

Land at Marsh Lane, Christchurch

**Christchurch & East Dorset Core Strategy
Public Examination**

**Supporting Statement on former Policy CN 3:
'Land at Marsh Lane', in relation to the provision
of Suitable Alternative Natural Greenspace**

A Report on behalf of Sembcorp

August 2013

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1.0 Introduction

- 1.1 A site at Marsh Lane, Fairmile, Christchurch, Dorset, is being promoted for residential development by Sembcorp Bournemouth Water (SBW). The proposed development site (known hereafter as 'the Site') is shown in **Figure 1**. Designated sites in the area are shown in **Figure 2**. A further description of the site and designated sites is given in **Section 2** below. Land access (including designated open countryside) and rights of way are shown in **Figure 3**.
- 1.2 The Site was previously allocated for the development of 90 dwellings, open space and an area of Suitable Accessible Natural Greenspace (SANG), in Policy CN3 (Land East of Marsh Lane) of the Pre-submission Draft Christchurch and East Dorset Core Strategy (2012). The residential development was to be located outside a 400m exclusion zone around the Dorset heathlands international and European designated sites.
- 1.3 Existing and emerging local planning policies draw on evidence from Natural England research¹ that has shown that increases in housing within 5km of the Dorset heathland European and internationally designated sites could contribute to significant cumulative effects on the heathland through a range of urban and recreational pressures, including arson, dog walking, disturbance to ground nesting birds, trampling and damage to heath habitats, predation by cats). The findings of the Habitats Regulations Assessment (HRA, February 2012) of the Core Strategy, found that the potential effects of the development allocation in Policy CN3 would be mitigated through the proper implementation of policies in the Core Strategy (including policies M1-M3. However, Policy CN3 was deleted in the Proposed Changes to the Pre-submission Core Strategy, due to an objection from Natural England. Natural England raised concerns in relation to the effects on Dorset Heathlands SPA/Ramsar site and Avon Valley SPA/Ramsar site and component SSSIs, the effects on grazing management, and the lack of a biodiversity survey.
- 1.4 Further work has been carried out on behalf of Sembcorp and discussions have been held with Natural England in relation to a potential smaller development allocation (of 45 dwellings) and a larger area of SANG than was proposed in Policy CN3.

¹ Including Clarke, R., Liley, D., Underhill-Day, J., and Rose, R., 2005. Visitor Access Patterns on the Dorset Heathlands. English Nature Research Report No. 683.

I.5 This report provides an update on the results of an ecological survey of the Site, and a discussion of the designated sites and their condition and management (**section 2**). It provides a discussion of national and emerging local planning policy and how the proposals for the Site accord with policy and guidelines (**section 3**). It describes the latest concept proposals for SANG provision at the Site, and proposes that a package of off-site heathland mitigation measures is prepared, which together are considered likely to mitigate and avoid adverse effects on the designated sites (**section 4**). Lastly, the report responds to the specific concerns and objections from Natural England, including on the suitability of SANG provision at the Site (**section 5**).

I.6 In conclusion, it is considered that:

- A concept design for Suitable Accessible Natural Greenspace (SANG) in conjunction with the development of land at Marsh Lane, could be implemented that would provide avoidance and mitigation for the nearby European and international designated sites through deterrence of local trips on foot from the development site.
- Direct access impacts on to Avon Valley sites can be avoided through suitable fencing.
- The development can secure a package of off-site heathland mitigation measures for Town Common (through a Section 106 agreement or CIL) aimed at improving visitor access management at the designated sites, to reduce the impacts of existing and future visitor access, and perhaps achieve a positive impact, in a variety of ways as outlined in the St Catherine's Hill and Town Common Management Plan.
- Together these measures can provide an effective strategy for avoidance and mitigation for the residents (and their dogs and cats) of a development of 45 dwellings at Marsh Lane, on European and nationally designated sites in the vicinity of the Site.

2.0 BASELINE CONDITIONS

The Site

- 2.1 The Site at Marsh Lane is 5.7 hectares in size and is located at Grid Reference SZ153945. The Site is adjacent to Marsh Lane, in Fairmile, an established residential area of Christchurch, with several dwellings' gardens backing on to the Site to the south/west, and is on fairly level ground, which drops several metres to the south. The Site is not accessible to the public, being fenced, gated securely and signed accordingly. The Site is adjacent to SBW's water treatment works at Knapp Mill, including open water tanks to the east, and the main water works site to the south. A footpath to the south follows the boundary of the Knapp Mill water works which lies behind a thick conifer hedge for the most part. To the immediate north west lies another small area of pasture and a stable.
- 2.2 The River Avon lies between 100 and 300 metres to the east, with the land between is floodplain and grazing marshes. The site itself sits above the floodplain, and is elevated approximately 2-10m. The boundary between site and floodplain is marked by patches of developing woodland and scrub above a flooded ditch, and fencing.
- 2.3 To the north and east beyond the water tanks the floodplain of the River Avon is designated as the Avon Valley Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar sites, which the River Avon (designated as the River Avon System SSSI and Special Area of Conservation (SAC)), flows through. St Catherine's Hill and Town Common, designated as SSSI and part of the Dorset Heathlands SPA, SAC and Ramsar sites, lies within 300m of the northern edge of the Site.
- 2.4 The location of the site is shown in **Figure 1**. Designated sites in the area are shown in **Figure 2**. Public rights of way and open countryside areas designated under the Countryside and Rights of Way Act 2000 are shown in **Figure 3**.
- 2.5 The Site comprises an area of largely semi-improved acid grassland of varying botanical quality, surrounded by hedgerows. The site is managed including by grazing by horses and cattle; grazing is undertaken over the northern part of the site under the terms of a grazing licence between local residents with SBW in conjunction with adjacent meadows at Knapp Mill within the Avon Valley SSSI/SPA and Ramsar site.

Extended Phase I Habitat Survey

- 2.6 An Extended Phase I Habitat Survey was undertaken on the 6th July 2012 by an experienced ecologist from Nicholas Pearson Associates (NPA) to assess the potential wildlife value of the site and assess the presence or likely presence of protected or notable species.
- 2.7 The majority of the site is semi-improved acid grassland, of varying quality, and has the characteristics of the UK BAP Priority Habitat Lowland Dry Acid Grassland. As such, part of this habitat area should be retained and enhanced as part of a proposed development. Scattered and dense scrub formed the second habitat type on the Site, particularly the site boundaries, with a number of semi-mature trees including Oak and Rowan, and a hedgerow along a field boundary within the west of the Site.
- 2.8 The site also offers some potential to support protected and notable species, as was identified by the presence of a Grass Snake on-site. The dense scrub network offers suitable habitat for breeding birds, Great Crested Newts and commuting/foraging bats with the grassland offering foraging opportunities for both bats and birds. The River Avon nearby also supports Water Vole and Otter. Further detailed ecological surveys are recommended to accompany any planning application, including for bats, reptiles and Great Crested Newt.

Designated sites

European sites

- 2.9 Six European Designated sites lie within 1km of the Site boundary. These are described below and are illustrated on **Figure 2**.
- 2.10 Special Areas of Conservation (SACs) are protected sites designated under the EC Habitats Directive. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). There are two SAC within 1 km of the site boundary and the reasons for selection are shown within **Table I** below:
- River Avon SAC – closest point lies 265m to the west; and
 - Dorset Heaths SAC – closest point lies 105m south and east.

Table I: Special Areas of Conservation Selection criteria

Site Name	Annex I habitats that are a primary reason for selection of this site	Annex I Habitats present as a qualifying feature (but not a primary reason for selection)	Annex II species that are a primary reason for selection of this site	Annex II species that are present as a qualifying feature
Dorset Heaths SAC	<ul style="list-style-type: none"> - Northern Atlantic wet heaths with <i>Erica tetralix</i> - European dry heaths - Depressions on peat substrates of the Rhynchosporion 	<ul style="list-style-type: none"> -Molinia meadows on calcareous, peaty or clayey-silt-laden soils; -Calcareous fens with Great Fen Sedge <i>Cladium mariscus</i> and species of the Caricion <i>davallianae</i> - Old acidophilous oak woods <i>Quercus robur</i> on sandy plains 	Southern damselfly	Great Crested Newt
River Avon SAC	<ul style="list-style-type: none"> - Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation; 	Not applicable	<ul style="list-style-type: none"> - Whorl snail; - Sea Lamprey; - Brook Lamprey; - Atlantic Salmon; - Bullhead 	Not applicable

2.11 Special Protection Areas and Ramsar sites (SPAs) are protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Ramsar sites are wetlands designated under the Ramsar Convention 1971. The initial emphasis was on selecting sites of importance to waterbirds within the UK and consequently many Ramsar sites are also SPAs. There are two SPA and two Ramsar sites with the same boundaries that lie within 1km of the site boundary: Dorset Heathlands SPA/Ramsar and Avon Valley SPA/Ramsar.

2.12 The Dorset Heathlands SPA/Ramsar sites lie approximately 265m to the west of the site boundary. The SPA is designated for its significant breeding populations of three birds that are listed on the Annex I of the Birds Directive.

- Dartford Warbler *Sylvia undata* – supports 21.8% of GB breeding population;

- Nightjar *Caprimulgus europaeus* – supports 12.8% of the GB breeding population;
- Woodlark *Lullula arborea* – supports 6.8% of GB breeding population; and
- Overwintering population of Hen Harrier and Merlin.

2.13 Town Common SSSI forms the part of the Dorset Heathlands SPA closest to the Site at Marsh Lane. The SSSI condition assessment undertaken in 2012 by Natural England states that ‘The SSSI remains in favourable condition for the 3 SPA birds (Nightjar, Woodlark and Dartford Warbler)’.

