

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

## **Introduction**

This document provides guidelines for the type of site that can constitute a Suitable Alternative Natural Green Space (SANGS) and identifies measures that can be taken to enhance sites so that they are suitable to be used as SANGS provision. The guidelines do not provide all functions that can be delivered through the provision of green space. Instead the guidelines concentrate on the specific function of mitigating visitor impacts on the Ashdown Forest Special Protection Area (SPA).

These guidelines have been formulated using evidence from a visitor survey at Ashdown Forest<sup>1</sup> together with the consideration of measures implemented at other heathland sites (Thames basin Heath, Dorset Heaths). The Ashdown Forest Visitor Survey identifies the reasons why people are drawn to using Ashdown Forest as a recreational resource as well as identifying visitor access patterns. Understanding this information is essential to ensure that any future SANGS provision will be able to effectively mitigate the impact of recreational pressure at Ashdown Forest SPA. In addition, Wealden District Council commissioned Consultants in 2012 to undertake visitor surveys at a number of existing green spaces in the Uckfield and Crowborough area<sup>2</sup>. These surveys have also been useful to supplement our current understanding with regards to recreation and access patterns in these areas in relation to what types of site will work as SANGS and the features that a SANG site will need to have to be considered as effective mitigation.

Evidence from the surveys is presented throughout this document to explain the reasons why certain features are required. For further information please refer to the relevant survey reports.

## **Suitable Alternative Natural Greenspace (SANGS)**

Suitable Alternative Natural Green Space (SANGS) is the name given to green space that is of a quality and type suitable to be used as mitigation for residential and where necessary tourism development likely to affect the Ashdown Forest SPA. It is considered that the provision of SANGS together with a range of on-site and other management measures at Ashdown Forest has the potential to provide an effective means of avoiding or mitigating harm from the effects of recreational pressure from new development.

The aim of SANGS is to provide alternative green space to accommodate additional levels of recreation and divert visitors away from the Ashdown Forest SPA to mitigate together with other on-site and other management measures, recreational impacts to Ashdown Forest. It is considered that by increasing the amount of or improving existing green space in an area by providing sites designed to be welcoming and attractive to particular users that this will counterbalance or even reduce the levels of visitor use and the effect of recreational pressure on Ashdown Forest resulting from new development. This in turn will reduce the potential for adverse impacts on the protected bird species nightjar and Dartford warbler during their breeding season.

---

<sup>1</sup> Visitor Access Patterns on Ashdown Forest (UE Associates, 2009).

<sup>2</sup> Ashdown Forest Visitor Survey Data Analysis Natural England Commissioned Report No. 48 (Clarke, R., Sharp, J. & Liley, D, 2010).

For sites to function as effective SANGS they must act as an alternative to Ashdown Forest, attracting people who would otherwise visit the SPA. Critical to the effectiveness of any SANGS provision is the location of SANGS, their scale, on-site features and their overall design. The aim is that any SANGS provision must be more attractive to use as a recreational resource than the Ashdown Forest to ensure that it diverts users. Central to this is the overall quality of the site.

### **The Ashdown Forest designations and character**

The Ashdown Forest is situated on the highest sandy ridge top of the High Weald Area of Outstanding Natural Beauty (AONB) providing open views across the surrounding countryside. The Forest was designated as a SSSI in 1986 due to it being one of the largest single continuous blocks of heath, semi-natural woodland and valley bog in south-east England. There are fine examples of heathland habitats (both wet and dry heaths), varied woodlands, uncommon plants, a rich invertebrate fauna and important breeding bird populations.

Further legal protection was afforded in 1996 and 2001 when the Ashdown Forest was designated an SPA and SAC respectively. The SPA is designated for its populations of Dartford warbler and nightjar. According to available data, both species populations remain above the levels present at the time of SSSI and SPA designation resulting in the SPA conservation objective currently being met. However, compared to other south east SPAs bird densities are considered to be low.

### **Visitors to the Ashdown Forest**

The Ashdown Forest is a popular place for recreation and natural resources. It is the largest free public access open space in the south east and attracts an estimated 1.35 million visitors per year.

