Wellesley

ALDERSHOT

SHADOW HABITATS REGULATIONS ASSESSMENT (HRA)

DECEMBER 2012

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Shadow Habitats Regulations Assessment (HRA)
Wellesley, Aldershot

Grainger plc

December 2012

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Shadow Habitats Regulations Assessment (HRA)

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Shadow Habitats Regulations Assessment (HRA)

Background

Introduction

1.1 This Shadow HRA accompanies a hybrid planning application submitted by Grainger plc to Rushmoor Borough Council (RBC) for the development of land within Aldershot known as the Aldershot Urban Extension (AUE), hereafter referred to as 'Wellesley'. The applicant seeks outline planning permission for residential development of up to 3,850 dwellings with associated infrastructure including access, as well as detailed consent for Maida Zone - Phase 1 comprising 228 dwellings at Wellesley. This Shadow HRA should be read in conjunction with the corresponding application forms and drawings and the suite of documents that support the hybrid application. For further details on the hybrid application please refer to the Planning Statement. The proposals lie within close proximity to two Natura 2000 sites: the Thames Basin Heaths Special Protection Area (TBH SPA) and the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (TAPC SAC), see figure 1.

1.2 The Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations') transpose the requirements of the European Council Directives on the Conservation of Natural Habitats and of Wild Fauna and Flora (42/43/EEC) and the Conservation of Wild Birds (2009/147/EC) into domestic legislation. The Habitats Regulations afford a high level of protection to sites classified as SPAs or designated as SACs as areas that hold significant populations of certain bird species (SPAs), or areas that support habitats or rare species (other than birds) considered to be scarce or vulnerable at a European community level (SACs).

1.3 Under the Habitats Regulations, RBC is a competent authority, responsible for ensuring that development control decisions do not adversely affect the integrity of European sites. This document sets out a consideration of the analysis that RBC will be required to undertake as part of determination of the proposals for Wellesley. The purpose of this is two-fold:

- It allows Grainger the opportunity to check compliance of the proposals for Wellesley against the Habitats Regulations prior to submission of the planning application
- It demonstrates Grainger's approach to addressing the requirements of the Habitats Regulations, and provides RBC with information to carry out its own independent assessment.

1.4 This document should therefore be read as a Shadow Habitats Regulations Assessment (HRA).

Consultation

1.5 This Shadow HRA has been the subject of on-going consultation process with the following key stakeholders:

- Natural England
- Rushmoor Borough Council
- RSPB
- Blackwater Valley Countryside Partnership

1.6 An informal consultation on a consultation draft of this document was carried out in June 2012. All comments received from the stakeholders have been reviewed and incorporated into this current document as appropriate.

1.7 In August 2012, the documentation underwent a further round of consultation as part of pre-application submission to RBC. As for the June consultation exercise, minor comments received have been incorporated into this current document as appropriate.

1.8 Appendix 1 sets out a record of all comments received, the response of this document to them, and provides cross-references to new or changed text against the text of the June Consultation Draft. Appendix 1 also includes the minutes of the workshop at which verbal comments were received from stakeholders, in advance of written comments.

2.0 Background to the Habitats Regulations

Introduction

2.1 The Habitats Regulations include provision to ensure that European sites of importance for nature conservation are protected in the determination of a planning application. To enable this, local authorities are required to carry out a process known as a Habitat Regulations Assessment (HRA), an umbrella term encompassing two tests required under Regulation 61(1) of the Habitats Regulations.

- **Test 1:** having ascertained that the plan is not directly connected to, or necessary for site management for nature conservation, the first test of the HRA, commonly referred to as a screening test, considers whether or not a plan or project is likely to have a significant effect on a European site either alone or in combination with other plans or projects.

- **Test 2:** The second test of the HRA is only relevant to those plans or projects that are screened as likely to have a significant effect alone or in combination, and requires an **appropriate assessment** of the plan or project. The role of the appropriate assessment is to consider the implications of the plan or project for the conservation objectives of the European sites in question, and determine whether they will have an adverse effect on the integrity of the site. Depending on the outcome of the appropriate assessment, a local authority may need to adapt the plan to reflect the outcome of the appropriate assessment process.

Thames Basin Heaths Delivery Framework

2.2 Residential development in southern England has been identified as having the potential to significantly affect breeding populations of Annex 1 birds breeding where it lies in close proximity to heathland SPAs such as the TBH SPA. The extent of the potential impact is such that without mitigation, any residential development is considered likely to have a significant impact on the TBH SPA, alone or in combination with other plans or projects, if it lies within 5km of the SPA boundary.

2.3 The difficulties of housing delivery in close proximity to the TBH SPA are compounded by those of coordinating a consistent and effective response to a European site that extends across eleven local authority boundaries, and that is large and fragmented in nature. Drawing on the overarching policy (policy NRM6) in the South East plan for developments which may affect the TBH SPA, the Thames Basin Heaths Delivery Framework[1] (TBHDF) was published in 2009, promoting a strategic response to the challenges presented in enabling housing delivery in local authority areas heavily constrained by the statutory protection afforded to the TBH SPA.

[1] Thames Basin Heaths Special Protection Area Delivery Framework (Thames Basin Heaths Joint Strategic Partnership Board) (February 2009)

2.4 The TBHDF was produced for use by local authorities in the preparation of local plans, development plan documents and supplementary planning documents. The use of the TBHDF ensures that local authorities make reference to a consistent set of avoidance and mitigation measures relating to the protection of the TBH SPA in the preparation of local development frameworks.

2.5 The TBHDF concluded that net residential development, either alone or in-combination with other plans and projects, is likely to have a significant effect on the interest features of the TBH SPA and these developments should provide, or contribute to the provision of avoidance and mitigation measures. The likely significant effect of a net increase in residential development is mitigated through the provision of Suitable Alternative Natural Greenspace (SANG) and management of access to the SPA.

2.6 The TBHDF identifies a minimum SANG provision of 8ha per 1,000 population and it is recommended that they are at least 2ha in size. The document requires sufficient SANG be provided in advance of dwelling completion to ensure no likely significant effect occurs.

2.7 The delivery framework requires SANG to be provided on new or existing public open space taking into account availability of land and its potential for improvement. Where SANG uses land already open to the public, existing patterns of use need to be taken into account and protected. Any existing nature conservation interest of SANG must be taken into account.

2.8 The adoption by local authorities of the approach laid out in the TBHDF to mitigating the likely significant effects on the interest features of the SPA does not negate the need for an HRA of the relevant SPD/DPD.

2.9 The TBHDF standards included in Rushmoor's adopted Core Strategy, require:

- A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) per 1,000 new occupants either through contributions towards the provision of SANG identified by the borough council, or through on site SANG agreed with Natural England. The SANG must be provided in perpetuity
- Contributions calculated on a per dwelling basis towards Strategic Access Management and Monitoring (SAMM) measures, to be applied across the whole of the TBH SPA.

2.10 Although the TBHDF and Core Strategy make specific reference to the need for large residential developments to provide bespoke mitigation, these standards provide a context to the measures required to mitigate the effects of the Aldershot Urban Extension (AUE) on the TBH SPA. RBC has advised that a suitable package will include a combination of benefits including SANG, biodiversity enhancement, and green infrastructure improvements (RBC, 2011).

2.11 The TBHDF is relevant to the TBH SPA, but is not of direct relevance to the TAPC SAC. Nonetheless, the provision of SANG in relation to a development can also mitigate impacts on a SAC, depending on the interest features concerned and potential for recreational impacts accruing from a development to affect them.

3.0 Determination of likelihood of 'significant effects'

Introduction

3.1 Under Regulation 61(1) of the Habitats Regulations the requirement for an appropriate assessment is triggered where a plan or project, "not directly connected with or necessary to the management of the site but likely to have a significant effect thereon" is proposed. The appropriate assessment considers the implications of the plan or project upon a European site in view of the site's conservation objectives.

3.2 The proposals for Wellesley are not directly connected with, or necessary to the management of the site. Therefore it is necessary to determine whether the proposals are likely to have a significant effect upon the European site to determine if an appropriate assessment is required.

3.3 Determination of whether the proposals for Wellesley are likely to have a significant impact has been approached from two directions, reflecting the close proximity, and therefore the potential of the proposals to affect both the TBH SPA and the TAPC Special Area of Conservation (TAPC SAC):

- Consideration of the proposals against the requirements of RBC's adopted Core Strategy, deriving from the avoidance and mitigation measures set out in the TBHDF necessary to ensure that proposals are not likely to have a significant effect on the TBH SPA
- A pragmatic checklist for assessing likely effects on site integrity[2] published by Natural England (formerly English Nature). This checklist can be used to evaluate the likelihood of significant effects occurring as a result of the proposals and help determine whether an appropriate assessment is required. It is particularly useful in considering whether the proposals are likely to have a significant effect on the TAPC SAC, for which there is no equivalent of the TBHDF.

Site integrity checklist, for use in considering 'likely significant effect'

3.4 The checklist below can used to determine whether the proposals are likely to have a significant effect on a European site. If this process identifies the possibility of a significant effect then an appropriate assessment will be required.

[2] European Sites Guidance. Internal Guidance to decisions on site integrity: A framework for provision of advice to competent authorities. Caroline Chapman. Final Version 1.0. February 2004.

Table 1. Site integrity checklist (English Nature, 2004)

Has the appropriate assessment [or screening for appropriate assessment] shown:
1. The area of Annex I habitats (or composite features) will not be reduced?
2. That there will be no direct effect on the population of the species for which the site was designated or classified?
3. That there will be no indirect effects on the populations of species for which the site was designated or classified due to loss or degradation of their habitat (quantity/quality)?
4. That there will be no changes to the composition of the habitats for which the site was designated (e.g. reduction in species structure, abundance or diversity that comprises the habitat over time)?
5. That there will be no interruption or degradation of the physical, chemical or biological processes that support habitats and species for which the site was designated or classified?

3.5 Advice from the European Commission on the implementation of the provisions of Article 6 (EC, 2000) notes that the notion of what is 'significant' needs to be interpreted objectively. It notes that effects that may be significant in relation to one site may not be significant in relation to another. This position is in accordance with the view of Natural England, which is that each case potentially affecting a European site should be determined on its own merits[3].

3.6 This document sets out the process undertaken to determine whether the proposals for Wellesley are likely to have significant effects, alone or in combination with other plans or projects, on the TBH SPA or the TAPC SAC such that it is necessary to carry out an appropriate assessment.

[3] Research Information Note in Hoskin, R & Tyldesley, D. How the scale of effects on internationally designated conservation sites in Britain has been considered in decision making: A review of authoritative decisions. English Nature Research Reports, No 704. 2006

4.0 Description of the application proposals

Introduction

4.1 The Wellesley proposals are for 3,850 residential units and associated infrastructure that include for the provision of two primary schools, a neighbourhood centre, highways improvements and the provision of 109.2 hectares of SANG as an integral part of the proposal. The application will include a number of strategies, of which the following are of relevance to the process of HRA:

- A Green Infrastructure strategy
- A Surface Water Strategy
- A SANG Delivery Strategy

4.2 The development will be phased over a 13-year period. The SANG network will be provided according to the phasing provisions set out in the draft document entitled *Wellesley: Strategy for the delivery of SANG* (Grainger, 2012) which accompanies this document.

