

MILTON COMMON LOCAL NATURE RESERVE MITIGATION AND MANAGEMENT FRAMEWORK

PORTSMOUTH CITY COUNCIL

ADOPTED BY PORTSMOUTH CITY COUNCIL AT THE CABINET MEETING ON 21 FEBRUARY 2023

Executive Summary

This Framework sets out a mitigation and management strategy to alleviate recreational pressure on Chichester and Langstone Harbours SPA and Solent Maritime SAC resulting from the increase in expected visitors following proposed development at St James Hospital and the former Langstone Campus.

Natural England submitted a formal objection to application 20/00204/FUL (which proposed the development of 209 dwellings at St James) in relation to the fact that a bespoke mitigation package could not be provided for the consequent 'alone' impacts on the SPA and SAC resulting from an increase in visitors. This was due to the 2015 Milton Common Local Nature Reserve Restoration and Management Framework being outdated.

In order to address Natural England's concerns about the recreational impact on the designated sites, this update to the 2015 Framework sets out a Suitable Alternative Natural Greenspace (SANG) style mitigation scheme. This will direct visitors to use the central and western extent of Milton Common as a place for recreation as an alternative to the neighbouring coastline. Milton Common represents the most appropriate location to direct visitors due to its close proximity to the proposed development site and being already established as a popular destination for walkers, dog walkers, cyclists, runners and bird watchers.

Milton Common currently comprises a variety of habitats and character areas, although bramble and scrub coverage dominates the site covering 38.1% of it; the greatest individual proportion. Following this, coarse/tussocky grassland comprises 31.2% of the 45-hectare site.

To understand the current capacity and visitor footfall at Milton Common, visitor surveys were undertaken throughout October, November and December 2022; the period at which overwintering birds using the SPA will be present. The majority of users were local residents who recreate regularly either for walking or to walk their dogs.

The visitor information is used to calculate the number of visitors that can be accommodated on Milton Common based upon the standard of 8 hectares (ha) per 1,000 people as has previously been agreed by Natural England for the Thames Basin Heaths SPA. The survey allowed a calculation of the average number of visits per day for the winter period (1296.6) and the Summer period (1,608), a variation of 19.37%.

With this variation evidenced in surveys and therefore taken into account the current residual capacity on the Common was calculated as 0.55ha. The 1,052 additional visitors from the proposed development will need the equivalent to 8.416 ha of capacity on the Common, therefore requiring a further 7.866ha capacity.

This will be achieved through management measures including the clearance of brambles and scrub, enhancing the path network and maintaining areas of amenity grass and meadow. These and other measures outlined within this Framework will be implemented to make Milton an attractive inland alternative location to the coastline, reducing detrimental recreational impact to the designated sites.

When the total cost of these management measures have been calculated and assessed against the number of proposed dwellings at St James and the former Langstone Campus it provides a costing figure of £9,528.49 per unit to be paid by the developer to mitigate impacts from recreational pressure on the nearby SPA and SAC.

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1 Introduction

1.1 Purpose of the update

- 1.1.1 Portsmouth City Council (PCC) have been preparing this updated Milton Common Local Nature Reserve Mitigation and Management Framework following Natural England's formal response to applications 20/00204/FUL seeking *'Redevelopment of St James' Hospital; conversion of listed buildings/Chapel to provide 151 dwellings; new 2 & 3 storey housing to provide 58 dwellings (phased development) (Amended Scheme).'*
- 1.1.2 In a formal letter dated 26 September 2022 (provided within appendix 1) Natural England raised an objection to the above application *based on PCC's (draft) appropriate assessment dated 10 January 2022, the Draft HRA report dated 18 December 2020, and the Milton Common LNR Restoration and Management Framework dated 21 July 2015.* The letter stated that further information would be required to determine the impacts on designated sites and without the updated HRA, nutrient budget and agreed mitigation, Natural England advised the plan would have a likely significant effect on the below designated sites and objected to the proposal. These designated sites referred to in the formal letter include:
- Solent and Dorset Coast Special Protection Area (SPA)
 - Portsmouth Harbour SPA and Ramsar Site
 - Chichester and Langstone Harbours SPA
 - Solent Maritime Special Area of Conservation (SAC)
 - Solent and Southampton Water SPA
- 1.1.3 The approximate location of the application site that Natural England refer and object to is highlighted in figure 1. From this image it is evident that of the designated sites listed, those in closest proximity and potentially most at risk from the resulting recreational pressure following the proposed development are Chichester and Langstone Harbours SPA and Solent Maritime SAC (both to the east of the site). Chichester and Langstone Harbours Ramsar site and Langstone Harbour Site of Special Scientific Interest (SSSI) are also designated here, although were not highlighted within Natural England's letter.
- 1.1.4 Natural England stated the development *will lead to a net increase in an accommodation type and occupancy identified in the Solent Recreation Mitigation Strategy as having an impact on the notified features of the site at least in combination with other plans or projects.*

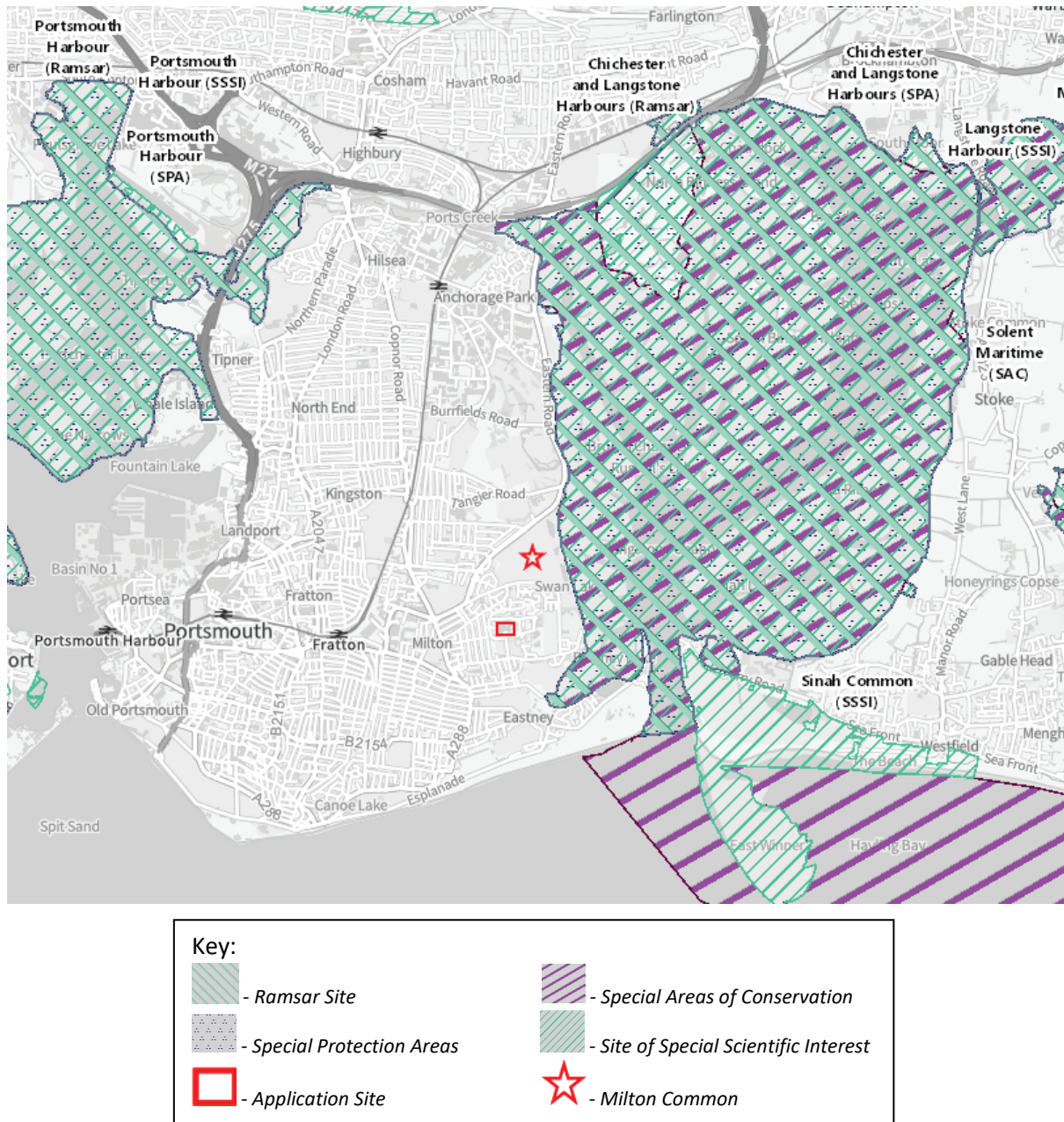


Figure 1: Map showing the location of the Internationally Designated sites in relation to application site 20/00204/FUL (Source: Magic Map)

1.1.5 PCC is part of the Solent Recreation Mitigation Partnership (Bird Aware) set up to coordinate efforts from fifteen local authorities along the Solent, Natural England, and other stakeholders¹ⁱ to ensure the continued and ongoing protection of the three SPA's within the Solent region (Solent and Southampton Water, Portsmouth Harbour and Chichester and Langstone Harbours). The Bird Aware scheme²ⁱⁱ is in place to mitigate against in-combination effects resulting from an increase in recreational pressure.

¹ [Bird Aware Solent partners](#)

² [Bird Aware Homepage](#)

- 1.1.6 Human disturbance to birds can arise from any activity which results in a change in the bird's behaviour. An acknowledged issue is the impact which disturbance, much of which is caused by recreation, can have on the protected species which use the SPA including Brent Geese and Solent Waders.
- 1.1.7 The Draft Habitats Regulations Assessment (HRA) submitted as part of application 20/00204/FUL (dated 19 December 2020) concludes that the proposal has the potential to cause an 'alone' impact to the designated sites which are not covered by Bird Aware. While Natural England agreed that mitigation could be provided through contributions to the Milton Common Access and Recreation Project, the Milton Common Local Nature Reserve Framework (2015) was considered outdated and therefore needed to be updated to *stipulate exactly how the restoration project will mitigate for potential 'alone' impacts of development proposals which contribute to it.*
- 1.1.8 This updated Framework therefore aims to achieve a similar output to that of the 2015 Framework which focussed on enhancing nearby green infrastructure in order to divert recreational pressure away from the coast and towards inland sites. Milton Common represents a great opportunity to put this into practice given its close proximity to the development site which is located some 300m south of Milton Common (as shown in figure 2). By enhancing the central and western extent of Milton Common to create a Suitable Alternative Natural Greenspace (SANG) it will divert recreational pressure away from the neighbouring coastline, SPA and SAC and reduce the pressure on these important habitats and the species that use them.
- 1.1.9 It is important to note that this Framework seeks to direct additional users away from the coastal path on the eastern boundary of Milton Common and the mudflats which form part of the designated sites and direct users further inland to the central and western extent of Milton Common (west of the three lakes on site). This will be achieved by providing a number of measures (as outlined in section 6 of this Framework) that enhance this area and make it a more attractive destination for visitors. The aim is for this area to then become the prime walking route on Milton Common.



Figure 2: Location of Milton Common and the proposed development site under application 20/00204/FUL (Source: Google Earth)

- 1.1.10 This Framework has been informed by visitor surveys undertaken between October and December 2022 to understand the existing user capacity of Milton Common and understand the level of site specific mitigation and management measures required to account for the increased footfall resulting from the nearby proposed developments. It is also important for this Framework to recognise the supporting habitat that certain areas of Milton Common itself provides to species who use the neighbouring SPA and SAC (predominantly Brent Geese) and protect these areas of the Common.
- 1.1.11 This document will set out the context of Milton Common, the existing baseline management measures that take place and will then propose a number of new site specific mitigation and management measures that will be put in place accordingly to account for the increase in potential visitor numbers. As the central and western extent of Milton Common will be acting as a suitable alternative natural greenspace to the coastal path and neighbouring SPA and SAC, where relevant, mitigation and management measures will have due regard to the 19 criteria for a SANG (as established by Natural England). However, the unique nature of the site and the location of it in comparison to the designated site in which it is seeking to divert recreational pressure away from means that it cannot prescriptively follow all 19 criteria.

1.1.12 Milton Common is not an area of open space where additional visitors are actively encouraged to visit and the mitigation strategy therefore focusses on supporting current users, and those who are or will be living in close proximity, to reduce their recreational disturbance to protected species.

1.1.13 Once all mitigation and management measures have been considered, the cost of these will then be set out to allow contributions to be made to combat the alone impacts that new nearby developments could have on neighbouring designated sites.

1.2 Other Developments

1.2.1 The proposed development at St James to which Natural England objected is part of a larger allocation within the emerging Portsmouth Local Plan (2038). The allocation lists two main development plots which are the St James Hospital and the former Portsmouth University Langstone Campus as shown in figure 3 below.

1.2.2 Application 20/00204/FUL forms one part of the St James allocation with the other part (southern part of the site previously occupied by the Harbour School and owned by Homes England) currently under consideration for 107 dwellings (18/00288/OUT). The remainder of the St James Hospital site, owned by the Solent NHS Trust is currently anticipated to be retained in medical use.

1.2.3 The former Langstone Campus is allocated for a mixed-use development comprising education facilities, community uses, open space and circa 120 dwellings.

1.2.4 This Framework will also allow these developments to provide the appropriate level of monetary contributions to mitigate and manage Milton Common accordingly.

1.2.5 In addition to these, there is a development that has already been built out and contributed to the restoration and management of Milton Common through the 2015 Framework under planning application 14/01664/FUL for a total of 30 dwellings to the north of the allocation (formerly Light Villa and Gleave Villa). Table 1 provides a breakdown of the anticipated total number of dwellings that will be provided as part of the allocation within the emerging Local Plan (requiring mitigation through monetary contributions) and those that have already provided monetary contributions to Milton Common.