The majority of Ashdown Forest regular users derive from the local area, in particular from surrounding villages as well as nearby towns Crowborough and Uckfield. The Ashdown Forest Visitor Survey showed that 87% of visitors to the SPA arrive by car, while 11.2% travel on foot and 2.5% travel by non-motorised transport. 70% of those who visited by car had come from within a 7km radius of the SPA. The majority (91%) of Wealden residents who visit the SPA by car travel from within 4km to do so. This indicates a significant use of Ashdown Forest by the local population.

A large proportion of Ashdown Forest visitors are dog walkers (60%), many of whom visit the site on a regular basis (either every day or multiple times per week). The average dog-walker will travel around 2.5km while on the Forest.

Further detailed information on visitors and access patterns can be found in the Ashdown Forest Visitor Survey<sup>3</sup> and the visitor survey data analysis<sup>4</sup>.

### **Creating a SANG**

---

<sup>3</sup> Visitor Access Patterns on Ashdown Forest for Mid-Sussex and Wealden District Councils (UE Associates and University of Brighton, 2009).

<sup>4</sup> Ashdown Forest Visitor Survey Data Analysis Natural England Commissioned Report No. 48 (Clarke, R., Sharp, J. & Liley, D, 2010).

SANGS may be created from:

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

The identification of sites with nature conservation value which are likely to be damaged by increased visitor numbers should be avoided. Such damage may arise, for example, from erosion, increased disturbance and input of nutrients from dog faeces. Where sites of nature conservation are considered for SANGS provision their nature conservation value should be assessed and considered alongside relevant planning policy.

### **Guidelines for the quality of SANGS**

The quality guidelines have been sub-divided into different aspects of site fabric and structure. The guidelines concentrate on the type of SANGS designed principally to cater for heathland dog walkers. The Guidelines cover the QUALITY of SANGS provision only. There will be a number of other matters that will need to be agreed with the Local Planning Authority and Natural England. This will include the enhancement of SANGS; management of SANGS in perpetuity; SANGS capacity where existing accessible sites are proposed; and other avoidance and mitigation measures as necessary.

#### Accessibility – Reaching the SANGS

The large majority of visitors reach Ashdown Forest by car. Only a small proportion of visitors access the site on foot with the majority of on-foot visitors deriving from settlements located adjacent to the Forest.

In addition, the visitor survey identified that the majority of Ashdown Forest users who use alternative sites also access these sites by motorised vehicle. Only a very small proportion of users access an alternative site on foot. This could be due to there being a limited number of easily accessible and attractive suitable alternative sites in the visitor's local area making car use essential to access alternative sites<sup>5</sup>.

Therefore, unless SANGS are small in size or provided adjacent to and for the sole use of a specific development and / or a local population living adjacent to the forest then they will need to be designed to attract visitors who arrive by motorised transport. SANGS may also be required to attract both types of visitors. Overall, the design of SANGS will need to consider and take into account the anticipated target group of visitors.

---

<sup>5</sup> In relation to the distance that users of the Ashdown Forest travel to access an alternative site the visitor survey identified that only 13.3% of groups travelled less than 1.6km to an alternative site, 32.5% travelled between 1.6km and 8km and 53.9% travel more than 8km.

If a SANG is intended to attract visitors arriving by car, the availability of adequate car parking will be essential if a SANG is to be effective. This is especially in relation to the larger SANGS sites that will seek to attract users from further afield.

Car parks may be provided specifically for a SANG or a SANG may make use of existing car parks subject to the agreement of the landowner and providing that there are no restrictions that would deter users from using the facility such as parking charges or restrictions.

The provision of car parking should reflect the anticipated use of the site by visitors and the catchment size of the SANGS. This should be an attractive alternative to using/parking at the SPA, easily accessed and car parks should be advertised as necessary and clearly signposted to ensure that they are known by potential users.

It is important that there is easy and safe access between the car park and the SANG. For example, access to the SANG should not be impeded by a road crossing. SANGS should therefore have a car park with direct access straight on to the SANG with the ability to take dogs safely off lead from the car park to the SANG.