2.14 The Avon Valley SPA/Ramsar sites lie immediately adjacent to the northern boundary of the site and extend around the western and southern edge, approximately 60m from the site boundary. This SPA qualifies under Article 4.1 the Birds Directive by supporting populations of European importance of the following species listed on Annex I of the Directive:

- Bewick's Swan *Cygnus columbianus bewickii*, 135 individuals representing at least 1.9% of the wintering population in Great Britain.

2.15 The Avon Valley SPA also qualifies under Article 4.2 of the Birds Directive supporting populations of European importance of the following migratory species:

- Gadwall *Anas strepera*, 667 individuals representing at least 2.2% of the wintering Northwestern Europe population.

Sites of Special Scientific Interest

2.16 SSSIs are protected under the Wildlife and Countryside Act 1981 (as amended). There are three SSSIs within 1km of the site boundary, which are also internationally important for their wildlife and designated as SACs, SPAs or Ramsar sites:

- Avon Valley (Bickton to Christchurch) SSSI. This site lies adjacent to the northern boundary and within 60m to the west and the south (also Avon Valley SPA/Ramsar);
- River Avon System SSSI. This site lies 105m to the east of the site at its closest point (also River Avon SAC);
- Town Common SSSI. This site lies 265m to the west (also Dorset Heathlands SPA/Ramsar).

Avon Valley SSSI

- 2.17 The Avon Valley SSSI is one of the largest expanses of unimproved floodplain grassland in England, and supports a highly diverse flora and fauna. Unit 210, also known as Cowards Marsh, lies immediately adjacent to the northern boundary and in September 2009 was assessed as being in an 'unfavourable, *recovering*' condition. Units 216 and 217 of the SSSI lie within 60 m of the eastern boundary of the site. In 2010, Natural England assessed the units as being in an 'unfavourable, *recovering*' condition. The condition assessment also noted that these units entered into a Higher Level Stewardship Agreement, HLS, in autumn 2008. Ditch restoration was completed in Oct/Nov 2008 to the main ditch running along the western boundary of the site unit. This has been effective in reducing the waterlogging in-field and has enabled hay-cuts with aftermath grazing in 2009 and now again in 2010.

River Avon System SSSI

- 2.18 The section of the River Avon that crosses the floodplain is included within the River Avon System SSSI (Unit 35). It passes within 110 m of the Site at its closest point. The River Avon rises in the chalk of the Pewsey Vale in Wiltshire, and carries its lime-rich water across acid sands and clay in its lower reaches near Christchurch. Its varied habitats support very diverse plant communities and associated ecosystems, and the SSSI as a whole is especially notable for its communities of invertebrates, including Desmoulin's Whorl Snail *Vertigo moulinsiana*, birds and fish (including salmonid species). A condition assessment of Unit 35 was undertaken by Natural England in March 2010 states that the unit is currently in an 'unfavourable, *recovering*' condition and cites:

'All remedies are underway however we will have to wait until the next Condition Assessment in 2014 to assess recovery and whether any further actions are still required. The status of the pea mussel and large mouthed valve snail is not actually known (although recorded as unfavourable recovering). Most of the sites for Desmoulin's whorl snail are in favourable condition (4 out of 5 sites). Salmon are, however, below their conservation limit and at risk.'

Town Common SSSI

- 2.19 Town Common SSSI is a large tract of lowland heathland with a varied mosaic of heathland plant communities, woodland and wooded heath. It is one of the largest unfragmented blocks of heathland in south-east Dorset, and supports important invertebrate, bird and reptile communities. It has breeding populations of all six native British reptiles, including the

European Protected Species (EPS) Sand Lizard *Lacerta agilis* and Smooth Snake *Coronella austriaca*.

- 2.20 Unit 18 of the SSSI (encompassing the southern and eastern part of St Catherine's Hill) lies 270m west of the Site, and in the last assessment by Natural England (January 2012) was described as in an 'unfavourable, no change' condition, 'based on the large area of tree and rhododendron cover on land where the objective is restoration of significant areas of heathland together with the Molinia dominance of wetter areas. These issues are currently being looked at within a management plan currently being prepared. There is significant public use of the unit but because most of the access points are to the west it is the western part of the unit where there is little heath that more of the public pressure occurs.' The assessment stated that there has been 'good progress' since 2005, when the unit was described as being in 'unfavourable, declining' condition. The condition of all units² of the SSSI is included in **Appendix I**.
- 2.21 Unit 10 of the SSSI (most of the flat plateau of St Catherine's Hill and the western and part of the southern slopes) was also 'unfavourable no change' when last assessed in 2011, mainly due to some 70% of the unit being mature pine with a rhododendron understorey, in areas with good potential for heath restoration. The SSSI also 'remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler) although this particular unit has high levels of public access which may affect its ability to support breeding nightjar'.
- 2.22 Part of Town Common SSSI (the western slopes and St Catherine's Hill) is managed by a number of parties under the guidance of the St Catherine's Hill & Town Common Management Plan 2012-2023, which has been adopted by Christchurch Borough Council. The implementation of the Management Plan is managed by a Steering Group including the Council and ward councillors, Natural England, the Amphibian and Reptile Conservation Trust (ARC), Dorset County Council's Urban Heaths Partnership, Friends of St Catherine's Hill, West Christchurch Residents Association, Hurn Parish Council, and Sembcorp Bournemouth Water (as owners of the reservoirs). The Management Plan sets out the current conditions, features, ecology, history, access and uses, and objectives for management which have been painstakingly agreed with all stakeholders over the last 10 years. The Management Plan highlights the priority for management is for heathland habitat creation, and the management of heathland, woodland and wooded heath habitats, to

² Maps of the SSSI units are found at http://www.sssi.naturalengland.org.uk/Special/ssi/unitlist.cfm?ssi_id=1002693

increase the area of heathland and manage change. Actions are identified for a wide range of measures, including:

- habitat management and protection, and heathland expansion;
- safeguarding and interpreting features of historic and archaeological interest;
- maintaining and enhancing the valued sense of place, while ensuring informal public access allows people to enjoy and appreciate the site;
- provide opportunities for education;
- continue to engage community support for the site's care and management;
- have regard for the provisions of statutory obligations and the rights and safety of people who live nearby and/or use the site.

2.23 The Management Plan describes the accessibility of the area and recreational uses and their impacts (including walking, dog walking, horse-riding along bridleways, and other more damaging activities such as non-bridleway cycling (off-road mountain biking), motorcycling (quad bikes), flytipping, fires, poaching and camp building). The local community are heavily involved in the management of this part of the Dorset Heathlands SPA/Ramsar site and SSSI, through the Friends of St Catherine's Hill local volunteer group, and guided walks and other volunteer activities run by the Friends and the Urban Heaths Partnership and other site managers. Interpretation signage and boards full of information about the site and activities are present at entrances to Town Common. Section 8 of the Management Plan makes it clear that St Catherine's Hill and Town Common are very popular for walking and dog walking, and that dog walkers are the highest proportion of the site's users and an important part of the partnership of people who care for the site. Responsible dog walkers are welcomed by the managers of the site. The Management Plan does not discuss any issues in relation to additional developments in the area which might increase dog walking.

2.24 Actions agreed in the Management Plan that relate to the management of visitor access and recreational uses, include:

- A17: Agree perimeter fencing and location of infrastructure (e.g. access gates, troughs, etc.). This is to allow the introduction of grazing, and to manage visitor access.
- A26: Encourage dog owners to keep dogs on leads / under control on paths in open areas during bird nesting season. [N.B. a Dog Control Order is now in force within Christchurch Borough Council, which requires this on open land in any case].
- C2: Use practical but rustic effects to limit car parking along local access roads to the site, where this parking disturbs residents.

- C5: Develop protocols for dog pack walking. Direct dialogue between the Urban Heaths Partnership and professional dog walkers about their use of the site for pack walking of dogs.
- C6: Continue to promote and implement dog related events on site as provided by the Friends Group and Urban Heaths Partnership.
- C7: Periodic monitoring of use of the site by all users to measure impacts in relation to benefits and potential disturbance to wildlife on site and help encourage responsible use. Provision of clear signage and advice for dog walkers.
- C13, C16: Site wardens to discourage motorcyclists and off-bridleway cyclists.
- C15, C18: Investigate the improvement of physical barriers (against motorcyclists and off-bridleway cyclists).
- C17: Improve signage, place way marking discs at key locations where cycling is not permitted.
- C21: Continued maintenance of physical barriers such as gates at site entrances to discourage flytipping.
- D1-4: Update site leaflet and make available in print and on web. Secure funding for interpretation board renewal and for a new history panel. Give talks and lead walks about wildlife, heathland management and history. Maintain website with up to date news and resources.
- E1-3: Identify a volunteer coordinator. Promote opportunities for volunteering by maintaining up to date list and identifying volunteer contact point. Publicise volunteering opportunities through site posters, and programmes.

2.25 Section 9 of the Management Plan, 'Resources', states that the delivery of the above actions is dependent on there being adequate resources, including finances, during the life of the plan, including from existing sources, which include: Council and ARC budgets, grant aid (mainly Higher Level Stewardship administered by Natural England), and potentially Forestry Commission's English Woodland Grant Scheme. Both the Council and ARC warden the site most days, and rely on volunteer work parties for light habitat maintenance, and site users (including dog walkers) to monitor issues arising at the site.

2.26 A survey of households in the area for the Dorset Household Survey³ found that St Catherine's Hill and Town Common was the 9th most visited heathland site in south-east

³ Clarke, R.T., Sharp, J., and Liley, D., 2008. Access Patterns in South East Dorset. Dorset Household Survey and Predictions of Visitor Use of Potential Greenspace Sites. Dorset Heathlands DPD.

