

# Purbeck District Council Core Strategy Examination in Public

Hearing Statement  
on behalf of Ashvilla Estates (Wareham) Ltd  
(Respondent Reference 2799)

Matter 14: Central Purbeck (Policy CEN)

April 2012



**Purbeck District Council Core Strategy**

**Examination in Public**

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(Respondent Reference: 2799)**

**Matter 14: Central Purbeck (Policy CEN)**

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## **1.0 INTRODUCTION**

- 1.1 This Statement is submitted on behalf of Ashvilla Estates (Wareham) Ltd to Matter 14: Central Purbeck (Policy CEN) of the Examination in Public into the Purbeck District Core Strategy Examination in Public. Ashvilla Estates (Wareham) Ltd are the promoters of strategic residential led development of land to the West of Wareham.
- 1.2 This Statement is specifically intended to respond to the Inspector's questions and set out Ashvilla Estates (Wareham) Ltd case on matters of soundness.

## 2.0 RESPONSE TO INSPECTOR'S QUESTIONS

### **Issue 14.1: Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?**

- 14.1.1 The settlement hierarchy fails to provide sufficient focus to Wareham and Swanage in terms of the distribution of development. Our hearing statements to Matters 1, 2 and 4 have set out our case that PDC<sup>1</sup> has failed to justify adequately why it is not addressing the evidence of housing need in the District in accordance with national policy and local needs, thereby the Core Strategy is not sound as it is not positively prepared to meet objectively assessed development requirements. The Council proposes to accommodate only 30% of the remaining housing requirement at Central Purbeck is inadequate and demonstrates the imbalance in the Council's approach.
- 14.1.2 The only reasonable location to extend Wareham (in order to address housing need) lies on the western edge of the settlement; physically adjoined to the original town, rather than the more detached North Wareham area, which in itself is constrained by the Green Belt.
- 14.1.3 Worgret Manor, controlled by Ashvilla Estates (Wareham) Ltd, lies on the western periphery of Wareham (125 hectares). Built development can be accommodated on an area of about 35ha with the remainder of the land to the south and west left for the purposes of public open space, strategic SANG, recreation and nature conservation.
- 14.1.4 A strategic SANG at Worgret Manor (**Appendix 1**), would achieve several objectives and ensure that a higher quantum of development (required to meet housing needs and sustain the economy):
- Greatly enhance the available range of recreation opportunities around Wareham;
  - Attract many existing users of the heaths to a nearer alternative recreational facility;
  - Offer direct access on foot from new and existing development in the west of Wareham;
  - Provide a destination and viewpoint for tourist traffic passing through to Dorchester and west Dorset;
  - The potential for a sustainable transport connection between Wareham and Swanage through the provision of a new railway halt with park and walk scheme; and

- Allow the re-creation of what was, historically, heathland and grassland, and an enhancement of biodiversity in the area between Worgret Heath and the Frome, supported by onsite Nature Conservation Education facilities.
- 14.1.5 Worgret Manor is on the northern periphery of the Dorset AONB. National policy requires its protection. However, AONB is not of the same order as the Habitat Regulations. The Council proposes that significant strategic development will occur around Swanage: within the AONB. National policy requires that effect to be weighed against alternative effects. In the context of the Core Strategy, those alternative effects could be damage to Habitat Regulation sites.
- 14.1.6 The landscape character of the site does not fully reflect the Dorset Heathlands of the AONB. There will be some limited landscape and visual impact on the character and appearance of the AONB, however, this can be mitigated through the design and layout of the built forms of new development and the identification of appropriate areas to introduce new structural landscaping. CD32 confirms (page 43) that the Worgret manor development option would have **“some impact”** but not a major impact on the AONB: the same as three of the four settlement extension site options at Swanage.
- 14.1.7 In light of the comments made in our hearing statements to Policies LD and HS a greater quantity of new homes should be planned for in Central Purbeck (Wareham) and the policy should be amended to require at least 700 homes at Wareham within the plan period (there is potential for up to 1,000 dwellings on Worgret manor alone), including 200 inside the bypass and a further 500 at Worgret Manor to the west of Wareham including the provision of a strategic SANG to serve development at Wareham. 50% of these dwellings should be provided as affordable homes.