With regards to a suite of SANGS (where a number of smaller SANGS may contribute to the overall provision) car parking may not be a requirement if these sites are small sites located near to existing or new development or where they are linked by green corridors and easily accessible on foot from the development. However, the need for a car park will need to be assessed on a case-by-case basis.

Given that the Ashdown Forest has qualities that are considered worth driving some distance to reach there would be a significant benefit to locate SANGS close to existing settlements to make the site attractive and convenient to use. Where SANGS are provided within or adjacent to settlements, where possible they should be attractive to visitors on foot through the provision of sufficient footpath links. Where SANGS are located close to the local population they will need to be designed in a way to attract access on foot. The nature of the access between the development and SANGS is important and green corridors / access routes will be an important part of facilitating access to the SANGS.

1. Sites must have adequate parking for visitors, unless the site is intended for local pedestrian use only i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car.
2. Car parks must be easily and safely accessible by car, be of an open nature and should be clearly signposted.
3. Where applicable car parks should be located sensitively to take into account surrounding landscape.
4. There should be easy and safe access between the car park and the SANG, with the ability to take dogs safely from the car park to the SANG off the lead.
5. Access points should have signage outlining the layout of the SANGS and the routes available to visitors.

6. SANGS must include access points appropriate to the group of visitors that the SANG is targeting.
7. Where SANGS are located close to development with the purpose of targeting the local population sufficient footpaths must be present or provided to ensure a safe route of access on foot to the SANG.

### The size of SANGS and length of visitor routes

The Ashdown Forest visitor survey identifies that on average users of the forest travel between 2.5km -2.8km whilst on the Forest. At a very minimum a SANG must therefore be large enough to provide an attractive circular walk of 2.5km. To achieve a 2.5km circular walk will require a site around 40 hectares in size. The design of routes within sites smaller than around 40 hectares will therefore be critical to providing routes of sufficient length and attractiveness for mitigation purposes.

It is realised that there is a significant proportion of users who travel further than 2.5-2.8km whilst visiting the Forest<sup>6</sup>. It would therefore be ideal to provide a range of different length walks including longer routes within a SANG where possible and / or a range of different SANGS of varying sizes to ensure that users are provided with a choice in relation to their experience and recreational requirements. The provision of longer routes within large SANGS will contribute to the effectiveness of SANGS mitigation.

Where a 2.5km walk or longer routes cannot be accommodated within individual SANGS it may be possible to provide a sufficient walk using a network of sites. However, networks of sites are likely to be less attractive to users of the type that visit the SPA, and the more fragmented they are, the less attractive they will be, although this is very much dependant on the land use which separates each component.

For example, visitors are less likely to use a network of sites if sites are separated by urban areas or where urban influences are present. This could result in the user perceiving each site as a separate entity and one where each fragment is unable to provide for the recreational users needs in relation to length of route provided. The network of sites will therefore need to be interpreted as part of a larger site by its users. Otherwise users may continue to consider that Ashdown Forest is one of the only green spaces in the area that is able to provide a walk of sufficient length and will continue to use the forest on a regular basis. To overcome this, a network of sites must be linked by attractive green routes with minimal urban influences.

The suitability of using a network of sites for SANGS mitigation together with green access links will need to be considered on a case-by-case basis.

In addition, although a network of SANGS may accommodate and provide sufficient or longer visitor routes they should not solely be relied upon to provide adequate or long routes. Similar to the SANGS, the green corridors must be secured in perpetuity.

8. All SANGS must have a circular walk which starts and finishes at the car park and / or other access points.

---

<sup>6</sup> The visitor survey identifies that 30% of users travel 2.5-2.8km, 48% travel between approx 2km-4km and 22% of people travel up to 8km in distance whilst on the Forest (page 41).

9. SANGS must be large enough to provide an attractive circular walk of at least 2.5km. For larger sites, a range of longer circular routes of varying lengths must be provided.

### Paths, roads and tracks

SANGS should aim to supply a choice of circular walking routes that provide an attractive alternative to those routes provided by Ashdown Forest. Given the average length of walks at Ashdown Forest, a circular walk of 2.5km – 2.8km in length is necessary unless there are particular reasons why a shorter walk is considered appropriate. Where possible a range of different length walks should be provided in considering that a proportion of Ashdown Forest visitors walk between 4 - 8km in distance when visiting the Forest. The provision of longer walks will therefore be valuable and should therefore be considered as standard, either on-site or through the connection of sites linked by green corridors.