Dorset. Some 55 visitors (out of the 1635 who responded) stated they visited this heathland site, of which 23 (41%) visited a few times a year or less, 16 (29%) visited roughly every month, 10 (18%) visited most weeks and 5 (9%) visited most days. From this data, it can be assumed that a majority of the total visits made to this heathland would be those trips made 'most days', but that a small minority of people visit this frequently. Some 49% visits were made by car, with the mean average distance travelled being 3.05km.

2.27 It is proposed in **section 4** below that a development of the Site at Marsh Lane could provide a package of (or contributions to) off-site heathland mitigation measures that are identified as required for the Town Common SSSI component of the Dorset heathlands, which together with on-site SANG provision, would ensure avoidance and mitigation of recreational pressures and impacts arising from the development. Such measures could include:

- Contributions to fencing within the heathland, for visitor access management and grazing (action A17 above);
- Contributions to improvements to other physical barriers for visitor access management (actions C15, C18, C21);
- Support for site wardening, volunteer coordination and management, visitor events and activities, walks and talks, and monitoring of site usage (actions C5, C6, C7, C13, C16, D3, E1, E2, E3);
- Contributions to improvements to visitor signage, interpretation boards, leaflets and website information (C17, D1, D2, D3, D4).

3.0 Planning Policy

3.1 This section looks at national and local planning policies of most relevance to the consideration of the potential impacts from a development of the Site at Marsh Lane on designated nature conservation sites and the mitigation measures required.

National Planning Policy Framework

3.2 The Government's National Planning Policy Framework (NPPF, March 2012) consolidates the previous national planning guidance, and replaced all Planning Policy Statements, including PPS9. Section 11 of the NPPF deals with Conserving and Enhancing the Natural Environment.

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- 3.3 Paragraph 109 states that the planning system should ‘...contribute to and enhance the natural and local environment by: ... minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...’
- 3.4 Para 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity, including through ensuring that significant harm to biodiversity and adverse effects to SSSIs from developments are avoided or mitigated, and by encouraging opportunities to incorporate biodiversity in and around developments.
- 3.5 Para 119 states that ‘The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.’
- 3.6 The Local Plans prepared by local planning authorities are required to be consistent with the NPPF.

Christchurch and East Dorset Core Strategy

- 3.7 The Christchurch and East Dorset Core Strategy is the first part of the Local Plan being prepared by Christchurch Borough Council and East Dorset District Council (‘the Councils’). The Pre-Submission Core Strategy was subject to public consultation from April to June 2012. Of particular relevance were policies:
- ME1: Safeguarding Biodiversity;
 - ME2: Protection of the Dorset Heathlands;
 - ME3: Suitable Alternative Natural Greenspace;
 - CN3: Land East of Marsh Lane.
- 3.8 In November 2012, the Councils published the Proposed Changes to the Core Strategy Pre-submission. Former policies ME3 and CN3 have been deleted in the Proposed Changes. Text from former Policy ME3 has been amended and expanded on to form Appendix 5, which provides guidelines for the provision of SANG, as referred to in amended Policy ME2.
- 3.9 Amended policy ME 1 seeks to protect, maintain and enhance biodiversity and the condition of all types of nature conservation sites, habitats and species and their ecological networks,

including designated sites and priority species and habitats. National policy will be applied to provide protection for international, national and local designated sites ‘*commensurate with their status*’. Where harm is identified as likely to result from a development proposal, measures to adequately avoid or adequately mitigate harm will be required, as well as management of new features and monitoring of habitats and species. Development ‘*may be refused if adequate mitigation or, as a last resort compensation cannot be provided*’.

3.10 The site at Marsh Lane would accord with policy ME1 as it can be developed in conjunction with adequate on-site and off-site mitigation and avoidance measures to protect the nearby internationally and nationally designated sites, as set out later in this section and in **section 4**.

3.11 Amended policy ME2 sets out to protect the European and internationally designated Dorset heathlands (Dorset Heathlands SPA/Ramsar and Dorset Heaths SAC):

- ‘*no residential development will be permitted within 400m of protected European and internationally designated heathland;*
- ‘*any residential development within 400m and 5km of these areas will provide mitigation measures through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document (DPD), and the Dorset Heathlands Joint Supplementary Planning Document (SPD)... including:*
 - *provision of on-site suitable alternative natural greenspace (SANG) (provided in accordance with guidelines set out in appendix 5);*
 - *contributions to off-site greenspace / recreational projects*’.
- The policy states that the avoidance or mitigation measures will need to be delivered in advance of occupation of development, SANG will be secured through a legal agreement, heathland mitigation measures will be secured through Community Infrastructure Levy in the majority of cases.
- ‘*On development proposals for approximately 50 dwellings, where adequate mitigation cannot be provided on-site as part of the development, a financial contribution from the Councils will be required.*’ The policy refers to the Dorset Heathlands Joint DPD to set out the types of development, list of projects to be funded and the calculation of contributions, and states that ‘*Projects to be delivered through the DPD will include SANG, heathland access and visitor management, wardening, education, habitat re-creation and other appropriate avoidance measures.*’

3.12 The guidelines for the establishment of SANG, set out in new proposed Appendix 5 to the Core Strategy, requires and states:

- Green space that is suitable for mitigation for applications likely to affect the Dorset Heathlands European and internationally designated sites, as one of a range of mitigation measures, a number of which are detailed in the Dorset Heathlands Planning Framework SPD, considered capable of avoiding or mitigating harm from a number of urban effects;
- Alternative green space to divert users away from the Dorset heathlands designated sites, as mitigation for the likely impact of residential developments, by preventing an increase in visitor pressure.
- The effectiveness of SANG as mitigation will depend on its location and design, such that SANG is more attractive to visitors than the Dorset heathlands.
- SANGs may be created from existing open space of SANG quality with no (or limited) public access which for the purposes of mitigation could be made fully accessible to the public, (or from open space with existing access that could be made more attractive, or land in other uses that could be converted to SANGs).
- Identification of SANG should avoid sites of high nature conservation value that are likely to be damaged by increased visitor numbers.
- Accessibility: Guidelines 1-4: SANGs design needs to take into account the anticipated target group of visitors, e.g. be attractive to visitors on foot in urban areas, so sites must have adequate car parking unless the site is intended for local pedestrian use only, i.e. within easy walking distance of the developments linked to it. Access points should have signs outlining the layout of the SANG and routes available.
- Paths, tracks and other infrastructure: Guidelines 6-8: SANGs should aim to supply a choice of walking routes that provide an attractive alternative to those routes on heathlands in the vicinity. Given the average length of walks on heathlands, a circular walk of 2.3-2.5km in length is necessary unless there are particular reasons why a shorter walk is considered appropriate. Paths must be easily used and well maintained, suitable for use in all weather and seasons, but most should remain unsurfaced to avoid the site feeling too urban. SANGs must be designed so that visitors are not deterred by safety concerns.
- Advertising: Guidelines 9-10: SANGs should be clearly sign-posted and advertised, with leaflets (distributed to new homes in the area, and made available at site entrances), and a website available.

- Landscape and Vegetation: Guidelines 11-SANGs must aim to reproduce the quality of relative wildness found at open and semi-wooded heathland, but do not have to contain heathland vegetation. SANGs must be perceived as natural spaces without intrusive artificial structures. A natural looking landscape with plenty of variation including both open and wooded areas is ideal – SANGs must aim to provide a variety of habitats for visitors to experience. Access within the SANGs must be largely unrestricted with plenty of space for dogs to exercise freely and safely off lead. SANGs must be free from unpleasant visual, auditory or olfactory intrusions.

3.13 The above guidelines for SANG are also included in Appendix E of the Dorset Heathlands SPD and Appendix B of the Dorset Heathland DPD, discussed below.

3.14 The development of the Site at Marsh Lane would accord with policy ME2 and the associated SANG guidelines above as:

- Housing development on site would be located over 400m of protected heathland sites. The policy does not prevent housing development outside the 400m zone.
- An effective area of on-site SANG is proposed, to attract residents (particularly dog walkers) making recreational trips from the Site away from heathland sites. This is despite policy ME2 not strictly requiring on-site SANG provision for smaller developments of approximately 50 dwellings such as Marsh Lane.
- The proposed SANG is in line with the associated SANG guidelines outlined in new Appendix 5 to the emerging Core Strategy:
 - The SANG would provide an attractive area with a natural feel, an acid grassland habitat, and where dogs can exercise freely and safely, surrounded by trees, with hedgerows and new features (for further detail, please see **section 4**). Some attractive views would be available from the SANG, which is likely to attract dog walkers regularly to see views out to the nearby woodland and heathland of St Catherine's Hill, and the floodplain of the Avon Valley.
 - The SANG would be designed to attract pedestrian visitors from the adjacent development Site at Marsh Lane, as well as existing residents of Marsh Lane within 400m, without a need for additional car parking at the SANG, to cater for frequent visits from dog walkers. The SANG area is level and would provide an easy walk (see **section 4**), in contrast to the steep hill of St Catherine's Hill which would deter some dog walkers, particularly the more elderly.
 - The length of footpaths that can be provided in the SANG and through the adjacent development area is approximately 1.8km (see **section 4**). A shorter

route than recommended in the guidelines (72% of the 2.5km high end of the range) is considered appropriate here as the Site is relatively small, and creating additional paths through the area would be difficult if the 'natural feel' is to be retained. The guidelines allow for a shorter distance to be provided if there are particular reasons why it is considered appropriate.

- The guidelines state that SANG provision on site is one of the range of measures that can be required, rather than the only measure. The policy and guidelines promote a combination of on-site SANG and off-site heathland mitigation/avoidance measures.
- A financial contribution can be provided to provide a package of heathland mitigation measures, including the types of measures listed in the policy (see **section 4**). These measures can be targeted at the Town Common and St Catherine's Hill part of the protected Dorset heathlands. Such measures are also described as required in the St Catherine's Hill & Town Common Management Plan (see **section 2**).