5.0 Baseline information

European sites potentially affected by the proposals: Thursley, Ash, Pirbright and Chobham Heaths (TAPC) – Special Area of Conservation

5.1 The proposals lie within 1.5km of the TAPC SAC. The Ministry of Defence is a major landowner/manager of the area, which is used for firing ranges and military exercises. A Memorandum of Understanding between Natural England and the MoD regulates the impact of these activities on the nature conservation interests of the site.

5.2 The presence of three Annex I habitats that are a primary reason for selection of this site:

4010 Northern Atlantic wet heaths with *Erica tetralix*
This site represents lowland northern Atlantic wet heaths in south east England. The wet heath at Thursley is NVC type M16 *Erica tetralix – Sphagnum compactum* and contains several rare plants, including great sundew *Drosera anglica*, bog hair-grass *Deschampsia setacea*, bog orchid *Hammarbya paludosa* and brown beak-sedge *Rhynchospora fusca*. There are transitions to valley bog and dry heath. Thursley Common is an important site for invertebrates, including the nationally rare white-faced darter *Leuccorhinia dubia*.

4030 European dry heaths
This south east England site contains a series of large fragments of once-continuous heathland. It is selected as a key representative of NVC type H2 *Calluna vulgaris – Ulex minor* dry heathland. This heath type has a marked south eastern and southern distribution. There are transitions to wet heath and valley mire, scrub, woodland and acid grassland, including types rich in annual plants. The European dry heaths support an important assemblage of animal species, including numerous rare and local invertebrate species, European nightjar *Caprimulgus europaeus*, Dartford warbler *Sylvia undata*, sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca*.

7150 Depressions on peat substrates of the *Rhynchosporion*
This site contains examples of depressions on peat substrates of the *Rhynchosporion* in south east England, where it occurs as part of a mosaic associated with valley bog and wet heath. The vegetation is found in natural bog pools of patterned valley mire and in disturbed peat of trackways and former peat-cuttings.

European sites potentially affected by the proposals: Thames Basin Heaths (TBH) – Special Protection Area

5.3 The Thames Basin Heaths SPA is a composite site that is located across the counties of Surrey, Hampshire and Berkshire in southern England. The open heathland habitats overlie sand and gravel sediments which give rise to sandy or peaty acidic soils, supporting dry heathy vegetation on well-drained slopes, wet heath on low-lying shallow slopes and bogs in valleys. The site consists of

tracts of heathland, scrub and woodland, once almost continuous, but now fragmented into separate blocks by roads, urban development and farmland. Less open habitats of scrub, acidic woodland and conifer plantations dominate, within which are scattered areas of open heath and mire.

5.4 The site supports important breeding populations of a number of birds of lowland heathland, especially nightjar and woodlark *Lullula arborea*, both of which nest on the ground, often at the woodland/heathland edge, and Dartford warbler, which often nests in gorse *Ulex* sp. Scattered trees and scrub are used for roosting. Together with the nearby Wealden Heaths SPA and Ashdown Forest SPA, the TBH SPA form part of a complex of heathlands in southern England that support important breeding bird populations.

5.5 This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season;

Dartford warbler, 445 pairs representing at least 27.8% of the breeding population in Great Britain (count as at 1999)

Nightjar, 264 pairs representing at least 7.8% of the breeding population in Great Britain (count mean (1998-99))

Woodlark, 149 pairs representing at least 9.9% of the breeding population in Great Britain (count as at 1997)

5.6 National surveys have shown increase in the UK populations of all three species since the TBH SPA was classified. National Dartford warbler and woodlark surveys were undertaken in 2006, whilst the last national nightjar survey was in 2004.

5.7 In 2006 the UK woodlark population was estimated to be 3,084 pairs, up from 1,633 pairs in 1992. The last nightjar survey recorded 4,606 churring males in the UK in 2004 compared to 3,400 recorded in 1992. The UK Dartford warbler population in 2006 was estimated to be 3,214 pairs, representing a 70% increase in territories since the 1994 survey.

5.8 Since the last national survey of Dartford warblers a series of cold winters has significantly reduced the population of Dartford warblers on southern heathlands. It is estimated that the cold winter of 2008/2009 reduced the breeding population on the TBH SPA and Wealden Heaths SPAs by 88%, from c1000 pairs in 2008 to 117 pairs in 2009.

5.9 2Js Ecology provided data on the distribution of Dartford warbler, woodlark and nightjar territories across Bourley and Long Valley for 2008, 2010 and 2011. This data clearly demonstrates the impact of the cold winter of 2008/2009 on Dartford warblers with the number of territories falling from 36 in 2008 to 5 in 2010.

5.10 Nightjar winter in sub-Saharan Africa and are unaffected by the severity of UK winters. Woodlark are believed to be largely sedentary, wintering close to breeding sites, although it appears some of the population does undertake longer distance movements to wintering areas. Woodlark will move wintering grounds in response to prolonged periods of snow or freezing conditions, thus are less vulnerable to the dramatic population fluctuations experienced by Dartford warblers. Table 1 shows the respective populations of the three species on Bourley and Long Valley during 2008, 2010 and 2011.

Table 2: Populations of Annex 1 species on Bourley and Long Valley 2008, 2010, 2011.

Year	Number of territories		
	Dartford warbler	Woodlark	Nightjar
2008	36	21	24
2010	5	22	21
2011	10	22	21

5.11 Figures 2-4 show the distribution of the territories of these species in relation to Wellesley.

Baseline information: visitor survey of the SANG

5.12 In September 2011, Grainger plc commissioned GeoData Institute, part of the University of Southampton, to carry out an updated visitor survey of the proposed SANG[4]. The survey did not include a visitor survey of the TBH SPA.

5.13 The survey was carried out with the objective of ensuring that it was directly comparable with previous surveys carried out by Defence Estates during September and October 2005 and was required to provide up-to-date data for review of the extent of discounting applicable to the total area of SANG available, and to provide information to develop the conceptual design, implementation and management of the SANG going forward. In particular, the survey was used to establish:

- The user characteristics of the SANG
- The physical characteristics of the SANG that users either liked or didn't like

5.14 A number of key findings are evident from the results. These include:

- There had been no significant change in the number of people using the SANG when compared to the position recorded in 2005
- Approximately a third of the people using the SANG lived within 1 mile

[4] Geodata Institute. Aldershot Urban Expansion: 2011 Visitor Survey. Version 1.0. Prepared on behalf of Grainger plc. 2011.

- Just over a third of people using the site had walked to reach it. It is not clear whether it is the same proportion of people living locally who walk to the site, but this seems a reasonable assumption.
- 34% of those using the site had at least one dog with them and dog walking was the most popular reason for visiting, although walking and cycling also ranked highly.
- 66% of respondents used the SANG all year round
- 71% of users stayed on the site for under an hour (including some who used the path network for purposes of commuting); 26% of visitors stayed between 1 and 3 hours.
- The most popular qualities/characteristics liked by visitors of the sites were: peace and quiet, attractive scenery/countryside and ease of access. Of the other popular responses given, users commented on the suitability of the SANG for dog walking, fishing and playing football, whilst the availability of open space and flat ground were also mentioned.
- A third of visitors disliked an element of the SANG environment. The top dislikes regarding the sites were: litter (18%), dog mess (10%), overgrown paths and narrow paths (12% combined) as well as lack of toilets (5%). Some concerns were also raised regarding antisocial behaviour, personal safety and inappropriate use of the sites surveyed (e.g. motorised vehicles using the site).
- A wide variety of improvements were suggested, with the most popular including an increase in the number of litter and dog bins (19%), improving existing paths through cutting back vegetation and widening (15%) and increasing the range of facilities on site (15%) to include seats and picnic benches, toilets and a cafe.
- 95% of all visitors considered that the length and network of the paths at the sites were sufficient. The few negative responses focused on increasing the number of both walking and cycle paths, increasing the length of current paths, and making paths more suitable for buggies and wheelchairs

5.15 The results show that the SANG is already used by local people and is valued for the opportunity that it provides for dog-walking and other recreational pursuits in an attractive environment. It is convenient, an all year round site and easy to access for people nearby. However, there is also scope for improvement to further increase its suitability. Whilst not all suggestions are appropriate to its function as a SANG, many are and have been included within the proposal for SANG delivery going forward, as set out in *Wellesley: Strategy for the delivery of SANG* (Grainger, 2012).

Baseline information: other SANG users

5.16 It is a condition of Grainger's 999-year lease that the MoD retains the right to train over the SANG. Military use of the area has co-existed with public access in the past and will continue to do so. Details of the extent of training that has taken place over this land over recent years, and the extent to which it is likely to continue have been sought from Defence Training Estates, but are not currently available. It is notable that in questioning users of the SANG, only a third identified something that they disliked about the SANG area, and of

these respondents, only 1% identified 'military presence' as the element that they did not like. Conversely, of those respondents who identified positive features of the SANG, 1% identified the 'army presence' as something that they liked.

5.17 In addition to the MoD retaining the right to use the SANG for training, the Aldershot Garrison Angling Club (AGAC) has a licence to fish the Camp Farm lakes. Constructive discussions have been held with AGAC to determine the potential for conflict with SANG users and a range of measures have been identified to actively manage this risk so that the site can be effectively used as a shared facility. The full details of these measures are included in the document *Wellesley: Strategy for the delivery of SANG* (Grainger, 2012).

Baseline information: anti-social behaviour

5.18 The visitor survey identified anti-social behaviour as an issue for just 1% of the third of total respondents who identified a feature of the SANG that they did not like. Further investigation as to whether the MoD holds records for anti-social behaviour to characterise type and frequency of this type of event has yielded little information, although Aspire Defence has received three relevant calls to their helpline during 2012. All relate to reports of fly-tipping[5].

[5] A.Williams, Tree Manager for Aspire Defence. Pers comm, 2012

6.0 Consideration of impacts on site integrity and the likelihood of significant effect

Will the area of Annex I habitats (or composite features) be reduced?

6.1 The proposals for Wellesley lie outside the boundary of the European sites and no land take is required within the SAC or SPA. The area of Annex 1 habitat or composite features will not be reduced as a result of the application.

Will there be a direct effect on the population of the species for which the site was designated or classified?

6.2 The TBH SPA is designated for populations of breeding woodlark, nightjar and Dartford warbler. As the site lies outside the boundary of the European site and no land take within the European site is required no direct impacts on populations of European importance will occur.

6.3 There are no Annex II species for which the SAC is designated, either as a primary or secondary reason for classification. No impacts on populations of Annex II species will occur.

Will there be indirect effects on the populations of species for which the site was designated or classified due to loss or degradation of their habitat (quantity/quality)?

