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# Hart, Rushmoor and Surrey Heath SPA Mitigation Project

## Mitigation Capacity Review

Prepared on behalf of

Hart District Council, and Rushmoor and Surrey Heath Borough Councils

Final Report

14 January 2021

2075-1B

# Hart, Rushmoor and Surrey Heath SPA Mitigation Project

Mitigation Capacity Review

## Report Release Sheet

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## Executive Summary

This document is part of a series of studies commissioned by Hart District Council and Rushmoor and Surrey Heath Borough Councils to investigate the potential for alternative approaches to the mitigation of recreational effects on the Thames Basin Heaths Special Protection Area (SPA).

**Section 1** of this report considers the background to the existing strategic mitigation framework applied across the Thames Basin Heaths region, and its relationship to the current and historical Habitats Regulations Assessment (HRA) regime. The provision of Suitable Alternative Natural Greenspace (SANG), as a means of diverting recreational pressure, is identified as the principal 'impact avoidance' mechanism within the existing framework, and consequently as the key factor providing confidence that the requirements of the Habitats Regulations can be met in the face of planned housing growth.

It is considered that the implications of the 'People over Wind' ECJ ruling, and the stringent tests applied at the Appropriate Assessment stage of the HRA process, serve to underline the importance of SANG delivery as the principal means of securing impact avoidance – and as the proper principal focus of the current project.

It is noted that information presented in the *Access Management Study Report* (Liley & Panter, 2020) identifies scope for continued incremental expansion of the SPA Access Management and Monitoring (SAMM) programme as a secondary and supporting measure - but provides no evidential basis for increased reliance on SAMM-type measures in preference to SANG or to justify a departure from SANG requirements.

**Section 2** presents a review of background information and recent data on greenspace usage within the Housing Market Area (HMA) to identify greenspace characteristics that are key attractors of dog-walkers, the principal SPA user group. This data is not considered to support a radical departure from existing guidance on requirements for SANG design.

A review of the existing body of approved and operational SANGs across the Thames Basin Heaths region determines that some 46% of SANGs fall short of the 'must have' SANG requirement for a circular walk length of 2.3–2.5 km, and that several other SANGs depart from the design guidance in other notable respects, for example, by providing a series of linked discrete loops rather than a single, strictly circular walk. In some such cases, a deficit in circular walk length is considered to be justified or offset by occurrence within a network of linked or proximate sites, connectivity to other recreational resources, or overprovision against the standard 8 ha per 1,000 residents rate.

The efficacy and attractiveness of these SANGs is interrogated by review of recent monitoring data. 50% (i.e. a representative proportion) of SANGs that were subject to monitoring in 2018 do not accommodate a 2.3-2.5 km circular walk. Lower overall average visitation rates were recorded within the <2.3km SANG cohort – although the comparison was distorted by the effects of exceptionally high footfall within one component of the >2.3 km cohort, and overall visitation rates were effectively equal when this site was excluded from the dataset. Interviewee ratings for overall site quality and path quality were favourable and effectively identical between the two groups of SANGs. The <2.3km group was slightly less well rated for dogs – but was nevertheless positively rated in this respect.

The <2.3 km SANG cohort outperforms the >2.3km group when visitation rates are adjusted for SANG size – which may speak to the capacity of smaller SANGs to 'punch above their weight' in terms of absorbing recreational pressure. No significant correlation was identified between SANG size and either visitation rate or visitor rating.

A number of factors that might justify a relaxation - in some circumstances - of the 'traditional' circular walk requirement are considered. The omission of a 2.3–2.5 km circular walk from a significant proportion of the existing body of operational SANGs is not considered to have compromised the success of the existing mitigation framework as a whole, and there is no persuasive evidence that these particular SANGs are deficient in effectiveness or less attractive to potential SPA users. In several cases, the average length of walks undertaken by SPA visitors arriving at access points within the HMA falls short of 2.3 km. Various sources of evidence suggest that recreational users draw upon a variety of sites and take routes of varying lengths on different occasions.

The original basis for calculating the existing SANG provision rate is reviewed in light of updated and patch-specific visitor density data. Although the projected annual number of visits to the SPA per resident within 5 km was found to have declined from 4.58 to 4.45, the revised calculations indicate that the existing 8 ha/1,000 standard continues to hold true on the basis of a region-wide analysis.

**Section 3** reviews the potential typologies of 'alternative' SANG. Very small (<2ha) SANGs are considered unlikely to be capable of delivering the features required by the SPA user group. A review of available evidence suggests that larger SANGs are unlikely to be capable of exerting a catchment greater than the currently agreed maximum value of 5km. The provision of linear SANG would be difficult to reconcile with the key user group requirement to exercise dogs off-lead and away from potential conflicts with other users – although the provision or enhancement of linear connections between other greenspace destinations could be brought forward as part of a broader mitigation package.

With regard to the balance of evidence presented in this report, the provision of smaller SANGs, which may function as part of a broader network but are not, in isolation, necessarily capable of accommodating a 2.3-2.5km circular walk, is considered to represent the most promising 'alternative' avenue for meeting user group requirements and achieving effective mitigation.

**Section 4** addresses the mitigation capacity requirements of future development within the HMA and projects a baseline annual SANG delivery requirement of approximately 23 ha per annum. In practice, this target would increase to 29-35 ha if the per resident provision rate is increased to offset a relaxation of the circular walk requirement, and would potentially increase further where there is need to discount site mitigation capacity in view of existing recreational use or other factors.

**Section 5** outlines a potential model for future mitigation. It is proposed that SANGs which meet all the existing quality criteria should be delivered in the first instance, and that a departure from these criteria should only be pursued where their fulfilment is demonstratively not achievable. Such departures should be offset either by an increased provision rate or other 'mitigating' factors such as connectivity to other greenspaces.

This model would serve to formalise the acceptability of a reduced circular walk offering within individual SANG compartments, particularly where longer routes can be accommodated within and between a broader greenspace network. Where no supportable SANG solution is available, it is likely to be necessary to consider alternative locations for development, or - subject to the application of the requisite derogation tests - to pursue a strategy of compensation rather than impact avoidance.

Finally, it is suggested that the proposed mitigation model may be further evolved to supplement the established SANG plus SAMM package with complementary 'Greenspace Support Projects' - such as the provision of linear connecting routes, enhanced SANG links, dog training areas, and targeted SPA access restrictions.

## Contents



**APPENDIX**

# 1. INTRODUCTION

## Brief

1.1 Ecological Planning & Research Ltd. (EPR) has been commissioned by Rushmoor Borough Council (RBC), Surrey Heath Borough Council (SHBC), and Hart District Council (HDC) (collectively referred to as 'HRSHC') to review the mitigation capacity calculations presented in a series of research reports into potential alternative solutions to the avoidance and mitigation of recreational pressure effects upon the Thames Basin Heaths (TBH) Special Protection Area (SPA).

1.2 This review is a component of HRSHC's broader 'SPA Mitigation Project', which has the objective of identifying alternative complementary approaches to mitigation. The key outcomes of this review are to determine whether the approaches to capacity calculation taken in the research reports are appropriate and capable of providing solutions to an identified paucity of SANG supply; to identify further underpinning evidence and alternative approaches to calculating mitigation capacity, if required; and to characterise a package of measures that would be suitable to enable full mitigation for future development within the HRSHC joint Housing Market Area (HMA).

## Overview of Review Work to Date

1.3 This study has been progressed through a review of research reports produced for the SPA Mitigation Project, including the SANG Research Study (LUC, 2020a) and Access Management Study Report (Liley & Panter, 2020) – the principal subjects of this review – in addition to a series of background papers, including the SANG Background Paper (HRSHC, 2020) and SPA Visitor Distribution and Access Report (LUC, 2020b), and various articles of supporting evidence.

1.4 Four particular categories of mitigation option have been considered in the course of the overarching project to date:

- Alternative Sites / Green Infrastructure measures, specifically including the enhancement or creation of recreational routes, and the provision of SANG networks, Linear 'SANG', smaller SANG/facilities with smaller catchments, and larger SANG with larger catchments;
- Access Management Measures, including expansion of both the wardening service and education and communication service delivered pursuant to the Strategic Access Management and Monitoring (SAMM) programme;
- Access Restriction / Control measures, including SPA access restriction, dog control, and control of the availability of or access to car parking; and
- Habitat Management / Restoration measures.

1.5 Of these options, the proposed expansion of the SAMM wardening service and the various typologies of 'SANG alternative' are the particular focus of the present study. The title 'SANG alternative' is one that has been coined as part of the overarching project and is therefore used within this report; however the suitability of this term as a means of referring to deviations in SANG provision being explored and ultimately recommended as part of this study is considered further in **Section 6** below.

## Background to the Thames Basin Heaths SPA

1.6 As is more fully described in the SANG Background Paper, the TBH SPA is a composite designation which extends to a series of separate lowland heathland sites across Surrey, Hampshire, and Berkshire, covering some 8,309ha in aggregate. The SPA is designated for the presence of qualifying populations of three bird species listed on Annex 1 of Directive 2009/147/EC, the 'Birds Directive'. These species, the Dartford Warbler *Sylvia undata*, Woodlark *Lullula arborea*, and Nightjar *Caprimulgus europaeus,* nest on or close to the ground and are consequently vulnerable to disturbance by recreational visitors to the heaths.

## SPA Protection and Habitats Regulations Assessment

1.7 The primary legislative protection covering the Thames Basin Heaths SPA originates from the Habitats Directive 92/43/EEC, which is transposed into UK legislation by the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations') with the key sections of relevance to projects appearing from Regulation 63 onwards. Regulation 63 states that:

> *"(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—*
>
> *(a) is **likely to have a significant effect** on a European site or a European offshore marine site (either **alone or in combination with other plans or projects**), and*
>
> *(b) is not directly connected with or necessary to the management of that site,*
>
> *must make an **appropriate assessment** of the implications of the plan or project for that site in view of that site's conservation objectives.*
>
> *(2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required."* **[our emphasis]**

1.8 The above legislation thus requires that a sequential approach be adopted when addressing potential impacts upon International Sites. Guidance for doing this in practice as part of a 'Habitats Regulations Assessment' (HRA) has been published by the European Commission and others.

1.9 There are two assessment frameworks that can helpfully be used to inform an approach to HRA involving reliance on the use of mitigation measures:

- Conceptual Impact Assessment: the 'source-pathway-receptor' concept; and

- Ecological Impact Assessment: guidance on EcIA produced by the Chartered Institute of Ecology and Environmental Management (CIEEM)(2019) outlines application of 'the mitigation hierarchy' as part of the impact assessment process.

1.10 The first framework requires potential impact pathways to be considered, with control measures most effectively applied at source. The second framework establishes a hierarchy for control measures, with impacts most effectively addressed via avoidance measures, then mitigation measures that reduce impacts, and finally to compensate for unavoidable impacts that cannot be controlled.

1.11 Given the increasingly stringent tests applied at the progressive HRA stages, achieving impact avoidance at the potential impact source provides the greatest confidence that the requirements of the Habitats Regulations can be met. Achieving impact avoidance, whereby each development 'consumes its own smoke' and does not therefore contribute any impacts towards a potentially significant in-combination effect, also avoids the need for complex in-combination assessment. This consideration has influenced the approach to mitigating the effects of increased recreational pressure on the SPA to date, as set out within the Thames Basin Heaths Special Protection Area Delivery Framework (JSPB, 2009), and its predecessor, Natural England's Draft Delivery Plan, which take account of the implications of case law relevant at the time of production and adoption.