Developments required to provide a mitigation through monetary contributions		
Location	Application Reference	Number of residential dwellings proposed
St James North	20/00204/FUL	209
St James South	18/00288/OUT	107
Langstone Campus	N/A	120
Developments that have already provided a mitigation through monetary contributions		
Location	Application Reference	Number of residential dwellings proposed
Land at St James (formerly Light Villa and Gleave Villa)	14/01664/FUL	30
Total		466

Table 1: Breakdown of the housing numbers at St James and Langstone Campus

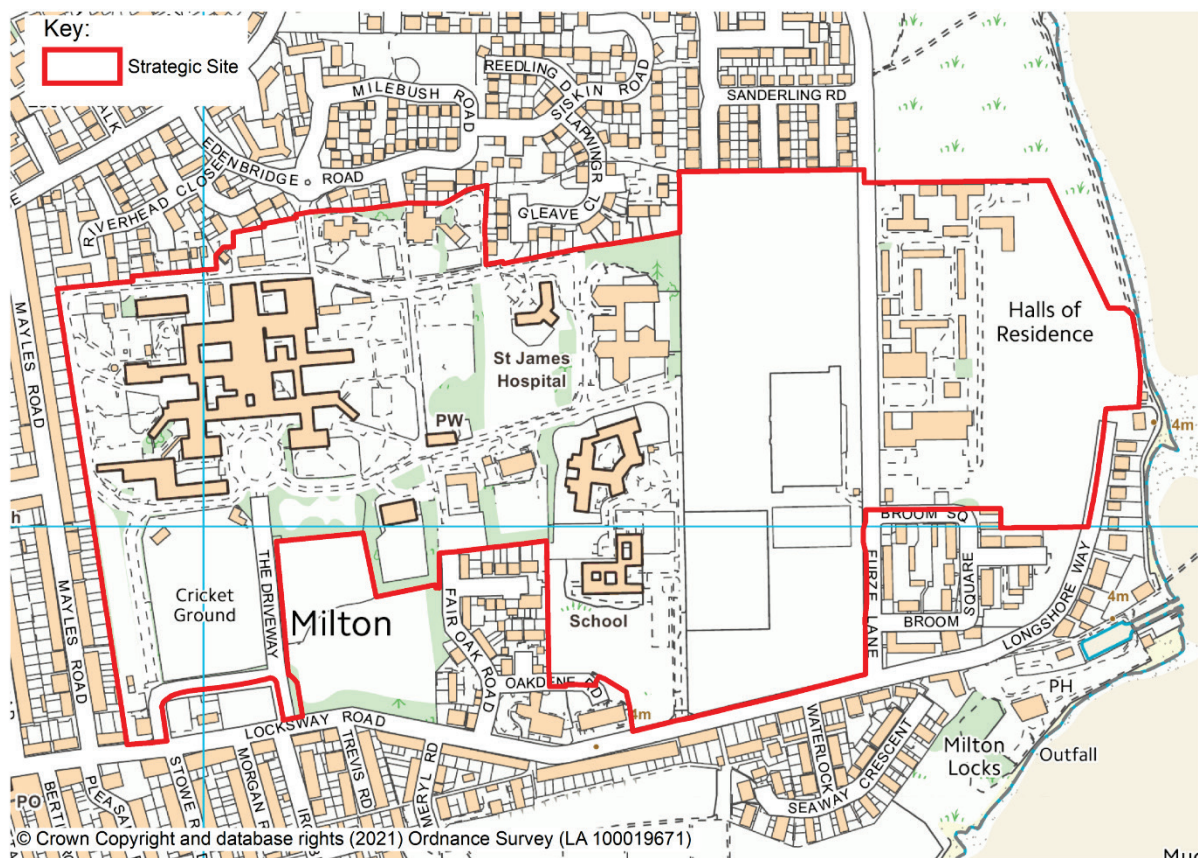


Figure 3: St James and Langstone Campus allocation in the emerging Portsmouth Local Plan (Source: PCC)

2 National Legislation

2.1 Legislative updates since 2015

- 2.1.1 The European Habitats³ⁱⁱⁱ and Birds Directives^{4iv} (Nature Directives) are the cornerstones of EU nature protection and aim to tackle the loss of nature and conserve Europe's natural heritage. These have brought about the creation of Natura 2000^{5v}; a network of core sites for endangered and threatened species. These directives were put in place to enable all EU Member States to work together under the same legislative framework.
- 2.1.2 Under the European Commission Birds Directives, each Member State is required to classify particular habitats as Special Protection Areas (SPAs) based on scientific criteria and have a duty to manage them to a favourable condition. Under the Habitats Directive member states are also required to designate Special Areas of Conservation (SAC) for other habitats and species. Both SPA's and SAC's are referred to collectively as Natura 2000 sites. Within Portsmouth, the Solent Maritime SAC covers a large area of the Solent, including Langstone Harbour (as shown in figure 1). There are separate Ramsar designations covering the same area as the two SPAs (Portsmouth Harbour Ramsar and Chichester Langstone Harbour Ramsar). Ramsar Sites are designated under the International Wetlands Convention and although not subject to the same legal protection as Natura 2000 sites they are still of significant ecological importance.
- 2.1.3 The Nature Directives were transposed into UK law through the Conservation of Habitats and Species Regulation 2017, however, due to the UK's departure from the EU (on 31 January 2020) there have been updates to this legislation. The minor amendments are referred to as The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019^{6vi}. Despite this major shift, existing protection for habitats and species will remain the same for the UK and the principles of the directives will be retained. Most amendments and updates simply involve transferring functions from the European Commission to the relevant authorities in the UK.
- 2.1.4 The judgement in *Harris & Anor v Environment Agency* (2022)-confirmed that despite the UK's departure from the EU, section 4 of the European Union (Withdrawal) Act 2018 (as amended) retains obligations grounded in EU Directives that were recognised by case law on and prior to 31 December 2020, meaning that many obligations stemming from European Directives remain enforceable by UK Courts. One notable change is that SPA's and SAC's no longer form part of the Natura 2000 network and instead come under a new 'national site network' within the UK made up of existing and newly proposed SPA's and SAC's. Whilst all Ramsar Sites remain protected in the same way SPA's and SAC's do, they are not defined as part of the national site network.

³ [The Habitats Directive - European Commission website](#)

⁴ [The Birds Directive - European Commission website](#)

⁵ [Natura 2000 - European Commission website](#)

⁶ [The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019 \(legislation.gov.uk\)](#)

- 2.1.5 The 2019 Regulations update the process for designating SPA's and SAC's and also establish new management objectives for the national site network. These new 'network objectives' (revoking the need to meet requirements of the nature directives) require maintenance and restoration (where appropriate) of habitats to favourable conditions and the objectives contribute to the conservation of these vital habitats.

2.2 HRA context

- 2.2.1 Under the 2017 regulations, the City Council must assess whether a proposed development is likely to have a significant effect on any SPA's or SAC's before it can be authorised. This assessment is called a Habitats Regulations Assessment (HRA). Despite the regulatory changes post Brexit, the HRA regime continues to apply in the same way and the process remains relatively unchanged. One minor change is the European Commission's role in the HRA derogation test process will be replaced by the Secretary of State for the Environment, Food and Rural Affairs.
- 2.2.2 The HRA needs to identify the interest features of the National Network sites and whether the plan or project is likely to cause harm to them. If necessary, avoidance or mitigation measures could be included to remove the harm which otherwise would have occurred. The first stage of the HRA sets out the details of the project or plan. The second stage of the HRA involves 'Screening' and assesses whether the plan or project will have likely significant (LSE) effect on the SPA or SAC alone or in combination with other developments in the local area. At this stage (in accordance with the ruling of the Sweetman case⁷) it was deemed that the proposal should not have been screened out by taking into account the measures that had been built into the design. Mitigation measures intended to reduce harmful effects of resulting development should only therefore be taken into account within the Appropriate Assessment stage.
- 2.2.3 A second stage, called the Appropriate Assessment (AA), comprises a detailed assessment to determine whether there will be an adverse effect on the site and identifies ways to avoid or minimise any effects. Due to the precautionary approach in the regulations, it is necessary to demonstrate, with a reasonable degree of certainty, that the project will not be likely to cause harm to a European site before it can lawfully be authorised. Only once the HRA has determined that there will not be an adverse effect can the proposal be authorised.
- 2.2.4 PCC's HRA in relation to the proposed development at St James' (ref. 20/00204/FUL) published on 13 December 2021 screened the proposed development and concluded it would have LSE on the integrity of the nearby designated sites. Within the appropriate assessment PCC agreed mitigation would be secured in line with the Solent Recreation Mitigation Strategy (Bird Aware) and the Milton Common Local Nature Reserve Management Framework (2015). Whilst Natural England agreed with mitigation through the Milton Framework, it was deemed to be out of date and in need of updating.

3 Milton Context

3.1 Historic Context

- 3.1.1 Some of the baseline management measures needed on site today are in place due to the historic reclamation of Milton Common. Between 1962 and 1970 land reclamation was undertaken to fill in what was previously known as Milton Lake which ran centrally through the site from west to east as shown in figure 4 below. The issue was that this reclamation involved the construction of a chalk and clay bund at the entrance of the lake which was then drained and filled with domestic refuse and other waste.



Figure 4: 1967 aerial photograph of Milton Common showing the construction of the bund across Milton Lake

- 3.1.2 While this was later capped and grassed over, the long term implications for how this infill and reclamation took place are still being felt today and must be borne in mind when considering future management of the site. The process of the organic matter in the refuse degrading has resulted in a great deal of settlement and the surface is now very uneven.
- 3.1.3 Today the Common is one of the most valued open spaces in Portsmouth and one of very few semi-natural areas within the City and the reason residents are drawn there for quiet recreation. There is a mix of more natural areas and some amenity grassland with a vast array of wildlife making the site intrinsically valuable and highly regarded. A network of paths criss-crosses the site, including a wider path stretching down the coastline, connecting Milton and Eastney with the shared footpath/cycleway stretching up the Eastern Road and out of the city.

- 3.1.4 In accordance with Part IIa (2a) of the Environmental Protection Act 1990^{8vii} and relevant paragraphs within the NPPF⁹, the Local Authority and developers have a duty to identify contaminated land and ensure that developments are safe and secure and are not contributing or being put at unacceptable risk from soil pollution. Whilst this relates directly to the site being developed, the intention is precautionary in nature and intended to protect the end-users and it is considered that it would apply to the amenity space at Milton Common intended by the developer to be used by future residents.
- 3.1.5 In terms of management, this presents challenges as the way in which the site was filled has meant that the resulting settlement of the site has been particularly uneven. It has also resulted in physical obstacles, such as lumps of concrete and metal, protruding from the ground. These issues make it difficult or for the countryside team to use machinery to manage the site. As such, they are reliant on hand tools which are a far less efficient way to manage a site the size of Milton Common.

3.2 Designated Sites

- 3.2.1 As shown in figure 1, Milton Common is located adjacent to the Chichester and Langstone Harbours Ramsar Site, SPA, Langstone Harbour SSSI and Solent Maritime SAC. This Framework seeks to direct recreational pressure away from the coastline due to the potential significant impacts on the SPA and SAC (highlighted by Natural England) and further inland, to the west of the three lakes on Milton Common.
- 3.2.2 Chichester and Langstone Harbours SPA was classified due to its international importance for regularly supporting tens of thousands of wintering wildfowl and waders^{10viii}. The Solent Maritime SAC has been designated due to its unique estuarine and coastal features including extensive areas of mudflats, sandflats and subtidal banks, all of which provide a vital habitat and feeding ground for the overwintering and other birds that use the coastline^{11ix}.
- 3.2.3 The Solent supports in excess of 90,000 waders annually. The intertidal habitat which the Solent provides, particularly the mudflats, shingle and saltmarsh provide ideal feeding and roosting grounds for these species, which are specially adapted to feeding in such habitat. At their winter peaks, the population of Brent geese in Chichester and Langstone Harbour SPA represents 20% of the national population and 9% of the international population of this species^{12x}.

3.3 Bird Aware

- 3.3.1 Portsmouth City Council is part of the Solent Recreation Mitigation Partnership (Bird Aware) set up to coordinate efforts from fifteen local authorities along the Solent, Natural England, and other stakeholders to ensure the continued and ongoing protection of SPAs.

⁸ [Environmental Protection Act 1990: Part 2A - Contaminated Land Statutory Guidance](#)

⁹ Paragraph 174(e), 184 and 185 of the NPPF (July 2021)

¹⁰ [European Site Conservation Objectives for Chichester and Langstone Harbours SPA](#)

¹¹ [European Site Conservation Objectives for Solent Maritime SAC](#)

¹² [Solent waders and brent goose strategy 2020](#)

- 3.3.2 Between 2009 and 2013 extensive research was undertaken through the Solent Disturbance Mitigation Project (SDMP) to understand the impact that recreational activities have on overwintering birds using the Solent Coast. While this work uncovered that some birds were able to alter their feeding habits, several species suffered mortality because disturbance disrupted their feeding and resting habits resulting in them not having the energy to fly back to their breeding grounds.
- 3.3.3 With over 60,000 new homes planned around the Solent (up to 2034), the research predicted that this would create a 13% rise in visitor numbers at the Solent Coast, with individual sections ranging from 4% to 84% increase^{13xi}. It was therefore determined that mitigation measures would be needed in order to reduce any further detrimental impact through recreational disturbance. The initial research adopted visitor and household surveys to determine how visitors used this space along the Solent. One survey point used in the visitor surveys was at the north-east of Milton Common on the main coastal path. This painted a picture of Milton Common as being a valued area, visited by those who live close by on a frequent basis for short day-to-day recreation including predominantly walking and dog walking.
- 3.3.4 Following the culmination of the SDMP research, Natural England issued the following advice to Local Planning Authorities including Portsmouth *"This follows the completion of Phase II of the Solent Disturbance and Mitigation Project (SDMP), which reported that there is a Likely Significant Effect associated with the new housing planned around the Solent. Natural England's advice is that the SDMP work represents the best available evidence, and therefore avoidance measures are required in order to ensure a significant effect, in combination, arising from new housing development around the Solent, is avoided."*
- 3.3.5 This directly fed into and informed the creation of the Solent Recreation Mitigation Strategy which was endorsed by the Partnership for South Hampshire (PfSH) in December 2017 and came into force (replacing a smaller scale interim strategy) on 1st April 2018. The Mitigation Strategy sets out the management measures that will be put in place by Bird Aware to prevent recreational activities causing harm to overwintering birds. The aim is not to restrict all recreation but provide guidance and advise on how to enjoy the coastline without causing detrimental harm to overwintering birds. These management measures are funded by developer contributions calculated according to the bedroom numbers of the property. The level of contribution is reviewed each year in line with the Retail Price Index.

¹³ [Solent Disturbance and Mitigation Project Phase 3](#)

- 3.3.6 The management measures and solutions meet the requirements of the Conservation of Habitats and Species Regulation 2017 by providing a strategic solution to in-combination effects of increased development in the Solent, resulting in increased recreational activity. Bird Aware *provides mitigation for the impact of in-combination recreational visits arising from housing which is planned around the Solent up to 2034. It does not address the impact of existing activities, which is the role of the separate Solent European Marine Sites (SEMS) initiative.*
- 3.3.7 There may however be some development (those in particular outlined within section 1 of this Framework) which due to their scale or location could cause significant 'alone' impacts regardless of whether other development is taking place nearby. In situations such as these where Bird Aware does not contribute to mitigation, a bespoke mitigation package will need to be provided by developers for the development.
- 3.3.8 The development which would come forward in the proposed development sites would be significant in scale and built out on sites ranging from immediately next to the SPA to 1km away. As such, it is considered that **these developments would lead to a significant effect on the SPA designations, regardless of any other development that will happen along the Solent.** As such, under the Habitats Regulations a bespoke mitigation package is required in order to allow the developments to lawfully go ahead.
- 3.3.9 The research that was previously undertaken at Milton Common between 2009 and 2013 as part of the SDMP is the only formal piece of research/survey that has been conducted in this area through the Bird Aware Partnership.
- 3.3.10 As part any works occurring at Milton Common, Portsmouth City Council will continue to collaborate and engage with Bird Aware to ensure protection of overwintering birds.