Potential indirect effects of Wellesley proposals on TBH SPA without mitigation

6.4 The TBH SPA is designated for its breeding populations of Dartford warbler, woodlark and nightjar. For there to be significant impacts on the breeding populations of any of these species material changes to the extent or quality of habitats would need to result from the implementation of the scheme. This could include significant levels of disturbance from the increased population arising from the additional 3,850 homes proposed at Wellesley.

6.5 Breeding territories of Dartford warbler generally occur over large areas of dry and humid heath with mature gorse. These birds favour areas with a high cover of gorse, heather and bell heather (*Erica cinerea*), although gorse is considered the most important foraging habitat [6]. It has also been shown that bare ground is important [7]. The proportion of gorse to heather has been demonstrated to be the main controlling factor in territory density. Reproductive success is highest in a territory of 2.13ha where gorse comprises 0.6ha of the total area. This species has a short incubation period (12-14 days) and young fledge within 10-14 days. Two or sometimes three broods are raised in a typical year.

[6] Bibby C.J. 1979. Breeding biology of the Dartford warbler (*S.undata*) in England. Ibis 121. 41-52.
[7] Van de Berg *et al*, 2001. Territory selection by Dartford warbler (*S undata*) in Dorset, England; the role of vegetation type, fragmentation and population size. Biological Conservation. 101. 217-228.

6.6 Nightjars nest on the ground, forming shallow scrapes on bare ground within clearings in the vegetation. Nightjar eggs are laid between mid-May and mid-July, the incubation period is 17-18 days and young fledge after 16-17 days. In Dorset predation was found to be a major factor in nest failure; 60% of nests failed, of which 93% were predated[8].

6.7 Woodlarks have an unusually large territory for a passerine, typically covering 4-5ha. This species requires substantial areas of extremely short vegetation and /or bare ground on which to feed (96% of territories contain bare ground or short grass). During the breeding season foraging is conducted exclusively on the ground, in vegetation less than 5cm tall.

6.8 The main impacts predicted on populations of SPA birds are those associated with disturbance caused by increases in recreational activity, cat predation or increased incidences of arson, fly-tipping etc.

6.9 The proposals for Wellesley are for the development of 3,850 new homes over a 13-year period. There is the potential that this increase in Aldershot's population will increase recreational pressure on parts of the SPA, particularly the Bourley and Long Valley area which lies only 1km from the development and is readily accessible via car-parks and rights of access across the military training area under the military bye-laws. It is not possible to predict precisely where areas of increased pressure may accrue, and the level to which it would accrue, but the local population could access the SPA locally by foot, or by bike and could also drive to a range of car parks in close proximity before accessing the heathland on foot. Figure 5 identifies the main points of access into the SPA which by virtue of their closes proximity, are likely to be subject to the largest increases in visitor pressure were the proposals for Wellesley to proceed without mitigation.

6.10 Increased public use of the Ash and Pirbright ranges is less likely due to poorer accessibility and restrictions on public use imposed by the MoD (see paragraph 6.27).

6.11 The potential impacts of increased levels of recreational activity on heathland bird populations is well-documented and therefore mitigation is required to ensure there is no likelihood of a significant effect on Annex 1 species breeding on the SPA. Information provided by 2Js Ecology shows that the distribution and numbers of nightjar and woodlark territories across Bourley and Long Valley are relatively static, possibly as a result of the extent of suitable habitat. The information on Dartford warblers is more difficult to interpret given the drastic decline in the number of territories between 2008 and 2010.

6.12 Increases in the population of Aldershot as a result of the development may lead to an increase in anti-social behaviour such as an increased incidence of arson, although the distance of the SPA to the new housing (1000m) is likely

[8] Murison G, 2003. The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on heathlands in south Dorset, England. English Nature.

to reduce this potential. Studies into patterns of arson on urban and rural heathlands in Dorset have demonstrated incidents of arson are far more frequent on those adjacent to housing compared to those heathlands in more rural locations[9]. Work quoted in the Scott Wilson report from the *English Nature Thames Basin Heaths Special Protection Area: Mitigation Standards for residential development* indicates that children of school age present the greatest risk of causing fires on heathland (either accidentally or on purpose)[10] and it is unlikely that many children would be allowed to travel to the SPA from home unsupervised.

6.13 The impacts associated with fire can vary from being relatively limited and short-term in nature to devastating, long-term effects with damage to soils, habitat structure and loss of bird and animal populations. The effect will vary depending on a number of factors including the time of year, whether the humic layer is burnt, the intensity of the fire and also the frequency with which fires occur.

Likely impacts of Wellesley proposals on TBH SPA with integral mitigation

6.14 The proposals for Wellesley follow the well-established formula for the provision of SANG to mitigate impacts on the TBH SPA set out in the TBHDF**.** The SANG (97.9ha when discounted to allow for existing visitor use and the area of open water at Camp Farm Lakes) will provide new residents with readily accessible walks that will provide an alternative to the heathland areas for daily activities like dog-walking, cycling or exercising. The design of the SANG at Wellesley has followed Natural England's guidelines as to the required features of SANG if it is to be effective in its function (see Appendix 2).

6.15 Furthermore, the SANG package has been developed and designed using information obtained through direct survey of existing users to understand the value of the SANG for recreation and how it can be improved. In general, the results of this survey have been incorporated into the principles of SANG delivery. Only those suggestions not considered in line with the function of the SANG have been excluded e.g. a café. This approach, together with the discounting procedures applied to ensure sufficient capacity for new users, delivers a high level of confidence that the SANG:

- Is an attractive existing recreational resource
- Has the scope to be improved as a recreational resource
- Has the capacity through both current low usage and scope for improvement as a recreational resource to provide a substantial facility for people moving into Aldershot to live in Wellesley

[9] Haskins, L. Heathlands in an urban setting – effects of urban development on heathlands in south-east Dorset. British Wildlife. Vol 11, No 4, April 2000, pp 229-237.
[10] Rushmoor Plan. Planning for Rushmoor's Future. Draft Aldershot Urban Extension. Supplementary Planning Document HRA: Draft Report January 2008.

6.16 The SANG has been shown to attract local users on foot, and it can be expected to deliver the same function for the new Wellesley population, effectively diverting pressure from the SPA. It can also be expected that the local publicity surrounding the SANG, and the improved resource that it will represent, will draw existing Aldershot residents to use it, reducing the existing overall pressure accruing to the SPA. Whilst it is not possible to quantify this effect, it will help to reduce the net impact of recreational disturbance in the event that the occasional new resident finds their way to the SPA from Wellesley. This effect should also be viewed in the context of the off-site measures additional to the provision of SANG, which will make it physically more difficult to access the SPA. This again is likely to affect existing as well as potential use of the SPA, reducing the net impact still further.

6.17 The delivery of the proposals for Wellesley over a period of 13 years has the potential to cause short-term impacts on the SPA if the mitigation in the form of SANG delivery is not phased to provide a sufficient resource for first occupants. Furthermore, this eventuality could result in first occupants establishing recreational habits that involve use of the SPA, which once established, become difficult to modify, even when the SANG is fully operational. However, the SANG delivery strategy has a clear implementation plan that front loads SANG provision to ensure a functional and substantial facility for the first Wellesley occupants. This will ensure that an alternative and sufficient recreational facility is available to the new community moving into the new housing from the day of first arrival.

6.18 The risk of an increase in anti-social behaviour relates more to whether the SANG can function successfully rather than to risk to the SPA. This reflects the distances between the new housing and the SPA (1km) and the physical location of the SANG in between, which will serve to 'catch' anyone who may otherwise head to the SPA for anti-social reasons. However, the provision of two rangers responsible for implementing the SANG delivery strategy and liaising with the public will provide an immediate point of contact for anyone witnessing anti-social behaviour, and by their very presence, they are likely to be a significant deterrent.

6.19 Lending substantial support to this analysis is the fact that the SANG provision at Wellesley will be in excess of the TBHDF standards included in Rushmoor's adopted Core Strategy. These require:

- A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) per 1,000 new occupants either through contributions towards the provision of SANG identified by the borough council, or through on site SANG agreed with Natural England. The SANG must be provided in perpetuity
- Contributions calculated on a per dwelling basis towards SAMM measures, to be applied across the whole of the TBH SPA.

6.20 Grainger has secured a gross total of 109.2ha of SANG land and prepared broad management proposals for these areas to develop their ecological

interest whilst also providing 97.9ha of the gross SANG area as a recreational resource (to allow for discounting in relation to existing recreational use and Camp Farm Lakes). The 'in perpetuity' provision of these areas has also been secured through a 999-year lease. In addition to the SANG provision, a number of significant off-site measures to reduce ease of access to the SPA will be secured through a S106 agreement as well as the precise funding mechanism for delivery of the proposals, which will be agreed between Grainger and RBC in parallel with the determination process. Finally, full contributions to the SAMM fund will be made, ensuring that the proposals contribute appropriately to the strategic measures that are implemented to manage recreational pressures on the TBH SPA.

6.21 These measures are therefore in full accordance with the TBHDF and associated Core Strategy policy. Taken together with the analysis of SANG function relative to bird distribution on the SPA, it is considered that issues relating to increased levels of recreational activity and potential increases in anti-social behaviour that could affect the TBH SPA will be fully mitigated. Consequently, there will be no likely significant effect on the TBH SPA.

6.22 Cat predation of heathland birds has been identified as a potential issue for developments close to heathland sites. Current research would suggest that 400m is a typical ranging distance for domestic cats[11]. The closest residential units to the SPA in Wellesley are approximately 1000m from the SPA boundary. Within this zone the A325 and the A323 will also act as a barrier to animals' ranging behaviour. Consequently, cat predation is not considered likely to have a significant effect on the TBH SPA.

6.23 Whilst direct impacts on the nightjar population of the Thames Basin Heaths SPA are not considered likely, this species is known to utilise habitats outside of the SPA for foraging. Radio-tracking of foraging nightjar in Dorset has shown that on average, birds fly from their nesting sites on heathland to feed in deciduous woodland, wetland areas and even farmland up to 3.1km from nest sites, with some birds travelling up to 5.8km[12]. Similar patterns have been found in other populations, such as those in Thetford Forest and the New Forest, although the selection of habitats for feeding away from nesting sites varies[13].

6.24 The proposals for Wellesley will not result in the loss of habitats that could be used by foraging nightjar such as woodland along the Basingstoke Canal and the lake, scrub and woodland at Camps Farm Lake. These habitats will all be retained and a management plan required as a condition of the Phase 1 consent will ensure the ecological interest of these areas is enhanced and maintained in perpetuity. It is unlikely that the changes to the management of these areas will

[11] Turner, D.C. and Meister, O., 1988, Hunting behaviour of the domestic cat. In Turner, D.C. and Bateson, P. (eds) The domestic cat: the biology of its behaviour. Cambridge University Press

[12] Alexander, I.H & Cresswell, B.H (1990) Foraging by nightjars *Caprimulgus europaeus* away from their nesting areas. Ibis 132 pp 568-574.

[13] Cresswell, B (1996) Nightjars – some aspects of their behaviour and conservation. British Wildlife. Volume 7. Number 5 pp 297-305.

have a significant positive effect on nightjars by increasing the suitability of these areas for foraging. Any impact is therefore considered to be neutral.