## Thames Basin Heaths Delivery Framework

### *Relevant Case Law*

1.12 The requirements of the Habitats Directive and Regulations have been clarified over the years through Judgments in the UK and European Courts – referred to as 'case law'. The following articles of case law have informed the approach taken within the Delivery Framework to date.

Case C-127/02 of the European Court of Justice (ECJ) – The 'Waddenzee' Case

1.13 The ECJ Waddenzee Case clarified a number of important points in relation to the correct interpretation of Article 6(3) of the Habitats Directive:

- When applying the likely significant effect test, '**objective information**' is required to decide whether an effect from a plan or project is 'likely'
- When applying the likely significant effect test an effect is 'significant' if it undermines the **conservation objectives** of the European Site in question; and
- When applying the integrity test following an appropriate assessment it is necessary to ascertain that there will be no adverse effect on the integrity of the site concerned. That is the case where **no reasonable scientific doubt** remains as to the absence of such effects.

The 'Dilly Lane' Case [2008] EWHC 1204 (Admin)

1.14 The High Court judgment of J Sullivan in Hart DC v the Secretary of State for Communities and Local Government (May, 2008: the ''Dilly Lane Judgment''), based upon an examination of EPR's ecological evidence, tested and upheld an important precedent in respect of the

protection of the Thames Basin Heaths SPA. It was determined that measures built into a project that were designed to prevent impacts to the SPA, such as Suitable Alternative Natural Greenspace (SANG), could be taken into consideration when deciding whether or not an Appropriate Assessment is required, provided that successful delivery of those measures could be guaranteed.

1.15 This ruling effectively enabled impact avoidance and mitigation measures to be taken into account in certain circumstances at the 'Screening' stage of a Habitats Regulations Assessment, where they form an integral part of the project concerned and can be delivered.

1.16 The Judgement clarified the purpose of SANG in terms of the way in which it functions to protect the Thames Basin Heaths SPA:

> *''The purpose of the SANGS was not to lessen the increase in visitor pressure, but to avoid it altogether by drawing some existing users away from the Heath to compensate for those new residents who might use it on occasion''* [our emphasis].

### *Agreed Approach*

1.17 The current approach to impact avoidance and mitigation, as set out in the 2009 Delivery Framework, principally relies on the provision of SANG as a mechanism to absorb recreational pressure, and the administration of the SAMM programme as a means of managing and monitoring visitor access to the SPA.

1.18 In the context of the HRA regime as it stood at the time of the preparation and adoption of the Delivery Framework, the intended purpose of SANG was to secure impact avoidance at source in order to avoid a net increase in visitation to the SPA, thereby enabling the risk of likely significant effects to be excluded at the Screening stage of the HRA process. The SAMM programme then fulfilled a complementary role, mitigating any effects that might otherwise arise from ongoing access to the SPA, such that no residual effects remained.

1.19 SANG was therefore intended to serve as the 'impact avoidance' component of the mitigation package and accordingly as the principal control measure providing confidence that likely significant effects would not arise.

1.20 Information presented in the Access Management Research Study (Liley & Panter, 2020) indicates that there is scope for continued incremental expansion of SAMM wardening effort in line with the current approach (i.e. as a complementary measure supporting SANG), at least for the foreseeable future. However the study presents no justification or potential mechanism for 'separating out' the SAMM and SANG components of the extant mitigation package approach or using an increased emphasis on SAMM to reduce reliance on SANG delivery.

1.21 Notwithstanding the implications of recent case law for HRA practice (as reviewed immediately below), the avoidance of impacts through the delivery of SANG and any 'SANG alternatives' should therefore remain the principal focus of the SPA Mitigation Project.

## Implications of Recent Case Law

*Case C-323/17 of the ECJ - the 'People over Wind' Case*

1.22 Until recently the established approach to Screening and Appropriate Assessment in HRA, derived from the 'Dilly Lane' case, meant that where impact avoidance and mitigation measures (such as SANG) were put forward as integral parts of a plan or project, and where the Competent Authority was satisfied that those measures would be effective and deliverable, and could be secured, there was no need for an Appropriate Assessment to be carried out.

1.23 This was because in such circumstances it was considered that the information pertaining to the efficacy of those impact avoidance and mitigation measures represented the 'objective information' referred to by the ECJ in the Waddenzee case above, enabling likely significant effects to be ruled out at the Screening stage of the HRA process.

1.24 However, in the 2018 'People over Wind' case, the ECJ concluded that it was **not appropriate to take account of measures intended to avoid or reduce harmful effects to a European site at the Screening stage** of the HRA process. Such measures now stand to be tested as part of an Appropriate Assessment, the stage of the HRA process that introduces a different and more onerous requirement to ascertain, beyond reasonable scientific doubt, that there will be no adverse effect on the integrity of the site concerned.

1.25 **Given the more stringent test applied at the Appropriate Assessment stage of the HRA process, the focus on delivering SANGs and 'SANG alternatives' as the** principal **means of securing impact avoidance is further reinforced.**

## Scope of the Report

1.26 The scope of this report is as follows:

- To review the evidence base underpinning the delivery of SANGs and SANG alternatives;
- To set out key requirements for alternative SANG provision;
- To recommend the future focus for alternative SANG provision;
- To review and establish the mitigation capacity requirements within the HMA; and
- To review the overarching mitigation model, and how modifications to SANG provision might be incorporated alongside other potentially supporting measures.

# 2. EVIDENCE BASE FOR SANG ALTERNATIVES IN HART, RUSHMOOR, SURREY HEATH CONTEXT

## Overview of SANG Alternatives Examined

2.1 Five principal typologies of 'SANG alternative' are addressed in this review and the preceding SANG Research Study.

### *Smaller SANG with Smaller Catchments*

2.2 Consideration was given to the delivery of smaller greenspaces, which would not be capable of meeting all of the SANG requirements but might nevertheless be effective in attracting recreational activity from their close vicinity.

### *Enhancement or Creation of Other Recreational Routes*

2.3 This typology would include the enhancement of general recreational connectivity and amenity within local footpath networks, rather than the delivery of identifiable destination sites.

### *Linear SANG*

2.4 Linear SANG would depart from the SANG requirement to provide a circular walk, and might be delivered through the enhancement of sections of existing long-distance pathways, and the provision or incorporation of adjacent greenspaces, linked by a linear route.

### *Larger SANG with Larger Catchments*

2.5 Consideration was given to the potential for exceptionally large and attractive SANGs to exert a catchment exceeding the currently prescribed maximum of 5 km.

### *SANG Networks*

2.6 Measures considered in relation to this typology include enhancing existing suites of SANG to increase their attractiveness to potential SPA visitors, improving the interconnectivity of proximate SANGs, and adopting a 'network approach' to future SANG delivery, whereby aggregations of small sites, which may not in isolation meet all of the requirements for SANG, would be suitably enhanced and interconnected so as to collectively provide features that are important attractors of the SPA user group.

## Additional Evidence from Greenspace User Survey

2.7 As is widely documented within TBH SPA strategies, and preceding documents produced for this project (as detailed in Section 1), the principal SPA user group is that of dog walkers.

2.8 However, dog walkers represent only a subset of all greenspace users, which is the reason that, as cited in the LUC SANG Research Study (para 4.64) *"The data from the 2020 online survey recorded a much lower proportion of people citing dog walking as the main reason that they used their most frequently visited green spaces than data from the earlier SPA and SANG surveys. Around one quarter of the main reasons cited for visiting green spaces, including at the SPA and SANGs, in the online survey was dog walking, compared to around three quarters*

*of all respondents recorded as dog walkers during the on-site SPA and SANG visitor surveys carried out previously (Table 4.1)."*

2.9 The LUC SANG Research Study presents data, at Table 4.5, on the types of green spaces visited by respondents to the Hart, Rushmoor and Surrey Heath online survey 2020 in the last year. Although a significant number of respondents reported using footpaths, bridleways and trails, the data was presented in relation to all greenspace users. It is therefore necessary to further analyse this data to obtain responses from the dog walking user group specifically, to ensure that the patterns of greenspace access used to explore the potential for SANG alternatives applies to the key SPA user group that SANGs are required to intercept.

2.10 **Table 2.1** sets out the number (and percentage) of respondents to the 2020 online survey visiting different greenspace types who reported dog walking as the main reason for visiting a site. This data can then be contrasted with the collective data for all greenspace users, as presented in Table 4.5 of the LUC report and reproduced below to aid comparison.

2.11 As can be seen from **Table 2.1**, a broadly similar proportion of dog walking respondents reported that they had visited footpaths/trails, urban parks and recreation grounds, footpaths/bridleways in the countryside, nature reserves or other 'natural areas' and country parks, in comparison to all survey respondents and greenspace user groups. This therefore validates examination of such greenspaces as SANG alternatives. However, there were also some discernible differences between dog walkers and other greenspace users which support more formal spaces being ruled out; a smaller proportion of dog walkers reported that they had visited footpaths/bridleways in an urban area, formal gardens, children's playgrounds and facilities for sports/fitness, and a higher relative proportion of dog walkers reported that they had visited small grassed areas suitable for information recreation.

2.12 **Table 2.2** lists the greenspaces named by dog walkers as having been visited in the last year, and shows the percentage of dog walking respondents naming each site and the qualities and features of each site. Information regarding the qualities and features of each named site was obtained from inspection of aerial imagery and available information on the internet.

**Table 2.1: Types of greenspaces visited by dog walking respondents in the last year.**

| Type of Greenspace | No. dog walking respondents (with %) | No. total respondents (with %) | % dog walkers compared to % total (+/-) |
|---|---|---|---|
| Footpaths/ trails (e.g. alongside canal, river, disused railways) | 240 (82%) | 753 (83%) | -1% |
| Urban parks and recreation grounds | 239 (82%) | 744 (82%) | No difference |
| Footpaths/ bridleways in the countryside | 235 (80%) | 744 (82%) | -2% |
| Nature reserve (e.g. RSPB site) or other 'natural' area | 207 (71%) | 625 (69%) | +2% |
| Country park (e.g. Lightwater Country Park) | 196 (67%) | 600 (66%) | +1% |
| Footpaths/ bridleways in an urban area | 170 (58%) | 560 (62%) | -4% |
| Smaller grassed area suitable for informal recreation | 155 (53%) | 445 (49%) | +4% |
| Formal gardens | 91 (31%) | 371 (41%) | -10% |
| Children's playground | 85 (29%) | 331 (36%) | -7% |
| Facility for sports or fitness (e.g. ball court, outdoor gym, mountain bike trails) | 71 (24%) | 261 (29%) | -5% |
| Other | 28 (10%) | 93* (10%) | No difference |
| Allotments | 17 (6%) | 64 (7%) | -1% |
| None | 1 (<1%) | 3 (<1%) | No difference |