**Issue 14.2: Is the Council's approach towards the modification of the green belt boundary in Central Purbeck appropriate and adequately justified?**

- 14.2.1 PPG2 has been cancelled<sup>2</sup> as of 27<sup>th</sup> March following the publication of the NPPF. Paragraphs 79-92 of the NPPF now provide national policy guidance on Green Belts. The five purposes of Green Belt are retained by the NPPF.<sup>3</sup> Once established Green Belt boundaries **“should only be altered in exceptional circumstances”<sup>4</sup>**. If LPAs are considering amendments to boundaries they must have regard to their

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<sup>1</sup> Purbeck District Council

<sup>2</sup> Confirmed by Annex 3 of NPPF

<sup>3</sup> NPPF Paragraph 80

<sup>4</sup> NPPF Paragraph 83

intended permanence in the longer term: beyond the plan period. It is important to account for the need to promote sustainable patterns of development.<sup>5</sup>

14.2.2 Concern is raised with regard the inclusion of additional land within the Green Belt in locations which either do not fulfil the reasons for inclusion within the Green Belt nor take account of the need to promote sustainable development in the longer term. Specific concern has been raised in our representations to the Green Belt review and the Core Strategy in respect of a proposed extension of the Green belt boundary shown on Map 5<sup>6</sup>, land north of Worgret Road and west of the by-pass. The explanation given on Map 17<sup>7</sup> is that the revised boundary will use roads and forest boundary and **“would reinforce the function of the Green Belt in preventing a westward sprawl of the town, it would also allow it to align with a more recognisable landline, i.e. the road.”**

14.2.3 Exceptional circumstances simply do not exist to require additional land west of Wareham to be added to the Green Belt and the rationale given above. Paragraph 7.2.2 (i) of CD127 states that:

**“the unrestricted sprawl of Wareham would still be prevented by the gap retained between Wareham and North Wareham, which is also flood plain. The by-pass would prevent any westward sprawl of the settlement.”**

14.2.4 The proposed realignment of the Green Belt boundary to extend westwards of Wareham between the present boundary and Worgret Road presented in Map 5 is unjustifiable; it does not fulfil any of the purposes of the Green Belt<sup>8</sup>.

14.2.5 Countryside policy within draft Core Strategy Policy CO and the national policy guidance in the NPPF is entirely adequate in ensuring that the countryside is protected from inappropriate development.

14.2.6 In the medium to long term land to the west of Wareham is one of the few remaining options to accommodate future development adjoining the town (the Settlement Extension Sites Map for Wareham confirms this<sup>9</sup>) – as such it is illogical to further constrain Wareham by extending the Green Belt designation.

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<sup>5</sup> NPPF Paragraph 84

<sup>6</sup> CD127 page 23

<sup>7</sup> CD127 page 51

<sup>8</sup> NPPF Paragraph 80

<sup>9</sup> CD32 Page 16



- 14.2.7 In seeking to release land within the bypass for the 200 homes at Worgret Road, the Council considers that in terms of land north of Worgret Road it does not contribute to the historic setting of the town. The gap between Wareham and North Wareham will continue to exist and ensure there is no coalescence with Wareham and other settlements<sup>10</sup>.
- 14.2.8 Moreover, Map 4 of CD127 states that a hedge line forming the proposed settlement edge on the inside of the bypass **"would provide a logical new Green Belt boundary and provide screening to reduce the visual impact of any new development."** The current Green Belt boundary follows this hedge line to the west of the bypass and this is considered to be the most appropriate Green Belt boundary.
- 14.2.9 Map 17 details that **"Adjusting the Green Belt to include land between the present boundary and Worgret Road would help reinforce the function of the Green Belt in preventing a westward sprawl of the town."** This flatly contradicts the justification for the release of Green Belt land inside the bypass for housing development.
- 14.2.10 The land west of the bypass at Wareham between the existing Green Belt boundary and Worgret Road is not required for Green Belt; it is not required in light of the purposes for including land within the Green Belt as advised by the NPPF. Therefore the Core Strategy is not sound in that it lacks justification, is not effective as it would not be flexible to accommodate future development nor would accord with national policy the NPPF.

**Issue 14.3: Wareham is a key town in the District but does not have an employment allocation. Is this approach justified?**

- 14.3.1 In light of the 8ha of employment land with planning permission at Holton Heath and a further 4ha of land at Admiralty Park with the benefit of a Certificate of Lawful Development<sup>11</sup> it is considered that an employment allocation is not required at Wareham as the above sites can serve Central Purbeck. However, strategic development to the west of Wareham would be capable of accommodating employment generating uses which would add to the range of services and facilities at Wareham.

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<sup>10</sup> CD127 Map 4

<sup>11</sup> Submission Core Strategy Paragraph 6.5.3

**Issue 14.4: Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of size, location and use and can be fully implemented?**

*"Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of size?"*

14.4.1 There is insufficient evidence within the Core Strategy to be able to demonstrate that the proposed SANGs are appropriate in terms of size. The Core Strategy does not provide specific boundaries for the SANG sites proposed, only a map showing their broad locations. From the map provided within the Core Strategy the extent of each proposed SANG site cannot be measured and no details on their size is provided within the text.