6.25 No significant changes to lighting levels across foraging areas are predicted as a result of the proposals and therefore no impacts on the foraging or breeding behaviour of nightjar are anticipated.

6.26 The primary routes for traffic associated with the new development will be the A3011, A325, A331 and A323. The A323 borders part of the SPA as it runs alongside the Basingstoke Canal. For there to be an impact on the SPA bird populations the predicted changes in air quality would need to affect significant areas of habitat at a level that would cause a deterioration in habitat quality that in turn would impact on the breeding population. The impacts of air quality on vegetation for both the SPA and SAC are discussed below.

Will there be any changes to the composition of the habitats for which the site was designated (e.g. reduction in species structure, abundance or diversity that comprises the habitat over time)?

Potential indirect effects of Wellesley proposals on TAPC SAC without mitigation

6.27 The principal impact on the heathland communities associated with the SAC is considered to be those associated with increased levels of traffic. The SAC lies approximately 1.5km from the edge of Wellesley as the crow flies and is unlikely to be affected by increased levels of recreational activity given the level of SANG provision described earlier. Access to Ash and Pirbright Commons is controlled under military by-laws, with restrictions applying to the danger areas. Public access to Pirbright Ranges is closed at all times because of unexploded ordnance; access to Ash ranges is restricted to periods when the red flags are not flying.

6.28 Heathland vegetation communities are known to be susceptible to increases in levels of nitrogen deposition, to which traffic emissions can contribute. This deposition can result in changes to plant communities.

6.29 Studies on the impacts of a road on adjacent heathland vegetation in the New Forest found increased growth of vascular plants in close proximity to the A31 dual carriageway. This trend was particularly apparent in heathers and grass species. An increase in the abundance of grasses in the heathland near roads was also noted[14]. It was suspected that this was due to changes in the competitive ability of various species under eutrophic conditions.

6.30 In contrast to the trends demonstrated by vascular plants, lichens close to the road (in this study, *Cladonia portentosa*) showed shorter, thinner and less luxuriant growth than those further away. This was measured by recording the diameter of each clump within the samples, the height of the stem and the

[14] Angold, P.G. (1997) The impact of a road upon adjacent heathland vegetation: effects on plant species composition. Journal of Applied Ecology. Volume 34, Number 2 pp 409-418.

number of first order branches. These trends were detectable up to 80 metres from the road.

6.31 The impact on traffic emissions on vegetation varies depending on the volume of traffic using the road. Effects up to 200m from the carriageway were recorded for the A31 dual carriageway in the study (carrying around 10,000 vehicles every 12 hours at the time of the study). Similar effects but at a reduced distance from the carriageway were recorded for roads with lower traffic flows.

6.32 Figure 6 shows the zone of potential influence from traffic emissions from traffic using the primary routes identified in the traffic assessment within the ES. The figure shows a 200m zone for those roads considered to be affected by the proposals. This includes high traffic flow roads (parts of the strategic highways network) and also the main roads feeding into the strategic highway network that will have lower traffic flows.

6.33 The method of determining significance used to identify roads for assessment is laid out in the Design Manual for Roads and Bridges (DMRB). The DMRB assesses "affected roads" as these are considered suitable in order to "indicate whether there are likely to be significant impacts associated with particular broadly-defined routes or corridors". A road that does not fall under one of the categories below is not considered to undergo significant change and does not require assessment to determine its impact.

a) road alignment will change by 5m or more; or

b) daily traffic flows will change by 1,000 AADT or more; or

c) HGV flows will change by 200 AADT or more; or

d) daily average speed will change by 10km/hr or more; or

e) peak hour speed will change by 20km/hr or more.

6.34 Three points have been selected by Capita Symonds for determining impacts of traffic emissions (as shown on figure 6). None of the selected sites (numbers 1-3) are in close proximity to the European sites. Three additional points (4-6 on figure 6) were also selected for consideration as they are the closest points to the European sites on the road network.

6.35 Table 3 shows the predicted nitrogen deposition at points 1 to 3 in 2026 with and without the development. Deposition modelling has been undertaken up to 200m from the road.

Table 3: Predicted nitrogen deposition at selected point in 2026 (with and without proposed development)

Affected road	Distance to road centre	Co-ordinates		Total N deposition (kg/N/ha/yr)		Difference due to scheme in 2026 (kg/N/ha/yr)
		x	y	2026 no scheme	2026 with scheme	
Point 1	5	486257	152290	18.0	18.5	0.5
	50	486306	152297	17.3	17.5	0.2
	100	486355	152306	17.2	17.3	0.1
	200	486455	152298	17.1	17.2	0.1
Point 2	5	488099	151740	17.5	18.1	0.6
	50	488110	151704	17.1	17.3	0.2
	100	488125	151657	17.1	17.2	0.1
	200	488170	151567	17.0	17.1	0.1
Point 3	10	488709	151408	17.2	17.3	0.1
	50	488658	151404	17.2	17.2	0
	150	488559	151393	17.1	17.1	0
	200	488509	151391	17.1	17.1	0

6.36 These points will be used as the basis for the assessment of likely significant effects as they represent the largest increases in predicted nitrogen modelled for affected roads. Capita Symonds has confirmed that deposition at points 4, 5 and 6 will be lower than at points 1, 2 and 3 (see paragraph 6.37 and 6.38). The use of deposition rates for points 1 to 3 provides a precautionary baseline for assessment purposes.

6.37 Point 4 (Eelmoor Bridge) is not located near any 'affected road' therefore, using DMRB assessment methodology, it can be concluded that deposition will not be significant at this location. Point 5 on Ash Hill Road is located to the east of the A331 where the greatest traffic flows and greatest change in traffic flows in this area are predicted. No significant impacts were predicted along the A331 and it can be concluded the deposition rates at point 5 will not be greater than at the location of the assessed site (point 3).

6.38 Point 6 (Farnborough Road) is located on an "affected road". However, this section of the Farnborough Road is not predicted to have as large a traffic flow (c.20000 per day) at point 1 as where it crosses the Basingstoke Canal (c.30000). The change caused by the proposed development is also not as great (c.1300 instead of c.1450). Furthermore, the Basingstoke canal section is also likely to be partly affected by the cumulative effect of the Alison's Road and Clubhouse Road junctions, hence the Basingstoke Canal section of road represents the worst case for the whole length of the road.

6.39 At the present time the APIS website shows that the critical level of nitrogen deposition on the wet and dry heath habitats of the TAPC SAC exceeds the

minimum critical load of 10kg/N/ha/yr at 16.24kg/N/ha/yr (based on 2005 figures), but is below the upper limit of the critical load of 20kg/N/ha/yr.[15]

6.40 For the more sensitive Annex 1 habitat depressions on peat substrate of the *Rhynchosporion* the current level of nitrogen deposition at 16.24kg/N/ha/yr exceeds the upper limits of the critical load given for this habitat of 15kg/N/ha/yr.

6.41 Road transport currently contributes approximately 13.5% of the nitrogen emissions contributing to deposition on the SAC (2.1kg/N/ha/yr (2005 figure)). The process contribution (from traffic associated with the completed scheme in 2026) has been calculated using the 2005 deposition rate for nitrogen on the SAC as shown on the APIS website. The background deposition rate for 2005 was 16.24kg/N/ha/yr. Table 4 shows the percentage contribution from traffic to deposition rates in 2026 at points 1, 2 and 3 (see figure 6).

Table 4: Percentage contribution to nitrogen deposition on SAC/SPA from AUE traffic in 2026

Affected road	Distance to road centre	Percentage contribution from AUE traffic in 2026 (% of critical load upper limit 20kg/N/ha/yr)
Point 1	50m	0.8%
	100m	0.6%
	200m	0.5%
Point 2	50m	1.1%
	100m	0.7%
	200m	0.4%
Point 3	50m	0.2%
	100m	0.2%
	200m	0.2%

6.42 The predicted increase in traffic flows on the strategic road network is insignificant and it is not considered that the minor increase in traffic will lead to a significant change to emission levels along these routes. Traffic generation associated with the development is not anticipated to reach levels where significant effects on the TPAC SAC are likely.

Potential indirect effects of traffic increases on TBH SPA

6.43 Wet and dry heath make up a significant proportion of the TBH SPA. The deposition rates for these habitats are the same as those given for comparable habitats with the SAC.

[15] www.apis.ac.uk

6.44 Road transport currently contributes approximately 24.9% of the nitrogen emissions contributing to deposition on the SPA (7.7kg/N/ha/yr). The process contribution (from traffic associated with the completed scheme in 2026) has been calculated using the 2005 deposition rate for nitrogen on the SAC as shown on the APIS website. The background deposition rate for 2005 was 16.24kg/N/ha/yr. Table 4 shows the percentage contribution from traffic to deposition rates in 2026 at points 1, 2 and 3 (see figure 6).

6.45 The predicted increase in traffic flows on the strategic road network is insignificant and it is not considered that the minor increase in traffic will lead to a significant change in emission levels along these routes. Traffic generation associated with the development is not anticipated to reach levels where significant effects on the TBH SPA are likely.

Indirect effects of surface water drainage and potable water supply associated with the Wellesley proposals

6.46 The European sites are both a significant distance from Wellesley and are unlikely to be affected by any on-site drainage arrangements associated with the proposals. The TBH SPA is upstream of surface water drainage outfalls into the Basingstoke Canal SSSI, so will not affect heathland hydrology, no change to the outfall location, volume or rate of discharge is expected in any event. The TAPC SAC is hydrologically discontinuous with the proposals and similarly, will not be affected.

6.41 Supplies of potable water will be provided by South-East Water through existing infrastructure provision. The water sources for this supply have no hydrological links with the TBH SPA or the TPAC SAC and no impacts on the European sites are predicted as a result of the supply of water to Wellesley.

Will there be no interruption or degradation of the physical, chemical or biological processes that support habitats and species for which the site was designated or classified?

6.47 This Habitat Regulation Assessment has considered the potential for recreational impacts, changes in air quality and water quality to impact on the interest features of the European sites. It is considered that the SANG package proposed is sufficient to mitigate the potential impacts associated with the predicted increase in recreational pressure on the TBH SPA and by default the TAPC SAC.

6.48 Analysis of potential air and water quality impacts has shown that these will not constitute a likely significant effect on either the TBH SPA or TAPC SAC.

7.0 Conclusion of review on the likelihood for significant effects on European sites

7.1 No direct impacts are predicted on the TBH SPA or the TAPC SAC. Analysis of potential impacts when considered against the mitigation integral to the proposals for Wellesley has shown that the identified impacts are not likely to have a significant effect on either European site.