**Table 2.2: Named greenspaces visited by dog walkers, and qualities of site.**

**[SSSI- Site of Special Scientific Interest; LNR- Local Nature Reserve; SANG- Suitable Alternative Natural Greenspace]**

| Name | Count | % of Dog Walkers | Type of Site and Qualities/Features |
|---|---|---|---|
| Basingstoke Canal | 92 | 31% | Extensive linear site with varied semi-natural habitats including open water, with parking and facilities |
| Fleet Pond(s) | 60 | 20% | SSSI, LNR |
| Caesar's Camp | 58 | 20% | SPA, SSSI |
| Lightwater Country Park | 49 | 17% | Overlaps SPA, SSSI |
| Frimley Lodge Park | 40 | 14% | Medium sized park adjacent to Basingstoke Canal and Blackwater Valley Path with grassland, woodland, parking, café, bike hub, play area, trim trail, model railway |
| Bramshott Country Park | 34 | 12% | SANG |
| Southwood Woodland | 33 | 11% | SANG |
| Hawley Woods | 30 | 10% | SANG |

| Name | Count | % of Dog Walkers | Type of Site and Qualities/Features |
|---|---|---|---|
| Hawley Lake | 29 | 10% | SANG |
| Southwood Country Park | 28 | 10% | SANG |
| Queen Elizabeth Park | 24 | 8% | SANG |
| Yateley Common | 23 | 8% | SPA |
| Aldershot Park | 23 | 8% | Small formal park with waterbody, parking, play area and with connections to Blackwater Valley Path and Tices Meadow Nature Reserve |
| Manor Park | 23 | 8% | Medium sized park with waterbody, skate park, play area and toilets |
| Blackwater Valley | 22 | 8% | SSSI, linear semi-natural habitats including open water |
| Barossa Common | 21 | 7% | Playing fields, semi-natural grassland and woods next to SPA (but also Blackwater Valley Path) |
| Hawley Meadows | 17 | 6% | SANG |
| Ash Ranges | 16 | 5% | SPA |
| Rowhill(s) Nature Reserve | 13 | 4% | SANG |
| Swinley Forest | 13 | 4% | Large forest partly overlapping SPA, and part of which is SSSI, with extensive biking trails |
| King George V Playing Fields | 13 | 4% | Medium sized park with good sized car park and play area |
| Frimley Fuel Allotments | 12 | 4% | Part SANG, with semi-natural woodland and pond(s). |
| Shepherd(s) Meadow | 12 | 4% | SANG |
| Minley Woods | 11 | 4% | Woods to east of SPA/SSSI |
| Watchetts Park and Lakes | 11 | 4% | Small linear park with lake, no parking |
| Farnham Park | 11 | 4% | SANG |
| Wellesley Woods | 10 | 3% | SANG |
| Brickfields Country Park | 10 | 3% | Small Country Park in middle of Farnham with parking, varied semi-natural habitats including lake, with connections to Blackwater Valley Path |
| Heatherside Recreation Ground | 10 | 3% | Small-medium sized park with parking and play area, adjacent to SPA/SSSI |
| Chobham Common | 9 | 3% | SAC/SPA/SSSI |
| Tweseldown | 9 | 3% | Racecourse next to SPA/SSSI but also named part of SPA/SSSI |

## Evidence for Accepted Deviation from SANG Quality Guidelines

### *Background to SANG Quality Guidelines*

2.13 Natural England's 'Guidelines for the creation of Suitable Accessible [sic] Natural Green Space (SANGS)' describe features that have been found to draw visitors to the SPA, and provides guidance on the types of site that can be taken forward as SANG and the measures that can be taken to enhance sites to the 'SANG standard'. The guidelines include a site quality checklist, which specifies a number of 'must have' and 'desirable' features.

2.14 Although the TBH Delivery Framework requires 'regard to' the SANG guidelines, stating *"In assessing the required quality for new SANG land regard should be had to the guidance published by NE."*, in practice the extent to which the 'must have' and 'desirable features' are incorporated within a SANG varies on a site-by-site basis. The acceptability of a particular design solution is ultimately a matter for the respective competent authority (the determining planning authority), in consultation with Natural England.

2.15 The SANG guidelines already acknowledge that some deviations from the standard criteria set out might be acceptable. For example, the guidelines comment on 'networks of sites', stating:

*"Where long routes cannot be accommodated within individual SANGS it may be possible to provide them through a network of sites. However, networks are inherently likely to be less attractive to users of the type that visit the SPA, and the more fragmented they are, the less attractive they will be, though this is dependent on the land use which separates each component…….. Though networks of SANGS may accommodate long visitor routes and this is desirable, they should not be solely relied upon to provide long routes."*

2.16 The guidelines therefore already acknowledge the potential difficulty in achieving the necessary 2.3-2.5 km circular walking length, and indeed this is the SANG criterion that most constrains the suitability (as assessed against the site selection checklist) of potential SANGs, requiring a minimum SANG parcel size of c. 10 ha. However, deviation from this requirement and delivery of smaller SANGs of a bespoke design has historically been accepted by Natural England on a case-by-case basis. Examples of variations in SANG provision are provided below.

### *Case Studies of SANG Delivery*

2.17 The 'Greenspace on Your Doorstep' (GOYD) web resource, hosted by the TBH Partnership, recognises a current total of 70 operational SANGs across the TBH region. As itemised in **Table 2.3** below, 32 of these SANGs – 46% of the current total – provide a circular walking route of less than the prescribed 2.3 km minimum. The circular walk lengths given in **Table 2.3** are as advertised on the GOYD booklet and website, or extracted from site-specific sources of information, such as management plans, in the case of sites for which GOYD provides only an approximate value.

**Table 2.3: Operational SANGs providing <2.3km circular walks.**

| SANG | Walk length (km) | Administrative area | Linear distance from SPA (km) | Other SANG within | |
|---|---|---|---|---|---|
| | | | | 400 m | 1 km |
| Pope's Meadow | 0.8 | Bracknell Forest | 3.9 | No | Yes |
| Englemere Pond | 1.9 | Bracknell Forest | 2.7 | No | No |
| Great Hollands Wood | 1.0 | Bracknell Forest | <0.1 | Yes | Yes |
| Horseshoe Lake | 1.9 | Bracknell Forest | 1.7 | Yes | Yes |
| Ambarrow Court & Hill | 1.5 | Bracknell Forest | 1.0 | Yes | Yes |
| Brooklands Community Park | 1.5 | Elmbridge | 2.1 | No | No |
| Lakeside Nature Reserve | 1.4 | Guildford | 0.4 | Yes | Yes |
| Swan Lake | 1.2 | Hart District | 0.8 | No | Yes |
| Bassetts Mead Country Park | 1.8 | Hart District | 3.5 | No | No |
| Queen Elizabeth II Fields | 1.0 | Hart District | 3.2 | No | No |
| Southwood Woodland | 1.6 | Rushmoor | 0.7 | Yes | Yes |
| St Ann's Hill | 1.4 | Runnymede | <0.1 | No | No |
| Homewood Park | 2.0 | Runnymede | 2.6 | No | Yes |
| Ether Hill | 1.4 | Runnymede | 1.9 | Yes | Yes |
| Timber Hill & Ottershaw Chase | 2.0 | Runnymede | 2.1 | Yes | Yes |
| Hare Hill | 1.5 | Runnymede | 2.8 | No | Yes |
| Franklands Park | 2.0 | Runnymede | 3.5 | No | Yes |
| Earlswood Park | 1.3 | Surrey Heath | 0.4 | No | No |
| St Catherine's Road | 0.5 | Surrey Heath | 1.9 | No | No |
| Chobham Place Woods | 1.0 | Surrey Heath | <0.1 | No | No |
| Little Heath Meadow | 2.0 | Surrey Heath | 0.2 | No | Yes |
| Allens Field | 1.2 | Windsor & Maidenhead | 3.1 | No | No |
| Brookwood Country Park | 2.0 | Woking | 1.3 | No | Yes |
| Woodham Common | 1.2 | Woking | 0.6 | No | No |
| White Rose Ln Nature Reserve | 1.0 | Woking | 2.7 | No | No |
| Clares Green Field | 1.4 | Wokingham | 4.8 | Yes | Yes |
| Five Acre Field | 0.6 | Wokingham | 4.7 | Yes | Yes |
| Old Forest Road Meadows | 1.5 | Wokingham | 7.5 | No | Yes |
| Kentwood Meadows | 1.0 | Wokingham | 5.5 | Yes | Yes |
| Keep Hatch Woods | 1.2 | Wokingham | 4.4 | Yes | Yes |
| Buckhurst Meadow | 1.7 | Wokingham | 3.5 | No | Yes |
| Oakham Woods | 1.5 | Wokingham | 0.8 | Yes | Yes |

2.18 In addition to the SANGs listed in Table 2.3, the 'circular' walk provided within the Cut Countryside Corridor SANG, Bracknell Forest, is more properly a series of discrete loops in a linear arrangement, the largest of these extending to no more than 1.5 km - this could be considered to represent a 'halfway house' between a genuinely circular walk, in the strict sense, and an entirely linear 'there-and-back-again' route. A similar arrangement occurs at Lily Hill and

Longhill Parks SANG, where the circular walk is not confined within the SANG *per se* but passes through a series of discrete greenspaces and interjacent urban areas.

2.19 In some instances, variations in SANG provision are considered to be justified by the occurrence of mitigating factors or some form of offsetting provision. In respect of the Swan Lake SANG, Hart, Natural England recommended the application of an increased provision rate of 10 ha per 1,000 residents to offset the deficit in length of a proposed 2.2 km circular walk (although how this comports with the 1.2 km walk length reported by the TBH Partnership is unclear). Similarly, in respect of a proposed SANG at Waverley Lane, Farnham, Natural England accepted the application of a 12 ha per 1,000 resident provision rate to offset the proposed provision of a 2 km circular walk – this approach was examined at an appeal into the refusal of permission for the SANG and its collocated development, and was found to be sound.

2.20 Broader recreational interconnectivity, for example with the Basingstoke Canal at Brookwood Country Park SANG and with the Blackwater Valley Path at Swan Lake SANG, is promoted as a key attraction in specific cases and may be considered to offset shortfalls in the cited circular walk length requirement to a certain degree.

2.21 The majority of the SANGs itemised in **Table 2.3** occur within 1km linear distance of other SANGs; several occur within 400 m – or easy walking distance – of other SANGs. In some cases, the 'acceptability' of SANGs that independently fall short of the published quality criteria is explicitly predicated on their provision as part of a coherent 'SANG network', which collectively serves to make a variety of walking routes available.

2.22 For example, in view of their diminutive scale, both Clares Green Field SANG and Five Acre Field SANG in Wokingham are incapable, either independently or collectively, of accommodating a 2.3-2.5 km circular walk. This shortfall is considered to be offset by their mutual adjacency and occurrence within the broader network of SANG delivered within the South of the M4 Strategic Development Location – which includes one larger SANG component within 400 m linear distance and two more within 800 m.

2.23 Similarly, Bracknell Forest Council's Avoidance and Mitigation SPD aggregates Popes Meadow SANG and Piglittle Field SANG as the 'West Binfield SANG' cluster, despite a linear distance of 660 m between the two sites and a walking distance of 870 m. This mechanism is used to justify the shortfall in the former site's circular walk and the application of a 4 km catchment area to the cluster as a whole – despite each component falling short of the 12 ha threshold (that would ordinarily invoke a SANG catchment of 4 km) in isolation. The SPD also relates the acceptability of the 4.8 ha SANG at Great Hollands Wood to the proximity of the Bucklers Forest SANG – together forming the notional 'Bucklers Park SANG' cluster – and justifies the provision of a proposed 2.7 ha SANG at Riggs Copse as an element of a 'West Bracknell SANG' cluster. The proposed Riggs Copse SANG (or SANG component) is linked to its nearest fellows by 1.4 km and 1.7 km 'linking routes', which pass through urban areas and over (or under) an intervening dual carriageway.