3.15 Former Policy CN3: Land East of Marsh Lane, allocated the Site for development and included:

- the Green Belt boundary would be amended to allow limited residential development to meet local needs at this site;
- residential development will be located outside of the 400m heathland exclusion zone around the Town Common component of the Dorset Heathlands SPA/Ramsar site and Dorset Heaths SAC;
- requirements for open space (ref. Policy HE4) and SANG (ref. previous Policy ME3);
- requirement for appropriate ecological survey work to allow suitable mitigation measures to be devised and defined to avoid adverse impacts on off-site areas used by qualifying species of the Avon Valley and Dorset Heathlands SPAs and Ramsar sites.

3.16 The above policies were assessed for the impact on European designated sites through the *Pre-submission Core Strategy Habitats Regulations Assessment* (HRA, February 2012). Paragraph 3.26 stated that due to the proximity of the Marsh Lane site to the protected heathland sites, there is potential for significant effects from physical disturbance/damage from new residents that may use the site for recreation. However, in para 3.29-3.35, the report stated that after the appropriate assessment, it is concluded that the Dorset Heathlands SPA/Ramsar, Dorset Heaths SAC and Avon Valley SPA/Ramsar site, are not likely to be adversely affected by development policies in the Core Strategy, including from policy CN3. This is because developments will be further than 400m from the Dorset heathland sites and the proper implementation of policies ME1-3 should ensure adequate mitigation measures

are provided to help relieve any increase in visitor and urban pressure on the heathland and other European sites. Para 3.34 also states that the parts of the CN3 allocated site within the 400m 'heathland exclusion zone' 'will be used for the planned SANGs provision, providing a buffer area of greenspace between the homes and the heaths.' It is considered that the HRA report came to a reasonable conclusion. The HRA report for the Proposed Changes to the Pre-submission Core Strategy (November 2012) contained no further assessment of the impact of policy CN3 in light of Natural England's objection, as the policy had been deleted.

Dorset Heathlands Supplementary Planning Document

- 3.17 The Local Authorities party to *The Dorset Heathlands Interim Planning Framework 2010-11* issued *The Dorset Heathlands Planning Framework 2012-14* as a draft Supplementary Planning Document (SPD) for public consultation in February 2012. This was adopted in September 2012, to replace the previous Interim Planning Framework (IPF) until the adoption of a new Dorset Heathlands Development Plan Document can be adopted in 2014. The SPD functions in the same way as the previous Interim Planning Framework, and retains the guiding principle that there should be no net increase in urban pressures on internationally important heathland as a result of additional development. The SPD largely retains the approach in the Interim Planning Framework, and sets out the approach that the local authorities will follow in determining planning applications for residential development within 5km of the designated heathlands. In the area between 400m and 5km mitigation measures will need to be defined to divert recreational pressure away from the heathland, to manage access, and to provide resources to enable the above to be implemented.
- 3.18 Appendix E to the SPD contains the Guidelines for the establishment of SANG Quality Standards for the Dorset Heaths. These guidelines are discussed above in relation to Appendix 5 of the Core Strategy Proposed Changes.
- 3.19 The SPD defines the level of proposed contributions from developments towards mitigation schemes, the means of securing these through planning obligations (Section 106 agreements) and the proposed list of mitigation projects for 2012-14.
- 3.20 In the adopted SPD, residential developments are required to pay a contribution for each dwelling granted planning permission. Currently this is £952 per flat and £1,524 per house, with an administration fee of two per cent of these sums, subject to a minimum of £50 and a maximum of £1,000. Those applying for planning permission should provide an agreement

to make the payment before the development starts (a 'unilateral undertaking', which should be submitted with the planning application).

- 3.21 The list of Mitigation Projects in Appendix A to the adopted SPD describes a variety of projects proposed for 2012-14 to deter users from heaths (including SANG and recreational route improvements), as well as access and fire management projects. This does not include any specific project dedicated to the Town Common component of the Dorset heathlands.
- 3.22 The development of the Site at Marsh Lane would comply with the SPD through the provision of on-site SANG and a package of off-site heathland mitigation measures, that should be targeted at the Town Common and St Catherine's Hill component of the Dorset heathlands. Such a package could be secured through a Section 106 Agreement, in the absence of any specific project for Town Common being listed in Appendix A to the SPD. Alternatively, a project for Town Common could be included in any update to the list of projects referred to in Appendix 5.

Dorset Heathlands Joint DPD

- 3.23 The current SPD will shortly be replaced by *The Dorset Heathlands Joint Development Plan Document (DPD)*. Local authorities in south east Dorset issued the Dorset Heathlands DPD Preferred Options for consultation in February 2013 and intend to adopt the DPD in April 2014. The draft DPD sets out a long-term strategy for the avoidance or mitigation of the adverse urban effects of residential development near heathland in south east Dorset.
- 3.24 Objective 2 of the draft DPD is most relevant, and states: *'To mitigate and avoid the impacts of population and housing growth and other contributing development through measures that include: Suitable alternative sites giving an attractive natural experience; Creating a network of alternative recreational facilities; Providing new routes and connections between open spaces; Enhancing capacity of existing open spaces and recreational facilities; and Providing access management of the heaths and education of users.'* This acknowledges the importance of developments providing both on-site SANG, links to alternative recreational facilities and routes, and making contributions to access management of heathland and to education of site users.

3.25 Draft Policy DH2 states:

'Development within the Plan Area: *Development that is able to avoid or mitigate its adverse effects upon the Dorset Heaths International Sites may be granted planning permission by virtue of complying with the Conservation and Species Habitats Regulations 2010.*

The following uses within 400 metres of protected sites are likely to have a significant effect, either alone or in combination, upon the International Sites:

- a. Residential Development within Use Class C3 and C4.*
- b. Residential Institutions ...*
- c. Self catering, caravan and touring holiday accommodation.*
- d. Permanent and transit Gypsy & Traveller sites.*
- e. Student accommodation.*

Development of the uses identified above (including changes of use) will not be permitted within 400 metres of the International Sites unless it can be demonstrated conclusively that they give rise to no adverse effects, either alone or in combination on the Dorset Heaths International Sites.

Between 400m and 5km such developments will be required to avoid or mitigate adverse effects through a combination of on-site measures and/or measures implemented across the plan area.'

3.26 The draft DPD discusses the introduction of the Community Infrastructure Levy, which would potentially remove a direct link between developments and their impacts on infrastructure provision. Draft policy DH3 states:

'Prioritising funding for Infrastructure and Mitigation required by European

Legislation: *The five charging authorities within South East Dorset will prioritise funding from the Community Infrastructure Levy towards avoidance measures and the mitigation of adverse effects upon the Dorset Heaths International Sites.*

3.27 Accordingly, Christchurch Borough Council's *Draft Infrastructure Delivery Plan*, which sits alongside the Pre-submission Core Strategy, includes a specific requirement for developments to fund Heathland Mitigation. The *Christchurch and East Dorset Community Infrastructure Levy Preliminary Charging Schedule*, includes a charge of £100 per sq m for residential development, to fund infrastructure as set out in the IDP.

3.28 The Draft DPD endorses the approach of requiring off-site mitigation measures as well as on-site SANG to avoid and mitigate impacts from residential development on designated heathlands. Appendix E to the Draft DPD lists Avoidance and Mitigation Projects included in

Local Authority HRAs, which mentions SANG being required by Christchurch Borough Council's Core Strategy policies for North Christchurch Urban Extension and Land to the south of Burton.

3.29 Draft DPD Policy DH4, on SANG, states:

'SANG provides one mechanism by which land can be used to avoid or mitigate the adverse effects of development... SANGs can consist of new areas of land or improvements to the accessibility and attractiveness of existing publicly accessible spaces.

A. *New SANGS: The implementation of SANGs may be through direct provision ... or through the combined income apportioned to Local Authorities from CIL contributions.*

B. *Safeguarding: [in relation to change of use of existing SANG].*

3.30 Supporting text to the above policy (Draft DPD para 8.23) states: *'The provision of SANGs is therefore proposed as one of the key tools in mitigating the adverse impacts of development on the Dorset Heaths. ... For large sites over 50 dwellings it will be expected that the provision of SANGs will form part of the infrastructure provision of that site particularly where urban extensions or greenfield sites are proposed. Within the built up area brownfield sites are unlikely to be able to accommodate the scale of space required for a SANG and would therefore make a contribution through either S106 or CIL towards SANG provision.'*

3.31 Appendix B to the Draft DPD comprises the guidelines for the establishment of SANG Quality Standards, which are set out in draft Appendix 5 to the Pre-submission Core Strategy Proposed Changes as well as Appendix E to the Dorset Heathlands SPD. As discussed in 3.14 above (see **Section 4** for further detail), it is considered that the SANG proposed at the Site at Marsh Lane is in accordance with these Guidelines.

3.32 The Draft DPD therefore infers that the development of sites under 50 dwellings (such as the Site at Marsh Lane) might normally be too small to require on-site SANG, such that a contribution to off-site heathland mitigation measures would be appropriate.

3.33 It is considered that provision of on-site SANG at Marsh Lane, together with a package of off-site heathland mitigation measures (targeted at the Town Common and St Catherine's Hill component of the Dorset heathlands), as described in Section 4, is likely to be effective in avoiding adverse urban and recreational pressure effects on designated sites. A package of off-site measures could be secured through a Section 106 Agreement, in the absence of any specific project for Town Common being funded through CIL contributions.