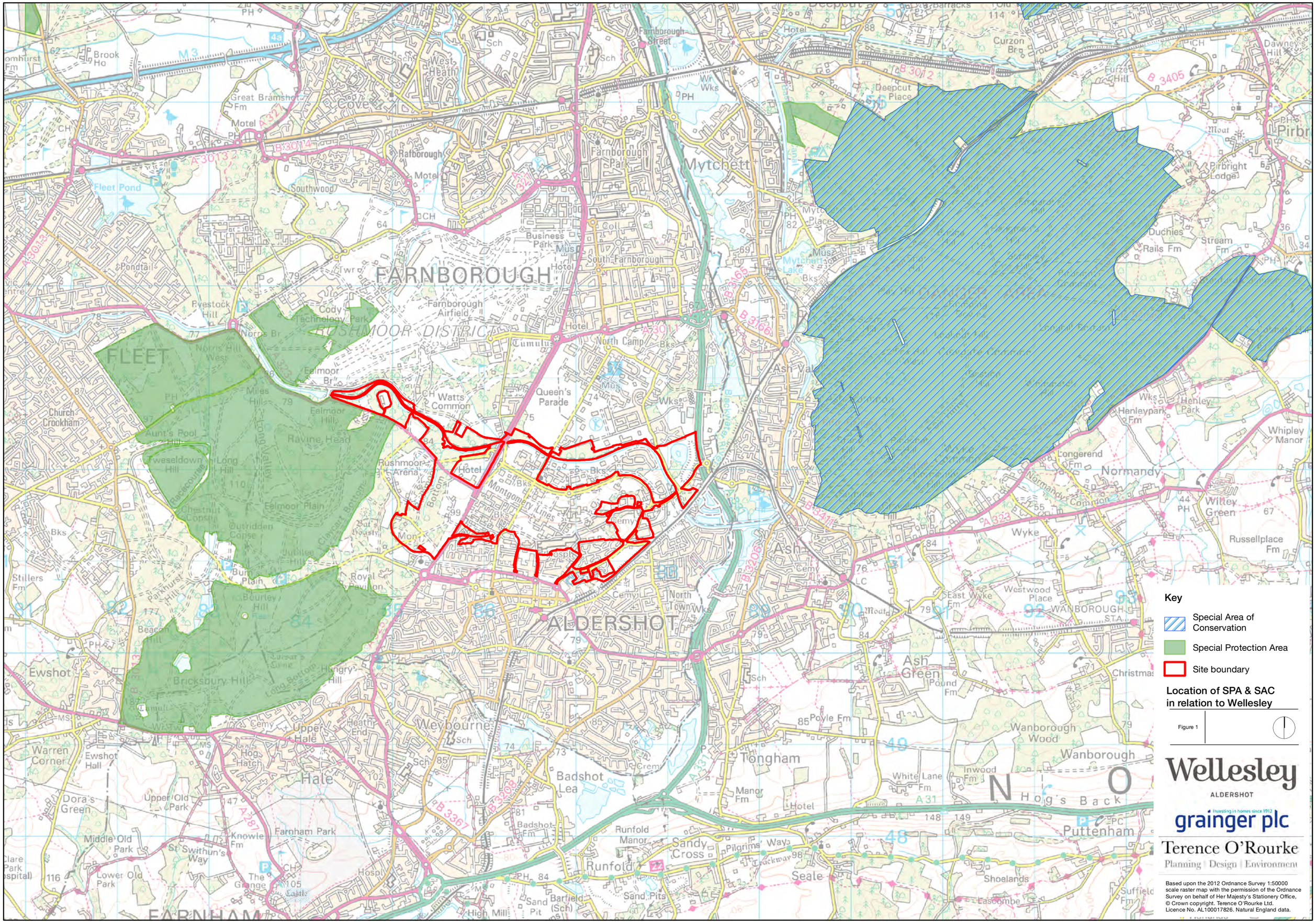
7.2 The proposed development at Wellesley will provide mitigation in full accordance with the recommendations of the TBHDF and the Rushmoor Core Strategy to offset the impact of a net increase in residential dwellings. Analysis has shown that the provision of an extensive SANG network in excess of the minimum areas specified in the Core Strategy, the provision of off-site measures to reduce ease of access to the SPA and the commitment by Grainger to contribute to the SAMM will ensure the development with not result in any likely significant effects, either alone or in-combination, on the SPA.

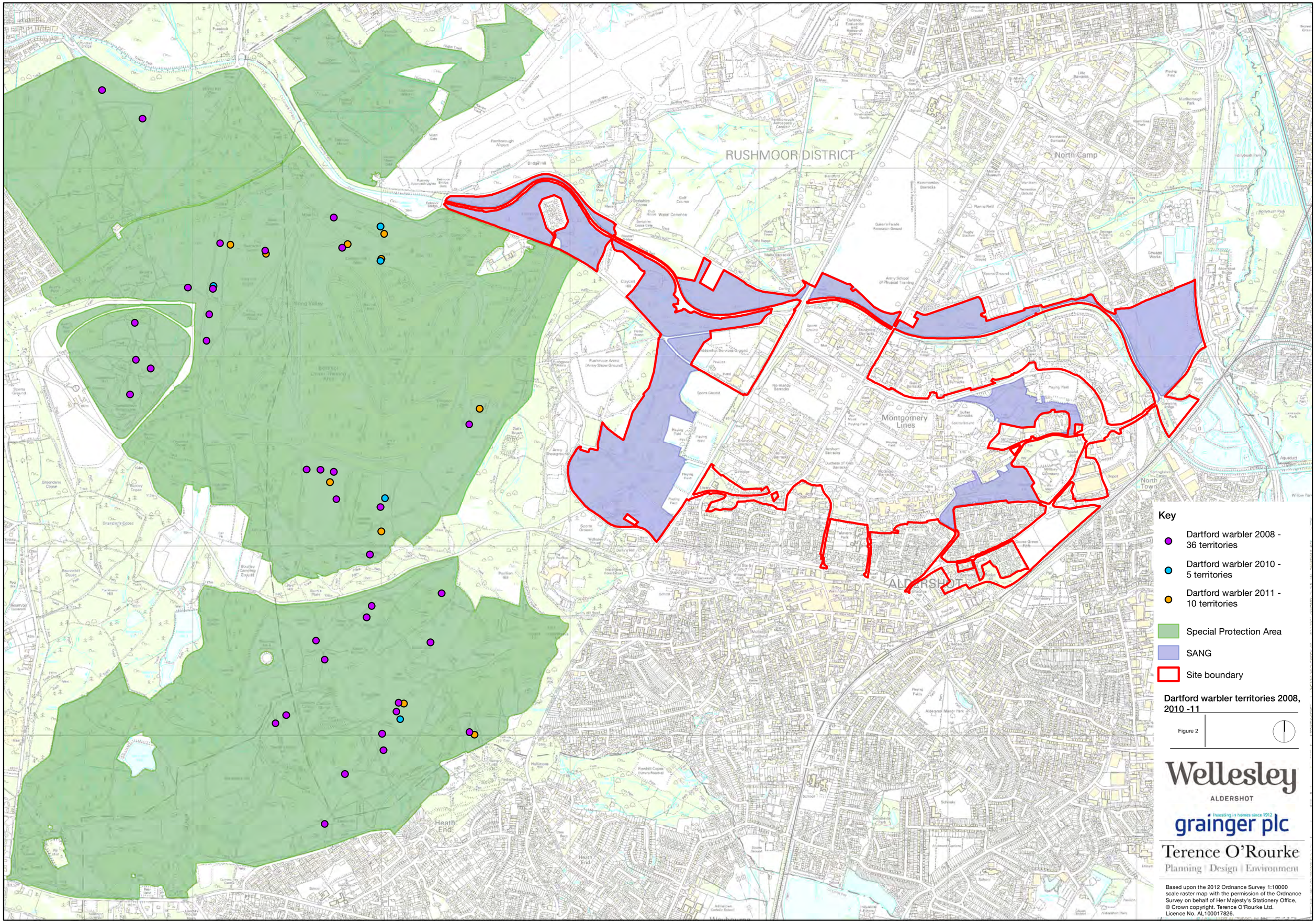
7.3 Impacts on the European sites as a result of increased traffic on the road network as a result of increased levels of nitrogen deposition are considered insignificant. Wellesley is not likely to have any significant effects on either European site.

7.4 The provision of potable water to Wellesley will be the responsibility of South-East Water. It is understood that the water supplied to Wellesley will not come from sources with hydrological links to the European sites. It is concluded that the development will not result in any likely significant effects, either alone or in-combination, on the European sites.

7.5 Wellesley is hydrologically independent from the TBH SPA and TPAC SAC. There is no potential for any on-site drainage arrangements or changes to water quality to impact on the interest features of the European sites; no likely significant effects, either alone or in-combination with other plans and projects, are predicted.

7.6 No additional impacts that could result in likely significant effects on the interest features of the European sites have been identified. It is therefore concluded that Wellesley will not result in likely significant effects, either alone or in-combination with other plans and projects and an appropriate assessment of the proposals is not required.





Dartford warbler territories 2008, 2010 -11

Figure 2

Wellesley
ALDERSHOT

Investing in homes since 1912
grainger plc

Terence O'Rourke
Planning | Design | Environment

RUSHMOOR DISTRICT

ALDERSHOT

Long Valley

Heath End

Weybourne

Montgomery Lines

North Camp

Key

- Nightjar 2008 - 24 territories
- Nightjar 2010 - 21 territories
- Nightjar 2011 - 21 territories
- Special Protection Area
- SANG
- Site boundary

Nightjar territories 2008, 2010-11

Figure 3

Wellesley
ALDERSHOT

Investing in homes since 1912
grainger plc

Terence O'Rourke
Planning | Design | Environment

RUSHMOOR DISTRICT

ALDERSHOT

Key

- Woodlark 2008 - 21 territories
- Woodlark 2010 - 22 territories
- Woodlark 2011 - 22 territories
- Special Protection Area
- SANG
- Site boundary

Woodlark territories - 2008, 2010-11

Figure 4

Wellesley
ALDERSHOT

grainger plc
investing in homes since 1912

Terence O'Rourke
Planning | Design | Environment

Limited parking

Parking on Rushmoor Road

Limited parking

RUSHMOOR DISTRICT

North Camp

Long Valley

Montgomery Lines

ALDERSHOT

Ewshot

Heath End

Key

- Access only
- Parking and access
- Special Protection Area
- SANG
- Site boundary