2.24 A substantial proportion of consented and currently operational SANGs – and therefore of the existing impact avoidance and mitigation apparatus within the TBH region – departs from the published SANG quality criteria with respect to the minimum circular walk length criterion..

2.25 There is no persuasive evidence that such variations in SANG provision, including in particular a modified length of circular walk, make the sites unattractive to users or materially defective in respect of their function as a mechanism for impact avoidance and mitigation.

2.26 The Cut Countryside Corridor and six of the SANGs itemised in **Table 2.3** fall within the scope of the 2018 SANG visitor monitoring reported by Panter (2019). **Table 2.4** below presents some key findings of this study, including the 'total' (i.e. weekday and weekend) average number of visitors per hour, and how interviewees rated "the paths of this site," "this site for dogs", and "this site overall" on a scale of 1 (very poor) to 10 (excellent).

2.27 Overall average hourly visitation rates across the suite of SANGs with shorter than 2.3 km circular walking routes were lower than for the cohort with walking routes exceeding 2.3 km – although this measure is distorted by the exceptional footfall recorded at Heather Farm SANG. If Heather Farm is excluded from the dataset, the adjusted overall average for the SANG group with >2.3 km circular walks (9.5) falls marginally below that of the SANG group with <2.3 km circular walks (9.6).

2.28 When adjusted to take account of SANG size (simply by dividing the visitation rate by SANG area in hectares), visitation rates are significantly higher for the SANG group with <2.3 km circular walks. This could be taken to indicate that more compact SANGs 'punch above their weight' in terms of absorbing recreational pressure – which rather comports with Panter's conclusion that there is no significant correlation between SANG size and visitation rate, and no significant correlation 'between SANG size and overall rating by visitors'.

2.29 Overall visitor ratings are almost identical between the two SANG groups, as are visitor ratings for 'paths'. Although the SANG group with >2.3 km circular walks is on average rated slightly higher in terms of suitability for dogs, the SANG group with <2.3 km circular walks was nevertheless positively rated in this respect – with the notable exception of Timber Hill SANG. Although this site does not include a circular walk of more than 2.3 km, Timber Hill is a relatively large SANG (20.7 ha), and the factors affecting its poor rating for dog suitability are unclear from the survey data: 75% of respondents considered that no improvements to the site were warranted, and the only improvements suggested were 'better paths' and 'more seating'. It should be noted that the dataset for this site was derived from only 16 interviews, and that only 50% of interviewed visitor groups had a dog – in relation to figures ranging from 66% to 91% for the other SANGs.

2.30 Notwithstanding the limitations of the overall monitoring dataset and the potential for confounding factors, the monitoring results as a whole can be taken to suggest that SANGs with shorter walking lengths can be as attractive to users as those with longer walking lengths.

**Table 2.4: 2018 SANG Monitoring Results (Panter, 2019).** [N.B. SANGs listed in Table 2.3, and Larks Hill as a component of the Cut Countryside Corridor, that have a circular walk length of less than 2.3 km are shown in **bold**]

| SANG | Total people per hour | Total people per hour adjusted for site size | Average visitor rating for paths | Average visitor rating for dogs | Average visitor rating of site overall |
|---|---|---|---|---|---|
| **Ambarrow Court** | **15.3** | **1.12** | **7.5** | **7.0** | **8.2** |
| Chobham Water Meadows | 11.2 | 0.45 | 6.1 | 8.0 | 8.1 |
| **Dilly Lane** | **5.5** | **0.56** | **7** | **8.7** | **8.7** |
| **Ether Hill** | **6.5** | **0.41** | **6.9** | **8.1** | **8.5** |
| **Hare Hill** | **15.3** | **1.13** | **6.4** | **8.1** | **8.1** |
| Hawley Meadows | 6.8 | 0.17 | 6.6 | 8.9 | 8.7 |
| Heather Farm | 27.8 | 1.12 | 8.1 | 8.0 | 8.5 |
| Horseshoe Lake | 13.1 | 0.68 | 6.7 | 8.7 | 8.9 |
| **Larks Hill** | **6.8** | **0.30** | **8.1** | **7.8** | 8.7 |
| Peacock Meadows | 6.4 | 0.18 | 8.7 | 9.2 | **9.2** |
| **Popes Meadow** | **15.4** | **2.91** | **8.1** | **6.6** | 8.6 |
| Shepherd Meadows | 12.7 | 0.38 | 7.2 | 6.9 | **7.9** |
| **Timber Hill** | **2.6** | **0.13** | **7.1** | **4.6** | 8.5 |
| Woodham Common | 6.7 | 0.23 | 8.5 | 8.3 | **8.8** |
| *Average All Sites* | 10.9 | 0.70 | 7.4 | 7.8 | 8.5 |
| *Average sites with >2.3 km walk* | 12.1 | 0.46 | 7.4 | 8.3 | 8.7 |
| *Average sites with >2.3 km walk with Heather Farm SANG excluded* | 9.5 | 0.35 | 7.3 | 8.3 | 8.7 |
| *Average sites with <2.3 km walk* | 9.6 | 0.94 | 7.3 | 7.3 | 8.5 |

## Requirements for Modified SANG Provision

*Needs of SPA User and Key Site Selection Criteria*

2.31 Research into the site qualities required to provide a suitably attractive alternative to the SPA was carried out to inform Natural England's SANG guidelines and site quality checklist (NE, 2008) (for example Liley et al. 2005). A review of the current evidence supporting the 'must have' and 'desirable' features is set out within the SANG Background Paper (Appendix 2), with a further consideration of features included within the SANG Research Study (LUC, 2020). These studies highlight a difficulty in determining how alternatives to the usual requirements for SANG provision might be capable of ensuring SPA visitor interception and therefore sufficient capacity to mitigate.

2.32 However the above review of existing consented SANGs, or SANGs that were agreed with Natural England but have not yet come forward, demonstrates that a number of sites have deviated from the stated list of 'must have' SANG quality requirements insofar as the circular walking length is concerned, but in all other respects have met the quality criteria. Examination of the particular qualities and features of these sites highlights a few common themes. A review of the characteristics of greenspaces identified as attractive to dog walkers in the 2020 greenspace survey also helps to highlight the particular importance of some SANG criteria, the inclusion of which will be particularly important in the design of modified SANGs. These qualities and features are set out in **Table 2.5** below, the shortlisting of which has also been informed by information regarding the patterns of visitor access to the SPA (EPR, 2018).

2.33 With successful interception of dog walkers set as the 'acid test', research regarding the behavioural psychology of dog walkers helps to further identify the critical qualities required in SANGs (Edwards & Knight, 2006; SIRC, 2008; Jenkinson, 2011). Dog owners have a different set of motivations and priorities than other types of user; dogs are very much regarded as a member of the family, and therefore the health and enjoyment of an owner's dog during a visit strongly influence site selection and the choices taken whilst onsite. This research is therefore particularly informative for understanding how to manage access on heathland sites where dog walkers are the predominant user group, and the findings have informed the design of visitor access management strategies in Hampshire (HCC, undated), in relation to the Wealden Heaths SPA (EPR, 2012) and elsewhere. Understanding the priorities and motivations of dog walkers, the key SPA user group, can accordingly greatly aid in the design of SANGs and any potential deviations from strictly cited quality criteria. **Table 2.5** breaks down the key site selection criteria and site features into those that are of relevance from the perspective of a dog, and from that of the dog owner.

**Table 2.5: Key site selection criteria highlighted as important for the design and provision of SANG.**

| Site Selection Factor | Site Features |
|---|---|
| Accessibility | ✓ Close to home<br>✓ Parking<br>✓ Safe offsite connections |
| Enjoyment of dog | ✓ Safe off lead access<br>✓ Space to run about<br>✓ Variety of ground-level interest features, such as a variety of natural habitats, in particular access to water |
| Enjoyment of owner | ✓ Overall countryside experience (not formal site in urban setting)<br>✓ Quiet/not too many people<br>✓ Visual interest, such as a variety of natural habitats, in particular water<br>✓ Ability to achieve required length of visit in safe setting<br>✓ Variety of route options, including opportunity for circular walk<br>✓ Ability to avoid other people/dogs |
| Other desirable practicalities | ✓ Facilities for dogs e.g. bins, water points, exercise areas<br>✓ Facilities, such as café, toilets, naturalised play |

2.34 As has been stated above, existing SANGs and a number of popular greenspaces within the HMA appear to meet all of the above criteria, except that of the 'must have' 2.3-2.5 km circular walk length.

2.35 Surveys have consistently shown that people use a variety of sites, of a variety of sizes, and it would appear that the absence of a 2.3-2.5 km circular walk in some circumstances, albeit with a shorter circular walk still possible, does not mean that these sites are found to be undesirable.

2.36 Given the positive findings of the 2018 SPA visitor monitoring survey, which reported a statistically significant drop in visitor numbers across the SPA despite a concurrent increase in housing within the 5 km SPA zone of influence (EPR, 2018), the examples of SANGs having been delivered without the inclusion of a 2.3-2.5 km walk do not appear to have significantly compromised the efficacy of the overall approach to securing mitigation. There would appear to be at least two influencing factors at play.

2.37 First, further analysis of the 2018 SPA visitor monitoring survey results (EPR, 2018), and in particular the walking routes identified by visitors interviewed (shown on Map 6 of that report), shows that although at some SPA locations visitors do complete long walks, at other locations the average length of routes taken is less than the 2.3-2.5 km requirement cited as a 'must have' SANG feature. Examples are shown in **Table 2.6**.

**Table 2.6: Average length of routes taken (km) within SPA patches, by access point, recorded during the 2018 SPA visitor monitoring survey (EPR, 2018).**

| LPA Area | SPA Patch | Access Point | Average length route (km) |
|---|---|---|---|
| Hart | Hazeley Heath | 18 | 1.91 |
| Hart & Rushmoor | Bourley and Long Valley | 28 | 2.23 |
| Hart & Rushmoor | Bourley and Long Valley | 29 | 1.89 |
| Hart & Rushmoor | Castle Bottom to Yateley and Hawley Commons | 9 | 1.66 |
| Hart & Rushmoor | Castle Bottom to Yateley and Hawley Commons | 10 | 1.42 |
| Surrey Heath | Ash to Brookwood Heaths | 2 | 1.84 |
| Surrey Heath | Colony Bog and Bagshot Heath | 14 | 1.86 |
| Surrey Heath | Colony Bog and Bagshot Heath | 15 | 1.54 |
| Surrey Heath | Colony Bog and Bagshot Heath | 16 | 2.08 |
| Surrey Heath | Horsell Common | 24 | 2.19 |

2.38 Second, surveys have shown that people seek a variety of sites, with the length of visit sometimes modified to suit differing requirements, for example, the quick before/after work/school walk as contrasted with a longer walk at weekends, or shorter/longer visits during different weather conditions. SANGs therefore function within an extensive greenspace network, reducing the need for every site to meet all longer route requirements.