4.0 DEVELOPMENT PROPOSALS, SUITABLE ACCESSIBLE NATURAL GREENSPACE AND OTHER MITIGATION MEASURES

- 4.1 The Site at Marsh Lane was previously allocated in the Pre-submission Core Strategy to include approximately 90 dwellings, outside the 400m heathland exclusion zone (to avoid adverse effects on the Town Common component of the Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar), together with open space (in accordance with policy HE4) and SANG (in accordance with former policy ME3), together with mitigation measures to be devised in relation to qualifying species of the Avon Valley SPA/Ramsar and Dorset Heathlands SPA after appropriate survey work.
- 4.2 Since the deletion of policy CN3 from the Core Strategy Proposed Changes, further work has been carried out on behalf of SBW, and discussions have been held with Natural England in relation to a potential smaller development allocation (of 45 dwellings) and a larger area of SANG than was proposed in Policy CN3.
- 4.3 Drafts of a Concept SANG Plan and a description of the justification and function of the SANG has been submitted to Natural England's Lead Advisor - Land Use (Mr Nick Squirrel) for review in Autumn 2012 and in January 2013, and the proposals were discussed at a meeting on site on 22nd October 2012. Feedback on the SANG proposals has been given by Natural England by email dated 26th October 2012, and 8th March 2013.
- 4.4 An updated Concept Plan is included as **Figure 4** An updated description of the SANG concept is given below:
- The area shown on our design provides a SANG area of approximately 2 ha, as requested by Natural England. Approximately 1.4 ha of incidental open space is also provided in addition to the SANG. It is assumed that the development site will be 2.4 ha, and providing 45 dwellings (average occupancy of 2.18 people/dwelling). The Site is approximately 5.7 ha in size.
 - The SANG area is retained dry acid grassland, which is to be grazed (requiring use of temporary paddocks, as currently occurs).
 - The 2 ha area allows for free roaming access, with dogs able to go off-lead in a secure area.

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- Visitor viewpoints would be created on the north east corners, with bird identification boards, to provide a destination and potential birdwatching location (with views into the Avon Valley) from within the site, with access remaining closed off from the site.
 - Car parking has not been provided for, as we feel the SANG should be used by the neighbouring housing development, who will have excellent pedestrian access to the SANG, direct from the housing development in the south. The SANG is fairly compact in area, and we feel that the expected number of users to the site would not require a car park. The carrying capacity of the SANG could be exceeded, if a car park was created, when its intention is to be used mainly by the residents coming from the new housing development. An existing parking area is allocated at the junction of Marsh Lane and Fairmile Road.
 - A footpath/cycle path is proposed to skirt the SANG and development site. Access to the SANG would mainly be from the proposed development access road off Marsh Lane. A number of potential pedestrian access points from the Marsh Lane residential area may also be appropriate (to be subject to further design and discussion).
 - Scrub and hedge planting, and fences are proposed around the site perimeter, in particular to restrict residents, dogs and cats from entering the Avon Valley SPA/Ramsar site to the north/east. Existing fencing around the site could be improved, to be high and lean inwards at the top, to specifically exclude cats, in line with RSPB advice.
 - New planting and features are proposed to create more interest and varied habitats within the site, including gorse/bracken planting, artificial hillocks, a living willow/hazel arbour, a swale, and trees.
 - A small childrens play area (which could be equipped or not, subject to detailed design) is included for in the Site in open space, outside of the SANG area. Natural England noted that a play area could attract users to the site, but may detract from the SANG function. The nearest fully children's equipped playground, adult gym and 'park' is at Knapp Mill Avenue, some 5 minutes walk via a footpath around the Waterworks to the south; signposts can be included within the site to highlight this recreational destination to local residents.
 - Dog waste bins, information boards (and bird identification boards), bird boxes and bat boxes, are proposed as shown in the SANG Concept Plan.
 - Ideally the length of the circular walk should be 2.3-2.5 km around the SANG (in strict accordance with the emerging Guidelines for SANG Quality Standard, as described in section 3, although the Guidelines do allow shorter distance walks to be provided where appropriate). The approximate total length of the footpaths around the development

site and within the SANG measures approximately 1.8 km (some 72% of the Guideline upper range). Creating a much longer footpath within a small SANG is difficult, if a natural feel is to be retained.

- The SANG should be casually overlooked by proposed housing – with the frontages of the new houses.
- Scattered trees could be planted to create discrete screens between the new housing development and the SANG.
- The proposed access road would need to be lit, by either bollards or lighting columns.
- It is recommended that the access road is designed to be slightly sunken from the neighbouring land, so as not to detract from the natural feel of the SANG.
- A SUDs drainage scheme may be required, and Natural England advise that this may be an attractive feature for the SANG, so a SUDs pond could be added into the SANG (although is not currently shown as drainage requirements have not been calculated).
- There is potential that the SANG could be adopted by the Council's Countryside Services.

4.5 Further discussion is found in the following table, a previous version of which has been discussed with Natural England:

Task	Why included?
Continue to graze areas	Continued grazing will help to reduce management costs, and help to retain a degree of naturalness. Area will be used by free-roaming dogs so the grazing animals will be fenced off from the public/dogs, and fields will be rotated to deal with the grazing.
Use re-enforced/all-weather footpath surfacing in some areas of the circular walk	Use in areas of high footfall, for instance by the entrances and viewpoints. Otherwise circular paths will be short mown grass, in contrast to the grazed areas of open dry acidic grassland.
To create a natural 'heathland' feel	Apart from boundary fencing and vegetation to keep dogs and cats within the SANGs area, remaining area would be open, dry acidic grassland. Existing vegetation will be retained, for instance trees and hedgerows.
Position of access road	Will be situated near to the farthest south-west edge, to allow the eastern edge to be free from traffic and noise. The access road will be positioned to retain as many existing trees and hedgerows as possible, to reduce disturbance to the area, and retain natural cover on Site.
Add interest on site for users	Create a small area of wooden sculptures – could be themed on species of nearby SPA. Could be created by local artist. Would add interest/focal point of the circular walks. Could be used as publicity event, by leafleting the new homeowners, have 'open day' when sculptures are created/unveiled. A small play area could be added to encourage families

Task	Why included?
	to use the SANG – making the SANG an integrated area, this could be situated at the southern end. .
To prevent dogs entering nearby SPAs	Boundary fence and native hedgerow/gorse scrub along boundary of SANG. Existing boundary vegetation will be retained. Thick gorse/prickly hedge may also prevent cats from new development gaining access to nearby SPAs. Cats are already likely to live in area, from existing houses. Swales or ditches could be added around the boundary of the SANG to also assist in preventing dogs and cats entering the N2K sites, the design of these would mimic the already existing filtration beds.
To prevent predation of ground nesting birds in nearby SPA	No obvious fenceposts or stand alone perching places will be created on site, to reduce the number of perching/roosting sites for corvids on site, which could potentially predate ground nesting birds.
Creation of a SUDs pond	If required to create drainage area. A secondary benefit of such a pond would be habitat creation/biodiversity for wildlife (invertebrates, foraging bats, birds) – multifunctional landscape (not shown on Figure 4).
To create diverse topography/interest for users	Addition of artificial hillock in SANG. May encourage children/pets to play around. This idea needs further discussion to see if, by creating a hillock, more damage would potentially be caused to the acid grassland, than benefit. Substrate could potentially come from the creation of the SUDs pond if one is required, or potentially from the housing development area.
To inform users/new home owners	Addition of information board to include info about circular walk options, and bird identification, when viewing Avon Valley SPA from viewing area. Could also include information on where the nearest bridleways and PROWs are, to encourage people to use the SANG as part of a larger walk.
Add 3 dog waste bins	To encourage dog walkers to use SANG. Position all 3 near to the 3 main entry points to make them easy to be emptied.
Create small area of deciduous woodland, and individual trees	To add interest to users, different feel from open field areas for users. Individual trees could also assist in screening the access road from the SANG, reducing the light spill (if lighting is required) on the access road, into the SANG.
Retain existing mature trees and areas of scrub	To maintain biodiversity, and keep a natural feel to area.
To screen adjoining area of hard-standing and filtration ponds along eastern site	There is currently a double fence around the filtration beds. SANGs need to be attractive, so a hedge could be planted next to these fences, to add to the biodiversity as well as act as a screen to the area of hardstanding and filtration beds along the eastern boundary. There are currently areas of scrub dotted along the fence. Increasing the vegetation would increase the amount of potential nesting habitat on site.
Addition of 2 benches in viewing areas	To encourage users to spend time in the SANG, to appreciate the surrounding protected sites. Viewing areas will be created in areas were vegetation is lacking, to reduce the amount of vegetation that needs to be removed on site.
Linking the SANG to wider afield	The SANG could link up with the nearby bridleway, to make a longer walk. The bridleway goes to the Avon Causeway. A parking area is allocated at the junction of Marsh Lane and Fairmile Road. The circular path around the perimeter of the SANG and development site leads to the footpath to Knapp Mill Ave Rec.