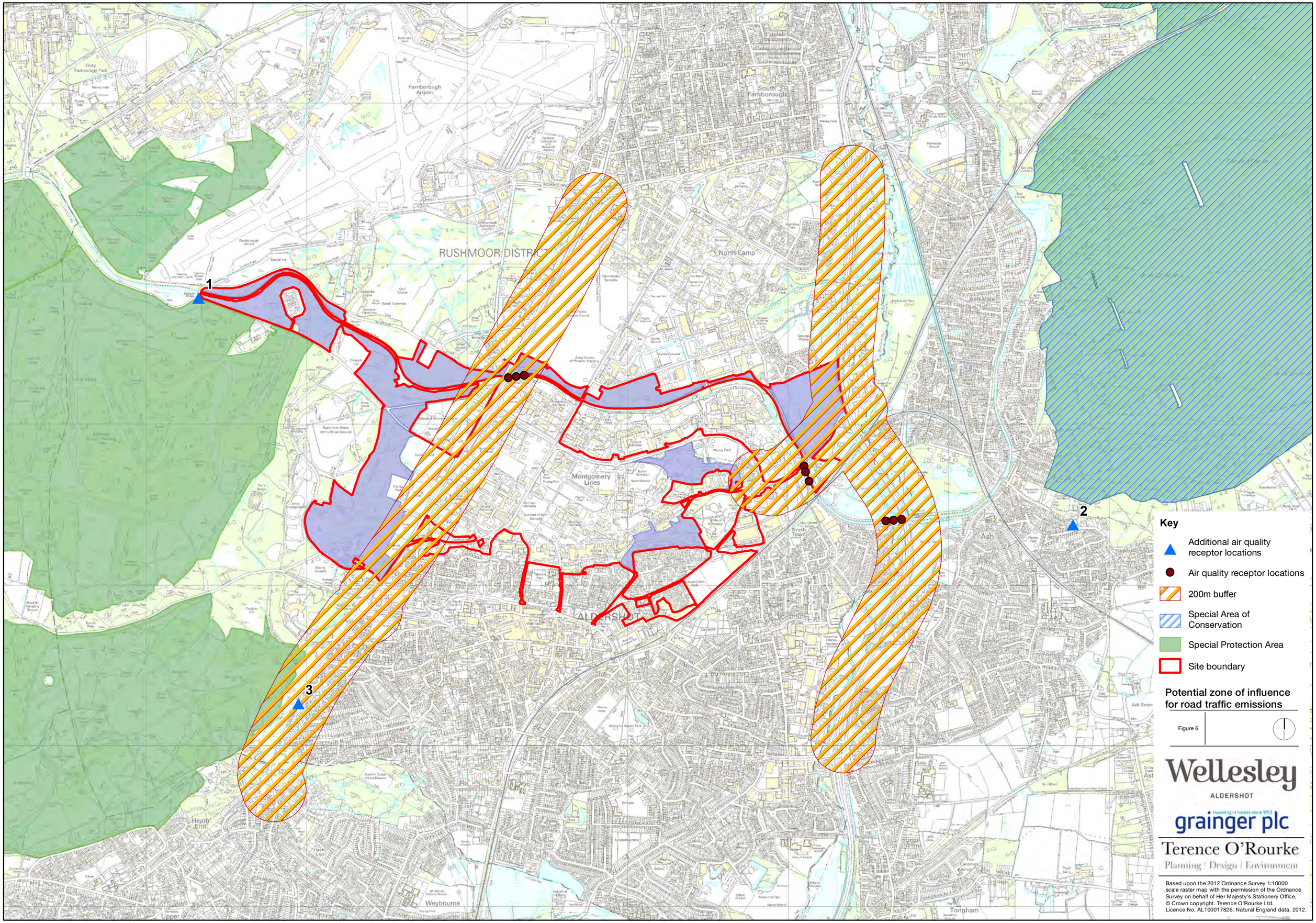
Main access points to SPA

Figure 5

Wellesley
ALDERSHOT

grainger plc
Investing in homes since 1912

Terence O'Rourke
Planning | Design | Environment



Appendix 1
Audit of changes arising from consultation with key stakeholders

Appendix 1
Wellesley: Comments received on Shadow HRA consultation

Organisation	Comments received/issue raised	Grainger response	Changes to the document
Marc Turner **Senior Adviser** **Natural England**	2.7 - Natural England recommends that this paragraph should highlight that the 8ha per 1,000 population is a minimum figure rather than an absolute requirement.	**Agreed. Document amended.**	**- Revised para 2.7, now para 2.6**
	5.5 We note that the bird population figures quoted here are out of date, as the populations will have changed substantially since 1999. We advise that up to date figures are included to provide a more accurate picture of current bird populations.	**Agreed. Document amended to include data for Nightjar, Woodlark and Dartford warbler for the years 2008, 2010 and 2011.**	**- New text inserted at paras 5.6-5.11** **- Data included at Table 2** **- Figures 2, 3 and 4 show Annex 1 distributions over the 3 years for which survey data is held**
	6.14 Natural England would like to see the required area of SANG included here also, based on the minimum 8ha per 1,000 standard, for comparison with the actual area, which will be provided. This is covered in other parts of the document, but best to reflect this point regularly throughout the document.	**Agreed. Document amended and updated.**	**- Revised para 6.14, now para 6.20**
	6.25 onwards Natural England advises that a more comprehensive assessment of air quality impacts should be included here in order to provide certainty that there will not be a likely significant effect upon the Thames Basin Heaths sites as a result of the development. We refer you to the assessment carried out in respect of the redevelopment of Broadmoor Hospital in Bracknell Forest Council as an example of this.	**Agreed document amended and updated to provide comprehensive assessment**	**- New text inserted at paras 6.27-6.45**
Carrie Temple **Senior Conservation Officer** **RSPB**	As a general point, we consider that the Shadow HRA should contain a more thorough baseline SPA impact assessment, reflecting the specific assessment that has been carried out for the proposed development. At present, we consider that the draft report relies much too heavily on the general evidence base supporting the Thames Basin Heaths Delivery Framework (and compliance with the associated minimum standard of mitigation required of smaller scale housing developments). The project-specific baseline assessment should include (as a minimum): • A clear presentation of the visitor survey results • Predicted increase in visitor pressure to the SPA without mitigation (including spatial illustration of the likely hotspots in increased SPA visits) • Available records of recent fires, fly-tipping, vandalism etc. on nearby areas of the SPA • Annex 1 bird distribution on the affected areas of the SPA (including Dartford warbler distribution pre-2009)	**Document expanded to include more baseline information and more comprehensive impact assessment. The document now includes:** • **Presentation of visitor survey results** • **Plan showing main access points to the SPA** • **Available records of fires and fly-tipping (limited data with little available)** • **Comprehensive data on Annex 1 breeding territories.** **Note that predictions in the increase in visitor pressure has not been carried out: baseline survey data of visitor use of the SPA (as opposed to the SANG) is not available.**	**- fully revised sections 5 & 6 of the Shadow HRA**
	2.10 - The reference to the avoidance of the need for residential development which complies with the Delivery Framework to undergo an appropriate assessment does not apply to large-scale, bespoke developments, which must be considered on their own merits (see para 4.4 of the Delivery Framework). The SANGs report (para 1.7) better sets out the correct policy approach for bespoke schemes and the application of the minimum 8ha/1,000 standard as "context" for such schemes.	**Agreed. Document amended.**	**- revised para 2.9 and 2.10**

	6.4 - Disturbance impacts may not visually affect the extent/quality of habitat, and therefore impacts are not limited just to the material changes to habitat described in this paragraph.	**Agreed. Document amended.**	**- revised para 6.4**
	6.11 - The impacts of fire associated with the development could equally be devastating and of long-term significance, depending on the time of year and the extent of the fire. Therefore, we do not consider that this paragraph represents a precautionary assessment of the potential severity of this impact.	**Agreed. Document amended**	**- revised para 6.11, now 6.13**
	6.14 In addition to the SANGs provision and SAMM contribution, we consider that the 'off-site' access management measures set out under Section 4 of the SANG Strategy are crucial to removing recreational impacts on the SPA, and should therefore be referenced in the HRA.	**Noted. Document amended.**	**- revised para 6.14, now para 6.20**
	6.16 3.1km was the mean foraging distance (+/- 1.2km) recorded in the referenced study. This study actually recorded a maximum nightjar foraging distance of 5.8km.	**Agreed. Document amended**	**- revised para 6.16, now 6.23**
	7.2 Simply meeting, or even exceeding, the minimum SPA mitigation standards set out under the Delivery Framework (and reflected in Rushmoor BC's Core Strategy) is not in itself sufficient to ensure no adverse effect on the SPA. The functionality and quality of the overall mitigation package of a bespoke scheme that must be carefully assessed in order to determine the net effect on site integrity.	**Agreed. Document amended**	**- revised para 7.2**
Pre-application consultation with RBC: August 2012 Paul Howe	Neither document [*Shadow HRA or SANG Strategy*] mentions the SE Plan and Policy NRM6. This is still part of our Development Plan and along with the TBHDF was a key influence on our Core Strategy policy so suggest reference to it could be made in paras 1.6 and 1.7 of the SANG Strategy and para 2.4 and Appendix 2 (Policy Review) of the Shadow HRA?	**Agreed. Document amended**	**- revised para 2.3** **- revised appendix 2**

Appendix 2
Review of SANG policy compliance

Appendix 2
Wellesley, Aldershot – SANG (Suitable Alternative Natural Greenspace) Proposals
Policy compliance

Thames Basin Heath Overview

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.

New residential development in the vicinity is likely to have a significant effect on the SPA and should therefore provide or contribute to the provision of avoidance measures. Developments can provide - or make a contribution to the provision of - measures to ensure that they have no likely significant effect on the SPA. In doing so, residential development will not have to undergo an appropriate assessment.

Relevant Policy and Guidance:

Rushmoor Borough Council

- Rushmoor Local Plan Review 1996 – 2011 (adopted 2000) (Saved Policies)
- Rushmoor Core Strategy (adopted October 2011)
- Aldershot Urban Extension SPD (adopted March 2009)

Bracknell Forest Council's Thames Basin Heaths Special Protection Area Avoidance and Mitigation Supplementary Planning Document Appendices (Consultation Draft) (September 2011)

Draft Aldershot Urban Extension Supplementary Planning Document Habitats Regulations Assessment: Draft Report (January 2008)

Thames Basin Heaths Special Protection Area Delivery Framework (Thames Basin Heaths Joint Strategic Partnership Board) (February 2009)

Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy 2012 (February 2012)

Guidelines for the creation of Suitable Accessible Natural Green Space (Natural England) (July 2007)

National Planning Policy Framework (March 2012)

The following analysis of policy compliance draws on the draft document *Wellesley: Strategy for the delivery of SANG* (Grainger, June 2012)

Policy/Guidance	Summary	Compliance/Potential Issue
The South East Plan: Regional Spatial Strategy for the South East (October 2009)		
Policy NMR6 - The Spatial Strategy	New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England.	As part of the Wellesley project a suite of mitigation measures are proposed which have been designed to ensure that significant impacts to the European site and its interest features are avoided. These have been agreed with Natural England. **Conclusion: mitigation package is compliant with the requirements of Policy NRM6**

Policy/Guidance	Summary	Compliance/Potential Issue
Rushmoor Core Strategy (adopted October 2011)		
Policy SS1 - The Spatial Strategy	The Council will ensure that subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area, provision is made for the delivery of at least 6,350 net new dwellings in the Borough over the period 2010 to 2027.	As part of the Wellesley project a suite of mitigation measures are proposed which have been designed to ensure that significant impacts to the European site and its interest features are avoided. **Conclusion: mitigation package is compliant with the requirements of Policy SS1**