When visiting the Ashdown Forest the majority of users remain on the tracks during their stay, therefore the provision of paths will be an important element in the provision of SANGS. The visitor survey did not cover the type of paths used or preferred by Ashdown Forest users, however, in considering the reasons why people use the Forest, it is considered that paths should blend in with the landscape to provide a natural and rural feel, if not imitate the types of paths provided on the Forest, if appropriate.

The visitor survey identified that easy walking terrain was a factor as to why people use the Forest. Therefore, paths should be user friendly. Boardwalks may help with access across wet areas but excessive use of boardwalks should be avoided, as may be necessary on sites which are mostly wet or waterlogged such as floodplain and grazing marsh, as this is likely to detract from the site's natural feel as well as the ability to freely roam within the site.

Paths do not need to be of any particular width with both vehicular sized tracks and narrow Public Rights Of Way (PROW) type paths being acceptable. A range of pathway widths would be similar to those provided on the forest and would therefore be considered suitable.

The majority of those who use the Forest do so alone<sup>7</sup> and a small proportion of people use the site before 9am and after 5pm<sup>8</sup>, when in winter months it will be dark. The provision of paths within SANGS should therefore be routed so that they are perceived to be safe by users. Therefore, some paths should be routed through relatively open terrain (with no trees or shrub, or well spaced mature trees, or wide paths with vegetation back from the path), especially those routes that are 1km-3km long.

Views were also a reason as to why people visit Ashdown Forest, therefore, paths should be routed where views can be maximised.

10. Paths should be easily used and well maintained but should remain unsurfaced where possible to avoid the site becoming too urban in feel.

---

<sup>7</sup> 55.9% of Ashdown Forest Users visit the Forest on their own and 33.2% visit in a pair.

<sup>8</sup> 13% of visitors arrived before 9am and 27.6% of people arrived after 5pm.

11. Paths should be suitable for use in all weathers and all year round. It may be necessary to use sections of boardwalks in areas that are particularly wet.
12. SANGS must be designed so that visitors are not deterred by safety concerns. For example, some routes must be open in nature and provided without tree and scrub cover.
13. Where possible, footpaths within SANGS should be routed where views can be maximised.

### Artificial infrastructure

The Ashdown Forest has numerous B roads, small roads and tracks linking settlements to one another and providing access to properties located across the Forest. The Forest also has an element of military use and numerous car parks and a visitor centre. However, given the size of Ashdown Forest it is considered that between these roads/tracks and small amount of artificial infrastructure there is a significant and vast amount of open space ultimately providing a complete rural and natural feel to visitors with little impact from anything else.

The visitor survey investigated the reasons why people use or visit Ashdown Forest. Numerous responses were given but the most frequent reasons were openness, views, natural beauty, ruralness and birds/wildlife. This confirms that urban influences are not what people are looking for when they visit the SPA. Therefore, users are looking to get away from urban influences rather than being reminded of them.

It has been identified that car parking will be an important element for SANGS. Car parks will need to be suitably located taking into account easy access to the site as well as the effect that a car park may have on landscape. In addition, for SANGS to be effective routes should be clearly but subtly signposted and information about the site and the routes should be provided at car park locations.

Other infrastructure specifically designed to make SANGS attractive to dog walkers may also be desirable but must not detract from a site's relatively wild and natural feel. Desirable measures could include accessible water bodies for dogs to swim, dog bins, appropriate fencing to ensure dog safety, appropriate signage for dog owners for example, to remind them to pick up after their dogs and to advertise areas for dogs to be safely off the lead. However, apart from this, artificial infrastructure should be kept to a minimum and should be restricted to car park areas. Benches in discrete locations and information boards could be acceptable.

