Zone C (2 kilometres to 5 kilometres)

4.7.17 Less concern has been raised about the definition of the boundaries of this zone. However the Peer Review and others question the robustness of the evidence underlying the definition of the outer boundary. Since up to 30% of drivers in the study by Liley et al were found to come from beyond 5kms and the graph at Figure 5 of the DDP indicates that a rapid levelling off of visitors by car only occurs at 7kms from the SPA, it could be argued that it would be more robust to set the outer boundary at 7 kilometres.

4.7.18 However, travel distances for visitors by car recorded in the Liley et al study are affected, at least to some extent, by the anomalous circumstances of "The Lookout" at Swinley Forest. This facility clearly attracts visitors from much further afield[90]. Looking at the findings from similar surveys for other areas of countryside it would appear that, apart from Cannock Chase, most visitors were recorded as travelling less than 5kms. On balance therefore I consider that the definition of the outer boundary of Zone C is appropriate. However, as a significant number of car visitors are recorded as coming from beyond this distance to visit the Thames Basin Heaths, I would suggest that large scale developments of over 50 houses which are located between 5-7kms of the edge of the SPA should also be individually assessed to determine whether they would have an adverse impact on its integrity.

Conclusions

4.7.19 I conclude that the boundaries of the zones should be defined by travel distance rather than by linear distance. I find the 400 metre boundary for Zone A is robust and does not need to be modified, except to take into account any permanent barrier to the movement of cats. In contrast, the definition of Zone B is not justified and I consider it should be reduced to 1 kilometre. The definition of Zone C is reasonable but larger residential developments in between 5-7 kilometres from the SPA should also be individually assessed to ascertain whether or not they would have an adverse impact on the SPA.

4.8 ***SANGs standards***

4.8.1 My consideration of the SANGs standards falls into two main areas. Firstly I shall examine the appropriateness of the 16ha and 8ha standards proposed in the DDP for Zones B & C respectively. Secondly I shall look at the detailed guidance on the location, minimum sizes and mix of SANGs.

The 16ha and 8ha standards

4.8.2 As I have already indicated in section 4.3 of my report I consider the evidential basis for these standards is weak and appears to rely primarily on schemes that have been put forward at the Queen Elizabeth Barracks at Fleet and Lorraine Road, Camberley. In both cases the amount of space provided by these schemes appears to have been determined by the particular circumstances of the case rather than in accordance with any quantitative assessment of need. In my view both these schemes actually

[90] A survey done by Bracknell Forest Borough Council found that in its area the mean travelling distance to the SPA was 8 kilometres.

provided more open space than was specifically required to avoid or mitigate the effect on the SPA. In agreeing the amount of space that would be provided it seems to me that NE may have been unduly influenced by its ANGst model[91] rather than looking specifically at what amount of land would be required to avoid any significant adverse effect on the SPA.

4.8.3 I also have concerns about the basis on which it was decided to require double the amount of mitigation land within Zone B to that required in Zone C. Given that the visitor study undertaken by Liley et al found that 38% of visitors came from within 400m to 2km of the SPA and 31% came from within 2kms-5kms of the SPA, there would actually appear to be very little difference in the likely amount of visitors coming from the two zones. Certainly there is no evidence that twice as many visits arise from Zone B.

4.8.4 The survey undertaken by Bracknell Forest Borough Council, in preparing their avoidance and mitigation strategy for their LDF core strategy, similarly found no significant difference between the two zones. I note that NE has accepted a single SANGs standard of 12ha in their case. Apparently this was because NE believed that the presence of the Lookout created an anomalous situation within this district. However, there is no clear statistical evidence to suggest that the situation would be substantially different within other districts. I am not satisfied therefore that there is sufficient justification for requiring different SANGs standards for Zones B & C.

4.8.5 In the circumstances, I have considered what alternative standard should be used. At first glance it might appear that the 12ha standard adopted by Bracknell Forest would be appropriate. However, this seems to be merely a half way house between the two standards originally included in the DDP. I can find no evidence that it was the result of any detailed statistical calculation.

4.8.6 I have therefore looked carefully at the alternative figures and approaches that were suggested at the technical meetings. The first of these, which was promoted by the HBF, involved a simple arithmetical calculation. If the population increase for the 11 authorities over the 20 year period is taken as 68,388, which equates to 3.419 additional people a year. If as at present each person makes an average of 4.58 visits to the SPA per year and a hectare of the SPA currently absorbs 638 visits, then 24.5 ha of additional open space would be required which would equate to 490ha over the 20 year period. If this is then divided by the increased population it would produce a mitigation standard of 7.16 ha.

4.8.7 Although this approach is rather crude, I have no reason to believe it is any less valid than that adopted by NE. Indeed as it relies on the likely population increase and the number of visits generated I consider it may actually be more robust.

4.8.8 Various alternative approaches were put forward by Defence Estates (DE), the first of which used a more sophisticated method to calculate the maximum carrying capacity of a 50 ha SANGs, based on the assumption that users would want to keep 200m apart when using a 2.5km path system. Using this process DE calculated that 1.22ha would be required to support 1000 residents. Alternatively using the actual

[91] A model for calculating the need for accessible natural green space - see Section 3.2.4 on page 22 of the Draft Delivery Plan for further details.

usage rates for Bourley and Long Valley it calculated the requirement would be 5.3ha per 1000. Finally based on average usage rates for the SPA as a whole, it came up with a figure of 2.74ha per 1000.