3.4 Solent Waders and Brent Geese Strategy

- 3.4.1 The Solent Waders and Brent Goose Strategy (SWBGS) is a conservation partnership project, which aims to conserve the internationally important Brent Goose and wading bird populations within and around the Special Protection Areas and Ramsar wetlands of the Solent coast.
- 3.4.2 The SWBGS is a report of the Solent Waders and Brent Goose Strategy Steering Group, which comprises a selection of statutory and non-statutory bodies. The strategy was published in 2020 (following previous iterations in 2002 and 2010) setting out evidence gathering, data collection and analysis that has been undertaken to help inform decisions relating to strategic planning.

- 3.4.3 The 2020 study used a metric scoring system to classify the value of sites and assesses bird movement to understand how overwintering birds move between certain sites. This movement is not captured within a simple SPA designation as birds may use a network of sites to feed, rest and roost. There has been limited attention paid to these inland fields and grasslands which play a vital supporting role. Milton Common is one of a number of supporting habitats that overwintering birds use to feed and roost within Portsmouth.
- 3.4.4 Since the 2002 strategy which focussed solely on Portsmouth, Langstone and Chichester Harbours, research has expanded and within the 2010 strategy the whole of the Solent region was assessed and included Solent Waders along with Brent Geese. This identified sites of regular recorded use and encompassed the whole of Milton Common as an 'Important' site. The most recent strategy in 2020 was further developed and prioritised the conservation and maintenance of the existing key network of sites.
- 3.4.5 Between 2016 and 2019 survey data was collected that fed into the Strategy. Data collection for the Eastern Solent (including Portsmouth) was undertaken in the winter of 2016/17 and followed an updated site importance assessment method. Results of the new assessment method which incorporated metric-based analysis system created a classification of site importance for sites. These classifications were "core areas", "primary support areas", "secondary support areas" and "low use site". This adapted methodology meant it was not the whole extent of Milton Common that was classified and instead focussed on certain areas that the birds specifically used (as shown in figure 5).



Figure 5: Map of the Core Areas (blue), Secondary Support Areas (red) and Low Use Site (yellow) in and around Milton

3.4.6 As can be seen in figure 5, on and around Milton Common there are a several network sites used by Brent Geese. These consist of:

- P23R (Core Area) - The northernmost section of Milton Common
- P23A (Core Area) - South east section of Milton Common covering Swan Lake
- P23B (Core Area) - South of Milton Common on playing fields east of the former Langstone campus
- P52 (Core Area) - North of Milton Common on the City of Portsmouth College playing fields
- P54 (Core Area) - West of City of Portsmouth College
- P20 (Core Area) - Adjacent to the west of site P54 (Tangier Park)
- P25 (Secondary Support Area) - Playing fields west of the former Langstone Campus
- P129 (Low Use Site) - Baffins Pond

- 3.4.7 Further to these sites, as part of the North Portsea Island Coastal Defence Scheme (as discussed in section 3.5 below) there are two parcels of land that have been designated as supporting habitat sites for Brent Geese to mitigate the siting of a compound on site P23R. These two parcels of land are identified in figure 8 and their location, management and maintenance post construction (to provide further sites for Brent Geese) was determined to be appropriate by Natural England and Portsmouth City Council as part of application 19/01368/FUL.
- 3.4.8 Although additional recreation is being directed further inland and away from the coastal path to reduce recreational pressure on the SPA, this framework will also take into careful consideration the importance for site specific management measures to protect these 'core areas' of Milton Common (P23A and P23R) and the two designated mitigation sites established as part of the coastal defence scheme. Users of the site (especially dog walkers) will be redirected to alternative locations on the Common, which will become significantly more appealing through the implantation of the mitigation and management measures within section 6 of this framework.
- 3.4.9 Accompanying the SWBGS is the Guidance on Mitigation and Off-setting Requirements (2018). This document, produced by the steering group outlines the mitigation and off-setting requirements to inform assessments of plans and projects made under the Habitats Regulations and to protect the network should sites come forward for development.

3.5 Coastal Defence Work at Milton

- 3.5.1 The North Portsea Island (NPI) Scheme is a coastal defence project covering 8.4km of Portsmouth's coastline from Tipner through to Milton. It includes five phases with an overall project timeline of 2015-2025 (the location of each phase is shown in figure 6 below). The first Phase (Anchorage Park) and the second phase (Milton Common) were both completed in 2016. The third phase (Tipner Lake) was completed in 2019.
- 3.5.2 Phase 4 of this scheme (Eastern Road and Kendall Wharf) is broken down into 4a and 4b, with works commencing in 2019 and expected to be completed in 2023. Phase 4a at Kendall's Wharf was completed in 2020. This included raising ground levels of footpaths and a road as well as building the first section of the wall that will run down to Milton Common.



Figure 6: Diagram of the five phases of the North Portsea Island Coastal Defence Scheme (Source: Coastal Partners)

- 3.5.3 Phase 4b will be constructed throughout the summers of 2021-2023. The construction of this phase is restricted to summer months due to ecological constraints during the winter months (October - March) to ensure minimal disturbance to protected bird species. Works included continuation of the flood wall along the frontage which is formed using a textured mould to provide shelter for marine life (greening the grey).
- 3.5.4 The two sections that have the greatest impact on Milton Common are the already completed Phase 2 and the current Phase 4b. The completed Phase 2 was progressed after the publication of the previous 2015 Milton Common Framework and altered the landscaping of Milton Common. The works consisted of new rock revetments, a coastal path and three new earth bunds with footpaths. The location of these can be seen in figure 7.

Figure 7: Works comprising Phase 2 of the NPI Coastal Defence Scheme (Source: Coastal Partners)



- 3.5.5 23 April 2021 saw the commencement of work on Phase 4b which continued throughout the summer. In September 2021 main construction work on phase 4b was paused to allow minimal disturbance to overwintering birds. In April 2022 works commenced again following the departure of overwintering birds.
- 3.5.6 To accommodate the scheme a number of compounds have had to be erected along the coastline. Due to the limited space for these, as part of Phase 4b, there was a need to construct a compound on the northernmost point of Milton Common which fell within the SWBGS Core Site P23R. To combat the need to demobilise it over the wintering periods and reinstate the land for use by Brent Geese, a mitigation package was secured which adhered to the SWBGS Guidance on Mitigation and Offsetting Requirements (SWBGS, 2018).

- 3.5.7 Two mitigation areas (totalling 3.05 hectares of cut grassland) were agreed to be established to offset the loss of habitat caused by the compound located within core area P23R (figure 8). These sites were proposed to be maintained throughout the duration of the coastal defence works with ongoing monitoring to measure the bird use on site. Natural England supported this mitigation solution and welcomed their ongoing management as refuge areas after the proposed works.
- 3.5.8 These parcels will be managed to ensure optimal condition for September of each construction year and maintained until the end of March. Decoys and audio systems were proposed to be trialled to attract Brent Geese to these sites. Following the demobilisation of the compound, P23R will be reinstated by Coastal Partners to be suitable for Brent Geese to use.
- 3.5.9 These alterations to Milton Common have further driven the requirement for an updated strategy. With new pathways implemented following Phase 2 and new Brent Geese mitigation parcels being managed, any future management of Milton Common will have to take these into account to provide workable solutions.

3.6 Existing Character

- 3.6.1 Milton Common is an area of open space comprising a mix of grassland, scrub and lakes, located on the eastern coastline of Portsea Island adjacent to Langstone Harbour. It is roughly triangular in shape and covers an area of approximately 45 hectares. Figure 8 shows the character of the site and various habitats present.



Figure 8: Different habitats and character areas within Milton Common (Source: PCC)

- 3.6.2 A certain level of scrub has always been present at the site, largely around the three lakes, although comparative analysis over the years has shown a steady encroachment westward. In 2004 the amount of scrub and bramble occupied 7.89ha (17.14% cover of the site) which increased to 13.87ha (30.2% cover of the site) in 2015.
- 3.6.3 When comparing the 2015 mapping (figure 9) to the 2022 mapping (figure 8) it is clear that the level of scrub on site has further encroached westwards across the site, especially within the north west section of the site. The scrub coverage in 2022 has been calculated as 17.15ha (38.1%). Table 2 below sets out the different character areas and habitats that make up Milton Common and compares this to the data from 2015. The 2015 measurement of the ponds only includes the areas occupied by water, however the 2022 calculations include the whole wetland habitat which includes the reed beds. The current sea defence works compound is a temporary structure and this section of land will return to amenity grass once the coastal defence works are completed.

2015			2022		
Character Area	Area in Hectares	% of total site area ¹⁴	Character Area	Area in Hectares	% of total site area
Amenity Grass	7.68	16.73%	Amenity Grass ¹⁵	6.76	15.02%
Coarse/Tussocky Grassland	22.26	48.46%	Coarse/Tussocky Grassland ¹⁶	14.04	31.2%
Meadow Grass	0	0%	Meadow Grass	0	0
Path Network	N/A	N/A	Path Network	1	2.2%
Total Accessible Area	29.94	65.16		21.8	48.4%
Bramble, Scrub and Trees	13.87	30.2%	Bramble, Scrub and Trees	17.15	38.1%
Lakes	2.09	4.54%	Wetland habitat (Ponds and reedbeds)	3	6.7%
Brent goose mitigation parcels	N/A	N/A	Brent Geese mitigation parcels*	3.05	6.8%
Other	0.03	0.07%	Other	N/A	N/A
Total inaccessible Area	15.99	34.63%		23.2	51.6%
*These are discussed in section 3.5. The figures for other habitats/character areas have taken these mitigation parcels into consideration, and their area calculated accordingly.					

Table 2: Comparison between the character areas at Milton Common between 2015 and 2022

¹⁴ Figures have been rounded to 1 or 2 decimal places. This applies to the percentage in this table and table 7

¹⁵ Defined as moderate condition, 'Modified Grassland' on the Biodiversity Metric 3.1 calculation tool (as existing on Milton Common).

¹⁶ Defined as moderate condition, 'Other Neutral Grassland' on the Biodiversity Metric 3.1 calculation tool (as existing on Milton Common).



Figure 9: The different habitats and character areas on Milton Common in 2015

- 3.6.4 Due to the level of bramble and scrub and the ongoing maintenance required, its encroachment was not slowed during the COVID-19 pandemic, which halted any significant management of the site due to national lockdowns and restrictions. This is evidenced in figure 10 showing the scrub coverage between 2019 and 2022 where again significant encroachment occurred in the north west of the site.



Figure 10: Map showing the encroachment of scrub between 2019 and 2022 (Source: PCC)

- 3.6.5 Scrub encroachment leads to the break-up of the open character which the swathes of grassland provide. The bramble can grow up to around 3m high at some points, resulting in a dominant feature across the largely flat area of the Common. Although the scrub is a vital habitat its current extent exceeds the desired balance for the wildlife on site and in fact may lower its carrying capacity by lowering the provision of other food sources provided by the grassland (flora, nectar and invertebrates at the base of many food chains).
- 3.6.6 The coarse tussocky grassland stretches across a large portion of the site. This habitat creates an open, natural and almost wild sense of place within the centre of the Common and essentially defines its character. The grasslands dominating this part of the site however varies with regards to diversity, coarseness of sward and transition to scrub.
- 3.6.7 The amenity grassland areas of the Common are focussed on two stretches. One forms a linear strip along the Eastern Road boundary whilst the other covers the south-west corner of the site by Shore Avenue and extends along the southern boundary along Moorings Way.

- 3.6.8 These two areas in themselves are quite different and serve different functions. The northern linear strip serves as a buffer between the Common and the busy Eastern Road and also contains the shared-use cycleway and footpath that runs along the Eastern Road. The amenity grassland area at the south-west and south of the site forms a focal point in the Common where people congregate, and more intensive activity takes place including its popular use for off-lead dog walking. There is a series of picnic benches and a set of goals which are well used.
- 3.6.9 There are several small clusters of trees on the site, predominantly located closer to the boundaries of the Common and around the lakes. These provide a rare taller element of the vegetation on the Common which, although due to the former use of the site as a landfill, trees struggle to thrive as roots cannot form and may breach the protective layer into the landfill itself. Mature specimens should also be discouraged due to the risk of disturbing the landfill cap if they fall in the future.
- 3.6.10 There are three lakes located on the eastern side of the site between the coastal path and the main section of the Common. These are, from the north, Frog Lake, Duck Lake and Swan Lake. Whilst not suitable for swimming, they do offer excellent habitat for many species of waterfowl which use the lakes and provide wetland habitat. They also provide a very interesting aspect of the Common's character, making it a unique place and provide a protective barrier to access from the Common itself onto the coastal path where excess disturbance could be detrimental to feeding coastal birds on the intertidal mudflats.
- 3.6.11 The species richness of the water bodies is presumably fairly low due to the landfill leachate. However, the reedbeds provide a bioremediation service with regards to heavy metals and excessive organic nutrients, their current extent should be encouraged to remain. The reedbeds also provide excellent forage and nesting habitat for a range of warblers and other associated songbirds.

3.7 Infrastructure

- 3.7.1 Figure 11 below shows the existing infrastructure across Milton Common comprising several benches, bins, and a picnic area. There are four notice boards across the site, located on the northern, southern and western boundaries and a car park to the west of Milton Common. Much of these are however in a deteriorating state and in need of upgrading, which section 6 of this Framework will address.