2.39 The implication of the above is that the 2.3-2.5 km SANG circular walk requirement could potentially be reduced within SANGs without significantly undermining the value of that additional greenspace provision as mitigation. Modification of the circular walk requirement would provide greater flexibility in delivering SANGs, and would open up a number of opportunities within the pool of potential SANGs previously reviewed but discounted because the circular walk length could not be achieved.

2.40 However the results of visitor/greenspace surveys confirm that the amount of space for dogs to exercise and the 'busyness' of sites is still a critical factor influencing site selection, alongside the provision of other high quality features (such as those listed at **Table 2.5** above).

2.41 Whilst the requirement to deliver a 2.3-2.5 km walk within a single SANG compartment has functionally defined the minimum size of a SANGs that are able to meet the stated criterion (at c.10 ha), the SANG provision rate, considered in the context of adjacent SPA patch visitor use, will also inform the capacity of a site to intercept and absorb visits. This is considered further below.

### *Review of Required Provision Rate*

#### Basis for Existing Provision Rate

2.42 The SANG provision rate establishes the amount of 'space' or additional greenspace needed to absorb visits *on an equivalent basis to those absorbed by the SPA* (the relevance of this latter emphasized point will become clear in the section below).

2.43 As has already been described within the SANG Research Study (LUC, 2020) the basis for the current 8 ha of SANG per 1,000 population increase originates from calculations carried out by the South East Plan Assessor, as set out in his report (Burley, 2007). The SANG provision rate calculation is set out below in **Table 2.7**. The 7.16 ha of SANG per 1,000 arrived at in the bottom row of **Table 2.7** was rounded up to 8 ha on a precautionary basis, when considered in light of alternative methods presented to the South East Plan Examination for calculating required SANG capacity.

**Table 2.7: Calculation used by South East Plan Assessor to derive the SANG 8 ha/1,000 provision rate (Burley, 2007).**

| | |
|---|---|
| Population increase over 20 yr plan period for 11 authorities within 5km SPA zone | 68,388 |
| Visits to SPA made per person per year | 4.58 |
| Increase in visits to SPA | 313,217 |
| Visits absorbed by SPA/ha/yr | 638 |
| Total SANG area (ha) required to absorb visits | 490 |
| SANG required per person | 0.00716 |
| SANG required per 1,000 population | 7.16 |

2.44 The figure of 4.58 visits made to the SPA per person per year was calculated by Errington (2006) using 2006 population data for the TBH SPA districts and data from the 2005 SPA visitor survey report (Liley et al. 2005), and the number of visits absorbed by the SPA per hectare per year was also derived from the original 2005 SPA visitor survey data (Liley et al. 2005). Updates to these statistics can now be derived from the most recent visitor monitoring of the SPA (EPR, 2018). Therefore the implications of the most up to date data and the variations in visitor access across SPA patches on the SANG provision rate calculation are examined further below.

## Current Evidence and Influence of SPA Patch Visitor Access

2.45 **Table 2.9** below presents 7 calculations that are iterations of, and equivalent to, that set out in **Table 2.7** above, that is, the calculation used by the South East Plan Assessor to derive the 8 ha/1,000 population standard SANG provision rate. These revised calculations have been made using the latest (2018) SPA visitor monitoring data on SPA visitation across the 5 km SPA zone, and visits absorbed per hectare for the SPA as a whole (i.e. using data collected from all access points surveyed), and with various iterations using patch-specific data (with one component SSSI representing a single SPA 'patch').

2.46 The revised 4.45 figure (used in **Table 2.9**) for visits made to the SPA per person per year, which represents an update from the previous figure of 4.58 used in the original South East Plan calculation, is based on the calculation set out at **Table 2.8**.

2.47 The revised figure for visits absorbed per hectare per year for the SPA as a whole (515 - used in calculation 1 of **Table 2.9**) was obtained by dividing the total number of visits to the SPA per

year (4,564,000 – see **Table 2.8**) by the total SPA area (8309.5 ha). The patch specific figures were then derived by calculating:

- the average number of entries or exits per access point per year (whichever was higher, and based upon a 4,564 visiting hours in a year, see **Table 2.8**) for an SPA patch (representing one component SSSI);

- multiplying this by the assumed number of access points across the patch (based on there being 160 access points providing at least 1 car parking space (Panter & Liley, 2020) across the total SPA area, and so 1 access point for every 55 ha of SPA) to give the number of SPA visits per site per year; and then

- dividing that by the SPA patch size to yield the total number of annual visits absorbed per hectare for each SPA patch.

2.48 Calculation 1 in **Table 2.9**, which represents the revised calculation for the SPA as a whole (i.e. all component SSSI patches), shows that because visitor access to the SPA has decreased since the previous calculation the SANG provision rate has increased to 8.10ha/1,000 from the 7.16 ha/1,000 previously calculated. Although rounding to the nearest whole number, this still validates the 8 ha/1,000 provision rate standard currently being used across the TBH region.

2.49 Calculations 2-7 then illustrate the effect that variations in the number of visits absorbed by component SPA patches have on the requisite SANG provision rate.

2.50 For example, calculation 2 uses information on visits to the quietest SPA patch within close proximity of the HMA - Castle Bottom to Yateley and Hawley Commons SSSI. Because this part of the SPA received the fewest visits (per ha per year), for SANG to be provided on the basis of achieving the same visitor density per hectare as the SPA then a relatively higher provision rate would be required.

2.51 In comparison, calculation 3 uses information on visits to the busiest SPA patch within close proximity of the HMA - Horsell Common. Because Horsell Common absorbs a relatively higher number of visits, and therefore experiences higher visitor densities per hectare, to provide SANG on an equivalent basis would mean a relatively lower provision rate would be required.

2.52 Calculations 4-7 then use data on the average number of visits absorbed per hectare per year for the SPA patches within each of the LPA areas, and the aggregate figure for the combined HMA patches. Overall the provision rate required for the HMA is exactly 8 ha/1,000. However the LPA-specific calculations reveals that, theoretically, if the provision rate calculation is based on data from the less visited SPA patches within Hart and Rushmoor, then a relatively higher SANG provision rate would be required to ensure equivalence of visitor density across the SANG and SPA, whereas the opposite is the case for the busier SPA patches in Surrey Heath Borough.

2.53 Of course, visitors from new housing located within a particular LPA area do not only visit those SPA patches located within close proximity of that LPA boundary, and the SPA visitor survey results show that visitors do not always visit the SPA patch that is closest to home. This is part of the rationale for adopting an SPA wide strategy, as set out within the Delivery Framework. This addresses potential effects on the SPA across the region in a holistic way by adopting the 8ha per 1,000 population SANG provision rate standard (as per calculation 1 in **Table 2.9**

below), which is derived from evidence regarding visitor access patterns generalised across the SPA as a whole. Therefore, it remains appropriate to comply with the 8 ha/1,000 standard across the HMA as any deviations would not reflect the SPA-wide approach. Taking an SPA-wide approach also means that the SANG provision requirement is standardised across LPA areas, enabling developments to secure capacity within SANGs in adjoining Boroughs subject to their location within the relevant SANG catchment.

2.54 However information regarding the link between SPA visitor density and SANG provision rate can still be taken into account during the design of modified SANGs (on a site-specific basis) where sites are not able to accommodate a 2.3-2.5 km circular walking route, to ensure that the sites brought forward provide enough space for future recreational need. In such circumstances, a degree of overprovision beyond the minimum 8 ha/1,000 standard may be required, and this is considered further below.

2.55 The institution of the existing Delivery Framework approach to mitigation has corresponded with a statistically significant decline in visitor numbers across the SPA (EPR, 2018). This apparent 'overperformance' in relation to the requirement to achieve no net increase in visitation could be taken to indicate that the existing 8ha per 1,000 population standard represents an overprovision against need. However, in the absence of a robust evidential basis to justify the adoption of a reduced provision rate that would nevertheless remain capable of avoiding a net increase in visitation, the retention of the 8ha per 1,000 population minimum standard is considered to represent a duly precautionary approach for present purposes.

**Table 2.8: Revised figure for estimated visits to the SPA per person per year across the 5 km SPA zone of influence, using data contained within the 2018 SPA Visitor Monitoring Survey report (EPR, 2018).**

| | |
|---|---|
| No. entries[1] to SPA/30 access points/16 hrs survey | 3,001 |
| No. entries/access point/hr | 6.25 |
| Total no. access points with space for at least 1 car across SPA[2] | 160 |
| Total entries for SPA/hr | 1000 |
| Total number visiting hours per year[3] | 4,564 |
| Total number visits to SPA per year | 4,564,000 |
| Total number of visits per year originating from 5 km SPA zone of influence (based on 76% of visitors travelling from within 5 km of SPA, 2018 SPA visitor postcode analysis) | 3,468,640 |
| Number of residential delivery points within 5 km zone | 325,174 |
| No. visits per dwelling per year | 10.67 |
| Household occupancy rate | 2.4 |
| Visits per person per year | 4.45 |

[1] Count data for visitor entries, rather than exits, has been used as this represents the higher figure.

[2] Taken from Panter & Liley (2020).

[3] Based on a 14 hour day in spring, summer, autumn (0600-2000), and a 8 hour day in winter (0800-1600).

**Table 2.9: Re-run of SANG provision rate calculation using 2018 SPA visitor survey data and SPA patch specific data regarding visitor access.**

| Calculation: | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|---|---|---|---|---|---|---|---|
| | All SPA patches | Quietest patch[A] | Busiest patch[B] | Average All HMA Patches[C] | Average Hart Patches[C] | Average Rushmoor Patches[C] | Average Surrey Heath Patches[C] |
| Population increase over 20 yr plan period | 68,388 | 68,388 | 68,388 | 68,388 | 68,388 | 68,388 | 68,388 |
| Visits to SPA made per person per year (see **Table 2.6**) | 4.45 | 4.45 | 4.45 | 4.45 | 4.45 | 4.45 | 4.45 |
| Increase in visits to SPA | 304,327 | 304,327 | 304,327 | 304,327 | 304,327 | 304,327 | 304,327 |
| Visits absorbed by SPA/ha/yr[D] | 549 | 206 | 1554 | 553 | 357 | 337 | 710 |
| Total SANG area (ha) required to absorb visits | 554 | 1477 | 196 | 550 | 852 | 903 | 429 |
| SANG required per person | 0.0081 | 0.022 | 0.0029 | 0.0080 | 0.012 | 0.013 | 0.0063 |
| SANG required per 1,000 population | 8.10 | 22.00 | 2.90 | 8.00 | 12.20 | 13.00 | 6.30 |

[A] Castle Bottom to Yateley and Hawley Commons SSSI.

[B] Horsell Common.

[C] SPA patches - those component SSSIs falling within 400m of HMA/LPA boundaries.

[D] based on the number of entries or exits.

Context with Wider SANG Delivery Across the Region

2.56 Success of the Delivery Framework requires a consolidated approach to SPA mitigation provision across the affected LPA areas. Acceptance of SANGs that could be perceived as 'deficient', or 'easier' provisions to secure, therefore has the potential to undermine the current approach, setting a precedent that could cause the current strategy to unravel with highly undesirable consequences for planning and further housing growth.