4.8.9 NE acknowledges that these approaches have some merit and deserve further examination. However, it contends that the DE alternatives are not based on a sufficient evidential basis. It considers that the HBF assumption of a 5.8% growth in population is not sufficiently precautionary. In addition, it argues that all other open space up to 10kms from the SPA should be included in the calculation. If it was it would produce figures similar to those in the DDP.

4.8.10 I accept that the evidential basis for some of the DE calculations is weak. I also consider relying on visitor figures for just one part of the SPA is unlikely to be an entirely reliable approach to estimating the amount of alternative space required generally. In contrast I find the HBF calculation to be more convincing. I note the suggestion that the 5.8% growth is insufficiently precautionary but even if you take the growth figure from the 2003 statistics presented by GOSE, which indicate a growth of 8%, as being more reliable, and feed this into the HBF calculation, the result would still only be a requirement of 7.44ha of SANGs per 1000.

4.8.11 As for the suggestion that all other open space should be included in the calculation, I see no justification for such an approach. SANGs are supposed to provide alternative land to the SPA not an alternative for all other open space in the area. As such I consider that the HBF calculation, using the population projections based on the 2003 figures provided by GOSE, provides a more statistically valid figure for SANGs than the figures in the DDP. This approach already includes an element of precaution since the population increase relates to the whole of the 11 core authorities rather than merely those parts of their districts which fall within 5km of the SPA. However, rounding the figure up to 8ha per 1000 would provide a further degree of precaution. In my view this would provide a reasonable and proportionate standard for the provision of SANGs, particularly if it was supported by appropriate access management measures.

4.8.12 In reaching this conclusion, I have also considered the graded standard suggested by Howard Hutton Associates, which would appear to be a rather simpler version of the more sophisticated methodology set out in Appendix G of the Peer Review. This would work by setting a standard figure for the zone immediately next to the SPA which would then be gradually decreased at regular intervals of 0.5km or other appropriate distance as one travelled out from the SPA.

4.8.13 A tiered system would on the face of it appear much fairer. However, in the absence of firm evidence that the number of visits tails off at a steady linear progression as one moves out from the SPA, I am not satisfied that it would be justified. Moreover I am concerned that it could be seen to add an unnecessary level of complexity to the calculation. Nevertheless, a tiered system may be worth exploring in the longer term if the rate by which visits diminish can be established.

4.8.14 I appreciate that a single standard rate could be seen as being inequitable, particularly if a development which is located 4.9kms from the SPA has to make the required contribution but one at 5.1kms does not. However, the line has to be drawn somewhere. If, as I suggest, large developments that are located between 5-7kms

are individually assessed in respect of their impact on the SPA this should avoid significant anomalies occurring between sites just inside and just outside Zone C.

Location, size and distribution standards

4.8.15 The Peer Review and others have questioned whether it is appropriate to limit the minimum size of SANGs to 2ha. NE set this standard because they considered it is the minimum area of land that could accommodate a 2.5km walk, which is the average distance that the Liley study found dog walkers to travel on the SPA. In my view this was a reasonable approach. However, some participants have pointed out that this fails to take adequate account of linear routes.

4.8.16 I have no doubt that linear routes could make a contribution in respect of providing alternative places for people to walk or walk their dog, particularly where they linked other areas of existing open space. In my view therefore the avoidance and mitigation strategy should recognise that smaller areas could in certain circumstances make an acceptable contribution as alternative open space.

4.8.17 Criticism is also raised about the detailed provisions in tables 6 & 7 of the DDP, which set out the percentage of various sizes of SANGS that should be provided in each zone taking account of their location. It is argued that these standards are unduly prescriptive. I share this view.

4.8.18 While I can understand NE's desire to ensure an appropriate spread of open space in terms of size and location, in my view, this has only a limited role in ensuring that such space would provide adequate mitigation. As the Peer Review indicates most respondents to the survey of users of existing open space in the Thames Basin Heaths[92] area attached far more weight to the accessibility of the space and the facilities it provided than to its size. In the circumstances, I am not convinced of the need for these complicated tables. In my view it would be better to include some general guidance on the quality and accessibility of such space, indicating the type of facilities that might reasonably be expected to be provided within such a space depending on its size. This would allow local authorities more flexibility to tailor the SANGs provision to meet the particular needs of their area more directly.

Conclusions

4.8.19 I find insufficient justification for different SANGs standards for Zones B & C. I am not satisfied that the standards are based on a robust evidential basis. The calculation method proposed by HBF, although crude, is more convincing. I conclude therefore that a revised single standard of 8ha per 1000 should be used instead. The detailed provisions in tables 6 & 7 of the DDP should be deleted and replaced with more general guidance on the quality and accessibility of SANGs and the type of features that should be provided.

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92 *Liley D, Jackson D & Underhill-Day J C (2005) – Visitor access patterns on the Thames Basin Heaths. English Nature Research Report (in press)*