- 4.6 As discussed in **section 3**, the size of SANG proposed and the quality of the site concept proposed here is considered to accord with the Guidelines for SANG Quality Standard included in the Appendices to the Proposed Changes to the Christchurch & East Dorset Pre-submission Core Strategy, Dorset Heathlands SPD and Dorset Heathlands Draft DPD. The one aspect of the SANG proposal that does not strictly meet the Guidelines is the provision of a shorter length of circular walk (1.8km) than recommended under the Guidelines (2.3-2.5km). However, the Guidelines allow for a shorter walk in suitable circumstances. As the development site is small, existing and emerging policies do not strictly require on-site SANG to be provided for sites of approximately 50 dwellings. There are also footpath links to alternative recreation areas, which could be signposted from the development, including Knapp Mill Avenue, it is considered that the shorter length of footpaths provided within the SANG remains suitable. Paragraph 2.26 above refers to the Dorset Household Survey 2008 (Clarke et al, 2008), which found that of trips to St Catherine's Hill and Town Common, roughly 2/3 of visits in any year can be assumed to be made by those people visiting the heathland 'on most days'. It is these frequent trips, which would comprise the majority of total trips to local heathland, which the SANG could perhaps best capture, and divert from the heathland, due to the proximity to the proposed development site.
- 4.7 As discussed in section 2 in relation to the St Catherine's Hill and Town Common Management Plan, and in section 3 in relation to planning policies, a development of the Site at Marsh Lane could also provide a package of (or contributions to) off-site heathland mitigation measures, targeted at the Town Common SSSI component of the Dorset heathlands. This would help ensure avoidance and mitigation of recreational pressures and impacts arising from the development. Such measures could include:
- Contributions to fencing within the heathland, for visitor access management and grazing;
 - Contributions to improvements to other physical barriers for visitor access management;
 - Support for site wardening, volunteer coordination and management, visitor events and activities, walks and talks, and monitoring of site usage;
 - Contributions to improvements to visitor signage, interpretation boards, leaflets and website information.

- 4.8 Off-site mitigation and avoidance measures could be secured through a Section 106 Agreement, or through CIL if a project specific to Town Common can be identified within local planning policy documents as a recipient of funding.
- 4.9 Recent surveys of pet ownership⁴ by the Pet Food Manufacturers Association found that nationally, on average some 23% of households (29% in the South West) own at least one dog, and 19% (25% in the South West) own at least one cat. From this data, of the 45 households proposed for the Site at Marsh Lane, approximately 13 households can be predicted to own one or more dog and approximately 11 households to own one or more cat.
- 4.10 The small additional number of dogs and cats likely to be resident on the Site, and potentially able to create additional pressure on the Dorset heathland sites (in the absence of mitigation) is therefore considered small. It is considered not unreasonable to assume that the provision of an attractive area of acid grassland as SANG at Marsh Lane, and a circular walk around the development, as described above, could attractive a large number of regular walking and dog walking visits from new residents to the SANG, including for bird watching, relaxation and to let their dog off the lead, as well as a proportion of existing residents on Marsh Lane, which would avoid trips to the heathland sites. Direct access for residents, dogs and cats to the Avon Valley from the Site can be prevented through appropriate fencing. A package of improvements to visitor management at the Town Common heathland, could also reduce the existing visitor pressures on the SPA and SSSI, including the three species of SPA birds, as well as reduce potential new pressures from the development of 45 dwellings (where 11 or 13 households are likely to own cats or dogs).

5. SUPPORTING STATEMENT

- 5.1 The Pre-submission Core Strategy Habitats Regulation Assessment (HRA, February 2012) concluded that there was potential for significant effects on the European sites from physical damage from new residents at the site as a result of Policy CN3, but that the location of the Site outside 400m from the Dorset heathland sites and the proper implementation of policies MEI-3 should ensure adequate mitigation measures are provided to relieve any increase in visitor and urban pressure on the heathland and other European sites.

⁴ <http://www.pfma.org.uk/pet-population/>. N.B. National data is from survey in 2012, based on a survey of 2165 households by TNS, regional data is from surveys in 2010-2012.

5.2 Objections were received in relation to the inclusion of Policy CN3 from local residents, and Natural England. Despite the previous inclusion and conclusions of the HRA, Policy CN3 was subsequently deleted in the Councils' Proposed Changes to the Pre-Submission Core Strategy. The reason given being '*Natural England are not satisfied that effective mitigation measures can be put in place to avoid / mitigate harm to the heathlands and other nearby designations in order to satisfy the habitats regulations. On this basis, the allocation has been deleted*'.

5.3 Natural England's response (dated 25/06/2012) highlighted four areas of concern:

1. Off-site recreational pressures, including cat predation on ground nesting/ feeding birds, on the Dorset Heathlands SPA/ Ramsar site and Dorset Heaths SAC, raising a likely significant effect which will require significant mitigation, including the provision of SANG.
2. Off-site recreational and other pressures, on the Avon Valley SSSI, SPA and Ramsar site, raising a likely significant effect on the designated sites, particularly on the bird features. Pressure from cat predation, due to the long boundary of the site with and close to these designated sites. Mitigation is required to divert access away from Access Land in the designated sites.

For reasons 1 and 2 above, Natural England considered that there is insufficient land available at the site, and no other land available outside designated sites, to provide both housing and a SANG of sufficient size and quality to avoid adverse pressures on the designated sites.

3. Undermining the delivery of management on adjacent grazing marsh in the Avon Valley SSSI, SPA and Ramsar site, due to removal of higher land grazed when the marsh is in flood. Natural England consider mitigation is needed in the form of replacement grazing support land, and that there is insufficient land available to provide this function as well as SANG of sufficient size and quality.
4. Inadequate information and assessment of the biodiversity features on the policy land, as there may be significant biodiversity interest, to comply with policy considerations in the NPPF on sustainable development, including the need to achieve net gains for biodiversity.

- 5.4 Subsequent discussions between Natural England and the agents for SBW (Goadsby), in liaison with Nicholas Pearson Associates, have focused on the potential development of the Site for a small allocation (a development of 45 dwellings) and the provision of a larger and more suitable SANG area than that included for in the original Policy CN3.
- 5.5 Natural England's concerns in their response to the Core Strategy are addressed briefly below in turn:
- I. The existing and emerging policy framework, specifically provided by the Pre-Submission Core Strategy policies ME1 and ME2, the Dorset Heathlands Joint DPD and Dorset Heathlands Joint SPD, promotes the mitigation and avoidance of significant and adverse effects on designated heathland sites from developments such as at Marsh Lane, through a range of measures, including on-site SANG provision and off-site measures (see **Section 3**).

We consider that it is likely that a suitable area of SANG for the Marsh Lane development can be designed for the Site and agreed with local planning authority that is of sufficient size and quality, in line with the requirements of the Guidelines for the Establishment of SANGs, and sufficiently attractive to residents of the new development and existing residents of the area, to avoid harm by attracting residents away from the heathland for regular daily dog walking trips from the development site's residents. The SANG area could be used for regular daily (or more frequent) dog walking, avoiding the need for walks up the hill to St Catherine Hill and Town Common or around the Avon Valley. A SANG area of 2 hectares with the features proposed, and a sufficient degree of naturalness (with acid grassland habitat), is likely to be attractive to a number of residents, existing and new. The current concept proposals for on-site SANG, which have taken account of Natural England's comments on previous drafts, is included in **Section 4** and shown in **Figure 4**. The degree of overlooking from residents on Marsh Lane is not considered significant so as to deter visits, as houses can appear far away in views within the east and central area of the SANG. Dog walkers will be able to exercise their dogs freely. The SANG and footpath network would provide a pleasant walk for walkers, and would provide a large and level area of green open space that is not currently available to local residents of Marsh Lane. Most of the total visits to the heathland would be the visits made on most days (see 2.26 above), and the SANG at Marsh Lane would appear to offer a highly convenient alternative walk (and dog walk).

It is also considered that additional off-site mitigation measures (a package of access management and habitat management measures targeted to ensure implementation of measures identified in the adopted St Catherine's Hill and Town Common Management Plan) can also be proposed and implemented, in accordance with the existing and emerging policy framework. The off-site mitigation measures envisaged would provide sufficient and further confidence that significant and adverse effects on the Dorset heathland sites will be mitigated and avoided, and are described in **Section 4** below.

2. It is considered that while the focus for the design of a suitable area of SANG on site relates in policy terms to the need to mitigate and avoid significant and adverse effects on the Dorset heathland sites, the SANG proposed would also mitigate and avoid such effects on the Avon Valley designated sites, by providing an alternative walking and dog walking area that is sufficiently large and attractive to new residents (see **Section 4**).

In relation to access for residents (including dog walkers) and cats from the Site to the Avon Valley designated sites, the Site boundary to the north and east is entirely fenced.

The fence on the north east boundary with the water tanks is concrete post and mesh, topped with three strands of barbed wire that lean in the direction towards the Site, approximately 2m high in total. This fence is robust and would appear to prevent cats climbing over, in with the RSPB's guidance on cat deterrents

(<http://www.rspb.org.uk/advice/gardening/unwantedvisitors/cats/catdeterrents.aspx>).

The fence boundary with the Avon Valley sites is lower, and post and wire. It appears robust and together with the scrub woodland and drop to lower ground beyond, would deter any residents (including dog walkers) from climbing over. It is considered that this fence could easily be improved to a specification that also deters cats in line with RSPB advice (see above) as part of the development. The inclusion of additional planting of a native hedgerow/gorse scrub along the boundary within the SANG and development site (as described in Section 4) would further prevent cats entering the Avon Valley designated sites.

Access from the Site to the Avon Valley designated sites to the south is prevented by the fence and high conifer hedge boundary surrounding the Knapp Mill water works, which provides an impenetrable boundary for both residents and cats.

It is therefore considered that the development of the Site can easily ensure that residents (including dog walkers), and cats, have no direct access to the Avon Valley designated sites from the Site, by ensuring that the fencing is retained and improved, and the boundary planting strengthened, in accordance with specifications to be agreed with the Council and Natural England.

3. It is understood that the grazing agreement which allows grazing at the Site in conjunction with land adjacent to the north (Knapp Mill fields), is renewable annually with no commitment to permit grazing in the longer term. As above, the development of the site for housing and SANG would curtail livestock access through the Site to the Avon Valley designated sites by requiring the gate to be removed and replaced with fencing. It is considered that alternative grazing arrangements could reasonably be made which maintained the management of the Knapp Mill fields within the Avon Valley designated sites.
4. An Extended Phase I Habitat Survey and Ecological Desk Study has been undertaken at the Site, and is summarised in **Section 2**. The survey report provides information and assessment of the biodiversity features and interest on the Site, to satisfy policy considerations in the NPPF.