Policy/Guidance	Summary	Compliance/Potential Issue
Policy SP1 - Aldershot Urban Extension	Requirement for measures to avoid and mitigate any impact of development upon the Thames Basin Heaths Special Protection Area (TBH SPA) including the provision of SANG, and SAMMS.	As part of the Wellesley project a suite of mitigation measures are proposed which have been designed to ensure that significant impacts to the European site and its interest features are avoided. These include a comprehensive SANG package and the expectation that full SAMM contributions will be paid. **Conclusion: mitigation package is compliant with the requirements of Policy SP1.**
Policy CP13 - Thames Basin Heaths Special Protection Area	All net new dwellings beyond 400m and within 5 km of the SPA boundary (in a straight line), which covers the whole Rushmoor borough, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects on the SPA. Mitigation standards include a minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) that should be provided in perpetuity per 1,000 new occupants either through contributions towards the provision of SANG identified by the Borough Council, or through on site SANG agreed with Natural England; and contributions towards SAMMS.	The Wellesley SANG proposals represent a bespoke package appropriate to the size of the Wellesley scheme. The package includes the provision of 103.03 hectares of SANG for residents moving into the new residential units, when discounted according to the Bracknell Forest discounting model. This approach and the results of discounting have been agreed in principle with both Rushmoor Borough Council and Natural England. The package has been designed to ensure delivery in perpetuity: the majority of the SANG land is covered by an appropriate 999-year lease and will be funded through an appropriate commuted sum. Off-site works on MoD land will be delivered through a S106 agreement, to which the Secretary of State has committed. It is expected that full SAMM contributions will be paid. **Conclusion: mitigation package is compliant with the requirements of Policy CP13.**
The Rushmoor Borough Council Local Plan Review (1996 to 2011) (Saved Policies)		
Saved Policy ENV16	Development on major sites, which is in accordance with other policies, will be permitted provided that: • the development does not result in any demonstrable harm to amenity; • existing landscape features are used to advantage and, where appropriate, new landscaping is included; • existing and potential nature conservation value is considered in both design and future management; and • adequate provision is made for parking, highway and servicing arrangements without detriment to the quality of the environment.	See analysis below in relation to the Aldershot Urban Extension SPD.
Aldershot Urban Extension SPD (adopted March 2009)		
	This SPD supports saved policies in the Rushmoor Local Plan Review, in particular Policy ENV16 (Major Site Development). *Based on discussions with Natural England (NE) and Royal Society for the Protection of Birds (RSPB), it has been agreed that for a major planning application of approximately 4,500 homes would translate to a minimum SANGS provision of roughly 92 hectares. The on-site provision of SANGS is provided to mitigate the effects of new development such as the AUE on European sites* (para 8.2.5 of the AUE SPD).	The Wellesley proposals incorporate a SAMM & SANG package that includes a total of 103.03 hectares when discounted to allow for existing recreational use. It therefore provides substantially more than the 92 hectares required by Policy CP13. Furthermore, the number of residential units has decreased from 4500 to 3850, further reducing the burden of SANG provision required and increasing the relative scale of the actual SANG provision. Not withstanding this 'over provision', the SANG package has been developed as a bespoke scheme that is both functional and realistic on the ground. In this sense, the total SANG quantum is appropriate and fit for purpose. **Conclusion: mitigation package is compliant with the requirements of the AUE SPD.**
Draft Aldershot Urban Extension Supplementary Planning Document Habitats Regulations Assessment: Draft Report (January 2008)		
	The HRA lists a series of avoidance and mitigation measures that will be required for the project-level assessment. These are: • the management of recreational demand through the provision of at least 92 hectares of SANG (appropriate to 4500 residential units) • the provision of formal playspace, youth facilities and wardening to reduce the risk of vandalism and fly-tipping. • the provision of a Waste Management Strategy to reduce incidence of fly-tipping	The SANG package demonstrates a comprehensive suite of SANG proposals that are greater than the minimum area required on the basis of the '8 ha per 1000 population' rule. This larger area has resulted from ensuring that the SANG is functional in real terms and is therefore demonstrably a viable scheme from the perspective of the user. The SANG proposals have been carefully phased to ensure front-loading of provision and accessibility that reflects the constraints of a demolition and construction site. The SANG proposals have also been evaluated

	• the integration of on-site SUDS to maintain surface water flows to the Basingstoke Canal SSSI, and the SANG to which it forms part • a transport assessment to establish the impact of vehicle emissions on air quality and the risk to heathland habitats • the creation of a neighbourhood centre to provide an accessible focal point, reducing the need to travel • the creation of direct and convenient walking and cycling route • the provision of a Biodiversity Action Plan (see note below) • the provision of a Visitor Management Plan (see note below) Mitigation measures need to be viable, timely and possible to implement. Note that the Thames Basin Heath Development Framework has been prepared subsequent to the production of the Draft AUE SPD HRA Report. Some of the requirements set out in the HRA are therefore no longer relevant, due to the fact that there are now other mechanisms for delivery such as SAMM payments and the 'SANG formula' outlined in the framework. This relates to the requirement for: • visitor surveys of the SPA and the need for a Visitor Management Strategy. It has been agreed with Natural England and Rushmoor Borough Council this is now covered by the requirement for SAMM contributions. • A biodiversity management plan. With the agreement of Natural England and Rushmoor Borough Council, the biodiversity management plan has been split into two: biodiversity issues relating to the SANG have been included in the Wellesley:Strategy for the delivery of SANG, whilst biodiversity issues relating to the site have been incorporated into a Green Infrastructure Strategy for the site.	by the Blackwater Valley Countryside Partnership (BVCP), with experience of delivering SANG in Rushmoor. Feedback from the BVCP has been used to ensure that the package is realistic and workable on the ground. BCVP has also identified the scope of wardening required to ensure the implementation and function of the SANG package on the ground. The scheme has been secured in perpetuity through a 999-year lease that extends to the majority of the SANG and legal agreements ensuring appropriate MoD sign-up to S106 agreements required to secure off-site measures. The SANG proposals need to be viewed in the context of the GI Strategy for the site that demonstrates how multi-functional green spaces have been designed to ensure that the entire population can access the SANG from any point within the development. This strategy also incorporates landscape and open space strategies to demonstrate sufficient provision of formal play and community facilities for children and youth groups, important for addressing such issues as vandalism, as well as a SUDS strategy for the site. In addition to the GI Strategy, the planning application will include a Waste Management Strategy, a Flood Risk Assessment and Surface Water Strategy to address issues of water levels and quality identified in the HRA document. The application will also include travel plans, pedestrian/cycle networks together with a Travel Assessment and a Public Transport Strategy to maintain air quality, also identified in the HRA document as required to avoid impact on the TBH SPA and TAPC SAC. **Conclusion: mitigation package is compliant with the requirements of the Draft HRA of the AUE SPD.**
Thames Basin Heaths Special Protection Area Delivery Framework (Thames Basin Heaths Joint Strategic Partnership Board) (February 2009)		
SANG	• Sufficient SANG should be provided in advance of dwelling completion to ensure that there is no likely significant effect on the SPA. • SANG should be provided on new or existing public open space, taking into account the availability of land and its potential for improvement. Where it is proposed to use existing public open space as SANG, the existing patterns and rights of public use must be taken into account and protected. When new land or existing public open space is proposed as SANG, any existing nature conservation interests must be taken into account. • SANG should be provided on the basis of at least 8ha per 1,000 population. The average occupancy rate should be assumed to be 2.4 persons per dwelling unless robust local evidence demonstrates otherwise. • The preference should be for SANG to be of at least 2ha in size, and located within a wider open space or network of spaces although smaller spaces may form part of a wider SANG network. Across the affected area, a range of types and sizes of SANG should be provided, offering a range of experiences, including large SANG which have the benefit of being able to act as attractor sites.	• The SANG will be phased according to a set of rules that 'front load' SANG provision, to ensure sufficient SANG availability during the early phases of the development & thereafter. • The SANG comprises a mix of both new and existing, but under-used public open space. All SANG will be subject to a comprehensive suite of management measures to improve quality and facility for recreational users. The total SANG quantum has been discounted to allow for existing recreational use. Although the SANG includes lengths of the Basingstoke Canal SSSI, the proposal have been designed to avoid areas of high sensitivity. Furthermore, management of the SANG for their ecological interests will enhance the nature conservation value of these areas that have been long neglected and ensure their long-term security of management. • The SANG will be provided at a rate of 11.15 ha per 1000 population. All components of the total SANG are greater than 2 ha in size (smallest = 5.23 hectares, the largest = 35.15 hectares). The SANG includes a wide range of topography, from the flat of the tow path, to the steep footpaths in Ski Slope Woods and Peaked Hill. The SANG also provides a range of habitats, from beech woodland to large freshwater lakes, and from the canal to the open space around the Wellington Statue. The proposals include a comprehensive GI Strategy to ensure access to the SANG is through green walkways and spaces from all elements of the developable area.
Access Management	• Existing landowners and managers should deliver access management and funding should come from developer contributions. Funding should be provided for in	• The SANG form part of a 999-year lease, allowing Grainger to deliver the package in perpetuity.

	perpetuity. • Access management should be coordinated strategically, by Natural England (NE) working with local authority and land managers, in line with an overarching strategy for access management on the SPA and SANGs, which should include: i) A consistent SPA/SANG message - which may include signs, leaflets, educational material, etc ii) Guidance on access management on the SPA eg rangers, seasonal restrictions, campaigns etc iii) Guidance over access management on SANG eg provision of attractive facilities.	• Off-site works will be delivered through a S106, to which the SoS has committed the MoD to enter. • The SANG will be funded in perpetuity by an appropriate commuted sum. • Grainger expects to make full SAMM contributions.
Monitoring and review	Monitoring of the success of avoidance/mitigation measures should be carried out by local authorities, NE and existing landowners and managers, and funded by ensuring that the charge levied on developer contributions includes an allowance for the cost of this work. This monitoring should address: i) Habitat condition and bird numbers (an existing NE responsibility). ii) The provision of SANG and delivery of dwellings iii) Access Management iv) Visitor Surveys.	• Full SAMM payments will ensure that the Wellesley proposals fund an appropriate contribution to this strategic work
Guidelines for the creation of Suitable Accessible Natural Green Space (Natural England) (July 2007)		
Location and design	• The location and design of SANG must be such that the SANGs are more attractive than the SPA to users of the kind that currently visit the SPA. • The identification of SANGS should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers.	• The SANG is located within easy walking distance of all areas within the Wellesley proposals. It is therefore more convenient than the SPA. It will provide a range of suitable, semi-natural, rural experiences attractive to recreational users • The SANG proposals have been specifically designed to avoid damage to areas of high nature conservation value due to increased visitor numbers and will be monitored to ensure that recreational use is carefully managed in this respect.
Accessibility	• The availability of adequate car parking at sites larger than 10 ha is essential • Car parks should be clearly signposted and easily accessed.	• The SANG package includes provision for car parking and specific proposals to upgrade existing car park facilities. The provision of parking has been a balance between encouraging people to walk to the SANG to meet sustainability policies, and a realistic expectation that notwithstanding the close proximity of the SANG to the new residential units, some people will inevitably drive. The capacity of the car parks has been analysed according to likely trip generation. • Car parks will be clearly signposted, and new residents will be made aware of their existence in the welcome packs that they receive on moving in.
Target groups of Visitors	• 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. • Where large populations are close to the SPA, the provision of SANGS should be attractive to visitors on foot.	• The close proximity of the SANG to the developed area will mean that the main pool of SANG users will not be typical because they will have accessed the SANG by foot rather than car. The design of the Wellesley SANG has been driven by ensuring that it is attractive and accessible to users on foot. The GI Strategy provides green links from across the developable area to the SANG; careful consideration has been given to pedestrian crossings across roads, and; distances have been kept to a minimum to ensure that it is realistic to walk to the SANG from any back door on the development.
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 (Though networks of SANGS may accommodate long visitor routes and this is desirable, they should not be solely relied upon to provide long routes).	• The SANG provides for a range of walks, from the short 10 minute hop to much longer routes that can take 2-3 hours to complete. A reasonable walk within the SANG is 4.5 km in length along the Basingstoke Canal. This walk can be easily extended by joining the loops around Camp Farm Lake or Rushmoor Bottom. The SANGS also link to longer routes along the Blackwater Valley and it is also possible for users of the canal towpath