2.57 It is consequently imperative to ensure that, where the delivery of SANGs that deviate from the listed quality criteria is envisaged, there is a visible equivalence in provision. Where particular SANG quality criteria are not fully met, this should be offset through the provision of alternative qualities/features, such as a higher provision rate, or through achieving the criteria across a network of connected sites. This is essentially the basis upon which a number of SANG deviations described above were found to be acceptable by Natural England.

2.58 **Section 5** below explores the potential way in which modified SANG provision (or as per the project terminology 'SANG alternatives'), could fit into the current Delivery Framework mitigation model without compromising the overall ongoing ability of the strategy to ensure no adverse effect on the integrity of the SPA alongside further housing growth.

# 3. FUTURE FOCUS FOR MODIFIED SANG PROVISION

## Summary of Best Available Evidence

### *Small SANGs with smaller catchments*

3.1 The 2020 greenspace survey found that sites under 2 ha accounted for less than 2% of the most frequently visited sites in the sample (LUC, 2020). Given the motivations of dog walkers and the site selection requirements shortlisted above following review of the collective evidence base (**Section 2**), small sites of less than 2 ha are unlikely to appeal to the SPA user group, reinforcing the minimum SANG size of 2 ha outlined in the Delivery Framework.

### *Large SANGs with large catchments*

3.2 As one of the critical requirements of SANG is that it needs to be more accessible than the SPA, and the SPA has a 5 km visitor catchment (visitor monitoring surveys have shown that roughly 75% of visitors travel from within 5 km (Liley et al. 2005; Fearnley & Liley, 2013; EPR, 2018), which is what the 5 km SPA zone of influence is based upon), demonstrating visitor intercept potential for SANGs with catchments greater than 5 km is likely to be difficult. Although the SANG visitor monitoring survey found that *"there was evidence of a larger draw or catchments for some sites (i.e. 75% of interviewees lived within 7.5 km of Heather Farm and within 6.3 km of Chobham Water Meadows)"*, average travel distance was 3.8 km (and with Heather Farm having an average travel distance of 4.1 km). Therefore the circumstances where a SANG catchment of greater than 5 km could be supported by the latest evidence are likely to arise infrequently, such that pursuing large SANGs with large catchments as a means of ensuring mitigation capacity within the HMA is not recommended.

### *Linear SANGs and Enhancement or Creation of Recreational Routes*

3.3 The SANG alternative typologies 'Linear SANGs' and 'Enhancement or Creation of Recreational Routes', as reviewed within the SANG Research Study, have been grouped together here because they sit on the same functional continuum insofar as a modified SANG offering is concerned – that is the offering of a linear walk rather than a circular walk. Overall the size and characteristics of a site will influence its visitor draw, and therefore its potential to intercept SPA bound visits.

3.4 Although the 2020 greenspace survey found that dog walkers are using footpaths, trails and bridleways (**Table 2.1**), most of the greenspaces named as having been visited in the last year comprise more spacious greenspace sites (**Table 2.2**). Although the linear Basingstoke Canal was named as the most popular greenspace site, this is an extensive site with varied habitats that often broaden out into larger adjoining/interconnected areas. The canal may therefore be used as part of a wider greenspace network with visitors completing circular routes along the canal and back through adjacent areas, rather than providing a strictly linear site with a 'there-and-back-again' route offering, although there is no existing survey data to indicate the balance of use types. It also includes other attractive features such as open water, parking and various facilities along its length, which as detailed above are likely to be important for inclusion within any modified SANG provision.

3.5 The greenspace survey found that 'space to walk dogs off lead away from potential conflicts with other users' was regarded as the most important site feature for dog walkers (a response

returned by 59% of participants), an attribute that is likely to be more challenging to achieve in linear sites (either as a discrete SANG or recreational route). The evidence does not therefore offer strong support for the role of linear sites or the enhancement/creation of recreational routes as a reliable means of delivering a sufficient quantum of acceptable modified SANGs, although, as stated above, this will be dependent on site size and characteristics.

3.6 To take two contrasting examples, linear SANGs providing larger discrete greenspace sites, where linear routes are provided within a wider extent of surrounding semi-natural habitat and where there is more potential to address risk of visitor conflict through careful management (e.g. signage, wide paths, route links/alternative routes, features set back from paths etc.), are more likely to be acceptable than narrow recreational routes that immediately adjoin adjacent land uses. However, improvements to linear connections between other greenspace sites, in order to enhance visitor access to and within a wider greenspace network, is something that could be incorporated as part of a broader SPA mitigation package; this is considered further below in **Section 5**. Ultimately, potential linear SANGs will stand to be reviewed on a site-specific basis, although other means of more reliably securing modified SANGs should also be explored.

*Small SANGs and SANG Networks*

3.7 The evidence set out within **Section 2** indicates that several SANGs have been delivered which are too small to incorporate the minimum 2.3-2.5 km circular walk requirement set out within the SANG quality guidelines, but were nonetheless found to be acceptable by Natural England and would appear to be being used.

3.8 Therefore, subject to a potential SANG site incorporating enough other features sought after by dog walkers (as per the suggested list at **Table 2.3**), and in particular enough space for them to avoid conflicts with other users (which would be aided by consideration of the appropriate SANG provision rate), current evidence indicates that sites would not necessarily have to be big enough to accommodate a 2.3-2.5 km walking route within their confines to be successful, especially if longer routes could be achieved within other nearby/connected greenspace, including other SANGs. Indeed, the SPA visitor survey data indicates that people do not always choose to complete a 2.3-2.5 km walk within a single site and during a single visit, as the average route length taken at some SPA locations is less than the stipulated SANG requirement (**Table 2.4**).

3.9 All of the evidence reviewed for this study therefore indicates that small SANGs functioning within a SANG network are likely to represent the best opportunity for achieving SPA mitigation in a format other than SANGs independently meeting all the 'must have' criteria. This type of SANG provision could take the form of several smaller interconnected SANGs or SANGs that provide extensions to larger SANGs, such that at least a 2.3-2.5 km circular walk could be met, if required, within a connected greenspace network. As per current guidance, such sites could come forward as entirely new accessible greenspaces or through upgrades to existing sites that are already publicly accessible (subject to appropriate discounting for existing use, which is discussed further in **Section 4**).

3.10 As detailed in **Section 2**, networks of SANG sites are already referred to in Natural England's SANG guidelines (NE, 2008), and all of the visitor surveys carried out confirm that people use a variety of sites for recreation, selecting sites from a pool of favourites according to need.

3.11 Since the only deviation from the SANG guidelines envisaged for this type of modified SANG provision would relate to the circular walk, the existing SANG catchments set out within the Delivery Framework and SANG guidelines would remain appropriate (2-12 ha SANG: 2 km catchment; 12-20 ha SANG: 4 km catchment; 20+ ha SANG: 5 km catchment; SANGs with no parking: 400 m). Sites would therefore have to come forward within appropriate distances of potential future housing locations.

3.12 The delivery of this type of modified SANG would continue to be supported by contributions to the existing SAMM project, or an extended SAMM project, as required and confirmed as feasible within the Access Management Study (Likely & Panter, 2020), but could also be supported by other potential measures, as considered in **Section 5**.

## Specific Site Review

3.13 **Table A1** in **Appendix 1** reviews the potential SANG alternatives set out within the SANG Research Study (Table 6.2, LUC, 2020) in light of the evidence collated and examined as part of this study. Potential SANG provision rates are set out, providing an allowance for any requirement for overprovision and/or capacity discounting, either for existing site constraints or public access. In very general and indicative terms, the following methodology was used to assign provision rate, which would of course stand to be tested against site-specific survey data and to be agreed with Natural England:

- **Site is likely to meet all SANG criteria with no requirement for overprovision or discounting** - **8 ha/1,000**
- Site does not meet all SANG criteria with overprovision potentially required - 10 - 12 ha/1,000
- Site has existing public access and/or site constraints with capacity discounting likely to be required - 10 - 12 ha/1,000
- Site is likely to require overprovision and capacity discounting - 14 ha/1,000

3.14 The sites considered to have potential as SANGs, either as standalone sites or as part of a SANG network, account for over 480 ha, which on the basis of the precautionary provision rates suggested could serve something in the region of 17,000 dwellings subject to appropriate location within size-based SANG catchments (as per the Delivery Framework).

3.15 Additional potential SANG sites are also listed within Appendix 6 of the SANG Background Paper, with many sites identified for further investigation. Some would appear to have notable potential, including Tongham Pools (15 ha, less 6ha open water), Tices Meadow (55 ha, less 5 ha open water and additional area to discount for nature conservation interest), Bishop's Meadow (12.8 ha), Runfold Sandpit (50 ha), Jolly Farmer Sandpit (13.7 ha), Mychett Lakes (51 ha, and south of Blackwater Valley), Frith Hill Wood (135 ha, south of Frimley Fuel Allotments) and many other sites submitted to Hart's Strategic Housing Land Availability Assessment (SHLAA).

There would therefore appear to be a large number of potential SANG sites that HRSHC can further research the deliverability of, and evaluate in the context of potential locations for housing delivery considered as part of future Local Plan review work.

# 4. MITIGATION CAPACITY REQUIREMENTS

## Status of SANG Availability Across the HMA

4.1 Remaining levels of strategic SANG capacity across the HMA are generally limited. The recently opened Southwood Country Park provides the vast majority of remaining capacity in Rushmoor – a significant proportion of the capacity released by this SANG has been earmarked for a series of named Local Plan allocations.

4.2 Within Hart, the reserve of strategic SANG capacity is currently low, and whilst there is enough SANG 'in the pipeline' to meet the District's total Local Plan housing requirement to 2032, there is ongoing pressure on SANG capacity arising from windfall development. A significant amount of SANG capacity in Hart has also been allocated to housing development within Rushmoor and Surrey Heath. The SANG supply situation is particularly acute within the western part of Surrey Heath. Although the eastern part of the borough has sufficient capacity to serve planned development until 2033-34, the western part is projected to experience a SANG capacity shortfall as early as 2021.

## Potential Future Capacity Requirements

4.3 The 2018 Strategic Housing Market Assessment (SHMA) identifies an objectively assessed housing need of 1,200 dwellings per annum across the HMA. On the basis of a simplified overall average occupancy rate of 2.4 persons per dwelling, and the standard 8 ha per 1,000 resident provision rate, as set out in the Delivery Framework, this indicates a SANG delivery requirement in the region of 23 ha per annum.

4.4 The adoption of an increased provision rate of 10 ha or 12 ha per 1,000 residents to offset a departure from SANG quality criteria (namely the circular walk length), in accordance with the principle of 'visible equivalence' and in line with precedents investigated in **Section 2**, would respectively inflate this indicative mitigation target to 29 ha or 35 ha per annum.

4.5 In practice, mitigation land requirements may be further inflated, over and beyond these estimates, by a requirement to discount the capacity of potential SANGs to account for ecological sensitivity, environmental constraints (such as flooding or large areas of open water) and/or existing recreational use. The requirement to discount the potential mitigation capacity of land would need to be informed by site-specific survey and consultation with Natural England, as has been mentioned within the SANG Research Study (LUC, 2020).

4.6 The method established by Bracknell Forest Council for discounting SANG mitigation capacity for existing visitor use (as set out in their TBH SPA SPD, Appendix 3, paragraph 8 and Table 16), which has been widely applied across the region, remains appropriate, subject to the relevant SANG provision rate being utilised.