5.6 In conclusion, it is considered that, in light of the review of site conditions, existing and emerging local planning policies, and the Management Plan for St Catherine's Hill & Town Common, that:

- A concept design for Suitable Accessible Natural Greenspace (SANG) in conjunction with the development of land at Marsh Lane (previously included as draft Core Strategy Policy CN3), could be implemented that would provide avoidance and mitigation for the nearby European and international designated sites through deterrence of local trips on foot from the development site.
- Direct access impacts on to Avon Valley sites can be avoided through suitable fencing.
- The development can secure a package of off-site heathland mitigation measures for Town Common (through a Section 106 agreement or CIL) aimed at improving visitor access management at the designated sites, to reduce the impacts of existing and future visitor access, and perhaps achieve a positive impact, in a variety of ways as outlined in the St Catherine's Hill and Town Common Management Plan.

- Together these measures can provide an effective strategy for avoidance and mitigation for the residents (and their dogs and cats) of a development of 45 dwellings at Marsh Lane, on European and nationally designated sites in the vicinity of the Site.

APPENDIX I: CONDITION OF TOWN COMMON SSSI UNITS

Sourced from Natural England website:

<http://www.sssi.naturalengland.org.uk/Special/sssi/reportAction.cfm?report=sdrt13&category=S&reference=1002693>

http://www.sssi.naturalengland.org.uk/Special/sssi/unitlist.cfm?sssi_id=1002693

Website accessed 23 August 2013. N.B. Table below excludes columns entitled Region (South West), County (Dorset) and District (Christchurch), for ease of pagination.

Team - Somerset And Dorset - **SSSI name** - Town Common - **Staff member responsible for site** - Helen Powell
Report compiled: 1 August 2013