14.4.2 Although boundaries for the SANG sites are not provided within the Core Strategy, it is possible to make assumptions on the likely extent of the mitigation land based on surrounding land use. We are unable to envisage the possibility of a SANG well in excess of 20ha at either of the locations proposed. This therefore falls far short of the 30-40ha that the HRA<sup>12</sup> estimates would be necessary **"in order to provide a self-contained site that is large enough to attract dog-walkers and users, and adequately mitigate for the housing numbers proposed"**. It also brings into question the ability of the SANGs to incorporate a 2.3-2.5km circular walk, one of the 'must-have' features in Natural England's SANG Quality Guidelines (**Appendix 2**). The two SANGs proposed are therefore, in our view, highly likely to be insufficient in size to effectively mitigate recreational effects on nearby European Sites.

*"Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of location?"*

14.4.3 In the context of Central Purbeck and Wareham the HRA<sup>13</sup> describes the following broad locations as ideal for SANGs provision:

**"Near Wareham, to the west or north-west of the town, drawing new residents away from sensitive locations within Wareham Forest and Hartland/Stoborough/Arne."**

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<sup>12</sup> Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

<sup>13</sup> SD16

It also states that **“the only option for SANGs provision [in support of housing at Wareham] is to the west of the town”** and goes on to describe potential for SANG **“either side of the Wareham by-pass utilising the current underpass and land adjacent to Worgret Road”**.

- 14.4.4 Research on the Dorset Heaths SPA<sup>14</sup> has shown that 75% of visitors walking to reach the heaths had walked less than 500m and 89% had walked less than 1km (Clarke et al. 2006). A similar pattern of visitor access was also found in the Thames Basin Heaths (Liley et al. 2006). Consequently, in respect of the Thames Basin heaths, the JSPB<sup>15</sup> and Natural England use a 400m linear distance as the indicative walking catchment for a heathland site or SANG.
- 14.4.5 **Appendix 3** shows that travel distances in excess of 1.7km are likely to be required to reach the Heathland Mitigation sites from the proposed new housing at Worgret Road. The Worgret Road site is therefore too far away from both of the proposed SANG sites for its new residents to be able to easily walk to pursue their recreational activities, and that the majority, if not all, of the new residents at the Worgret Road site will need to drive to reach the SANG sites proposed.
- 14.4.6 The HRA<sup>16</sup> sets out relative drive times to reach heathland access points from locations in Purbeck, and shows that a large number of heathland sites are within five minutes drive of the proposed development site at Worgret Road. Stoborough & Creech Heaths and Povington & Grange Heaths are directly adjacent to the proposed SANG sites, with Hartland Moor and Arne only slightly further to the east and with Worgret Heath and Mordon Bog & Hyde Heath within equivalent travel distance to the west and north, respectively. Therefore the SANG sites proposed are no more accessible by car from the Worgret Road site than a number of heathland sites, and therefore their ability to act as interceptor sites to secure avoidance of recreational effects on the heaths is severely compromised.
- 14.4.7 Furthermore the location of the proposed SANGs directly abutting two heathland SAC sites has the potential to compound the effects of visitor pressure on the heaths as a result of visitors continuing their walk onto the heaths from the SANG. Given the location of the SANG adjacent to Stoborough & Creech Heaths SSSI and Povington & Grange Heaths SSSI, if the SANGs cannot deliver the length of circular walk sought

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<sup>14</sup> Special Protection Area

<sup>15</sup> Joint Strategic Planning Board

<sup>16</sup> Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

by visitors it is even more likely that their walk will continue onto the heathland sites.

14.4.8 The HRA<sup>17</sup> sets out predicted changes in visitor rates for different heathland blocks as a result of development, and finds that Stoborough Heath has one of the highest relative anticipated increases in visitor rates across Purbeck. Therefore Stoborough & Creech Heaths SSSI is particularly at risk from increased recreational pressure as a result of the Nutcrack Lane SANG.

14.4.9 The two proposed SANG sites located south of Wareham along the A351 do not accord with the ideals for broad SANG locations set out in the HRA<sup>18</sup>. They are not easily accessible from the proposed development site at Worgret Road and their location directly adjacent to two SAC<sup>19</sup> sites has the potential to further compound effects from development by drawing users to the sites but then facilitating their access on to the heath. In our view both proposed SANG sites are not appropriately located and there is no evidence set out in the Core Strategy to justify or demonstrate the appropriateness of their location over and above the convenience that the land is within the same ownership as the development site.

14.4.10 The HRA<sup>20</sup> states that **"mitigation measures need to be specifically tailored to development locations"** and **"should ensure that there is no net increase in visitor pressure on to the heathland sites"**. Based on the points set out above, it is our view that the mitigation sites proposed satisfy neither of these criteria.

*"Is there sufficient evidence to demonstrate that the proposed SANGs are appropriate in terms of use?"*

14.4.11 Research by Footprint Ecology in the Dorset Heaths and the Thames Basin Heaths has shown that accessibility, either on foot or by car, is an extremely important factor influencing visitor selection of sites. If the SANGs are not easily accessible to the new residents of the proposed development, then this strongly indicates that the sites will not be appropriate for their intended use as heathland interceptor sites.