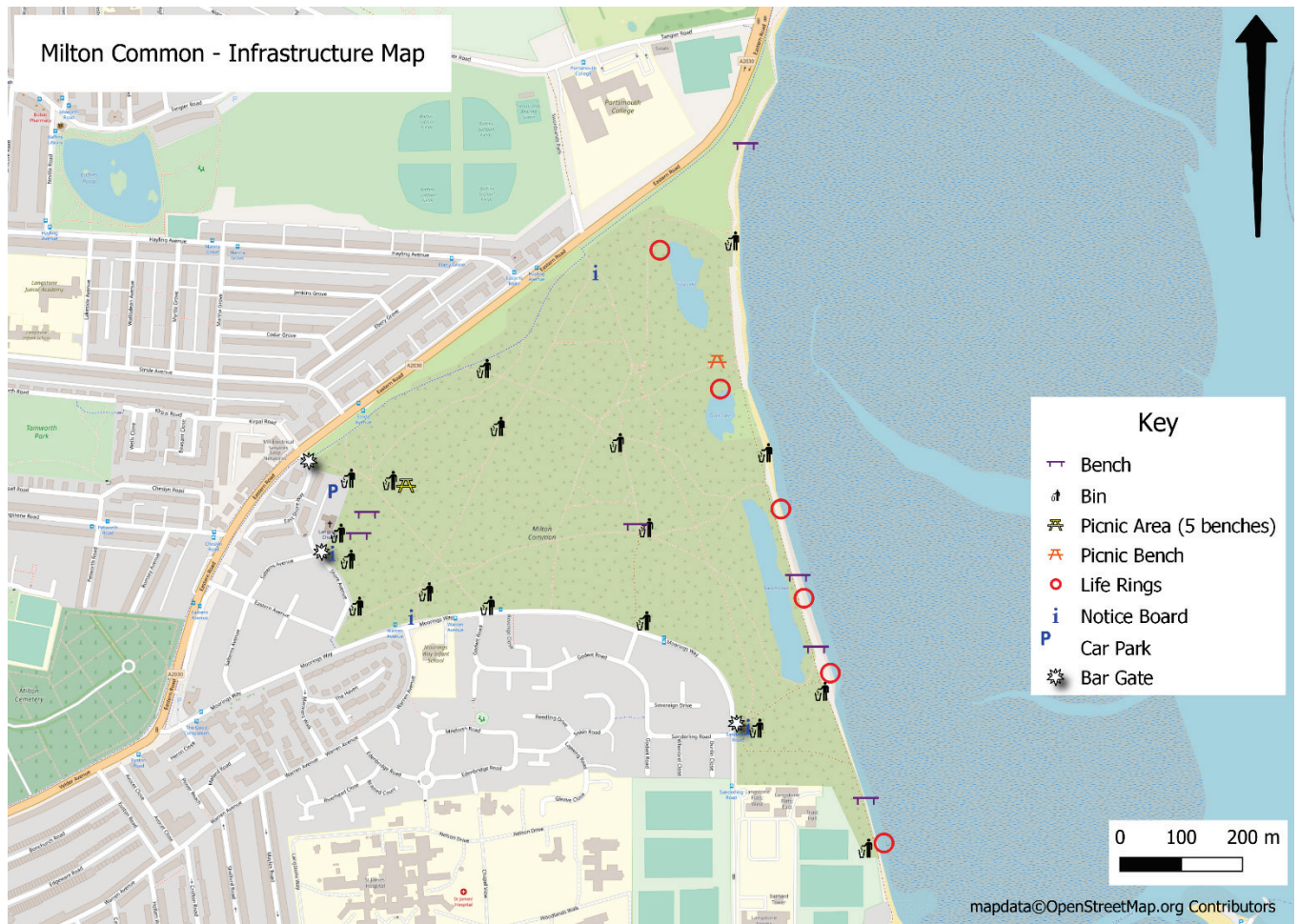


Figure 11: Existing Infrastructure at Milton Common (Source: PCC)

4 Visitor Surveys

4.1 Carrying Capacity of Existing Space

- 4.1.1 Once Milton Common was identified as potentially suitable to provide a function as alternative open space, the capacity of the existing Common must be established in order to ensure there is potential to absorb new visitors. An area will only be suitable alternative open space if either existing capacity can be identified, or if capacity can be increased.
- 4.1.2 The concept of carrying capacity can relate to various aspects of an area of open space, for example:
- Ecological – this considers the level of use and impacts an area can support before, for example, the following factors are put at risk: soil erosion, pollution of water resource, loss of species or loss of habitats.
 - Physical – this considers the threshold limit for space, beyond which facilities are saturated. This usually relates to safety thresholds and is commonly used by Environmental Health when licensing venues and identifying and assessing maximum capacity.
 - Social – this is commonly viewed as the level at which visitor enjoyment diminishes and dissatisfaction sets in.
 - Economic - this is the level at which visitor interference with non-visitor activities becomes economically unacceptable.
- 4.1.3 The key component we are concerned with when identifying recreational land as suitable for avoiding the impacts on the SPA is social carrying capacity. However, it is also essential to identify any ecological sensitivities to ensure that any increase in mitigation carrying capacity does not detrimentally impact on the ecology of the site.

4.2 Social carrying capacity of semi-natural open space

- 4.2.1 Social carrying capacity is defined as the maximum level of recreational use, in terms of numbers and activities, above which there is a decline in the recreational experience of the recreation participant; it is consequently a subjective concept. As a result, the carrying capacity of an area of open space cannot be expressed as a fixed and rigid value; on the contrary, it should fluctuate between tolerable thresholds, allowing the management of the concept in an integrated, flexible and sustained way. Perceptions of crowding have more to do with the nature of interactions, settings and visitor attributes and expectations than they do with user density. It is likely that the perceptions of visitors to semi-natural open space is that there should be a less crowded environment, i.e. 'wilderness experience' than in formally managed parks and amenity space.

4.2.2 The consensus of much research is that the carrying capacity of an area of open space is difficult to simply relate to the area available to visitors, although this is an important consideration. Other aspects have to be carefully assessed, for example:

- Accessibility
- Car park availability
- Quality of open space
- Existence of amenities
- Provision of information, and in particular
- People's perceptions, behaviour and characteristics (sex, age, socio – economics and cultural background) The criteria below are widely believed to be a measure capacity:
- Physical criteria
 - Size of area – total and accessible area
 - Length of paths
 - Number of parking spaces
 - Number of entrances
- Psychological criteria
 - Visitor perception of impact on environment or of crowding
 - Visitor satisfaction
 - Complaints or reports of undesirable visitor behaviour
 - Amount of litter in areas

4.2.3 The following has been identified by several social scientists as a suitable and realistic methodology to measure social carrying capacity:

1. Establish existing conditions requiring judgmental inputs from users
2. Document visitor particulars including:
 - a. frequency of site visits
 - b. group size
 - c. length of stay
 - d. activity patterns
 - e. expectations and preferences

3. Number of visitors in area per day
4. Accessibility to the site
5. Visitor perception of impact on environment and of crowding
6. Visitor satisfaction

4.2.4 Using this methodology, and the results of visitor research and the PPG17 study, an analysis has been undertaken of whether each area of open space is above or below its social carrying capacity. Information relating to carrying capacity is outlined below in section 4.7 below.

4.3 Previous research

- 4.3.1 The City Council conducted an audit of all of the open spaces in the City in 2022. This used an independent specialist to assess both the quality and value of all of the open spaces in the City. Each site was assessed against several different criteria and given a score out of ten for each. The results for Milton are shown in table 3.
- 4.3.2 Milton Common achieved an overall quality score of 76% and scored relatively highly in all categories with the lowest individual score of 6/10 within the 'community involvement' category. The Common scored highly in 'Design and Specification' and 'Health and Wellbeing' with scores of 9/10. In all other categories the Common scored between 7/10 and 8/10. These results (with no maximum score entries of 10 out of 10) implies that there is room for improvement at Milton Common to provide a much better visitor experience with improved infrastructure, signage and a feeling of safety and security.

Assessment Criteria		Milton Common Score (out of 10)
A Welcoming Place	Signage	7
	Physical Access	8
	Inclusiveness	8
	Design and Specification	9
Healthy, Safe and Secure	Health and Wellbeing	9
	Safety and Security	7
	Control of Dogs	7
Well Maintained and Clean	Litter and Waste Management	7
	Grounds Maintenance	8
	Buildings (except toilets)	-
	Public Toilets	-
	Infrastructure	7
Conservation and Heritage		8
Community Involvement		6
Total		91
Percentage		76%

Table 3: Sites quality audit scores and results for Milton Common (Source: PCC)

- 4.3.3 As part of the 2015 Milton Common Local Nature Reserve Framework, visitor surveys uncovered the site was used for a high level of dog walking with 62% of visitors to the Common going there to walk a dog. Of the remaining activities, 25% were going for a walk, 11% cycling and 2% jogging. There were also a high number of dogs noted with 0.94 dogs per dog walker.

4.4 2022 Visitor Survey methodology

- 4.4.1 To understand how and if these figures have changed since 2015, further visitor surveys were commissioned and undertaken by the Hampshire and Isle of Wight Wildlife Trust in 2022 to help provide the most appropriate mitigation and management measures within this Framework. Following advice from Natural England, the data collection at Milton Common followed a very similar methodology to that of the Thames Basin Heaths SPA (Bracknell Model^{17xii}), albeit on a smaller scale, with a total of 48 hours of survey data collected across a three-month period covering October to December to understand the capacity of the site over the course of a weekday and weekend.
- 4.4.2 Five access points onto the Common were surveyed (as shown in figure 12 below) for a total of 24 two-hour periods, split into twelve periods on a weekday and twelve periods over the weekend. Within both the weekend and weekday visit, each access point was surveyed during each of the following time slots:
- 0700 - 0900
 - 1000 - 1200
 - 1300 - 1500
 - 1700 - 1900
- 4.4.3 Five surveyors were posted on site working alongside a site ranger to interview members of the public who were visiting Milton Common. During each two-hour period, a tally was taken of all people (i.e not groups but total people including children) entering the site. As the weather could produce anomalous results, only days and times when the weather was considered good were surveys done. As the surveys were completed during the same period at which the overwintering birds are present, it provided accurate capacity figures of Milton Common and therefore the potential to provide the correct mitigation and management measures to reduce any detrimental impact.

¹⁷ [Thames Basin Heaths Special Protection Area Supplementary Planning Document \(bracknell-forest.gov.uk\)](https://bracknell-forest.gov.uk)



Figure 12: Map showing the survey points at Milton Common (Source: Hampshire and Isle of Wight Wildlife Trust)

4.5 2022 Summary of Visitor Survey Results

- 4.5.1 The Survey indicated a number of patterns of usage of Milton Common (the full survey results can be found on the PCC website).
- 4.5.2 Of the survey points within figure 12 the most southerly point (5) was visited by the most people with an average of 56.8 people per survey period. Survey point 4 was the next busiest with an average of 54.2 people per survey period. Survey point 4 had the highest number of dogs per survey period at 47.57. By contrast survey point 1 was the most visited by cyclists with an average of 9.3 per survey period.
- 4.5.3 The number of visitors to Milton Common gradually declined over the three month survey period. October saw the largest number of visitors with an average of 53.6 visitors seen per survey period. In November an average of 43.1 visitors were seen per survey period. December saw the lowest number of visitors with only 36 per survey period.

- 4.5.4 The survey between 10am and 12pm saw the highest number of visitors to the site with an average of 57 seen per survey. Both 7am-9am and 1pm-3pm saw a similar number of visitors on average (46.1 and 40.1 respectively). The evening survey (5pm-7pm) saw the lowest number of visitors to site with only 24.7 being seen on average.
- 4.5.5 The vast majority of visitors to Milton Common (96.5%) indicated that they were visiting from home. Only a small minority were visiting while on holiday (1.75%). The remaining 1.75% were either coming to the area to visit family, or were in the area briefly for work. 255 respondents, or 49.5%, had been coming to Milton Common for over 10 years. While “More than 10 years” was the highest category recorded by surveyors, indicating a pattern of long-term use of the site, many surveyors did note that the average visitor had been visiting Milton Common for far longer than 10 years, with the longest recorded in the notes being 53 years. The second most frequent response was “Less than or approximately 5 years” with 123 responses.
- 4.5.6 The Coronavirus pandemic does not appear to have made a large impact on the use of Milton Common, as 107 respondents (59.4%) judged that it had not affected their use of the site.
- 4.5.7 Morning was the preferred time of day to visit Milton Common, with 321 respondents (62.3%) preferring to visit at that time of day, followed by afternoon and evening (29.3 and 24.9%, respectively).
- 4.5.8 Most users of Milton Common indicated that they had no preference for time of year when visiting the site, with 455 respondents saying that they visited year-round. Of those with a seasonal preference, summer was the most popular response with 30 respondents.
- 4.5.9 Most visitors to Milton Common arrived on-site by foot (67.8%), with most of the remaining visitors arriving by car (28.6%). The remaining users tended to cycle or run to Milton Common. Most visits to Milton Common are short, with 303 respondents (58.8%) spending less than one hour on site. 205 respondents (39.8%) said they spent between one and two hours on Milton Common.
- 4.5.10 The main activity being undertaken on Milton Common is dog walking. 390 respondents indicated that they were dog walking on their visit that day, making up 75.73% of the activity on Milton Common.
- 4.5.11 After dog walking, the most frequent activity was walking with 137 respondents (26.6% of responses). Exercise like jogging and cycling was the third most frequent activity, with 73 responses collected and allowing for the fact that joggers and cyclists can be more difficult to approach to interview due to the speed at which they may be travelling, meaning this figure is likely an underestimate of their true use of the site.

4.5.12 As indicated by the heat map in figure 13 below the most common walking route at Milton Common is a loop around the ponds on site. This route measures circa 1.9km, which coincides with the length of time most visitors to the common tended to stay with 58.8% of respondents spending less than an hour on site. The heat map also shows that very few people walk from the car park (point 3) into the Common. This is consistent with survey data showing only just over a quarter of visitors access the Common by car.

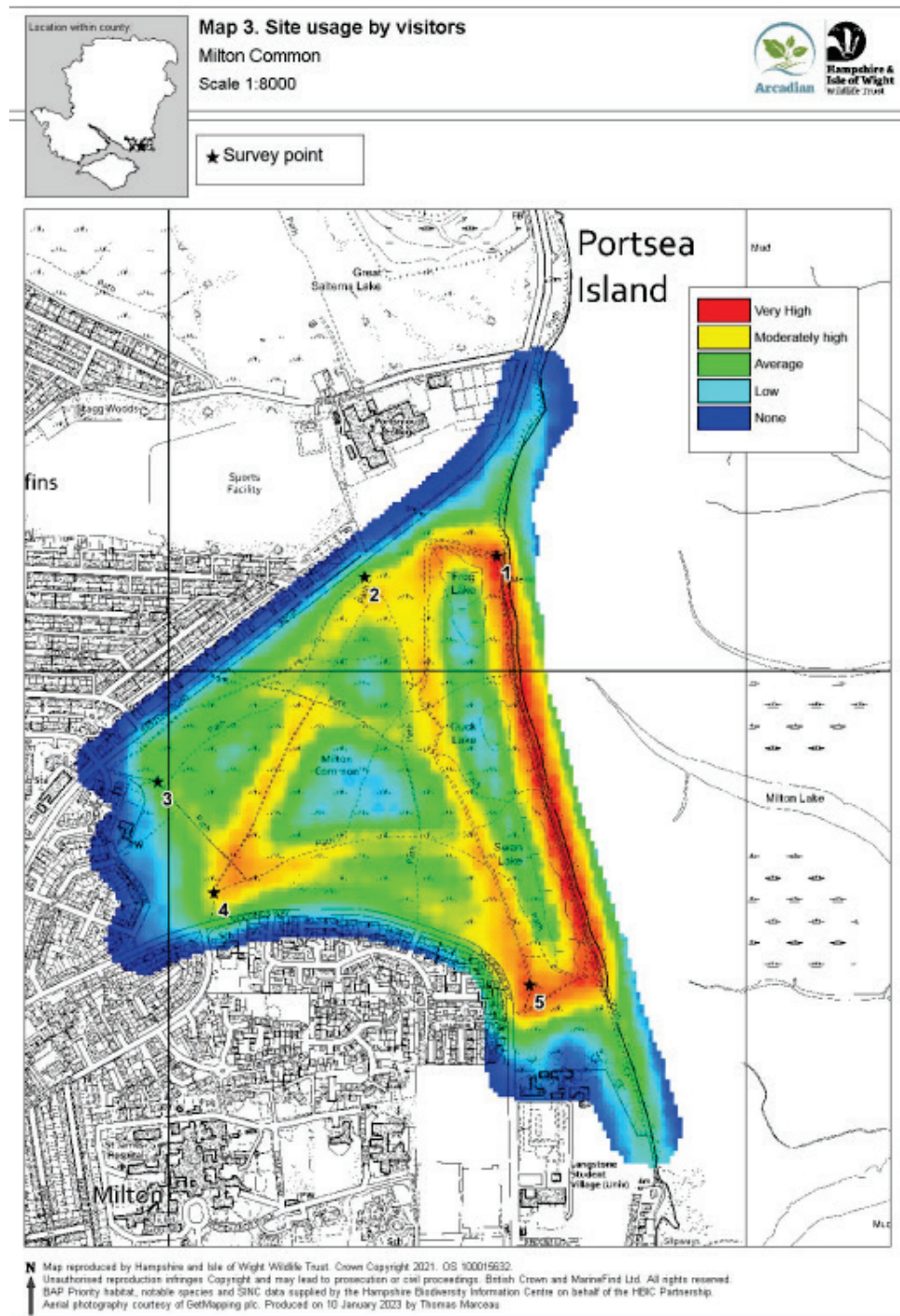


Figure 13: Heat map showing the most popular walking routes around Milton Common (Source: HIWWT) 2022

- 4.5.13 Bird and wildlife watching, and family outings were cited as an activity 38 and 31 times, respectively, often as a secondary activity to dog walking or walking. Other activities being undertaken at lower frequencies include commuting, photography, picking fruit and foraging, and visiting or volunteering at the People's Memorial (a place for the community to remember and honour fallen members of the armed forces and their loved ones).
- 4.5.14 The main reason for visiting Milton Common instead of another site cited by respondents was that it was close to home and/or convenient, with it being at least one reason for visiting the site for 346 (67%) respondents.
- 4.5.15 Visitors to Milton Common tend to visit the site from immediate neighbouring residential areas. Surveyors recorded 237 instances of PO4 post codes, and 136 instances of PO3 post codes. There were also 29, 22, and 21 recorded instances of PO1, PO5, and PO2 post codes, respectively. These five post code prefixes make up the bulk of visits to Milton Common.
- 4.5.16 The survey data collected demonstrates that visitors to Milton Common are local residents, accessing the area by foot and spending a relatively short amount of time on site. The mitigation and management scheme outlined in section 6 considers all this information when providing alternative measures to reduce and mitigate recreational impact on overwintering birds.
- 4.5.17 Further information regarding the survey can be found within the document containing the full survey results on the PCC website.

