Authority Monitoring Report and the finances in its annual Infrastructure Funding Statement.

## **6 Consultation**



- 6.1 External consultation was not necessary as the Natural Greenspace Improvement Strategy for the provision of Suitable Alternative Natural Greenspace is a statutory requirement under the Conservation of Habitats and Species Regulations 2017.
- 6.2 Natural England, the government's statutory body for environmental/ Habitats Regulations was consulted with throughout the development of the strategy. Natural England have provided a letter of support for the strategy (See Appendix C).
- 6.2 Internal Council departments were consulted with during the development of the strategy and on the final draft. These included, Leisure & Culture, Development Management, Regeneration, Highways, Environmental Health, Finance, Legal as well as the Council's parks operator Vision RCL.
- 6.3 The Natural Greenspace Improvement Strategy has been shared with neighbouring boroughs including London Borough of Newham, Epping Forest District Council, London Borough of Havering, London Borough of Waltham Forest, London Borough of Barking & Dagenham, London Borough of Enfield, Essex County Council. The document has also been shared with various landowners of the SANGs sites.

## **7 Risk**

- 7.1 The key risk of this strategy and new SANGs payment tariff is that it will add to the costs for developers of new residential developments in the borough. It may impact the viability of some schemes and for example, it may result in negotiation of lower affordable housing provision. However, the Habitats Regulations Assessment mitigation requirements are a statutory requirement.
- 7.2 The SANGs payment tariff applies to all new qualifying residential developments in the ZOI which includes development by the Council's housing and regeneration teams. The Council will need to ensure it can fund the SANGs (and Strategic Access Management Measures (SAMMs)) payments. The relevant service areas in the Council have been made aware of the payment requirements.
- 7.3 The opposing key risk is that Redbridge is currently in breach of the Conservation of Habitats and Species Regulations 2017 because it is not fully mitigating the impacts of all new residential development in the ZOI in accordance with the Habitats Regulations Assessment (HRA) and Natural England's advice. As a consequence, Natural England may potentially object to planning decisions or take actions against the Council if HRA mitigation requirements are not fulfilled.

## **8 Fairness Implications, including Equality and Diversity**

- 8.1 In summary, section 149 of the 2010 Act requires the Council, when exercising its functions, to have 'due regard' to the need to:

- a) Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act (which includes conduct prohibited under section 29);
- b) Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
- c) Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).

8.2 Under the PSED the relevant protected characteristics are:

- Age
- Disability
- Gender Reassignment
- Pregnancy & Maternity
- Race
- Religion
- Sex
- Sexual Orientation

8.3 In respect of the first aim only i.e. reducing discrimination, the protected characteristic of marriage and civil partnership is also relevant.

8.4 Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not includes having due regard, in particular, to the needs to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a protected characteristic where those needs are different from the needs of persons who do not share that characteristic;
- Encourage those who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

8.5 Further, section 149 provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

8.6 Compliance with the duties in section 149 may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited under the Act (which includes breach of an equality clause or rule, or of a non-discrimination rule).

8.7 An Equality Impact Assessment Screening has been undertaken (See Appendix A) and there are no negative equality impacts identified to those with protected

characteristics. The SANGs measures are designed to make the 4 SANGs sites more accessible and inclusive to all.

- 8.8 There are no negative implications for human rights, modern slavery or health inequalities.

## **9 Staffing Implications**

- 9.1 The proposed SANGs payment tariff includes a proportion to pay for an ecologist/ecological service to conduct work relating to SANGs. This includes conducting surveys, SANGs interventions delivery, options appraisals, and monitoring.
- 9.2 The Planning Policy and Infrastructure CIL/S106 team will be responsible for reporting and monitoring of the Natural Greenspace Improvement Strategy.

## **10 Child Friendly Implications**

- 10.1 The Natural Greenspace Improvement Strategy measures are designed to make it easier and more accessible for everyone to access 4 green spaces in the borough. In relation to the child rights principles, improving access to and throughout the 4 green spaces will mean children can use these safer spaces to exercise, play, grow, develop and nurture their emotional wellbeing.

## **11 Crime & Community Safety**

- 11.1 The Natural Greenspace Improvement Strategy measures are designed to make it easier and more accessible for everyone to access 4 green spaces in the borough.
- 11.2 The SANGs interventions will require designing and appropriate planning consent and assessments which will consider designing out crime and improving community safety. There are no anticipated public safety risks beyond the usual risks when using green spaces/parks in the borough.

## **12 Value for Money**

- 12.1 Through applying the Polluter Pays Principle, only forthcoming qualifying residential developments within the Zone Of Influence (which have the most likely visitor and air quality impacts to Epping Forest SAC) will be required to pay the SANGs payment tariff.
- 12.2 A combined monitoring fee for Suitable Alternative Natural Greenspace (SANGs) and Strategic Access Management Measures (SAMMs) gives developers value for money. The monitoring fee will help pay towards the resource costs for ensuring SANGs monies are collected, monitored, and reported adequately.

## **13 Financial Implications**

- 13.1 A new SANGS payment tariff will be introduced from 1 May 2024 which will be £1,892.20<sup>2</sup> per new residential unit. A combined administration monitoring fee for SANGs and SAMMs will be payable by developers on top of the tariff. The fee will be £135 per application but for major developments where payments are secured via S106 agreements, it is 5% of the chargeable amount, or £135, whichever is higher.
- 13.2 The tariff of £1,892.20 is calculated by estimating the projected capital costs of each intervention with 5% of this cost estimated as the first-year maintenance costs and then further projected maintenance costs for a further 80 years and projected monitoring fees. The expected number of qualifying new residential developments is taken into account to calculate a tariff per new residential unit.
- 13.3 The Natural Greenspace Improvement Strategy will be included within the capital programme as and when the Council begins collecting monies from the tariff. At this point there will be better understanding of the forecasted income from new developments and the level of interventions that will need to be funded.
- 13.4 From 1 May 2024 monies received from developers will be identified separately for ease of monitoring similar to CIL and Section 106 monies.
- 13.6 The Council will need to pay the SANGS tariff and monitoring fee for any builds on which it acts as the developer, including for affordable housing.

## 14 Legal Implications

- 14.1 Habitats Regulations Assessments are required under the Conservation of Habitats and Species Regulations 2017, in particular, Part II of the Regulations.
- 14.2 Additionally, a key statutory provision is regulation 63, which requires competent authorities follow a number of prescribed steps when making development control decisions. Regulation 63 requires those competent authorities to do the following when dealing with planning applications that could impact a Habitats Site (including by way of nutrient pollution):
- i) Screening: establish whether the plan or project is likely to have a significant effect on the Site, either alone or in combination with other plans or projects, in view of that Site's conservation objectives: reg. 63(1);
  - ii) Assessment: where the proposal is likely to have a significant effect, to make an "appropriate assessment" of its implications in view of the Site's conservation objectives: reg. 63(1);
  - iii) Consultation: for the purposes of the appropriate assessment, to consult the appropriate nature conservation body and have regard to any representations made by that body: reg 63(3);
  - iv) Integrity test: only to agree to the proposal after having ascertained that it will not adversely affect the integrity of the site.

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<sup>2</sup> The SANGs payment tariff value is subject to change as SANGs interventions and costs are finalised and updated.

## **BACKGROUND PAPERS**

Appendix A Equality Impact Screening Natural Greenspace Improvement Strategy

Appendix B Natural Greenspace Improvement Strategy

Appendix C Natural England NGIS Strategy Draft Support in Principle

Appendix D Natural England Updated letter to authorities Sept 2022

Appendix E HRA Screening Report