14.4.12 Over and above accessibility and broad location, whether a SANG can be effective in achieving its intended use as a heathland interceptor site is influenced by the quality

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<sup>17</sup> Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

<sup>18</sup> Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

<sup>19</sup> Special Areas of Conservation

<sup>20</sup> Habitats Regulations Assessment SD16 (2011)

of the site. Natural England have set out guidance on the specific quality features that a SANG should possess to attract the specific user group of dog walkers who pursue recreation on heathland sites<sup>21</sup>.

- 14.4.13 The Core Strategy does not provide sufficient evidence to demonstrate that the proposed SANGs will include any of Natural England's 'must-have' features. Although the broad locations are shown on a map, no further detail regarding site design is set out. There is therefore insufficient evidence to demonstrate that the proposed SANGs will be appropriate for their intended use, including a 2.3-2.5km circular walk.

*"Is there sufficient evidence to demonstrate that the proposed SANGs can be fully implemented?"*

- 14.4.14 The HRA<sup>22</sup> states that:

**"If SANGs are to draw visitors away from the designated sites they have to be of sufficient size, character and quality. The characteristics of the heaths (large attractive sites with views) and spatial distribution of development in Purbeck (scattered across a number of settlements), indicate that SANGs provision needs to be delivered by a small number of well located, large sites, each sufficient to 'compete' with the heaths."**

- 14.4.15 It is our view that there is insufficient evidence within the Core Strategy to demonstrate that the proposed SANGs satisfy the criteria set out in the HRA in terms of size, character and quality. Moreover it is our opinion that the proposed SANGs will not be able to satisfy these criteria and do not represent the best option for heathland mitigation in respect of proposed development at Worgret Road.
- 14.4.16 Contrary to the Pre-submission Draft of the Core Strategy which states that **"there is currently no obvious site to provide suitable SANGS to mitigate growth to the west of Wareham"** an alternative location for SANGs to the west of the bypass does exist, at Worgret Manor.

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<sup>21</sup> "Guidelines for the creation of Suitable Accessible Natural Green Space (SANGS)" and in their 'Site Quality Checklist' in Appendix 1 (2008)

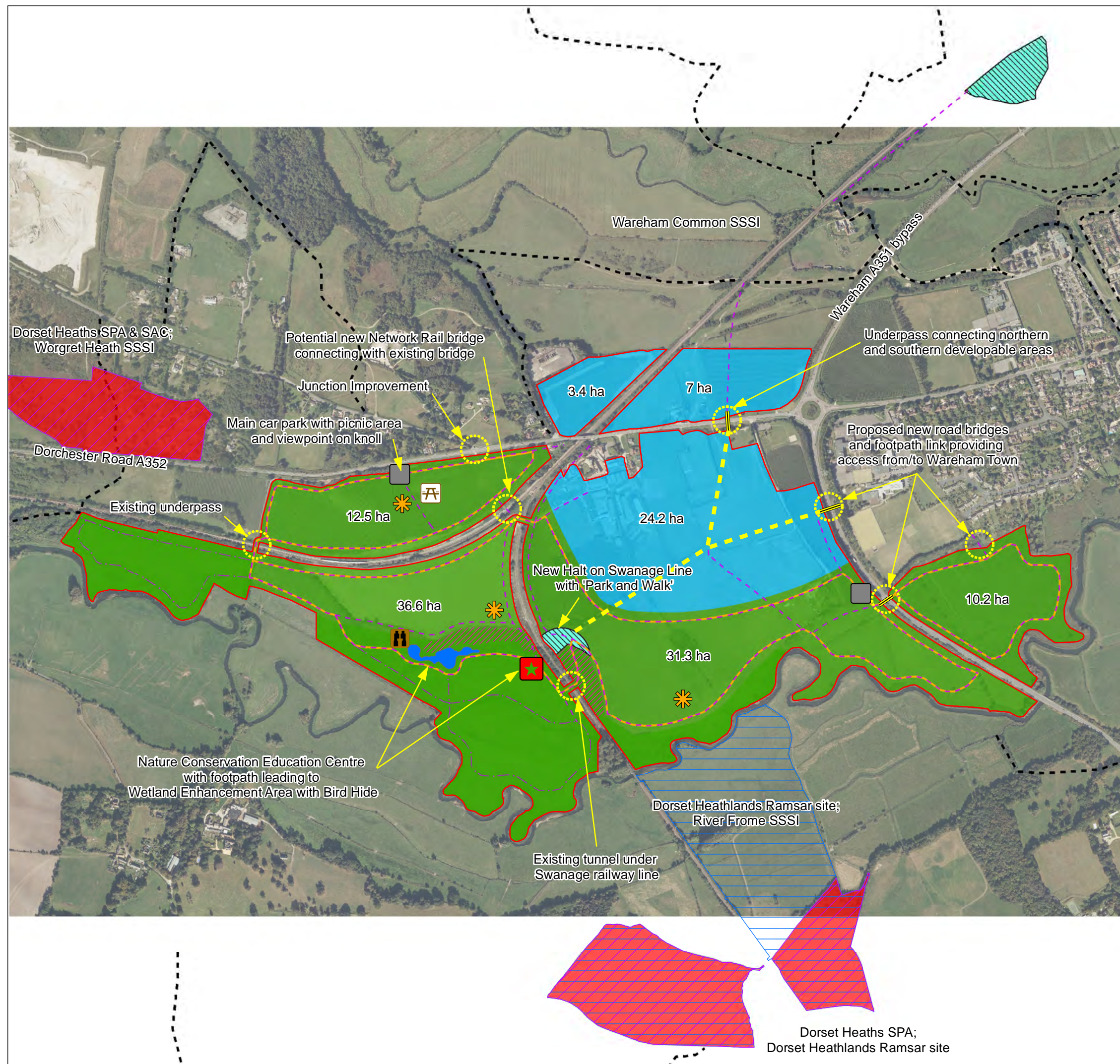
<sup>22</sup> Habitats Regulations Assessment SD6 (2010) and SD16 (2011)