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
Dwarf shrub heath - lowland	1	1006664	8.23	20 Sep 2010	Unfavourable declining	This assessment has been updated with Common Standards Monitoring (CSM) survey. Comments made under the 2008 assessment remain relevant to this updated CSM assessment. This unit of dry heath and acid grassland is now substantially clear of scrub colonisation, in part through cutting and periodic mowing to maintain a low vegetation height in connection with operation of the airport. In the north some further scrub control is required and also a focus on bracken control. The heath vegetation is not diversely structured; >80% is in the the mature phase whilst the mown areas support pioneer-type heathland and grass-heath mosaic. There is a very low species diversity that falls below favourable condition standard. <i>Calluna vulgaris</i> is the overwhelming dominant with <i>Erica cinerea</i> and <i>Ulex minor</i> occasional and rare respectively. The heathland condition is also being affected by the acid grassland species <i>Deschampsia flexuosa</i> . This occurs as a dominant in areas of acid grassland and also sparsely within the dry heath	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						vegetation. Monitoring has revealed some of the Deschampsia grassland to be long established and its extent to be increasing at the expense of dry heath following mowing, especially mowing of mature heather. Some of the Deschampsia grassland is almost mono-species mats while in other places colonisation has occurred in conjunction with scattered young heathers suggesting that in these situations a dry heath sward could return. This type of acid grassland is very unusual on the Dorset heaths but is not of high conservation interest, its dominance being associated with a loss of heathland biodiversity in some other heathland locations. Further investigation is required on the vegetation dynamics and, if Deschampsia grassland is replacing heath over the long-term, whether there are causal factors that can be reversed.	
Dwarf shrub heath - lowland	2	1006665	1.41	26 Oct 2009	Unfavourable recovering	This formerly isolated area of dry heath within conifer plantation now lies on the edge of a wider heathland area following removal of the plantation to the north. Many aspects to the dry heath interest are favourable, including its extent, low scrub presence and a mature structure of the heather sward. Other aspects including bracken cover are marginally favourable and vulnerable to change, and the gorse structure is unfavourable. Since the last assessment the scrub growth has been cleared, restoring an open heath. Nearly all the gorse has also been cut, and while this can be expected to re-grow, the scale of cutting has compromised a diversity of growth phases favoured by, for example, Dartford warbler. Bracken occurs widely over mature heather and may need controlling to prevent it gaining dominance through	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						shading. Bare ground management has also taken place in the form of a large sand scrape which can be expected to benefit reptiles. Further bare ground management to achieve an intimate mosaic with heather vegetation would be desirable to increase invertebrate habitat structure and growth phase diversity of the heath vegetation. The extent of heath providing sunlit, warm habitat conditions favoured by reptiles and heath invertebrates is compromised by shade, both from bracken and from a stand of tall conifers on the south boundary. Less shade would benefit these species interests.	
Dwarf shrub heath - lowland	3	1006712	23.76	27 Apr 2010	Unfavourable recovering	This part of the heathland continues to be in unfavourable condition for its mix of dry and wet heath, and their species interest features. The reasons for this are essentially those explained in the previous assessment. Management to be introduced under a Higher Level Stewardship agreement should improve habitat condition, especially the condition of wet heath by appropriate cattle grazing to reduce the closed nature of the sward and increase floristic species diversity. This allows a 'recovering' assessment under NEs remedies process. But there is uncertainty on whether this management scheme alone will be adequate to achieve favourable condition, in particular for the wet heath and bird interests. The dry heath shows a recovering trend following past removal of conifer plantation. It remains unfavourable due to insufficient heath vegetation structure with notably little at the pioneer phase, and a low diversity of characteristic species in the vegetation composition. A high frequency of tree seedlings and	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						bracken indicates an adverse successional pressure. The wet heath is unfavourable due to drainage from past forestry ploughing, some dominance by <i>Molinia</i> , and more widely due to a closed and quite tall structure with little bare peat for species such as sundews and consequentially a low diversity of characteristic species in the vegetation composition. The invertebrate interest feature is unfavourable due to insufficient habitat structural variety, especially open ground patches. The breeding bird community is unfavourable, including a loss of woodlark from this unit and the SSSI as a whole. A range of measures that aim to lessen urban related impacts are underway. These measures, along with planning control on additional development, will need to be maintained over the long term and possibly improved to encourage recovery of interest features toward favourable condition.	
Dwarf shrub heath - lowland	4	1006714	17.31	28 Jun 2010	Unfavourable recovering	Sopley Common is in the Dorset Urban Heaths HLS agreement and a felling licence was obtained in February 2008. Substantial tree clearance has taken place and works are now into the 3rd year of felling. A work programme has been agreed for this year (2010/2011) to address birch re-growth in previously cleared areas. Grazing is desirable and likely to be needed here in the medium to long term. Whilst the heathland is good quality heath, grazing will ensure that the existing heath is maintained in good condition into the future. It will also address the further growth of <i>molinia</i> in wetter areas where trees are being cleared.	
Dwarf shrub	5	1006715	11.44	28 Jun 2010	Unfavourable	Sopley Common is in the Dorset Urban Heaths HLS	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
heath - lowland					recovering	agreement and a felling licence was obtained in February 2008. Substantial tree clearance has taken place and works are now into the 3rd year of felling. A work programme has been agreed for this year (2010/2011) to address birch re-growth in previously cleared areas. Grazing is desirable and likely to be needed here in the medium to long term. Whilst the heathland is good quality heath, grazing will ensure that the existing heath is maintained in good condition into the future. It will also address the further growth of molinia in wetter areas where trees are being cleared.	
Dwarf shrub heath - lowland	6	1006716	3.40	14 Sep 2010	Favourable	Taken from Common Standards Monitoring Report for Town Common SSSI 2009. The special interest feature assessed is Wet Heath (M16) No loss in extent of wet heath habitat and no habitat degradation. Trees form less than 10% of the potential wet heath area and are largely confined to the west edge of the unit along the track. Seedlings and sapling, mainly are pine are frequent throughout and this needs to be kept in check to prevent a change from favourable condition. No exotic plant species noted. Common gorse rare and scattered bracken present on small ridges of dry heath within the larger expanse of wet heath. Molinia caerulea is >50% in one area but in most of the wet heath it is <10% cover. Vegetation composition in line with Common Standards Monitoring Guidance, more detail available in the report. Would benefit from extensive grazing in conjunction with adjacent units to the north and south. Species assessments incomplete but habitat assessment suggests that the unit is favourable for species.	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
Dwarf shrub heath - lowland	7	1006717	14.61	20 Sep 2011	Unfavourable recovering	The unit comprises mainly wetter habitats on lower lying ground in the north and dry heath on east facing slopes in the south (with some wet flushes). In the north, wet heath is mainly cross-leaved heath dominated although of good quality. There is no mire vegetation (M21) as such. There is also a smaller lower lying area (NW), possibly an old pond, now dominated by tussocky purple moor grass to the exclusion of much else (and not a candidate to restore to M21, even with grazing) and other smaller areas where purple moor grass dominance is probably a result of tree cover now removed (much of the scattered tree and scrub cover in this part of the unit has been removed since 2005 – a great improvement). Grazing would be beneficial. Recovery has continued where large scale capital works (tree and rhododendron removal mentioned in previous assessments) were undertaken, mainly in the central part of the unit. There is plenty of heather coming back but also much birch and locally rhododendron together with lots of other invasives. Control of these is needed or else the benefits of the previous good work will be lost. Dry heath in the south of the unit is also in good condition and there is good recovery of heath in areas at the top of the slope previously rhododendron dominated. Wet heath flushes have some white beak sedge areas (Rhychosporion). The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler).	
Dwarf shrub heath - lowland	8	1006729	3.29	28 Jun 2010	Unfavourable recovering	There has been significant clearance of rhododendron over the past few years. There is an on-going annual programme for further treatment of rhododendron re-growth and birch scrub re-growth which is developing on	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						some of the cleared areas. A heather re-seed has been undertaken.	
Dwarf shrub heath - lowland	9	1006718	15.88	20 Sep 2011	Unfavourable no change	The unit comprises predominantly dry heath on the mainly south facing slope of St Catherine's Hill. There is no wet heath (M16) although there are some small damper areas with cross-leaved heath at the bottom end of 2 of the valleys. Very little has changed since the last assessment and so most of the previous comment still applies. Some 34% of the unit area is covered by mature pine, mostly pine. Much of this could very easily be restored to good quality heathland, as indicated in the conservation objectives, and the issue is being considered by the site management plan, currently being prepared. The open heath is dominated by Calluna with few associates (bell heather, dwarf gorse, bristle bent) although it is rich in lichens and bryophytes as the sward is rather open. This may be partly a natural function of the hot dry conditions due to the south facing aspect and very well drained soils. The heather structure is diverse and quite open with gaps in the canopy with bare ground and lichens. Additional structural diversity could be introduced by selective mowing of small areas but this is not essential. There is little good quality bare sand and the unit would benefit if more were created. The young pine and birch on the open heath are at a stage where, although not yet affecting the heather, they soon will be and control is required this coming winter over much of the unit. There is still some mature rhododendron on the open heath (and much under conifers). The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler). The unit itself	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						has records of Dartford warbler but no nightjar or woodlark.	
Dwarf shrub heath - lowland	10	1006719	18.24	14 Oct 2011	Unfavourable no change	The unit comprises a good part of the relatively flat plateau on the top of St Catherines Hill together with south and west facing slopes. Some 70% of the unit is taken by mature pine with much of this having a rhododendron understorey, all in areas that would have good prospects of heath restoration. This is the main reason for the unfavourable assessment. The open heath is all dry heath and relatively free from invading trees, scrub and bracken. There were relatively few areas of single species scrawny appearing Calluna (an issue noted in the last assessment - this is more apparent in unit 9) and the effects of shading and leaf fall from retained trees was less evident. There have been small improvements in the condition of the open heath since the last assessment with areas previously cleared of trees and scrub having recovered their heath vegetation and further tree and scrub removal has taken place in a few small areas. However, overall the changes since the last assessment have been relatively minor. The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler) although this particular unit has high levels of public access which may affect its ability to support breeding nightjar.	
Dwarf shrub heath - lowland	11	1006736	1.27	10 Jun 2009	Unfavourable no change	No change since last assessment. Much of unit a reservoir with disturbed grassy surrounds. Heathy presence could be encouraged by removing dense scrub and thinning out pines and linking and extending the heath to adjacent units. Lots of invasives - buddleja,	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						cotoneaster, laurel, strawberry trees etc	
Dwarf shrub heath - lowland	12	1006730	0.54	10 Jun 2009	Unfavourable no change	Some scrub removal has taken place but not at a sufficient rate. A pine tree stand to the east still needs pushing back. Bramble and piri piri are found over the redundant reservoir structure which would benefit from grazing.	
Inland rock	13	1006734	1.44	10 Jun 2009	Unfavourable no change	Some scrub removal but pines still require removing and thinning around quarry edge. Patches of piri piri and sycamore and ash.	
Inland rock	14	1006735	2.40	29 Jul 2013	Unfavourable recovering	The CES agreement is now in place to remove pine and birch from the face of the geological exposure and adjacent heathy slopes. The management agreement also includes work to enhance the woodland areas by removing sycamore and maple as well as non-native invasive species across the site such as rhododendron and Strawberry tree. A felling licence is required for the work and initial consultation with local representatives has been positive. Other works include eyesore removal, to remove from site the unauthorised tipping that has occurred in the past.	
Dwarf shrub heath - lowland	16	1006722	24.23	28 Jul 2009	Unfavourable no change	Pine and birch clearance required. As stated in previous assessment the desirability of retaining a continuous and still developing birch wood fringe abutting the Avon Valley SSSI needs examining. Where there are adjacent tracts of wet grassland the enclosure provided by the trees may deter wintering and breeding wetland birds - a principal special interest for this land. Whole of unit needs grazing.	
Dwarf shrub	17	1006721	17.84	05 Sep 2011	Unfavourable	The unit comprises dry heath mainly on the east facing	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
heath - lowland					no change	slopes of St Catherines Hill. There is also a series of wet heath flushes about halfway up the slope. The main issue on this unit has been the extent of mature pine. There has been significant progress since the last assessment with the remaining pine areas on the hillside now removed although too recently for any heather regeneration as yet. Regrowth of rhododendron and birch needs attention. Some 11% of the unit remains under mature pine, mainly on the plateau on top of the hill, and attention needs to be given to this area in the management plan currently being prepared. Dry heath is good condition with bell heather and dwarf gorse both also common and with a varied structure. The flushes are dominated by cross-leaved heath and purple moor grass with only a few associated species and would benefit from grazing. There is a narrow ditch running through the northernmost of these flushes; wet heath would be improved if this were filled. The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler).	
Dwarf shrub heath - lowland	18	1006723	24.76	03 Jan 2012	Unfavourable no change	Although the issues recorded in the 2005 assessment in still apply, there has been some good progress since then in addressing them with recent work in the east part of the unit with clearance of trees from both the top and bottom of the slope so that this area is now predominantly open heath. Now the regrowth of trees and rhododendron in the recently cleared areas needs tackling but there is the early stages of heather regeneration too and prospects of recovery are good. Nevertheless, the tree cover on this unit is still some 40% and few signs of management were seen in the	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						western part of the unit. Most urgent is to tackle is the rhododendron and pine invasion of wet heath and mire on the small seepage surrounded by trees in the westernmost part. As mentioned in the previous assessment, grazing with the wider heathland site, would increase the heathland quality, especially areas of wet heath and seepage mires which mostly occur on the east facing slope of the hill. Four flushes were noted here much dominated by Molinia but also with better areas of wet heath with cross leaved heath, deer grass and sphagnum as well as locally, white beak sedge and bog asphodel. Most of the dry heath had abundant bell heather and dwarf gorse as associates and there was no sign in this unit of areas of single species Calluna noted previously. The unfavourable assessment is based on the large area of tree and rhododendron cover on land where the objective is restoration of significant areas of heathland together with the Molinia dominance of wetter areas. These issues are currently being looked at within a management plan currently being prepared. There is significant public use of the unit but because most of the access points are to the west it is the western part of the unit where there is little heath that more of the public pressure occurs. The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler).	
Dwarf shrub heath - lowland	19	1006724	2.42	12 Mar 2012	Unfavourable declining	This long narrow is quite diverse supporting at various points along its length, small areas of dry heath, wet heath with tussocky Molinia (the commonest habitat) and in the north an area of fen. Elements of the condition have improved since the previous assessment. Heath	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						vegetation has developed following the removal of the dense rhododendron and scrub mentioned in the previous assessment. However, effective control of regrowth, principally birch with some rhododendron, has not occurred and this is once again threatening the heath vegetation. Connectivity with heathland on the main part of Town Common to the west has been improved following tree and scrub work in adjacent units to remove part of the dense belt of pine. There remain issues with encroachment as reported in the previous assessment. The SSSI remains in favourable condition for the 3 SPA birds (nightjar, woodlark and Dartford Warbler).	
Dwarf shrub heath - lowland	20	1006725	7.35	10 Jun 2009	Unfavourable no change	Northern part of the site (mainly wet heath) more open but still some seedlings and stands of birch and pine need removing. North east of the site needs thinning out and invasives eg rhodo. Need removing. The area south of the track is dense with rhodo and pines – thinning this out would open up areas of heathland and mire. Grazing would result in opening up bare sandy patches and result in a more species rich site	
Dwarf shrub heath - lowland	21	1006731	2.28	07 Nov 2010	Unfavourable declining	This elongate unit along the trackbed of the old railway remains in unfavourable condition due to continuing encroaching by scrub and young trees that are reducing the remaining patches of heathland habitat. The most frequent encroaching species are pines, birch, oaks, brambles and common gorse, with occasional holly and willows. Rhododendron is rare locally occasional. Bell heather and wood sage remain frequent in gaps amongst the scrub species and dwarf gorse is locally frequent. Common stork's-bill is rare at the edges of the gravelly	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						track.	
Dwarf shrub heath - lowland	24	1030758	13.53	16 Nov 2010	Unfavourable no change	The unit contains areas of dry heath, wet heath and mire. The steep scarp slopes are being recovered from pine woodland and dense rhododendron. The extent of dry heath is currently unfavourable due to tree/scrub cover. A further felling licence is required. The dry heath which is present is all in a mature phase. However as clearance progresses pioneer heathland will establish. The wet heathland is dominated by dense molinia and so not meeting structural and bare ground criteria. Introduction of grazing will secure this. The mire habitats are concentrated along seepage zones which are currently being restored from scrub cover. This unit is evidently adversely effected by recreational disturbance and urban effects such as arson and nutrient enrichment. Key areas requiring a consistent approach are rhododendron respraying and pine seedling removal. A new felling licence is required to address dry heathland extent on th plateau.	
Dwarf shrub heath - lowland	25	1030771	40.39	25 Nov 2010	Unfavourable recovering	This unit has extensive areas of wet heath, mire and some dry heath. The unit assessment concluded that the mire and wet heath communities were heavily molinia dominated due to lack of grazing. There were some areas where the vegetation remains open with areas of bare peat but these are limited. The dry heathland is for the most part mature and so lacks the necessary structural diversity. There are also areas of gorse and scrub pine and birch to be removed to secure the appropriate extent. Grazing will help to secure suitable bare ground and open sand as existing paths are often heavily used	

Main habitat	Unit number	Unit ID	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment	Reason for adverse condition
						by horseriders so the sand created is unsuitable. A newly opened area to the very north may well be suitable for woodlark for a time.	