14. SANGS must be perceived as natural spaces without intrusion from artificial infrastructure or buildings except in the vicinity of car parks. Visually sensitive way-markers and some benches if appropriately located will be acceptable.
15. SANGS must be free from unpleasant visual, auditory or olfactory intrusions (i.e. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, sports grounds, sewage treatment works, waste disposal facilities etc.).

### Landscape and vegetation

The open and semi-wooded and undulating nature of Ashdown Forest provides a rural and wild feel. SANGS must aim to reproduce the quality as that provided by Ashdown Forest. However, it does not need to contain heathland or heath vegetation to do so.

The visitor survey looked into the types of alternative sites people already use. Wealden residents mainly use other woodland / forests or other open land<sup>9</sup> as an alternative site to the Ashdown Forest. In relation to user types, dog walkers generally use open land more than they visit a forest<sup>10</sup>. This pattern of use is reversed for non-dog-walkers<sup>11</sup>. Interestingly, dog walkers also rated openness higher than views with regards to attraction and qualities of Ashdown Forest.

Overall, the types of alternative sites used by Ashdown Forest visitors are quite varied and no one category stands significantly out from the rest. On this basis potential exists for SANGS to be varied in terms of the type of landscape provided, as long as SANGS provides an attractive natural/semi natural landscape with a rural feel. Preferably a combination of wooded landscapes (perceived to be safe) and open landscapes should be provided to make them attractive to users as well as providing users with an element of choice between sites.

The visitor survey did not go into as much detail to look at peoples preferred topography. However, the topography at Ashdown Forest is varied, unique and characterised by the High Weald AONB with gently undulating slopes. Ashdown Forest also provides vast views across the countryside, with views ranking the second highest reason for visiting the forest. On this basis, an undulating landscape is both preferable and acceptable (as long as it does not include steep slopes) and may also be beneficial in regards to providing potential attractive views. Water features (ponds/lakes) are also beneficial as they act as a focus for visitors, although this is not deemed essential.

The long-term management of the SANGS habitat should be considered at an early stage. This will be particularly important for larger SANGS, and those with grasslands where grazing management is likely to be necessary.

A number of factors can detract from the essential natural looking landscape and SANGS that have an urban feel, for example if they are thin and narrow with long boundaries with urban development or roads adjacent are unlikely to be effective.

16. SANGS must seek to provide a rural and wild feel with a variety of habitats for visitors to experience (e.g. some of woodland, scrub, grassland, heathland, wetland, open water).

17. Where possible it is desirable to choose sites with a gently undulating topography for SANG.

---

<sup>9</sup> The survey identified that 23.4% of alternative site users use other woods/forests, 21.3% use other 'openland' and 17.2% visit towns or villages.

<sup>10</sup> The survey identified that 24.3% of dog walkers visit alternative open land and 22.4% visit other woods/forest sites.

<sup>11</sup> A higher percentage of dog walkers (39.4%) visit alternative open land compared to 24.3% of other users. Fewer dog walkers (16.7%) visit alternative woodland/forest sites than non-dog walkers.

18. It is desirable that SANGS provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.
19. Where possible it is desirable to have a focal point such as a view point, monument etc or water feature within the SANGS.

### Restrictions on usage

The majority of visitors to the SPA visit to exercise their dogs and the ability to let dogs off the lead was noted as a key attraction for visiting the forest. It will therefore be imperative that SANGS allow for dogs to run freely over a significant part of the walk. Access should be largely unrestricted, with both people and their dogs being able to freely roam along the majority of routes. This means that sites where freely roaming dogs may cause a nuisance or where they might be in danger, such as from traffic, should not be considered for SANGS as this will devalue a sites attractiveness to dog walkers.

Where appropriate it may be possible to restrict the free roaming of dogs in certain areas. This could also be varied at different times, as long as mitigation for this is provided and maintained. However, SANGS provision with dog restrictions should only form a minority of SANGS provision and would need to be considered on a case by case basis in relation to the need for restrictions and the effectiveness of the SANGS provision.

20. Access within the SANGS must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.

### Advertising

There will be a need to sufficiently advertise the SANGS to ensure that potential users know of its existence. Any advertising should make clear that the site is designed to cater specifically for dog walkers.