- 14.4.17 Accordingly it is considered that the proposed SANGs at Stoborough will not fulfil their objective in creating avoidance measures to ensure no net effect on the Dorset Heaths SPA and the Core Strategy is therefore unsound in that it is neither justified in relation to evidence or the consideration of alternatives nor effective in terms of delivery. The Core Strategy therefore fails to comply with national policy in section 11 of the NPPF and does not meet the legal requirements with respect to the Habitats Directive.

## **APPENDIX 1**







## Appendix 1 Worgret Manor Farm SANG Indicative Layout

### KEY

#### Existing features

- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Ramsar site
- Site of Special Scientific Interest (SSSI)
- Site of Nature Conservation Importance (SNCI)
- Public Right Of Way (PROW)

#### Proposed features

- Site boundary
- Developable area (34.6 ha)
- Suitable Alternative Natural Greenspace (SANG; 90.6 ha)
- Footpath/cyclepath/bridleway\*
- Footpath with seasonally controlled access\*
- SANG circular walk (7.5 km)
- Car park
- Viewpoint
- Picnic area
- ★ Nature Conservation Education Centre
- H Bird hide
- Park and Walk/Park and Ride
- Road bridge/underpass
- Road link

\* Total proposed footpath length 12.5 km

SCALE: 1:9,500 at A3

0 100 200 300 400 500 Metres



Ecological Planning & Research

CLIENT: Ashvilla Estates (Wareham) Ltd

PROJECT: Worgret Manor Farm

DATE: April 2012

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## **APPENDIX 2**



## **Guidelines for the creation of Suitable Accessible Natural Green Space (SANGS)**

### **Introduction**

'Suitable Accessible Natural Green Space' (SANGS) is the name given to green space that is of a quality and type suitable to be used as mitigation within the Thames Basin Heaths Planning Zone.

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

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

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

These guidelines relate specifically to the means to provide mitigation for housing within the Thames Basin Heaths Planning Zone. They do not address nor preclude the other functions of green space (e.g. provision of disabled access). Other functions may be provided within SANGS, as long as this does not conflict with the specific function of mitigating visitor impacts on the SPA.

SANGS may be created from:

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

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

### **The Character of the SPA and its Visitors**

The Thames Basin Heaths SPA is made up of 13 Sites of Special Scientific Interest, and consists of a mixture of heathland, mire, and woodland habitats. They are essentially 'heathy' in character. The topography is varied and most sites have a large component of trees and some contain streams, ponds and small lakes. Some are freely accessible to the public and most have a degree of public access, though in some areas this is restricted by army, forestry or other operations.

A recent survey showed that more than 83% of visitors to the SPA arrive by car, though access points adjacent to housing estates showed a greater proportion arriving on foot (up to 100% in one case). 70% of those who visited by car had come from within 5km of the access point onto the SPA. A very large proportion of the SPA visitors are dog walkers, many of whom visit the particular site on a regular (more or less daily) basis and spend less than an hour there, walking on average

about 2.5km. Almost 50% are retired or part-time workers and the majority are women. Further detailed information on visitors can be found in the reports referenced at the end of this document.

### **Guidelines for the Quality of SANGS**

The quality guidelines have been sub-divided into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from visitor surveys carried out at heathland sites within the Thames Basin Heaths area or within the Dorset heathlands. These are listed as references at the end of this document.

The principle criteria contained in the Guidelines have also been put into a checklist format which are contained in Appendix 1.