4.6 Potential for Milton Common to provide alternative greenspace

- 4.6.1 In general Milton Common currently attracts visitors on foot using the site for dog walking and walking in general. It is deemed to be a relatively quiet site, with most visitors sticking to the main paths along the coast and to the open areas on the southern side which are well suited to dog walking.
- 4.6.2 Natural England has set out a number of guidelines for what a Suitable Alternative Natural Greenspace (SANG) should provide (as discussed below in section 6) and Milton Common already meets some of these criteria. The Common is a semi-natural space which can be accessed by car with various routes available for walking and a range of habitats present on site.
- 4.6.3 SANG's are areas of open natural green space that are enhanced and improved to redirect visitors who would have otherwise recreated to designated sites (in this instance the SPA and SAC). SANG guidance has therefore been adopted as the most appropriate guidance to follow when determining mitigation and management measures. However, in this case, due to the designated sites being adjacent to the area used for mitigation, not all criteria are considered appropriate. Due regard has however been given criteria where reasonable.

- 4.6.4 There is considerable scope for improving Milton Common increasing the accessibility and attractiveness of its central and western extents to divert additional visitors and current users away from the coastal path and further inland. Potential measures include significant improvements to the path network to the west of the three lakes on site as well as clearing a portion of the scrub and bramble that has encroached the site over the last decade. This would provide both additional habitat and sense of openness further inland, with some planting retained in between open areas to minimise impact on wildlife and create quieter areas for recreation. New and upgraded infrastructure along a new path network, with clear signage and interpretation boards would enhance the site and provide a much improved visitor experience.
- 4.6.5 All these mitigation and management measures are discussed in further detail within section 6 below.

4.7 Capacity of Milton Common to accommodate additional visitors

- 4.7.1 The results of the survey carried out by the Wildlife Trust in Autumn/Winter 2022 allowed a calculation of the total numbers of visitors to the Common per annum, by extrapolating the numbers of visitors in the periods surveyed.
- 4.7.2 By tallying the number of visitors at each survey point in two hour blocks and averaging this tally (Dividing the total number of visitors in each two hour period by the number of times surveyed) for all five survey points across all surveys provides a figure of how many visits each survey point on Milton Common is experiencing in a two hour window. These averages at each survey point are provided in table 4 below.

Survey Point	Total Number of Visitors
1	45.68181818
2	23.68421053
3	35.77777778
4	54.18181818
5	56.77272727

Table 4: Average number of visitors Milton Common experiences at each survey point during a two hour window

- 4.7.3 By adding these figures, it provides an average number of visits to Milton Common in a given two hour window, which is 216 (216.0984). Dividing this figure by 2 gives an hourly rate of visitors of 108 (108.0492), then multiplying it by 12 (which includes all hours between the first survey time of 7am and the last survey time of 7pm), gives a figure for daily footfall, on average 1,296.6 (1,296.5904). By multiplying this value by the number of days in half the year (182.5), gives the 6 monthly over winter average. The estimated figure is 236,628 (236,627.748) average visits for the 6-month overwinter period. The survey results indicate that there will be additional users of the Common in the summer months as the weather improves as indicated by the fewer number of users in the colder month of December, when compared to the more clement month of October. Several people also indicated they were more likely to visit the Common in Summer rather than Winter.
- 4.7.4 For the purposes of this Framework the capacity is calculated for the over winter period as that is when the Brent Geese and other overwintering birds are present on the SPA. The period of 6 months will provide a buffer for any years that birds may arrive to the Solent Coast earlier or leave later.
- 4.7.5 The Common is mainly used by Local People who visit the Common on a regular basis. This is reflected in the results of the survey when asking people, the frequency with which they visit the Common. Table 5 below provides the results on the number of people who said they visited daily (365 visits), weekly (52 visits), monthly (12 visits), those who visited several times, but fewer than monthly (4 visits) and those who visited less than this (once a year).

Survey Response	Corresponding number of visits	Number of responses	Calculated number of visits
<i>Daily</i>	365	282	102,930
<i>Weekly</i>	52	170	8,840
<i>Monthly</i>	12	41	492
<i>Several</i>	4	12	48
<i>Less Often</i>	1	4	4
TOTAL		509	112,314

Table 5: Table assessing the average number of visits per person per year

- 4.7.6 When dividing the total calculated number of visits (112,314) by the number of responses (509), the resultant number of average trips to the Common per person per year comes to 221 (220.6562).

- 4.7.7 The 221 trips per annum figure however does not take account of the distribution of trips by each individual throughout the year. The survey results show that trips to the Common decreased throughout the October to December period as the weather grew more inhospitable. October saw the largest number of visitors with an average of 53.6 visitors seen per survey while in November, an average of 43.1 visitors were seen per survey. However, December experienced the lowest number of visitors with only 36 visitors being recorded on average (*Visitor Surveys 2022: Milton Common*). It would be reasonable to expect at least 53.6 visitors per survey for the summer months (April to September) and a similar changing distribution in January-March
- 4.7.8 This gives an average daily footfall of at least 1,608, being 53.6 visitors at each of the 5 survey points in each 2 hours in a 12-hour day, for the months March-October. It is higher in this spring to autumn period than expected in the winter period as people answering the survey have expressed a preference for visits in the summer over and above visits in the other seasons, though without numerical data to show the exact levels of visitors this is an assumed minimum. The average number of visits per day for the overwinter period, actually recorded by survey, is 1,296.6, 19.37% less than the assumed minimum of 1,608 daily trips for the summer period. If that same variation (19.37%) is applied to the total anticipated trips per annum per person (221) identified from survey interviews and described above in 4.7.6, this would result in the division to an anticipated 131.9 visits per person in the six months of summer (April-September) and 89.1 visits per person in the six months of winter (October-March).
- 4.7.9 With an anticipated 236,628 visits to the common in the six period of winter, and an average visitor visiting the site 89.1 times in that period, we can anticipate 2,655.76 users of the Common currently during the winter period.
- 4.7.10 The visitor information is used to calculate the number of visitors that can be accommodated on Milton Common based upon the standard of 8 hectares (ha) per 1,000 people as has previously been agreed by Natural England for the Thames Basin Heaths. Where this methodology was applied in the [Thames Basin Heaths](#). This is shown in table 6 below.

4.7.11 The existing winter capacity of the Common is calculated by taking the Common's total area (45ha) and deducting those areas of the Common that are not accessible to the public including those covered by scrub (17.15ha), ponds and reed beds (3ha) and set aside as Brent Goose mitigation for the adjoining flood defence works (3.05ha). These areas total 23.2ha meaning the remaining 21.8ha of the Common is accessible to the public. Applying the Natural England standard (8ha per 1,000 people) the accessible areas of the Common have the winter capacity to mitigate visits from the equivalent of 2,725 people. With 2,655.76 anticipated winter visitors this means that the Common currently has a residual winter capacity to accommodate 69.24 additional visitors. Based on the requirement of 8ha per 1000 people the 69.24 residual capacity can also be expressed as a 0.55ha residual capacity

	A. Total visits per 6 month wintering period to Milton Common	B. Equivalent number of visitors using the common each wintering period <i>(no. of visits to site per wintering period (A) / the average number of visits made by users per wintering period (89.1))</i>	C. Estimated area of accessible land (ha)	D. Capacity to mitigate (persons)C / 8x1000	E. Residual mitigation capacity (persons) (D minus B)	F. Residual area capacity available (ha) (E/1000x8)
Milton Common	236,628 visits	2,655.76 visitors	21.8 ha	2,725 persons	69.24 persons	0.55 ha

Table 6: Milton Common capacity as mitigation. (Source: PCC)

4.7.12 The expected levels of development are set out in table 1. These are used to calculate the amount of capacity at Milton Common for mitigation. The total number of dwellings to be built out comes to 436 (Gleave Close is already complete and as such visitors to the /common from that development are accounted for through the 2022 survey).

4.7.13 The average number of residents per dwelling in Portsmouth is 2.415^{18xiii}. When multiplied by the anticipated 436 new dwellings this gives a total of 1,052 extra visitors to the Common (this number is a likely to be a maximum, the survey results show that the Common is the most regular visitor destination, residents will likely also use other destinations and spaces onsite in the St James and Langstone sites).

- 4.7.14 The 1,052 additional visitors will require the equivalent to 8.416 ha of capacity on the Common to provide the required mitigation. Of this additional requirement 0.55 ha is already available as residual capacity on the Common. Consequently a further 7.866ha of scrub clearance will be needed to create adequate open space capacity.

¹⁸ [Household and resident characteristics, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

5 Baseline Management Regime

5.1 Management Structure

- 5.1.1 The day-to-day practical wildlife management of Milton Common is carried out by the Countryside section of PCC (where a specific site ranger has been assigned), volunteers and various community groups. Other work is carried out by PCC parks department, contractors, and certain legal and administrative functions by other departments of PCC. The Countryside Service lies within the Culture Department of the City Council.

5.2 Management Activities

- 5.2.1 Due to the limited budget and resources, much of the management of Milton Common is undertaken on an ad-hoc bases as and when it is deemed necessary. When management of the site is undertaken, due to the small team at PCC and limited numbers of volunteers it is only possible to manage small sections at a time. Some of the management activities include the following and consist of activities to improve the visitor experience as well as improving the quality and biodiversity of the site:
- **Litter:** Keeping the site free from litter. Focus around the picnic area and ensuring bins are emptied and not overfilled.
 - **Amenity Grass:** Maintaining the existing short mown amenity grass including strimming around benches and bins.
 - **Infrastructure:** Maintaining the site infrastructure including benches, gates and fencing to ensure it is in a usable and safe condition. Maintenance of other infrastructure including information boards and ensuring life belts are present and in a good condition.
 - **Pathways:** Ensure pathways are kept open with no obstructions and are in appropriate conditions. Where appropriate the pathway edge should be trimmed back and any trip hazards or potholes dealt with appropriately.
 - **Community Involvement:** This includes ranger led walks, volunteer engagement and public talks.
 - **Monitoring:** Biological surveys are carried out to monitor species groups and monitor and control any invasive species.
 - **Manage areas of Scrub:** When areas of scrub are considered in need of cutting back volunteers and rangers use hand tools and pedestrian machinery to manage this. Only small sections at a time are able to be tackled.

- **Maintaining and enhancing water bodies:** Monitoring and management of the wetland environment to ensure there continue to be no invasive species. Where practical and appropriate reedbeds may be cut back to improve structure in small areas.

5.2.2 These management measures are currently in place to make maintain the Common in a usable and safe condition. They do not currently seek to enhance Milton Common to increase its capacity or encourage its use over the coastline and the neighbouring SPA and SAC. The next section will therefore discuss the site-specific mitigation measures that are proposed at Milton Common to achieve the aim of creating a SANG.

6 Proposed Mitigation and Management Framework

6.1 Establishing an alternative greenspace

- 6.1.1 Milton Common is currently a highly valued open space on the edge of the City used by walkers, dog walkers, cyclists and other recreational users. In order to encourage greater use of its central and western extent and to divert recreational pressure away from the neighbouring designated sites and coastal path a number of new site-specific mitigation and management measure are needed beyond the baseline management regime. These measures will increase the capacity of the site to accommodate the increase in recreational users resulting from nearby developments and enhance the locality to provide an attractive alternative natural greenspace location that is more of a draw than the neighbouring SPA.
- 6.1.2 In order to provide the most appropriate measures and create an area people would want to visit, the site-specific management and mitigation measures broadly follow the 19 criteria for a SANG developed by Natural England^{19xiv} (both must/should have and desirable criteria). The full list of these criteria is supplied in appendix 2. This is considered the most appropriate guidance to follow in the creation on a space to attract visitors. However, due to the unique nature of the site and its location (adjacent to the designated sites it is being enhanced to protect), not all criteria are considered to apply.

6.2 Site Specific Mitigation and Management Measures

- 6.2.1 The following set of tables sets out the site-specific management and mitigation measures that will enhance Milton Common so that it functions as a SANG to divert additional recreational visitors resulting from the newly proposed developments away from the SPA. Each table outlines the SANG criteria that will be met.

¹⁹ [Natural England SANG quality guidance \(bracknell-forest.gov.uk\)](https://bracknell-forest.gov.uk/natural-england-sang-quality-guidance)

1. Land and Water Contamination Management

Prior to the remainder of the mitigation package being implemented and to allow the management of contamination on site, it is necessary to do soil and surface water sampling and analysis.

Whilst previously assessed in the 1980s and 1990s, the assessment should now be updated because analytical techniques have moved on and the screening criteria has changed. It will be important to measure the pollution that is present on site prior to the completion of the development at St James and other nearby sites to understand whether the increase in residential dwellings and visitors increases these pollution levels. By understanding the level of pollution increase (if any) from a baseline it will be easier to provide mitigation measures. Whilst the pollution known to remain was considered acceptable during the previous assessment, it is also known that capping soils were minimal and with waste coming to the surface and the encouragement of increased visitor numbers to the site with the creation of improved access and routes, the contamination surveys should be updated to current standards.

The ponds on site already experience algal blooms in the warmer months of the year (which will only increase with climate change) which can be toxic to the wildlife that use them. Potential mitigation measures include the use of treatments that control these algal blooms, although tests and research would have to be undertaken prior to implementation to ensure there are no conflicting impacts with their use.