21. SANGS should be clearly signposted or advertised to ensure that people know of their existence.
22. Leaflets and websites should be provided to advertise the location of SANGS to potential users. Leaflets should be distributed to new homes in the area and be made available at entrance points and car parks.

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

#### Site enhancements

SANGS may be provided by the enhancement of existing sites. This includes those sites already accessible to the public that have a low level of use and/or could be substantially enhanced or changed in character to attract the specific group of visitors that would otherwise visit the SPA. However, a potential challenge is to consider firstly whether an existing green space could sufficiently contribute to SANGS provision and secondly how best to assess the contribution it could make.

The extent of enhancement and the number of extra visitors to be attracted would very much vary from site to site. Sites which are enhanced only slightly would be expected to provide less of a mitigation effect than those enhanced greatly, in terms of the number of additional people they would divert away from the SPA. It will be necessary to distinguish between slight and great enhancements. This will need to be assessed on a site-by-site basis where a comparison of current features and infrastructure can be assessed against the enhancements proposed. Methods of enhancement for the purposes of this guidance could include enhanced access through long-term availability of the land, creation of a car park or the creation of a network of paths.

If visitors of an existing site visit Ashdown Forest as an alternative destination (to the existing site) then it is unlikely that the existing site in its current form will be effective as SANGS provision due to the site not fulfilling the users current recreational needs. In these cases, substantial enhancements may be required to ensure that the site is an alternative green space destination to Ashdown Forest rather than an alternative green space that may be used for convenience for example. Overall, the site will need to work in its own right.

### Site capacity

Assessing the contribution that an existing site could make towards SANGS provision is complex and will depend only in part on how busy a site is. Therefore, to refer to site capacity alone can therefore be misleading.

In order to function as a SANG sites must provide a realistic alternative to the SPA by replicating the experience gained from a visit there to draw visitors that would otherwise use Ashdown Forest. It is unlikely that a busy or overcrowded site will provide this experience.

However, if existing sites are put forward as SANGS they must be able to accommodate additional visitors without being so busy that people are deterred from visiting. The danger being that existing users of the site may stop using the site and/or the site won't be attractive to new visitors. This could result in people using Ashdown Forest more and therefore having the opposite effect than what is required.

How busy a site feels is likely to be subjective. It will only depend in part in the total number of people visiting. A range of other factors will also play a part and will be dependant on the aesthetics, general character, size and shape of site together with a consideration of the vegetation present, site lines, design of pathways etc. In addition, factors such as the number of car park spaces may also limit capacity regardless of the site. For reasons such as these the potential for existing sites to function as SANGS and their potential to contribute to SANGS and how much they can contribute will need to be determined on a site-by-site basis.

The identification of existing sites should arise from evidence of low current use. This could be in a variety of forms, for example:

- Experience of managing the site, which gives a clear qualitative picture that few visitors are present;
- Quantitative surveys of visitor numbers;
- Identified constraints on access, such as lack of gateways at convenient points and lack of parking;

- Lack of easily usable routes through the site;
- Evidence that the available routes through the site are little used (paths may show little wear, be narrow and encroached on by vegetation).

Similar to local authorities elsewhere, such as those around Dorset Heaths, the focus for any SANGS provision to mitigate the effects of development in Wealden, whether a completely new site or an existing site, will be the quality of a site, its ability to meet the design criteria through the implementation of enhancements together with an assurance that the additional visits that the site will experience, if identified as SANGS, will not deter from the attractiveness of the site as a destination i.e. become too busy. Overall, it will need to be determined that the site will in combination with on-site mitigation at Ashdown Forest be an effective measure in which to attract the specific group of visitors that would otherwise visit the SPA.

### Quantitative assessments of existing sites

In relation to quantitative assessments, the 8ha standard per 1000 population, which is the standard used in the Thames Basin Heath area to determine how much land a developer should provide for NEW SANGS provision, must not be used for the purpose of assessing how much SANGS provision should be provided in Wealden to mitigate recreational pressure at Ashdown Forest. Neither should this standard be used for assessing the contribution that existing sites can make to SANGS provision as the standard is not directly transferable to assess existing capacity. Furthermore, the 8ha per 1000 population standard is not relevant to the amount of SANGS that should be provided in Wealden as there is no logical evidence to substantiate the use of the standard in the context of Ashdown Forest<sup>12</sup>. This is due to how the standard was originally formulated.