### **Accessibility**

**Most visitors come by car and want the site to be fairly close to home.** Unless SANGS are provided for the sole use of a local population living within a 400 metre catchment around the site, then **the availability of adequate car parking at sites larger than 10 ha is essential.** The amount and nature of parking provision should reflect the anticipated use of the site by visitors and the catchment size of the SANGS. It should provide an attractive alternative to parking by the part of SPA for which it is mitigation. **Car parks should be clearly signposted and easily accessed.**

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

### **Target groups of Visitors**

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

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

### **Networks of sites**

**The provision of longer routes within larger SANGS is important in determining the effectiveness of the authorities' network of SANGS as mitigation, because a large proportion of visitors to the SPA have long walks or run or bicycle rides.** The design of routes within sites at the smaller than about 40 ha will be critical to providing routes of sufficient length and attractiveness for mitigation purposes.

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. For example, visitors are likely to be less put off by green areas between SANGS than by urban areas, even if they restrict access to rights of way and require dogs to be kept on leads.

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

**Specific guidance on individual SANGS is summarised in Appendix 2. An information sheet for individual SANGS can also be found in Appendix 4.**

### **Paths, Roads and Tracks**

The findings suggest **that SANGS should aim to supply a choice of routes of around 2.5km in length** with both shorter and longer routes of at least 5km as part of the choice, where space permits. The fact that a considerable proportion of visitors were walking up to 5km and beyond suggests **the provision of longer routes should be regarded as a standard**, either on-site or through the connection of sites along green corridors.

Paths do not have to be of any particular width, and both vehicular-sized tracks and narrow PRoW type paths are acceptable to visitors.

The majority of visitors are female and safety is one of the primary concerns of site visitors. **Paths should be routed so that they are perceived as safe by the users**, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well spaced mature trees, or wide rides with vegetation back from the path), especially those routes which are 1-3 km long.

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

A substantial number of visitors like to have surfaced but not tarmac paths, particularly where these blend in well with the landscape. This is not necessary for all paths but **there should be some more visitor-friendly routes built into the structure of a SANGS, particularly those routes which are 1-3 km long.**

### **Artificial Infrastructure**

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

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

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

### **Landscape and Vegetation**

**SANGS do not have to contain heathland or heathy vegetation to provide an effective alternative to the SPA.**

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

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

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

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

### **Restrictions on usage**

The majority of the people using most of the SPA sites come to walk, with or without dogs. At two or three sites there were also a significant number of cyclists and joggers. A small amount of horse riding also occurs at some sites.

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

It may be that in some areas where dog ownership is low or where the cultural mix includes significant numbers of people sensitive to pets, then the provision of areas where dogs are unrestricted can be reduced. It should also be possible to vary restriction over time according to the specific needs of a community, providing effective mitigation is maintained. SANGS proposals which incorporate restrictions on dogs should be in the minority of SANGS and would need to be considered on a case by case basis in relation to the need for restrictions.

### **Assessment of site enhancement as mitigation**

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

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

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

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

SANGS with no evidence of a low level of use should not count in full towards the Delivery Plan standards. Information should be collected by the local planning authority to enable assessment of the level of increased use which can be made of the SANGS. The area of the site which is counted towards the Delivery Plan standards should be proportional to the increase in use of the site. For example, a site already used to half of its expected capacity should count as half of its area towards the standards.

### **Staging of enhancement works**

Where it is proposed to separate the enhancement works on a site into separate stages, to deliver incremental increases in visitor use, the proportion of the increase in visitor use arising from each stage should be estimated. This would enable the granting of planning permission for residential development to be staged in parallel to ensure that the amount of housing permitted does not exceed the capacity of SANGS to mitigate its effects on the SPA.

### **Practicality of enhancement works**

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

### **References**

CLARKE, R.T., LILEY, D., UNDERHILL-DAY, J.C., & ROSE, R.J. (2005). Visitor access patterns on the Dorset Heaths. *English Nature Research Report*.

LILEY, D., JACKSON, D., & UNDERHILL-DAY, J. C. (2006) Visitor access patterns on the Thames Basin Heaths. *English Nature Research Report*.

LILEY, D., MALLORD, J., & LOBLEY, M. (2006) The "Quality" of Green Space: features that attract people to open spaces in the Thames Basin Heaths area. *English Nature Research Report*.



## Appendix 1: Site Quality Checklist – for a suite of SANGS

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

The wording in the list below is precise and has the following meaning:

- Requirements referred to as “must” are essential in **all** SANGS
- Those requirements referred to as “should have” should all be represented **within the suite** of SANGS, but do not all have to be represented in every site.
- All SANGS should have at least one of the “desirable” features.

### Must have

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

### Should have

- SANGS should be clearly sign-posted or advertised in some way.
- SANGS should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.

## **Desirable**

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

## **Appendix 2: Site Quality Checklist – for an individual SANGS**

The wording in the list below is precise and has the following meaning:

- Requirements referred to as “must” or “should have” are essential
- The SANGS should have at least one of the “desirable” features.