		to continue along the path, in either direction, for many km's beyond the limit of the SANG.
Paths, Roads and Tracks	• SANGS should aim to supply a choice of routes of around 2.5km in length. • The provision of longer routes should be regarded as a standard. • Paths should be routed so that they are perceived as safe by the users. • There should be some more visitor-friendly routes built into the structure of a SANGS, particularly those routes which are 1-3km long.	• A number of loops within the SANG are around 2.5km in length. These include a loop in Rushmoor Bottom and a number of possible loops around Rushmoor Bottom and including Basingstoke Canal Loop 1. Shorter and longer loops are also available. These will all be available to first occupier users. • Management and creation of the paths by a suitably experienced management company will ensure that they are perceived as safe to use. • Shorter routes within the SANG include a DDA compliant route and a route to enable visitors to visit hide facilities at Rushmoor Flash.
Artificial Infrastructure	SANGS would be expected to have adequate car parking with good information about the site and the routes.	• The SANG package includes proposals for the substantial upgrade of 4 car parks. Each car park will be furnished with interpretation and map boards.
Landscape and Vegetation	• SANGS do not have to contain heathland or heathy vegetation to provide an effective alternative to the SPA. • Woodland or a semi-wooded landscape is a key feature and semi-natural looking landscape with plenty of variation is preferred. As is undulating landscape is preferred to a flat one.	• The SANG routes are predominantly through wooded areas, a habitat that is generally accepted as robust to recreational pressures. The SANG woodland offers a variety of woodland experience, from paths through beech woodland, heathy woodland within the development and the wooded towpath along the canal. Features of interest are also present, from the Wellington Statue in the south of Rushmoor Bottom, to Camp Farm Lake to the east. Old military infrastructure such as firing walls will be maintained as points of interest, and the flashes associated with the Basingstoke Canal will include hide and interpretation facilities. • Topography across the SANG as a whole is varied: the towpath route and Rushmoor Bottom are flat, whilst the woodlands of Ski Slope Woods and Peaked Hill are steep, requiring footpaths to contour along the gradient.
Restrictions on usage	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.	• The proposals include substantial lengths of fencing to secure the SANG against the risk of dogs running onto nearby roads. There are no other restrictions to prevent people letting dogs off leads.
Assessment of site enhancement as mitigation	• SANGS may be provided by the enhancement of existing sites. Methods of enhancement 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.	• A visitor survey of those parts of the SANG that are currently accessible has shown that they are little used. However, the use that does exist has been quantified and used to discount the available area for recreation in consultation with Rushmoor Borough Council and Natural England. Discounted in this way, the remaining SANG provision is well in excess of the minimum 8 ha per 1000 head of population standard requirement. • The SANG package includes a series of proposals designed to comprehensively enhance all elements of the SANG from the perspective of the recreational visitor, but also from an ecological perspective. These measures are all guaranteed for delivery in perpetuity.
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. Enabling the granting of planning permission for residential development to be staged in parallel.	• Phasing of the SANG has been carefully considered to front-load provision and to ensure that interim connecting routes are established as appropriate. Importantly, key personnel will have been employed at the point of first occupants to ensure good community liaison and explanation of the SANG package as it becomes progressively on-stream.
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. • 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.	• The SANG package is consistent with all current uses of the site, and there is no expectation that existing users would move from the SANG to the SPA. • The Aldershot Garrison Fishing Club currently use the Camp Farm Lake to fish under licence from the MoD. This licence will remain in place as part of the 999-year SANG lease but depends on AGAC enabling the use of the lake and surrounds as part of the SANG.
Site Quality Checklist – for a suite	Must haves:	• The SANG proposals have been designed to connect to the residential area

of SANGS	• 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).	through a comprehensive GI Strategy such that it is easy, pleasant and convenient for users to walk. Nonetheless, it is recognised that some users will drive, and the provision therefore includes the upgrade and expansion of 4 existing car parks. • It is possible to complete a 2.5km walk around Rushmoor Bottom. This loop will be established and available for first occupants of the scheme. • Car parking improvements and expansions have been designed by Highways Engineers and conform to all relevant standards. Car parks will be clearly signed from the road. • The SANG facility has been designed primarily for users on foot. However, the canal towpath provides a longer and appropriately surfaced route for off-roading bikes. • All car parks have a circular route that starts and finishes at the car park. • All SANG paths will be opened up and managed to ensure that they are safe for visitors. • All paths will remain unsurfaced, with the exception of the canal towpath that will be upgraded in places in conjunction with the Basingstoke Canal Authority to an unbound stone surface path. This will ensure that it is resilient to the likely pressures to which it is subject and appropriate for all user types. • The SANG has been designed to be a semi-natural experience. Waymarkers, sign posts, the occasional bench and interpretation boards will be sensitive to the SANG objectives. The only additional infrastructure will be the hides and interpretation facility to be constructed next to Rushmoor Flash. This will be low-key and rustic in nature to ensure that it is sympathetic to it's context. • The SANG provides a wide variety of habitat for users to experience, including open freshwater lakes, beech woodland, the canal, heathy woodland and open grassland areas. • The SANG will be unrestricted: dogs will be able to run off lead safely. • SANGS are generally free from unpleasant intrusions: where potential visual intrusions are present, screening is often already in place, and where not, will be planted up as part of the SANG proposals.
	Should haves: • 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.	• The SANG will be clearly sign-posted on the ground and will be brought to the attention of new residents through leaflets included in the welcome folder and through ranger/community liaison. A website for Wellesley will include full details of SANG facilities. • All car parks allow dog owners to take dogs off lead straight to the main areas of the SANG: the car parks are an integral feature. • The SANG includes a wide range of topography: from the flat of the towpath, to the gently undulating nature of Camp Farm Lake, to the steeper sections of Peaked Hill and Ski Slope Woods. • The main entrances to the SANG will include comprehensive interpretation boards with maps and all relevant information. • All of the SANG is semi-natural and includes a wide variety of habitat experience, including open spaces, woodland, open water of Camp Farm Lake and the canal. • To the south of Rushmoor Bottom, the SANG includes the Wellington Statue, an imposing and spectacular focal point. **Conclusion: mitigation package is compliant with Natural England's guidance on the creation of effective SANG**

Bracknell Forest Council's Thames Basin Heaths Special Protection Area Avoidance and Mitigation Supplementary Planning Document Appendices (Consultation Draft) (September 2011)		
	Bracknell Forest Council has developed a formula for calculating the provision of SANG, to take into account the existing visitor use of the SANG sites. This has become an established approach, and has been recommended by Natural England as the basis on which the quantum of SANG required to mitigate the proposals for the Wellesley development on the Thames Basin Heaths SPA should be calculated. When calculating the provision of SANG, proposals must take into account the existing visitor use of the site: *'The overall carrying capacity of each site can be calculated with reference to the 8ha/1000 standard set out in the Thames Basin Heaths Delivery Framework. For example, a new 8ha site would mitigate for 1000 new residents. However, as demonstrated by the visitor surveys, all of the potential SANGs have a level of existing visitor use. The actual mitigation capacity of each site is the difference between the overall carrying capacity (based upon the 8ha/1000 standard) and the current visitor use. (32)'* Table 5 of the SPD appendices demonstrates how to calculate the residual area of SANG capacity available, taking into account existing visitor numbers.	The Bracknell FC formula has been used to calculate the quantum of the Wellesley SANG that should be discounted to allow for existing visitor use of its constituent areas. This discount has allowed calculation of a quantum of SANG available for use by new users associated with the Wellesley proposals. The approach and assumptions made in calculating the final area of SANG available has been agreed with Rushmoor Borough Council and Natural England.
Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy 2012 (adopted February 2012)		
Suitable Alternative Natural Greenspace (SANG)	• SANG should be provided on the basis of at least 8ha per 1,000 population. The average occupancy rate will be assumed to be 2.4 persons per dwelling unless robust local evidence demonstrates that this is unrealistic. • SANG may be provided by developers for individual developments with the agreement of the Council and Natural England. • SANG should be at least 2ha in size, and located within a wider network of spaces. • The catchment of SANG will depend on the individual site characteristics and location and their location within a wider green infrastructure network. • ***Aldershot Urban Extension:*** The Aldershot Urban Extension Supplementary Planning Document identifies a minimum of 92 hectares of Suitable Alternative Natural Greenspace to be provided.	• The SANG assumptions of 8ha per 1,000 population and 2.4 persons per dwelling has been used in the calculations of quantum of the Wellesley SANG provision and capacity. • The approach and assumptions made in calculating the final area of SANG available and its provision has been agreed with Rushmoor Borough Council and Natural England. • All components of the total SANG are greater than 2 ha in size (smallest = 5.23 hectares, the largest = 35.15 hectares). • The SANG proposals have been designed to connect to the residential area through a comprehensive GI Strategy. It is recognised that some users will drive, and the provision therefore includes the upgrade and expansion of 4 existing car parks. • The Wellesley proposals incorporate a SAMM & SANG package that includes a total of 103.03 hectares when discounted to allow for existing recreational use. It therefore provides substantially more than the 92 hectares required.
Strategic Access Management and Monitoring Measures (SAMM)	Strategic Access Management and Monitoring of the SPA is required to be delivered by landowners and managers, funded by developer contributions, and provided for in perpetuity. The Joint Strategic Partnership Board has agreed that this figure should be an average of £630 per net additional dwelling. The break down of contributions is as follows: • 1 bedroom dwelling - £399 • 2 bedroom dwelling - £526 • 3 bedroom dwelling - £711 • 4+ bedroom dwelling - £807 • 5+ bedroom dwelling - £1,052	Grainger expects to make full SAMM to the strategic access management across the Thames Basin Heaths SPA as a whole. **Conclusion: mitigation package is compliant with RBC's Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy 2012**

Wellesley

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