4.7 Based on the potential SANG sites reviewed in **Section 3** and **Appendix 1**, if 50% of these sites could be delivered in appropriate locations and timescales relative to proposed housing, objectively assessed housing need could be supported for circa 7 years assuming precautionarily uplifted provision rates, with many additional opportunities identified within the SANG Background Paper that could be considered further by the LPAs..

4.8 Based on the potential variation in factors influencing the required SANG provision rate, HRSHC could, in very broad non site-specific terms, plan for SANG supply on the basis of a further uplifted rate, for example 16 ha/1,000, to ensure a sufficient 'pipeline' of SANG capacity to support housing delivery.

# 5. MITIGATION MODEL

## The Current Model

5.1 As has been described in earlier sections, the current Delivery Framework mitigation model is the delivery of SANG and SAMM. The strategy has now been in place for over 10 years, and there is now growing evidence that it is achieving its aim of securing no net increase in recreational pressure on the SPA.

5.2 The 2018 SPA visitor monitoring survey reported a statistically significant drop in visitor numbers to the SPA since the initial visitor survey in 2005, despite a concurrent 12.9% increase in housing within the 5 km SPA zone of influence over the same period. In the absence of other significant causal factors, this suggests that the provision of some 70 SANGs across the region since 2009 is playing a vital role in securing the avoidance of increases in recreational pressure that would have otherwise been likely to transpire. This conclusion is supported by the findings from the SANG monitoring carried out by the TBH Partnership (Panter, 2019), and also by the results of the HRSHC 2020 greenspace user survey, in particular Table 4.6 which shows that a significant proportion of greenspace visits is being diverted to SANGs within the HMA (LUC, 2020).

## How SANG Alternatives fit into the Current Model

5.3 As has been described in earlier sections, the concept that modest deviations from the listed SANG quality criteria could be acceptable in mitigation terms is not new. The Delivery Framework and SANG guidelines allow for bespoke provision to be made in consultation with Natural England, with SANG networks already being described in the guidelines. The type of modified SANG provision recommended in **Section 3** - that is, the potential delivery of smaller SANGs that are not able to accommodate the 2.3-2.5 km circular walking length within a single compartment, but which can otherwise meet and exceed other quality and provision rate criteria and connect to additional offsite opportunities for route extension - very much fits within the current established approach to mitigation. Such adaptations in provision have already formed part of SANG delivery across the region to date, without undermining the overarching approach. The evidence set out within this report should therefore provide confidence that smaller SANGs functioning within a SANG network, and ensuring 'visible equivalence' as previously described, could provide mitigation on an equivalent basis to SANGs delivered to date.

5.4 What this study is therefore conceptualising is the formalised acceptability of a reduced circular walking route within a single SANG compartment where longer offsite routes can be provided within other connected SANGs and greenspaces, so that, with the knowledge of future limitations in potential SANG land, opportunities to reliably secure SANG capacity within the HMA can be explored in the most transparent and proactive way, rather than through reliance on negotiating and securing mitigation capacity in an ad hoc way, on a case-by-case basis.

5.5 The High Court judgment of J Sullivan in Hart DC v the Secretary of State for Communities and Local Government (May, 2008: the 'Dilly Lane Judgment') offered support for proactive mitigation planning:

*"As a matter of common sense, anything which encourages the proponents of plans and projects to incorporate mitigation measures at the earliest possible stage in the evolution of their plans and projects is surely to be encouraged" (paragraph 61)*

5.6 The list of features provided in **Section 2**, which evidence suggests would be essential within any modified SANG provision, will therefore help to define the pipeline of SANGs potentially explored further by HRSHC and as suggested in **Section 3** and **Appendix 1**. However the assessment frameworks described in **Section 1** require that a clear hierarchy is set for SANG provision.

5.7 SANGs meeting all of the quality criteria should therefore be delivered in the first instance, and only where that is not possible, for clearly established reasons, should delivery of other options be pursued, ensuring visible equivalence in provision, and as agreed with Natural England. This is effectively what has happened in practice already, but this should nonetheless be formalised alongside the formalisation of any other modified SANG delivery criterion.

5.8 Visible equivalence in provision could be achieved through delivery of SANG at a higher provision rate or through the incorporation of a particular range of high quality site features, but could also be achieved through the delivery of other complementary features supporting greenspace access and dog walking in the HMA area. This is explored further below.

5.9 It must be acknowledged that in some circumstances it will not be possible to secure satisfactory SANGs, even where potential modifications have been explored, and in those cases alternative locations for housing delivery would need to be reviewed in the first instance. Where no alternative locations for housing can be found and where housing need is identified as an 'Imperative Reason of Overriding Public Interest' (IROPI) then the potential to secure SPA compensation measures could be explored and secured in accordance with the tests set out by the Habitats Regulations.

### Opportunity to Review and Evolve Model

5.10 The TBH Delivery Framework was one of the first strategies to be adopted to address the in-combination recreational effects on an International site. Similar approaches have been adopted elsewhere, including in the Dorset Heaths, the Wealden Heaths, and at numerous Coastal locations such as the Solent, the Severn Estuary and the Swale, with regional modifications.

5.11 In Dorset, SANGs are delivered alongside other greenspace access enhancements, which are collectively referred to as Heathland Infrastructure Projects (HIPs), funded via tariff based developer contributions as set out within the Dorset Heaths Planning Framework SPD 2015-2025 (2016; and its precursor documents). Besides SANGs, Dorset HIPs to date have included improvements to local greenspaces, upgrades to existing routes between greenspace sites, provision of specific spaces for off-road BMX/skating, dog activity areas, as well as visitor engagement and fire management projects. The diversity of projects funded through the SPD have targeted a variety of public access effects on the heathlands, and although monitoring reports are not publicly available, the fact that the strategy has rolled on without significant change since its inception under the Dorset Heaths Interim Planning Framework adopted in 2007, would appear to indicate its success.

5.12 Similar approaches are also being taken in the Wealden Heaths and at Coastal locations, where the focus is not just on the provision of SANGs, but also other greenspace access improvement measures.

5.13 Whilst every International site is subject to different pressures, influenced by the degree of urbanisation, habitat fragmentation, and of course qualifying habitats and species, there would

appear to be a potential opportunity to review a broader set of measures that could be delivered as part of an overall mitigation package within the HMA, alongside SANGs and SAMM. Careful consideration would be needed as to the scope of such measures, to ensure that they would not be regarded as providing heathland compensation, as opposed to impact avoidance and mitigation, which would invoke requirements to demonstrate the absence of alternative solutions and Imperative Reasons of Overriding Public Interest (IROPI) in order to meet the tests set out by the Habitats Regulations.

5.14 The mitigation model in Hart, Rushmoor and Surrey Heath could therefore be carefully evolved to include SANGs meeting all quality criteria and modified SANGs (meeting the criteria for design and delivery outlined above) as the principal measures for securing impact avoidance, supported by SAMM measures, but to also include other 'Greenspace Support Projects' (GSPs) to provide further confidence that visits that would otherwise be made to the SPA would be successfully diverted to the SANG and wider greenspace network.

5.15 Such additional measures could include:

- Enhanced linear recreational routes as features supporting access to SANGs, and providing an additional, distinct offering for recreation (perhaps providing long distance routes for cyclists);
- Improvements to interconnecting routes between SANGs and SANG networks to enhance access to and within the greenspace network;
- Dog training areas, targeted in certain areas known to be used by large numbers of professional dog walking companies, such as locations within Bourley and Long Valley, Broadmoor to Bagshot Woods and Heaths, Ash to Brookwood Heaths, and Horsell Common SSSIs (EPR, 2018) - such facilities have proved to be extremely popular wherever they have been delivered, being able to be booked out in advance. The delivery of dog training areas could also be accompanied by restrictions on the number of dogs that an individual walker can take onto nearby areas of the SPA, if such controls are feasible to implement; and
- Focussed access restrictions where agreeable.

5.16 The above GSPs could be designed, in consultation with relevant key stakeholders, to support location- and quantum-specific housing delivery, with an agreed list of projects set out within revised TBH SPA Impact Avoidance Strategies, to be costed up alongside SANG and SAMM delivery with a single per dwelling tariff.

5.17 The provision of GSPs, where required, would help to ensure equivalence in mitigation provision across the region where deviations in SANG provision are necessary to facilitate the delivery of identified housing need, providing further confidence that the requirements of the Habitats Regulations can be met.

5.18 The overall capacity of such a package of measures to mitigate the effects of a defined quantum of housing would be influenced by the relative balance of SANGs meeting all of the quality criteria, modified SANGs and GSPs, and would need to be informed by consultation with Natural England.

# 6. SUMMARY & CONCLUSIONS

## Summary

6.1 This study has reviewed the background to the TBH SPA Delivery Framework approach, which establishes SANG, supported by SAMM, as the principal measure securing impact avoidance and therefore confidence that the requirements of the Habitats Regulations can be met in the face of significant planned housing growth. The evidence base underpinning the delivery of SANGs and potential SANG alternatives is reviewed, and key requirements for modified SANG provision are set out. There are particular site qualities that dog walkers, the key SPA user group, seek out in sites, and these features should be accommodated within any SANGs that depart from Natural England's list of 'must have' SANG quality features.

6.2 Although a circular walk is one of those important features, alongside space, naturalness, accessibility and safety, current evidence indicates that the minimum 2.3-2.5 km circular walk specified in the guidelines would not necessarily have to be accommodated within every individual SANG site for that site to appeal to the SPA user group, if other qualities can be provided, including opportunities to complete longer walks within a wider connected SANG network.

6.3 Many SANG sites have been delivered to date with a shorter than 2.3 km walk, without apparent consequences for the overall success of the Delivery Framework approach, as indicated by the latest SPA visitor survey results that have reported a statistically significant drop in visitor numbers across the SPA since 2005, despite a concurrent increase in housing numbers across the same period. The potential acceptability of SANG networks is also already acknowledged within the SANG guidelines. Therefore if specific and carefully considered deviations from the SANG guidelines are required in order to ensure enough supply to achieve future housing delivery within the HMA, then this review indicates that delivery of smaller SANGs that cannot independently achieve a 2.3-2.5 km circular walk but which can function as a part of a wider SANG and greenspace network would be the modification most supported by current evidence.

6.4 The term 'modified SANG' is favoured, as it reflects the overall consistency of intended delivery with numerous SANGs that have been accepted by Natural England and delivered across the region to date. The term 'SANG alternative' therefore suggests more of a material deviation from current SANG provision than is actually envisaged within the SANG network approach recommended by this study – notwithstanding the consideration afforded to other potential alternative approaches to SANG within other studies commissioned by the SPA Mitigation Project.

6.5 Ensuring visible equivalence in provision will nevertheless still be important for any modified SANG delivery to ensure that the regional approach to SPA mitigation is not undermined. Any shortfall in SANG quality criteria envisaged, such as the length of circular walk, should therefore be offset by other complementary means, such as an elevated provision rate, and/or the delivery of other high quality site features or even other projects to support greenspace access in the locality. This should be further explored with Natural England.