### **Must/ Should have**

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

### **Desirable**

- It would be desirable for an owner to be able to take dogs from the car park to the SANGS safely off the lead.
- Where possible it is desirable to choose sites with a gently undulating topography for SANGS

- It is desirable for access points to have signage outlining the layout of the SANGS and the routes available to visitors.
- It is desirable that SANGS provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.
- Where possible it is desirable to have a focal point such as a view point, monument etc within the SANGS.

### **Appendix 3: Background**

The Thames Basin Heaths SPA was designated in 2005 under the Habitats Regulations 1994 to protect the populations of three internationally-threatened bird species that use the heathlands: woodlark, nightjar and Dartford warbler. One of the principle threats to these species is disturbance during their breeding period which collectively extends from February to August. Freely roaming dogs hugely exacerbate the disturbance caused by people visiting the sites.

The Thames Basin Heaths area is much urbanised with little green space available to people apart from the designated areas of heathland. The whole area is also under pressure for more housing.

The Habitats Regulations require an 'appropriate assessment' to be carried out for any plan or project (including housing developments) which may affect the designated interest, either alone or in combination with other plans or projects. The result is that each new planning application within the Thames Basin Heaths Planning Zone would have to be assessed in combination with all the other extant applications. A solution to this situation (which would cause a log jam in the planning system) is the Thames Basin Heaths Delivery Plan.

The Thames Basin Heaths Delivery Framework, which is monitored by the TBH Joint Strategic Partnership Board, provides the framework for addressing new residential development in the Thames Basin Heaths Planning Zone.

The need to provide green space for the community was incorporated into planning policy through PPG 17, originally published in 1991 and revised in 2003. It requires local authorities to set green space standards locally but that these should include aspects of quantity, quality and accessibility. PPG17 illustrates the breadth of type and use of public open spaces that are encompassed by the guidelines. SANGS fit into a small proportion of these. Local authorities may look at provision of SANGS in relation to other public open space provision within their area and identify potential SANGS as part of their audit of green space.

#### Appendix 4: SANGS Information Form

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

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

#### Background information

<b>Name and location of proposed SANGS</b>	<b>Name:</b>  <b>Address:</b>   <b>Grid reference:</b>  <b>(Please attach a map of the site with the boundaries clearly marked)</b>
<b>Size of the proposed SANGS (hectares), excluding water features</b>	
<b>Any current designations on land - e.g. LNR / SNCI</b>	
<b>Current owners name and address. (If there is more than one owner then please attach a map)</b>	
<b>Who manages the land?</b>	
<b>Legal arrangements for the land – e.g. how long is the lease?</b>	
<b>Is there a management plan for the site? (if so, please attach)</b>	

## Current visitor arrangements

<b>Is the site currently accessible to the public?</b>	
<b>Does the site have open access?</b>	
<b>Has there been a visitor survey of the site? (If so, please attach)</b>	
<b>If there has been no visitor survey, please give an indication of the current visitor levels on site</b>	High / Medium / Low
<b>Does the site have existing car parking?</b>	Yes / No  <b>How many car parks?</b>  <b>How many car parking spaces?</b>  <b>(Please mark car parks and numbers of car parking spaces on the site map)</b>
<b>Are there any existing routes or paths on the site?</b>	Yes / No  <b>(Please mark these on the map)</b>
<b>Are there signs to direct people to the site? (Please indicate where and what type of sign)</b>	

## Site quality checklist

This checklist is intended to help identify what is already present on the site and what needs to be developed for the SANGS to be suitable. This information is taken from Appendix 2 – please refer to Appendix 2 for more details.