Surveys will also test areas within the scrub clearance zones (see below) to assess the nutrient level of the soil and so confirm the best areas to target scrub clearance and grassland restoration (see below).

SANG criteria met

12

Frequency

One-off measure for land and ongoing surveying of the water environment

2. Bramble and Scrub Clearance

Milton Common has historically been made up of a reasonable level of scrub and bramble cover and this benefits the site by providing habitat to songbirds and invertebrates. However, over the past decade, it has spread steadily westwards, with now circa 17.15ha comprising scrub and bramble. Management of this has been problematic due to the difficulties of getting machinery onto the site and available resources. Left unchecked, the scrub and bramble would continue to spread westwards across the site, further decreasing the area of accessible grassland.

The key project for the future of Milton Common is to manage the scrub and bramble cover, restoring it to an appropriate level and then maintaining this in the future. The City Council's ranger team is carrying out routine scrub clearance as part of the ongoing habitat maintenance on the Common.

In terms of controlling and reducing the coverage of scrub on site, this will need to be implemented gradually over the course of a defined timeline. An instantaneous removal would be catastrophic in terms of habitat continuity and would represent a significant disruption to the carrying capacity of the ecosystem.

It is important to retain a variety of ages of scrub cover, from the longer, more woody older areas to shorter, younger ones as different species which need the scrub cover require different kinds of scrub to thrive. This will ensure that the Common continues to support a wide diversity of species. It would be advantageous to define areas of scrub to retain and scrub to remove in an 'on-the-ground' basis during the management to enable retention in areas of poor, or dangerous ground and clear in areas more suitable to future grass management. A flexible, site sympathetic approach.

The areas that have converted to scrub in the last 10 years should still have sufficient seed bank in the soil that the grassland should be able to re-grow, although this will be confirmed through the contamination survey (see above). However, bramble and scrub older than this would have decimated the available seed bank and so coastal grassland is unlikely to grow back.

Decreasing the level of scrub will also help the site to feel safer, reducing visual obstacles, particularly at the site's entrances. Nonetheless, keeping a certain amount of scrub is important in maintaining the character of the Common and also in making sure that access to the lakes is restricted, in particular Swan Lake which is defined as a 'core area' for Brent Geese and Solent Waders (P23A). As part of the mitigation strategy, access points into the lake will be closed off using soft measures such as increasing the level of scrub and reed bed. The area of scrub around this lake will be retained and managed to ensure there are no access points for dogs or visitors. Some level of scrub can be cleared on the western side of the central and northern lakes.

Nonetheless, this project will open up a minimum of 7.866ha of the site. This will allow for additional capacity as a result of the proposed development, an area of meadow and more open pathways. In turn this will improve the attractiveness and openness of the Common further improving perceptions of safety and the opportunity for additional habitats on site. The levelling of the site will ensure that once the scrub is restored to appropriate levels, it can be managed mechanically to make sure that it is maintained. Figure 16 below shows the proposed scrub level on Milton Common post implementation.

The project would involve a contractor being employed to physically remove scrub under close supervision from the city council's countryside service. The city council's countryside service will then work with community groups and volunteers to re-establish the appropriate grassland type in the cleared areas. This will open up the site whilst also fostering a sense of ownership of the site and help to inform the nearby community of what is happening at Milton Common.

Once restored to appropriate levels, a rotating management regime will be put in place to provide the mosaic of young and mature scrub ensuring that the structural diversity that will appeal to a

wide variety of species is in place. Low intensity management at regular intervals is generally better than major work every few years.	
SANG criteria met	7, 8, 9, 10, 12, 18
Frequency	Initial cut and clearance followed by ongoing rotating management regime with low intensity management at regular intervals late September-early March.

3. Grassland Management

Since the initial capping of the site only the amenity grassland areas and the path edges have undergone any significant grassland management

Management of the grassland is essential to maintain its structure, balance, and diversity. Without management, grassland loses both diversity and interest, and will eventually succeed into scrub as has occurred over a large part of the Common. This in turn has a detrimental impact on the quality of the Common as an open space and the level of accessible grassland that is available.

The overriding factor in the grassland management of the Common is the topology of the site. Since the initial capping there has been a great deal of resettling of the surface and subsurface as the organic material has decomposed. This has left the surface very uneven and difficult to work especially with machinery. It has also resulted in the exposure of a certain amount of buried refuse, such as concrete blocks, tyres, and metal reinforcing bars. The capping process itself appears to have been undertaken in wet weather when the substrate used was waterlogged. Combined with the heavy machinery used this has resulted in a large, often dense, network of deep ruts still visible across the site which further impede accessibility with machinery. The particular micro-climate of some of these depressions has resulted in the development of divergent flora communities specialising in the damp, semi-sheltered conditions. However, the drier areas devoid of this could be levelled with the use of either inert marine gravel or limestone chip depending on the surrounding flora to gradually improve the access for management.

A progressive assessment of the site will therefore be carried out to identify areas of the Common which should be managed as:

- meadow grassland
- coarse/tussocky grassland
- amenity grassland
- neutral grassland
- controlled scrub

Proposed meadow grassland will be introduced and managed to create a net gain in biodiversity on Milton Common in accordance with the Biodiversity Metric 3.1 Calculation Tool. The footnotes to table 2 and 7 provide further information.

Introducing some areas of meadow will create a further naturalistic space and introduce additional habitats to Milton Common. Areas that could be managed with small machinery and hand tools could be managed as controlled scrub and coarse/tussocky grassland. The proposed potential areas for meadow grassland are represented in figure 16. This would require the cut back of circa 0.5ha of scrub, as part of the overall clearance of 7.866ha of scrub clearance, as detailed in table 7.

By reducing scrub and allowing a meadow area to thrive in the location identified in figure 16 (on the western extent of Milton Common) this will encourage walkers and dog walkers to use this area as it creates a sense of openness either side of an enhanced pathway that will form part of a new circular route (away from the SPA and SAC).

In the absence of effective management, scrub, and the more vigorous herbaceous species such as nettle and mallow dominate. These species can out-compete the less vigorous herbs and fine-leaved grasses for water, light and nutrients. The southern section of Milton Common has already become dominated by such coarse grasses. However, by implementing a management regime, the remaining desirable species will be stimulated to flourish. This has already been successful in areas of the Common which have had occasional cuts and are now very species rich.

From the second year after the initial cut, a management regime will be introduced to maintain maximum diversity and flowering interest within the grassland. This will be achieved by cutting in sections at different times from July to the end of August - as appropriate depending on the species that emerge and the distribution of ground nesting birds. This spread of cutting times not only maximises variation and diversity on site but also disperses the workload over the summer making larger areas manageable. Grassland should not be cut in May or June as this represents a peak time in terms of supporting pollinators and seed dispersal. Parts of the grassland will also be left into September so that late flowering species can seed. It should also be highlighted that some ground nesting bird species (Meadow Pippit, *Anthus pratensis* and Skylark, *Alauda arvensis*) will be vulnerable during this cutting time. Each area of grassland must be appraised before cutting starts to ensure it is not being used as a breeding ground and any areas identified are to be recorded and managed accordingly. The character and composition of the meadow will continue to change with time, and we will get an understanding of the best techniques and timings for the site. Eventually a relatively stable community will develop, the balance of which will reflect management, soil fertility and the natural environment of the site.

Established grassland that is not mown regularly will become rough and "tussocky" in character. Once established, this grassland requires minimal maintenance. This can form useful refuge habitat on margins and areas difficult to manage mechanically. To control scrub and bramble development coarse tussocky areas will require edge cutting every few years between October and February. For wildlife this cutting is best done on a rotational basis so leaving part as an undisturbed refuge and promoting a diverse age structure.

Where possible exposed material such as concrete blocks will be brought together and made into hibernacula for reptiles, amphibians, and small mammals. These rock piles are locations that can be great refuges and over-wintering sites (hibernacula) for reptiles and amphibians - providing

habitat, cover, locations to bask, and food. Construction would involve bringing together inorganic and organic matter in piles which would then be partly turfed which will weather-proof part of the structure as well as making it more aesthetic.

It is considered that the grassland management regime set out will represent a subtle, but substantial, shift and will improve and emphasise the semi-natural environment at Milton Common which in turn will help to draw people to use the Common more.

The existing cutting regime undertaken by PCC has been taken into consideration within the costings.

SANG criteria met	7, 9, 10, 12, 16, 18
Frequency	Minimum of once annually after the seeds have set September onwards. With possible addition once April-March.

4. Site Levelling

Whilst the SANG guidance seeks to have undulating topography on the site, the site's history has left a series of sharp undulations and ruts which makes mechanical maintenance extremely difficult and means that management with hand tools only is usually required. This in turn makes the management of the site more labour intensive and difficult than would be the case if the use of some machinery was possible.

Following the scrub and bramble clearance, it will be possible to make a more accurate visual assessment of the ground levels across the Common and assess where a degree of levelling would be beneficial in specific locations. The use of sensitive materials such as marine gravel or limestone chip to level the site is vital to ensure it aligns with the character of site and its coastal location and does not introduce unnecessary nutrients to the site as might be the case if materials such as topsoil were used. A more levelled site would allow easier maintenance of brambles and scrub which will allow diversification of the vegetation within the site. Suitable coastal grassland, translocated from similar sites such as Fort Cumberland, could then be used to help establish the coastal heath habitat.

SANG criteria met	7, 8, 9, 12, 16
Frequency	Ongoing maintenance when required. Likely more regular once large areas of scrub have been cleared.

5. Brent Goose Foraging Area

Milton Common is identified in the Solent Waders and Brent Goose Strategy as being an important terrestrial area for Brent Geese to feed at high tide. The northern amenity grassland

strip is often used by the species, often as a 'stepping-stone' between feeding on the intertidal areas of Langstone Harbour and the nearby fenced off Brent Goose refuges at Portsmouth College and to the east of Baffins Pond. Whilst the variety in grassland types adds interest to the Common and also acts as a buffer to the busy Eastern Road, it is rarely used for recreation as it is largely made up of the land between the Eastern Road shared foot and cycle path and the Eastern Road itself.

This northern amenity strip is currently fenced off and the turf has been removed as part of the coastal defence replacement works making it unusable by the Brent Geese. It is imperative that this area be restored to prior condition by Coastal Partners once the need as part of the infrastructural upgrades has passed. This phase of coastal defence works is expected to be completed at the end of Summer 2023. Two areas on Milton Common have been mown as mitigation for this reduction in grazing space (As shown in figure 8). Interpretation boards will be located strategically around the circular walk and in close proximity to these mitigation parcels to inform visitors of their importance to support Brent Geese. Additional signage will be erected to encourage dogs to be kept on leads and not to enter these areas. The location of the northern parcel is amended slightly from that proposed to ensure it is not intersected by a path while meeting its agreed size.

In the future, when restored by Coastal Partners, P23R will be protected and further enhanced for Brent Geese by altering the mowing regime to a short mow in late summer. The edges of the area will also be managed to minimise disturbance to Brent geese by introducing elements of longer grass to visibly shield dogs, who can be perceived as predators. Mowing will also be used to encourage access onto the Common as opposed to onto the foraging area. Finally. The area of reedbed and scrub around the southernmost 'core area' P23A will be retained and where required, growth will be encouraged, particularly at openings where dogs and walkers are currently able to access the lake. This will significantly reduce the disturbance to any Brent Geese that may use this lake. Signage and interpretation boards will also be erected close to this P23A to provide visitors with information on Brent Geese and other Solent Waders and why it is important for them not to be disturbed. On the path adjacent to P23A, dogs will be encouraged to be kept on a lead and not to enter the water.

SANG criteria met	10
Frequency	Grass management will be ongoing in preparation for winter months.

6. Soft Barrier Approach

The reed bed habitat on Milton Common surrounding the three ponds on site has developed into a healthy thriving habitat over recent years. It is considered an important habitat and the best management measure is currently 'non-intervention'. All the time the reed bed is kept well established it acts as a barrier and reduces the number of people or dogs being able to access the lakes and disturbing wildlife, in particular, Swan Lake which is a 'core area' for Brent Geese and Solent Waders. This also provides greater safety when there are algal blooms and signage will also

be erected to warn people of these blooms and discourage dogs from entering the lake. Longer term it would be beneficial to undertake some level of cutting to improve the habitat structure, encouraging denser growth and expansion, although this should be carefully considered at target locations, particularly current openings whereby the lake can be accessed by dogs. There is potential to use soft barriers elsewhere on the Common using bramble and scrub to separate areas of grassland.

SANG criteria met	9, 10, 18
Frequency	Initial cut back of reedbeds with ongoing maintenance.

7. Circular Walk and Path Network

An essential requirement for a SANG includes a circular walk of 2.3-2.5km which starts and finishes at a car park, however, evidence has shown that current users of the common prefer a walk of circa 1.9km (despite longer routes currently being available) and like to spend less than an hour on site. In addition, the majority of users are local and access the site on foot, already therefore undertaking part of their walk before entering the Common. Just over a quarter access the site by car. Additional visitors resulting from nearby development are also expected to visit on foot given the proposed development sites are approximately 300m from the Common itself. A walk of 1.9km has therefore been established.

Enhancing the car park adjacent to Milton Common would attract additional visitors from further afield. This framework is being designed specifically for the alone impact of nearby development and therefore, upgrades to the car park have not been considered important as part of these mitigation and management measures.

It is still important to design an attractive route through the common to direct visitors away from the coastal path and further inland. Pathways should be easily accessed and well maintained with clear sign posting to direct users. The proposed circular walk at Milton Common (as shown in figure 14) is 1.9km in length and incorporates a variety of existing pathways, many of which need upgrading. The route will benefit many users including walkers, dog walkers, runners and those interested in wildlife and nature. It will take in predominant characters of Milton Common including the tussocky grassland, species rich meadow and amenity grassland.

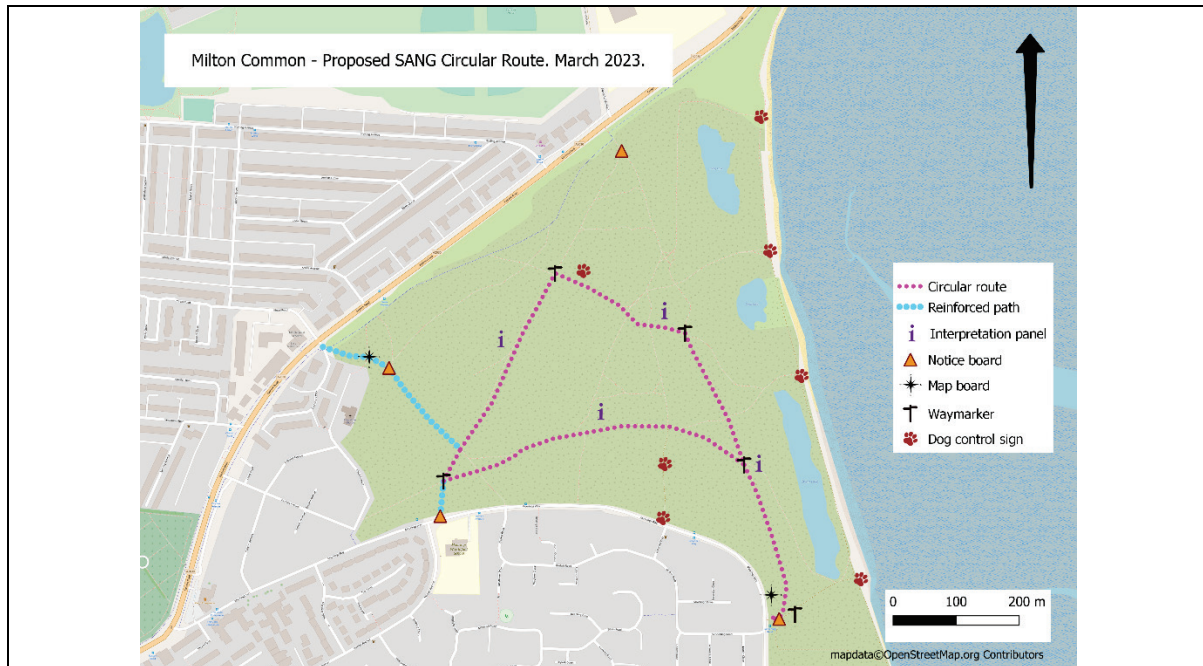


Figure 14: Proposed Circular Walk at Milton Common (Source: PCC)

This will particularly provide a relatively short, pleasant, non-linear route to use based on a walk of up to an hour. As shown on figure 14, pathways from the car park, Moorings Way and E Shore Way/Eastern Road will be enhanced to allow visitors easy access on to the circular route.