Overall, there is no evidence currently available in which to base the scale of SANGS provision or to estimate how much an existing site can contribute to SANGS provision. In considering the evidence, it is the quality of a site and its offer which is the most important consideration rather than how much land should contribute to SANGS.

There are a number of methods that may be used in combination with each other to assist in determining whether and how much an existing site could contribute to SANGS provision. Such methods could include:

- Using an acceptable benchmark to assess the level of current visitor use;
- A consideration of the character and quality of the site;
- Existing user route data to determine whether parts of the site are currently underused
- Asking qualitative questions of current users of the site which relate to their visitor patterns and how busy the site is to establish whether the site could accommodate more visitors.

---

<sup>12</sup> Burley, P (2007) Report to the Panel for the Draft South East Plan Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan. Inspectorate, Planning.

With regards to using a benchmark, based on work commissioned by Natural England<sup>13</sup> and recent visitor surveys undertaken on a number of green spaces in Wealden<sup>14</sup> it is considered that capacity could be estimated using a benchmark of 1 person per hectare per hour.

A visit rate of 1 person per hectare per hour is a level higher than that experienced at Ashdown Forest and other SPA sites but a level that is lower than would be expected on a busy urban park. This level of use is considered to be the right level of visitor use for a typical SANG site to not feel too busy. This benchmark is proposed as a guide only and it may well be the case that a site can support a higher level of use before a site feels too busy. Conversely a site may support a much lower level of use, for example if visitors are concentrated in certain areas due to physical limitations (such as water / marshy ground). The benchmark will therefore need to be checked against a sites features, character and infrastructure.

Alternative approaches may be acceptable subject to their suitability. Any alternative approach must be based on evidence, relate to Ashdown Forest and be relevant to the provision of SANGS in Wealden.

#### Staging of enhancement works

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

#### Practicality of enhancement works

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

#### Pre-application / planning application requirements for a proposed SANGS

The following advice must be considered by applicants wishing to put forward SANGS as part of a planning application:

A fully considered scheme for SANGS provision will ultimately need to be agreed by Natural England and the Council and will need to be submitted prior to the determination of a planning application to ensure that suitable mitigation is possible. Developers are advised to consult with Natural England, the Council and other relevant organisations as early as possible. The scheme will need to be fully detailed

---

<sup>13</sup> The Natural England commissioned report predicts visitor numbers to Ashdown Forest. Ashdown Forest Visitor Survey Data Analysis Natural England Commissioned Report No. 48 (Clarke, R., Sharp, J. & Liley, D, 2010).

<sup>14</sup> Visitor surveys at potential SANGs sites in Wealden District (Liley, D. & Floyd, L. 2013).

within a SANGS design and delivery scheme. This must include at a very minimum the following:

- A detailed SANGS proposals map;
- Evidence as to how the SANGS meets the Council's quality guidelines and the Habitat Regulations;
- Sufficient detail to identify how the site / sites will be designed and/or enhanced including topography, landscaping, cross sections and proximity to existing and proposed development to meet the requirements of the Habitat Regulations and the Council's quality guidelines;
- Detail of any relevant dog restrictions or other on-site restrictions;
- A design and delivery plan including identifying the phases of enhancement works to deliver SANGS mitigation;
- A management plan to identify how the site/sites will be managed in perpetuity; and
- Details as to how it is proposed for the site to be provided in perpetuity.

Additional information may be required as appropriate.

## **References**

Burley, P (2007) Report to the Panel for the Draft South East Plan Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan. Inspectorate, Planning.

Clarke, R., Sharp, J. & Liley, D. (2010) Ashdown Forest Visitor Survey Data Analysis. Natural England Commissioned Report No. 48, Natural England.

Liley, D. & Floyd, L. (2013). Visitor surveys at potential SANGS sites in Wealden District.

UE Associates. (2009) Visitor Access Patterns on Ashdown Forest for Mid Sussex and Wealden District Councils.