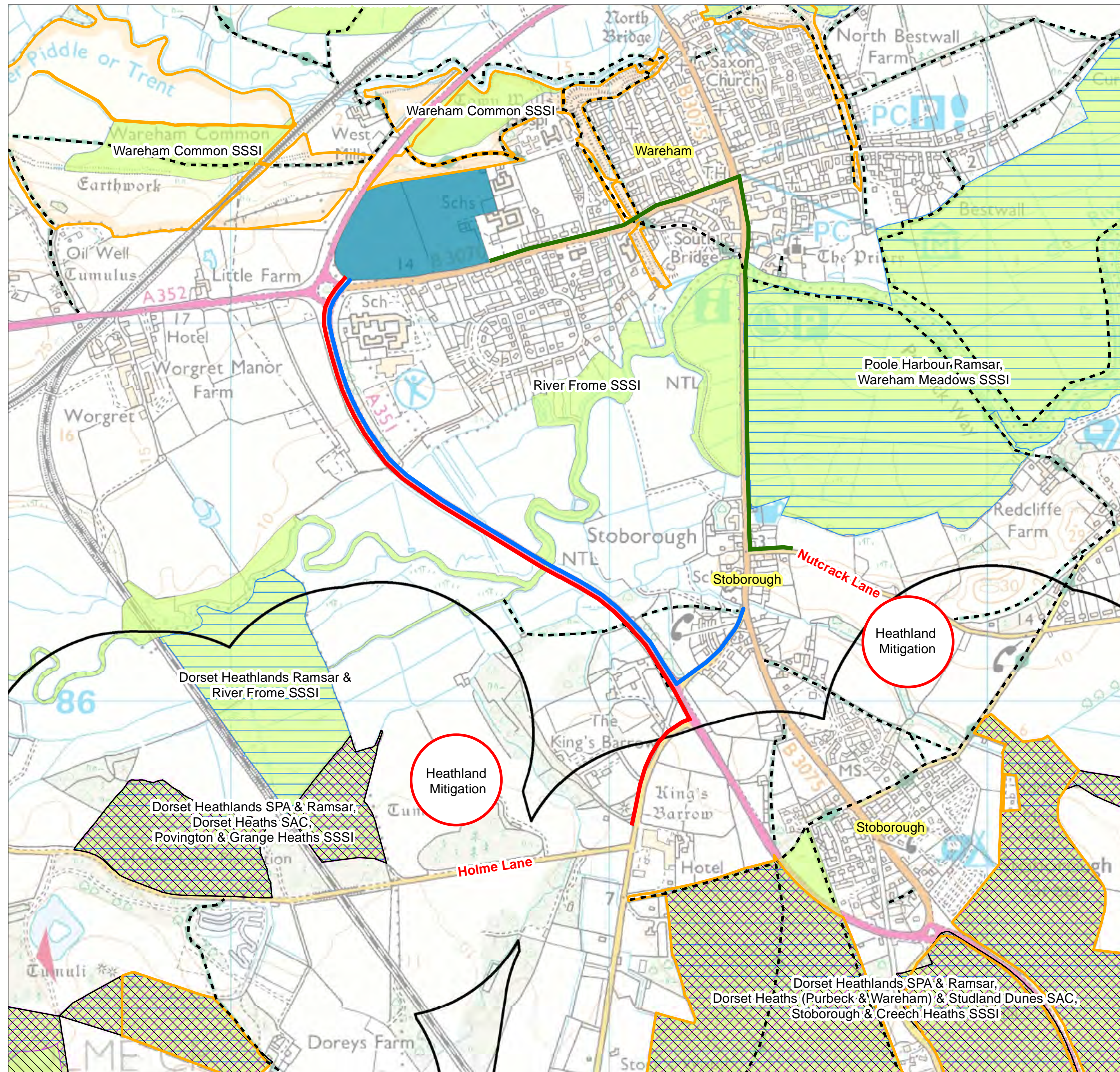
<b>Must/should haves – these criteria are essential for all SANGS</b>			
	<b>Criteria</b>	<b>Current</b>	<b>Future</b>
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)		
2	Circular walk of 2.3-2.5km		
3	Car parks easily and safely accessible by car and clearly sign posted		
4	Access points appropriate for particular visitor use the SANGS is intended to cater for		
5	Safe access route on foot from nearest car park and/or footpath		
6	Circular walk which starts and finishes at the car park		
7	Perceived as safe – no tree and scrub cover along part of walking routes		
8	Paths easily used and well maintained but mostly unsurfaced		
9	Perceived as semi-natural with little intrusion of artificial structures		
10	If larger than 12 ha then a range of habitats should be present		
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead		
12	No unpleasant intrusions (e.g. sewage treatment smells etc)		
13	Clearly sign posted or advertised in some way		



14	Leaflets or website advertising their location to potential users (distributed to homes and made available at entrance points and car parks)		
<b>Desirable features</b>			
	<b>Criteria</b>	<b>Current</b>	<b>Future</b>
15	Can dog owners take dogs from the car park to the SANGS safely off the lead		
16	Gently undulating topography		
17	Access points with signage outlining the layout of the SANGS and routes available to visitors		
18	Naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. Provision of open water is desirable		
19	Focal point such as a view point or monument within the SANGS		

## **APPENDIX 3**





### Appendix 3 Worgret Road Housing Allocation, Nature Conservation Designations and Proposed Heathland Mitigation

- KEY**
- Worgret Road site
  - Site of Special Scientific Interest (SSSI)
  - Special Protection Area (SPA)
  - Special Area of Conservation (SAC)
  - Ramsar Site
  - 400m linear distance from Dorset Heaths/Heathlands boundary
  - CRoW access land
  - Public Right of Way
- Minimum travel distance from Worgret Road site to reach heathland mitigation proposed
- 1778 m
  - 1798 m
  - 1959 m

SCALE: 1:10,000 at A3

0 100 200 300 400 500 Metres



CLIENT: Ashvilla Estates (Wareham) Ltd

PROJECT: Worgret Manor Farm

DATE: April 2012

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