The route would be set out on lectern style map/interpretation boards strategically placed across the site, primarily at entrance points and marked by subtle way markers.

Dogs will be encouraged to be kept on leads in areas close to Brent Gees mitigation parcels, core areas and along the coastal path. Signage will be clear on where this is expected. Areas of meadow and amenity grass are available for dogs to run free on less sensitive areas of the common and this will be encouraged to provide an inclusive space.

The path network across the Common varies a great deal in terms of width and quality. Figure 15 shows the existing path network and the condition of these. Some of the paths which require the greatest attention are hazardous, uneven and have landfill, rubble and other articles extruding. The highest priority sections to repair are those which form the circular route, and accesses to it. These paths will need to be surfaced, levelled widened and infilled where required to ensure they are accessible for all users including wheelchairs and prams.

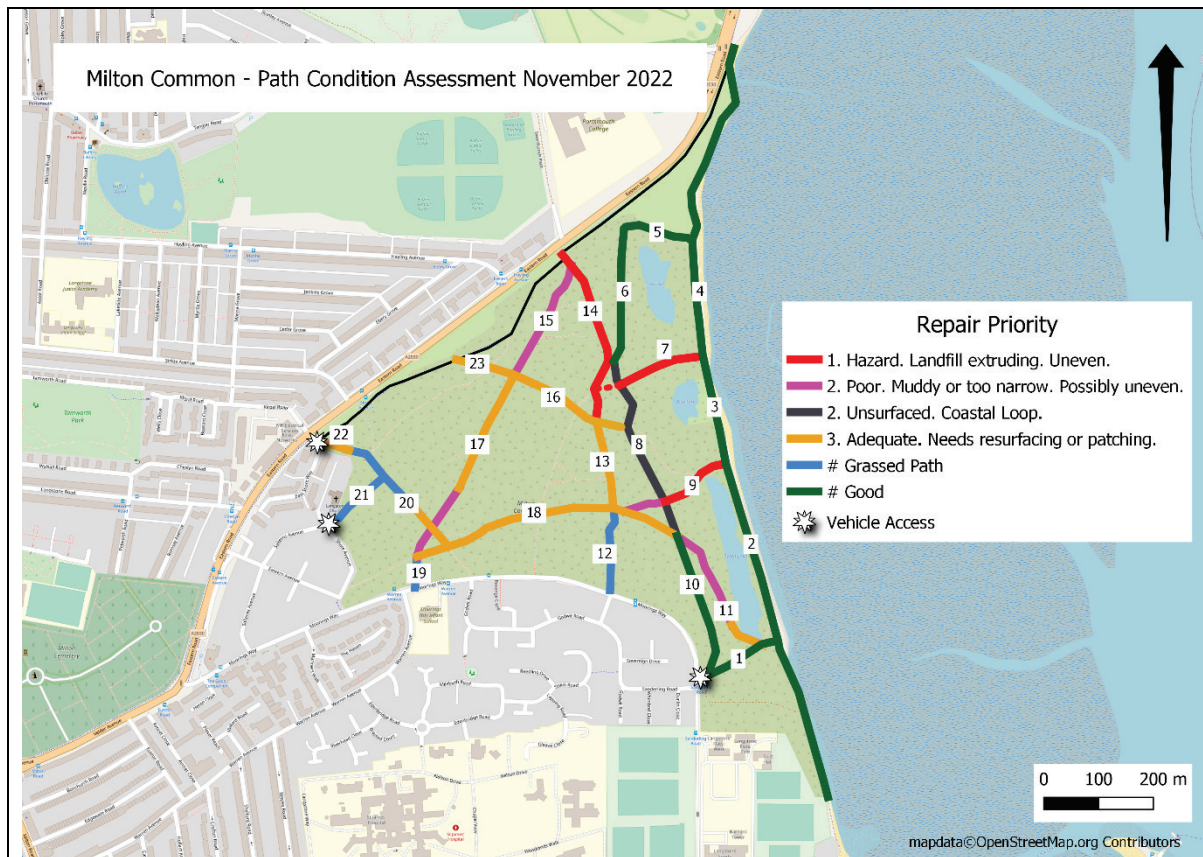


Figure 15: Map showing the condition of the existing paths at Milton Common (Source: PCC)

Only section 10 of this route is considered to be in good condition with no work required. Sections 8, 16, 17 and 18, are currently unsuitable and in need of upgrading. Paths 19, 20 and 22 will also need enhancing to provide access onto the circular route from various access points.

These works either include levelling, resurfacing, removal of overgrown vegetation and scrub to create rides along the main pathways, and path widening to allow access for all users. Where paths are being resurfaced, materials used will be sensitive to the character of the area and wildlife using the site, permeable with a natural feel. It is proposed Hoggins MOT type 2 (limestone) is most appropriate as it would not blow away and is less noisy than loose shingle.

The main circular route proposed would be no narrower than 2m wide in any location. It is preferred that other pathways across the site are no narrower than 1.5m to allow access, but to remain natural and in keeping with the surroundings. The path edges will not be specifically defined, allowing plants to colonise them.

As with the project to replace the benches and bins (see below), a phase II botanical survey will be undertaken prior to implementation of the project so that any notable species which would be effected can be protected or translocated.

Path 12 is a grassed path and will not be maintained as it intersects the southernmost Brent Goose mitigation parcel.

SANG criteria met	2 (partly), 4, 5, 6, 7, 8, 16, 18, 19
Frequency	Upgrade parts of the circular route on a priority basis.

8. Benches	
Although there are a number of benches across Milton Common already, it will be important to put new ones in key areas along the proposed circular route. This will provide accessibility for everyone and therefore an attractive location to walk. It is likely that the circular route could accommodate three additional benches. It is important that the design of new benches is in keeping with the semi-natural character of the Common. Benches will need to use natural looking sustainably sourced materials that blend into the surroundings and are also durable, requiring minimal maintenance. Prior to the benches being introduced on site, a detailed phase II, on-site botanical survey will be done to identify where there are currently notable plant species close to these features which would be damaged by the construction of the upgraded path or replacing the benches or bins. These would be protected or translocated to another location on the Common.	
SANG criteria met	5, 6, 7
Frequency	Erection of new benches to be regularly maintained and replaced every 10 years.

9. Bins	
The bins which are in place at the Common are rather dated and in need of being replaced with updated and more natural looking ones. This could include wooden clad bins with lids retained to minimise any risk of animals getting to the rubbish. As part of the previous management measures for Milton Common, combined bins for refuse and dog waste were implemented. It has become clear, however, through survey responses that members of the public who use the site are not aware of this and therefore clearer signage is needed. The current location of the bins is set out in figure 11 and it is not considered that more bins are required due to there being sufficient provision for the size of the site. It is generally considered that the current locations of the waste bins follows the principals in the evidence base of locating bins close to entrances, key path intersections and shorter mown areas to encourage their use. However, as access and other key points may change throughout the management of the common, the bins will be relocated accordingly.	

As with the project to replace the benches (see above) and upgrade the path network (see below), a phase II botanical survey will be undertaken prior to implementation of the project so that any notable species which would be affected can be protected or translocated.

It should be noted that part of the cost of a new bin itself as well as maintenance would be paid for through the mitigation Framework, emptying the bins would continue to be funded and carried out by the City Council.

SANG criteria met	7, 12
Frequency	Upgrade existing bins (2 per year across the site) to be regularly maintained and replaced every 10 years.

10. Interpretation and information boards

There are very few signs and interpretation boards across Milton Common providing welcome information, details about the natural environment of Milton Common itself and the path network. Existing signage is in poor condition and needs renewing to reflect the enhancement measures in this management Framework including the introduction of a circular walk. The design of the signs will be of a high quality, using materials which are suited to the Common's semi-natural character with the messages that they set out being positive and clear.

Lectern style map boards will be erected in key areas including entrance points. They will welcome visitors to Milton Common, provide information on the site's wildlife (including Brent Geese and Solent Waders), provide a map of the path network (including the circular walk), and provide information on the most appropriate way to enjoy the common whilst protecting the key habitats and sensitive areas. Four notice boards will be erected strategically at four entrance points to the common. These cabinet style boards will provide an opportunity for rangers to pin up relevant news that may interest visitors of the Common. This will encourage these entrance points to be used away from the coastal path.

Interpretation boards will be placed along the circular route itself in strategic locations to provide visitors with information on their immediate surroundings. These could include information on local wildlife that use the site and flowers that colonise different areas of the Common. They will further explain where dogs are permitted on and off leads. At more sensitive locations such as pathways close to Brent Geese mitigation and 'core' areas, there will be additional signage politely requesting dogs to be kept on leads and visitors not to divert off the pathway. Further signage will also be erected along the coastal path requesting visitors and dogs to stay off the mud flats during the overwintering period to reduce any bird disturbance.

The approximate location of signage is displayed in figure 14.

Throughout Milton Common, subtle way markers will be erected to direct users around the site along the circular route. These will encourage visitors to remain on circular walk to the west of the three lakes and not be diverted onto the coastal path.	
SANG criteria met	3, 13, 17
Frequency	Initial replacement of current interpretation boards. Ongoing maintenance and replaced every 10 years. Erection of way finders to be maintained and replaced when necessary.

11. Dog Management	
Dog walking is a very common activity at Milton Common and the surveys showed that circa 76% of activity on Milton Common is dog walking. It is important therefore not to discourage dog walkers, but instead manage the area in such a way that encourages them to use the most appropriate locations to cause minimal impact to protected bird species. It is proposed to include information online and on interpretation boards on the best practices for walking dogs in Milton Common. Maps and interpretation boards will direct dog walkers to on-lead and off-lead walking areas and encourage clearing up after your dog and disposing in one of the on-site bins which can be used for dog waste and general waste. Areas of amenity grass will be continually maintained throughout the year to allow dogs to play and be walked off the lead. It will be politely requested that in more sensitive locations (close to Brent Geese mitigation parcels and core areas) that dogs be kept on a lead, although open areas of meadow and amenity grass will be available for dogs to run off-lead. Liaison with the Bird Aware Dog Initiatives Officer will be undertaken to support messaging to guidance for good management.	
SANG criteria met	11, 13, 14, 15
Frequency	Information provided on interpretation boards and ongoing monitoring and educating

12. Online promotion and information for new and existing residents
It is important to encourage positive behaviours in new residents from the outset. Information will be provided through PCC's website highlighting the facilities which are available at Milton Common as well as the nature conservation value of Langstone Harbour SPA. In addition, information packs will be posted to all new homes. This will make sure that new residents, who may not be familiar with the City, can see the quality of the spaces and routes that they live near and can also inform existing residents who may not be fully aware of the importance the Milton Common plays as a habitat and key area of open space within Portsmouth.

SANG criteria met	13, 14
Frequency	Posting of information packs once development is complete. Ongoing maintenance of the website, updated when necessary

13. Monitoring Framework	
It is necessary to monitor the delivery of these management measures and therefore a monitoring report will be compiled every five years to outline the progress made with regards to each of the management measures.	
SANG criteria met	N/A
Frequency	Every 5 years

6.2.2 Overall, it is considered that the projects above will fulfil the aims and objectives of the management Framework and provide a SANG style mitigation scheme to reduce the recreational pressure on neighbouring designated sites. These mitigation and management measures will make Milton Common a more attractive recreation location and divert visitors away from the coastline to more a more inland site where disturbance on qualifying species using the designated sites will be greatly minimised.

7 Implementation and Costings

7.1 Future Character Areas

- 7.1.1 The character of the different parts of Milton Common as it would be after the projects above have been implemented has been calculated and supplied within table 7 below. The key changes to the character of the Common include the reduction in bramble and scrub coverage, the increase in meadow grassland and increase in space on the path network. Limited changes are proposed to the wetland habitat and brent goose mitigation parcels which therefore remain the same.
- 7.1.2 As progressive assessment of the site will be carried out to identify areas of the Common which after initial clearance should be managed, there is the potential for the figures within table 7 to change depending on appropriate ground conditions. With regards to the clearance of bramble and scrub, the new figure of 9.28ha represents the minimal level of clearance to provide additional accessible space to account for the increase in visitors following the development of the nearby housing. Further scrub clearance may occur as the City Council's ranger team is carrying out routine scrub clearance as part of the ongoing habitat maintenance on the Common.
- 7.1.3 The Biodiversity Metric 3.1 Calculation Tool has been used to assess the level of biodiversity net gain (BNG) that will be achieved at Milton Common with the reduction of scrub and the introduction of areas of meadow and increase in coarse/tussocky grassland. The BNG tool calculated there would be an on-site net percentage increase in biodiversity of 10.1%. This is displayed in table 7 below.

2022 (pre implementation)				Post implementation			
Character Area	Area in Hectares	% of total site area	Habitat units ²⁰	Character Area	Area in Hectares	% of total site area	Habitat units
Amenity Grass	6.76	15.02%	29.74	Amenity Grass ²¹	6.76	15.02%	29.74
Coarse/ Tussocky Grass	14.04	31.2%	123.55	Coarse/ Tussocky Grass ²²	16.81	37.36%	143.95
Neutral Grassland	0	0	0	Neutral Grassland ²³	0.8	1.77%	5.89
Meadow Grass	0	0	0	Meadow Grass ²⁴	4.1	9.1%	37.9
Path Network	1	2.2%	N/A	Path Network	1.2	2.6%	N/A
Total Accessible Area	21.8	48.4%		Total Accessible Area	29.67	65.9%	
Bramble, Scrub and Trees	17.15	38.1%	79.86	Bramble, Scrub and Trees	9.28	20.6%	45.23
Wetland (Ponds and reedbeds)	3	6.7%	39.6	Wetland (Ponds and reedbeds)	3	6.7%	39.6
Brent goose and wader mitigation parcels	3.05	6.8%	19.85	Brent goose and wader mitigation parcels	3.05	6.8%	19.85
Total Inaccessible Area	23.2	51.6%	-	Total Inaccessible Area	15.33	34.1%	-
Total Habitat Units	-		292.6	Total Habitat Units	-		322.16

Table 7: Character of Milton Common post implementation

²⁰ As calculated using the Biodiversity Metric 3.1 Calculation Tool

²¹ Defined as moderate condition, 'Modified Grassland' on the Biodiversity Metric 3.1 Calculation Tool (as proposed on Milton Common).