6.6 The latest visitor survey data has been used to update the original SANG provision rate calculation carried out by the South East Plan Assessor, and differing scenarios are tested to examine the influence of variations in component SPA patch visitor density on the SANG provision rate calculation. That SANGs should ensure at least an equivalent experience to the

SPA in terms of 'busyness' is fundamental to the SANG provision rate calculation, and this is to ensure that they can successfully intercept visits that would otherwise be made to the SPA. Overall, these calculations support the starting provision rate of 8 ha per 1,000 residents, based on the visitor pressure on the SPA as a whole. Busyness of a site, and the ability to avoid conflict with other users, was the most important site selection feature for dog walkers reported during the 2020 greenspace survey. Therefore variations in SANG provision rate have been considered in light of the list of potential SANG alternatives reviewed in the SANG Research Study (LUC, 2020). Sites that are considered, based on the findings of this study, to have potential to come forward as modified SANGs/SANG networks are set out in **Appendix 1**, alongside their potential provision rate and the associated quantum of housing that each site could serve.

6.7 This latter component of the review indicates that there is a large pool of potential SANG sites that HRSHC can further research the deliverability of. Assuming that 50% of these sites could be delivered in appropriate locations and timescales relative to proposed housing, the objectively assessed housing need set out by the 2018 SHMA could be supported for circa 7 years, with many other sites previously considered within the SANG Background Paper still potentially available for future review.

## Conclusions

6.8 This study has found that modifications to SANG provision are already being accepted across the TBH region and that duly 'modified' forms of SANG represent a substantial proportion of the extant impact avoidance apparatus. Relaxation of the 2.3-2.5 km circular walk requirement in some cases, particularly within individual SANGs provided as part of a wider SANG/greenspace network, would increase opportunities to proactively and transparently plan for future mitigation capacity requirements within the HMA, while maintaining the capability to provide SPA mitigation on an equivalent basis to many existing SANGs.

6.9 The recent Access Management Research Study indicates that SANGs and modified SANG networks could continue to be supported by incremental expansion of the warden service as part of the SAMM project, and this study suggests that the delivery of additional Greenspace Support Projects could also be considered as part of a wider SPA mitigation package in line with approaches being taken elsewhere.

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# Appendix 1

## Review of Potential SANG Sites within HMA

**Table A1: EPR evaluation of potential SANG alternatives considered in Table 6.2 of SANG Research Study (LUC, 2020), with potential provision rate and housing quantum that could be served if SANG were to come forward.**

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| Hart | Hook Common | 206.8 | Natural and semi-natural greenspace | Larger SANG with Larger Catchment | The low respondent count for this survey suggests that there may be significant capacity for additional visits. Potential for a range of interventions / enhancements to cater for a range of users whilst avoiding potential conflict. | Could come forward as standard SANG with 5km catchment. Influence of M3 would need to be considered, and whole area unlikely to come forward. Assume 100ha to north of M3 only. Existing SSSI designation (Hook Common and Bartley Heath) would need careful consideration. | 5km | 12ha/1,000 | 3,500 |
| Hart | Odiham Common | 116 | Natural and semi-natural greenspace | Larger SANG with Larger Catchment | The low respondent count for this survey suggests that there may be significant capacity for additional visits. Potential for a range of interventions / enhancements to cater for a | Could come forward as standard SANG with 5km catchment. Existing SSSI designation (Odiham Common with Bagwell Green and Shaw) | 5km | 12ha/1,000 | 4,000 |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | range of users whilst avoiding potential conflict. | would need careful consideration. | | | |
| Hart | Heckfield Heath | 76.6 | Natural and semi-natural greenspace | Larger SANG with Larger Catchment | Potential for a range of interventions / enhancements to cater for a range of users whilst avoiding potential conflict. Few environmental constraints / designations. | Could come forward as standard SANG with 5km catchment. | 5km | 10ha/1,000 | 3,200 |
| Hart | Yateley Green | 23.2 | Natural and semi-natural greenspace | SANG Networks | A range of habitats (grassland / woodland) with potential to enhance for a range of users. Easy access from surrounding residential areas. Relatively low respondent count for size of site. Further work would need to be undertaken to understand impact of use for large events on capacity. Potential to improve connectivity to surrounding sites (Castor Court Woods, Moulsham Green, Horseshoe Lake SANG, Trilakes Country Park) | Likely to be difficult to reconcile existing formal uses with natural countryside qualities required of SANG. | N/A | N/A | N/A |
| Hart | Elvetham Heath | 20.7 | Natural and semi-natural greenspace | SANG Networks | Local Nature Reserve. Relatively low respondent count for size of site with potential capacity for | Woodland/heathland LNR. Could come forward as standard | 5km | 12ha/1,000 | 720 |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | additional visits. A range of habitats with potential to enhance to cater for a range of users. Potential to improve connectivity to surrounding sites (woodland walk, Twyford Close Open Space, Broomhurst Wood) | SANG with 5km catchment. | | | |
| Hart | Zebon Copse | 12.4 | Natural and semi-natural greenspace / Parks and Gardens | SANG Networks | Varied site with formal and informal provision. Good existing connectivity to Basingstoke Canal. | Woodland LNR that could provide walk of up to 2km if connected to woodland on opposite side of Basingstoke Canal (Zephon Common/Peatmoor Copse). | 4km | 14ha/1,000 | 370 |
| Hart | Basingbourne Park | 8.8 | Park and garden | SANG Networks | Varied site (formal / informal provision) with potential to enhance and cater for a range of users. Relatively low respondents count suggesting there is capacity for additional visits. Potential to enhance connectivity to Basingstoke Canal. | Woodland site that could provide shorter walk, but also potentially link up with Zebon Copse and Basingstoke Canal as part of a small local network. | 2km | 14ha/1,000 | 260 |
| Hart | Castor Court Woods | 1.9 | Green corridors | SANG Networks<br>Linear SANG | Small site in close proximity to residential areas. Potential to improve | Too small and linear. | N/A | N/A | N/A |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Smaller SANG with Smaller Catchment | connectivity to larger surrounding sites. | | | | |
| Hart | Odiham Recreation Ground | 1.2 | Parks and Gardens | Smaller SANG with Smaller Catchment | Small site in close proximity to residential areas. Potential to enhance the 'offer' and cater for a wider range of users. | Too small. | N/A | N/A | N/A |
| Surrey Heath | Blackwater river valley walk | 46.2 | Natural and semi-natural greenspace | SANG Networks<br><br>Larger SANG with Larger Catchment | Large site with few environmental constraints / designations. Existing connectivity to surrounding open spaces (e.g. Coleford Bridge Road Lake) via Blackwater River Path. | Could come forward as standard SANG with 5km catchment, notwithstanding deliverability issues identified in SANG Background Paper Appendix 6. | 5km | 12ha/1,000 | 1,500 |
| Surrey Heath | Land East of the Maultway (north section) | 40 | Natural and semi-natural greenspace | Larger SANG with Larger Catchment | Potential to enhance and provide an improved offer for a wide range of users (cycling / horse riding). Existing parking with potential to enhance. Potential to improve pedestrian connectivity / access from surrounding residential areas. | Could come forward as standard SANG with 5km catchment, subject to addressing any issues regarding noise given location between M3 and railway line. Could connect to existing Earlswood Park SANG. Any connection to very nearby SPA would | 5km | 10ha/1,000 | 1,500 |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | also need careful consideration. Assume exclusion of c. 5 ha along boundaries. | | | |
| Surrey Heath | Frimley Fuel Allotments | 26.5 | Natural and semi-natural greenspace | SANG Networks | Wide range of existing users. Near several other sites with potential to manage in a coordinated way and maximise the 'offer'. Potential to increase capacity of existing nearby SANGS (Ridgewood SANG, St Catherine's Road). | OS mapping shows small existing 'Frimley Fuel Allotments SANG', but potential to expand as standard SANG and connect with St Catherine's Road SANG. | 5km | 10ha/1,000 | 1,100 |
| Surrey Heath | Watchetts Park and Lakes | 12 | Park and Garden | SANG Networks | Wide range of existing users. Near several other sites with potential to manage in a coordinated way and maximise the 'offer'. | Formal park would need significant habitat creation to provide a semi-natural offering, which may not be reconciled with formal use requirements. Connection to Watchetts Lake would increase offering if suitable link could be secured, to provide a SANG network. | 4km | 12ha/1,000 | 400 |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| Surrey Heath | Watchmoor Reserve | 1.7 | Natural and semi-natural greenspace | Smaller SANG | A notable number of respondents listed this small site. A range of activities are undertaken. A valuable example of the features and facilities that may be provided at a smaller SANG site. | Too small. | N/A | N/A | N/A |
| Rushmoor | Manor Park | 11.5 | Park and garden | SANG Networks | A range of feature and facilities provided. In close proximity to several other open spaces offering a range of different landscapes (Brickfields Country Park, Redan Gardens) | Could function as SANG network with Brickfields Park. | 2km | 14ha/1,000 | 340 |
| Rushmoor | Queen Elizabeth Park | 9.3 | Park and garden | SANG Networks | A range of features and facilities provided. The site is near residential areas and surrounding open spaces. Nearby green spaces include Cove Brook & Blunden Road. | Wooded site that could provide shorter circular walk with wider network with adjacent Southwood Country Park SANG and Blackwater river valley walk. | 2km | 14ha/1,000 | 275 |
| Rushmoor | King George V Playing Fields | 8.4 | Park and garden | SANG Networks | Potential to enhance site for a wider range of uses. Near several other sites with potential to manage in a coordinated way and maximise the ‘offer’. Nearby | Formal park would need significant habitat creation to provide a semi-natural offering, which may not be reconciled with | N/A | N/A | N/A |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | sites include Queens Road Recreation Ground, Salesian View Playing Field & Ramilies Park. | formal use requirements. Poor connections to other SANGs or semi-natural sites. Unlikely to be suitable. | | | |
| Rushmoor | Cove Brook Greenway | 7.8 | Green corridors | SANG Networks<br>Linear SANG | Linear open space connecting several open space, including Blunden Road Recreation Ground, Moor Road Playing Fields, Camarthen Close, Oak Farm Playing Fields, Blackwater River Path. | Review potential role in *supporting* wider SANG network, but not as SANG alternative itself. | N/A | N/A | N/A |
| Rushmoor | Brickfields Country Park | 3.1 | Natural and semi-natural greenspace | SANG Networks | In close proximity to several other green spaces offering a range of different landscapes. There is potential to manage sites in a coordinated way and maximise the 'offer'. Nearby green spaces include Blackwater Walk & Tice's Meadow Nature Reserve (outside of the borough). | Could function as a SANG network with Manor Park. | 2km | 14ha/1,000 | 100 |
| Rushmoor | Blackwater Walk | 1.3 | Green corridors | SANG Networks<br>Linear SANG | Small site linking several nearby green spaces including Aldershot Park and Tice's Meadow Nature | Too small. | N/A | N/A | N/A |

| LPA | Site name | Size (ha) | Open space typology | LUC alternative SANG type | LUC analysis | EPR evaluation | SANG catchment | Potential provision rate (after offsetting/ discounting) | Potential housing quantum released (rough estimate) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | Smaller SANG with Smaller Catchment | Reserve (outside of the borough). | | | | |
| Rushmoor | Prince Charles Recreation Ground | 0.7 | Parks and Gardens | Smaller SANG with Smaller Catchment | Small site with potential to enhance and improve the offer for local users. Nearby residential areas. | Too small. | N/A | N/A | N/A |