²² Defined as moderate condition, 'Other Neutral Grassland' on the Biodiversity Metric 3.1 Calculation Tool (as proposed on Milton Common).

²³ Defined as moderate condition, 'Other Neutral Grassland' on the Biodiversity Metric 3.1 Calculation Tool (as proposed on Milton Common).

²⁴ Defined as good condition, 'Other Neutral Grassland' on the Biodiversity Metric 3.1 Calculation tool (as proposed on Milton Common).

- 7.1.4 It should be noted that the proposals in this management Framework are one way in which developments could provide a package of mitigation measures which would remove the likelihood of a significant effect as a result of disturbance from recreation on nearby designated sites. Applicants are free to propose an alternative approach to the protection of the designated sites from disturbance caused by recreation and this will be considered by the city council. Figure 16 below shows

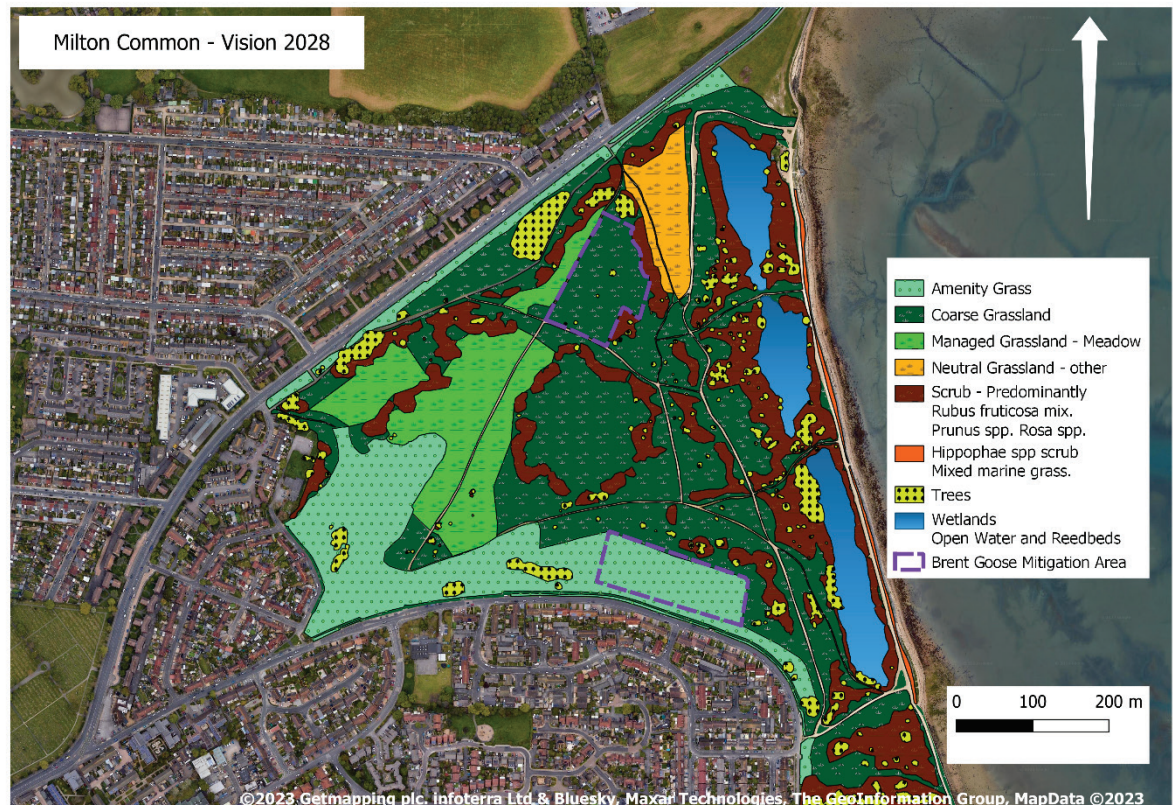


Figure 16: Proposed habitat and character area map post-implementation (Source: PCC)

7.2 Costing

- 7.2.1 The interventions as set out in the section above have been costed in order to calculate the contribution from the four development sites outlined in table 1.
- 7.2.2 Of the four site the development at Gleave Close has already provided a contribution of £262,410 under the previous 2015 version of the Milton Common Framework. This has been deducted from the total cost of works of £4,416,834 leaving an outstanding total cost of £4,154,424 When this is divided, between the 436 outstanding dwellings it gives a cost of £9,528.49 per unit. This final costing per unit takes into consideration the existing PCC budget of maintenance at Milton Common. A summary of the costings can be found in appendix 3.

- 7.2.3 Of course, the nature of the development funding which is available for the works means that this will generally be a lump sum paid when the scheme commences construction or based on the phasing of construction. However, the city council would be willing to discuss alternative ways of structuring the funding of mitigation packages. However, these would need to provide certainty that the funding would be at least equivalent to that which would be available if funded through a lump sum.
- 7.2.4 The costs set out in appendix 3 are based on 2022 prices. When putting together legal agreements accompanying any development scheme, the increase in costs which would have taken place between 2022 and the date of payment will be calculated, and the costs increased or decreased accordingly.

7.3 Next Steps

- 7.3.1 This Framework provides a long-term vision for the future of Milton Common and sets out the capital projects, management measures and ongoing maintenance which will be needed to ensure that a SANG is delivered and remains in place for the future.
- 7.3.2 Detailed management plans will be put together on a regular basis which link back to this Framework and set out how the specific projects which have been identified will be implemented, when this will happen and how.
- 7.3.3 The city council will keep the management Framework under close review to ensure that it continues to meet these goals. This will include at least five yearly reports into the implementation of the management Framework which will be published as part of the city council's Annual Monitoring Report.
- 7.3.4 We are confident that the proposed updated Framework provides a robust set of mitigation measures so that there will not be an adverse impact on the internationally designated sites arising from the development and that Natural England will therefore remove its objection to the development.

8 Appendices

8.1 Appendix 1: Natural England's formal response to application 20/00204/FUL

Date: 26 September 2022 Our ref: 377529 Your ref: 20/00204/FUL	
Portsmouth City Council planningreps@portsmouthcc.gov.uk BY EMAIL ONLY	Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ T 0300 060 3900

Dear Portsmouth City Council,

Planning consultation: *Redevelopment of St James' Hospital; conversion of listed buildings/Chapel to provide 151 dwellings; new 2 & 3 storey housing to provide 58 dwellings (phased development) (Amended Scheme).*

Location: *St James Hospital Locksway Road Southsea PO4 8LD*

I have been asked to provide a formal consultation response to update our previous response dated 14th September 2022, in which we advised further information was required to determine impacts on designated sites. Numerous informal emails containing advice have been provided to the council between then and now, and these are available on the planning portal.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

Objection - Impacts On Designated Sites

Natural England have based this response on; PCC's (draft) appropriate assessment dated 10th January 2022, the Draft HRA report dated 18th December 2020, and the Milton Common LNR Restoration and Management Framework dated 21st July 2015.

As submitted, the application could have likely significant effects on the below sites:

- Solent and Dorset Coast SPA
- Portsmouth Harbour SPA and Ramsar Site
- Chichester and Langstone Harbours SPA
- Solent Maritime SAC
- Solent and Southampton Water SPA

Natural England have been told that at this time there is no opportunity for the further submission of evidence. Without the updated HRA, nutrient budget and agreed mitigation, we advise the plan would have a likely significant effect on the above designated sites, and object to the proposal.

Recreational Disturbance

This application lies within close proximity to the Chichester and Langstone Harbours Special Protection Area (SPA) and will lead to a net increase in an accommodation type and occupancy identified in the Solent Recreation Mitigation Strategy as having an impact on the notified features of the site at least in combination with other plans or projects.

Natural England note that the Borough Council has adopted a planning policy to mitigate against adverse effects from in-combination recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP).

The Draft Habitats Regulations Assessment dated 19th December 2020 concludes that the proposal has the potential to cause an 'alone' impact to the designated sites and indicates that mitigation could be provided by contributions to the Milton Common Access and Recreation Project. Natural England agree that this is a potential mitigation option, but note that the Milton Common LNR Restoration and Management Framework dated 21st July 2015 is now out of date. The framework will have to be updated. Either the framework or an updated HRA should stipulate exactly how the restoration project will mitigate for potential 'alone' impacts of development proposals which contribute to it.

The update should include:

- *General updates to aspects such as regulatory or legislative updates and habitats regulations caselaw.*
- *Up to date habitat mapping to replace figures 14, and the tables in 4.12 – A comparison of how this has changed from the 2015 draft may be useful.*
- *Up to date visitor surveys and assessment of visitor capacity of the site.*
- *Up to date financial calculations.*

Standard Advice for Nutrient Neutrality

It is Natural England's view that there is a likely significant effect on the internationally designated sites in the Solent catchment due to the increase in wastewater from new housing. One way to address this is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

We have written to your authority about the availability of an updated package of tools and guidance in relation to nutrient impacts. We recommend that your authority moves to using the updated generic Nutrient Neutrality Methodology and the updated catchment calculators in preference to existing methodologies whether produced by Natural England or your own authority. Your authority will be best placed to consider how it transitions to the new tools and guidance. Natural England recognises that for some existing catchments where nutrient neutrality is being implemented and mitigation is being actively progressed, authorities may need to consider the associated practicalities of moving to the new guidance whilst recognising their role as Competent Authority.

The supporting information for this proposal should include a nutrient budget and details of any proposed mitigation to address nutrient impacts. To demonstrate that proposed mitigation will remain effective for the lifetime of the development, information on management and monitoring will be required, together with details of how this will be secured and funded in perpetuity. This information should be considered by your authority in accordance with regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) i.e. through a HRA.

Please note that paragraph 4.2.1 of the Draft Habitats Regulations Assessment states the need for further consultation with Natural England to determine the nutrient baseline. We have not provided advice on this matter. As above, an updated nutrient budget for the proposal should be produced.

The proposed development, and the application of any measures to mitigate the likely harmful effects from it, should be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment, in view of the European Sites' conservation objectives. Further information on carrying out a HRA as a competent authority can be found online¹.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

Yours sincerely,

Natural England

ANNEX A

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments.

Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the. Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England's Technical Information Note 049.

Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraph 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#).

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 8, 32 and 170 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you may wish to consider off site measures, including sites for biodiversity offsetting. Opportunities for enhancement might include:

- *Providing a new footpath through the new development to link into existing rights of way.*
- *Restoring a neglected hedgerow.*
- *Creating a new pond as an attractive feature on the site.*
- *Planting trees characteristic to the local area to make a positive contribution to the local landscape.*
- *Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.*
- *Incorporating swift boxes or bat boxes into the design of new buildings.*
- *Designing lighting to encourage wildlife.*
- *Adding a green roof to new buildings.*

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- *Links to existing greenspace and/or opportunities to enhance and improve access.*
- *Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)*
- *Planting additional street trees.*
- *Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.*
- *Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).*

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraph 98 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

8.2 Appendix 2: the 19 essential requirements to deliver a SANG

	Criteria
	Must/Should have criteria for a SANG
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)
2	Circular walk of 2.3-2.5km
3	Car parks easily and safely accessible by car and clearly sign posted
4	Access points appropriate for particular visitor use the SANG is intended to cater for
5	Safe access route on foot from nearest car park and/or footpath
6	Circular walk which starts and finishes at the car park
7	Perceived as safe – no tree and scrub cover along part of walking routes
8	Paths easily used and well maintained but mostly unsurfaced
9	Perceived as semi-natural with little intrusion of artificial structures
10	If larger than 12 ha then a range of habitats should be present
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead
12	No unpleasant intrusions (e.g. sewage treatment smells etc)
13	Clearly sign posted or advertised in some way
14	Leaflets or website advertising their location to potential users
	Desirable Criteria for a SANG
15	Can dog owners take dogs from the car park to the SANG safely off the lead
16	Gently undulating topography
17	Access points with signage outlining the layout of the SANG and routes available to visitors
18	Naturalistic space with areas of open countryside and dense and scattered trees and shrubs. Provision of open water is desirable
19	Focal point such as a viewpoint or monument within the SANG

8.3 Appendix 3 - Summary of the costings for the scheme

Milton Common mitigation scheme cost matrix				
Mitigation measure	Number / distance / area / other quantity	Capital cost	Revenue cost (over 100 years)	Total cost
Short term				
Contamination survey	1	£30,000	£0	£30,000
Benches	3 x 700	£2,100	£36,600	£38,700
Bins	13 x 650	£8,450	£147,200	£155,650
			Sub-total:	£224,350
Medium term				
Levelling site in specific locations	40 * 4 * 5 = 800t all in ballast	£164,250	£62,700	£226,950
Resurfacing of path network	3240	£197,024	£963,200	£1,160,224
Installation of circular walk (signage)	-	£12,620	£216,500	£229,120
			Sub-total:	£1,616,294
Long term				
Scrub clearance		£230,316	£2,259,300	£2,489,616
Grassland management	-	£0	£1,371,600	£1,371,600
			Sub-total:	£3,861,216
Other				
Leaflet	-	£500	£0	£500
Monitoring framework			£68,000	£68,000

			Sub-total:	£68,500
PCC budget (maintenance)		£12,271	£2,033,700	£2,045,971
Summary				
Sub-total capital cost	£645,261			
Sub-total revenue cost	£5,125,100			
Total cost	£5,770,361			
Contingency (12%)	£692,443			
Total (including contingency)	£6,462,804			
Minus PCC existing budget for Milton Common (1,667,400)	£4,416,834			
Minus contribution from Gleave Close (£262,410)	£4,154,424			
Number of houses being allocated:	436			
Cost per house	£9,528.49			

ⁱ <https://birdaware.org/solent/about-us/our-partners/>

ⁱⁱ <https://birdaware.org/>

ⁱⁱⁱ https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

^{iv} https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm

^v https://ec.europa.eu/environment/nature/natura2000/index_en.htm#:~:text=Natura%202000%20is%20a%20network,on%20land%20and%20at%20sea.

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- vi <https://www.legislation.gov.uk/ukdsi/2019/9780111176573>
- vii https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf
- viii <http://publications.naturalengland.org.uk/publication/5789102905491456>
- ix <http://publications.naturalengland.org.uk/publication/5762436174970880>
- x <https://solentwbgs.files.wordpress.com/2021/03/solent-waders-brent-goose-strategy-2020.pdf>
- xi http://www.solentems.org.uk/natural_environment_group/SRMP/SDMP/Phase3_Avoidance_and_Mitigation_Strategy.pdf
- xii <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-supplementary-planning-document.pdf>
- xiii <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021#:~:text=In%202021%2C%20this%20was%202.4,residents%20per%20household%20on%20average.>
- xiv <https://www.bracknell-forest.gov.uk/sites/default/files/2021-11/natural-england-sang-quality-guidance.pdf>