



Initial Wealden Heaths Strategic Access Management and Monitoring (SAMM) Strategy

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Summary

This strategy sets out the mitigation requirements relating to impacts from recreation and urban effects on the Wealden Heaths. The strategy covers a suite of internationally important sites which include the Wealden Heaths Phase I and Phase II Special Protection Areas (SPAs), Woolmer Forest Special Area of Conservation (SAC), Shortheath Common SAC and Thursley & Ockley bogs Ramsar. These are afforded strict legal protection and support a range of rare heathland and wetland species that include birds (such as Nightjar, Woodlark and Dartford Warbler) and habitats (such as dry heathland, wet heath and mire).

Access to the countryside is important to many, brings economic and health benefits to society and is a legal right, yet can be difficult to balance with nature conservation. High levels of recreation can result in impacts to the nature conservation interest for example through trampling damage, disturbance or increased fire risk. The strategy ensures the relevant local authorities (East Hampshire District Council, South Downs National Park Authority and Waverley Borough Council) meet legislative requirements and adequately protect the Wealden Heaths when permitting development.

The strategy extends the geographical coverage of (and builds on) the existing Whitehill and Bordon Strategy (delivered by Heathlands Reunited) which has been in place since 2018. The strategy sets out a suite of measures relating to the management of visitors, visitor engagement and monitoring, collectively referred to as Strategic Access Management and Monitoring ('SAMM'). Mitigation will be funded through developer contributions collected from development within a 5km radius of the protected sites. This strategy will be updated on a rolling basis approximately every 5 years, providing the opportunity to check the mitigation, scale of growth and update any costs. As such the strategy provides a long-term solution to recreation impacts.

By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth across a wide area are taken into account. The strategy ensures necessary resources and costs are identified and provides clarity for developers when bringing forward sites for development.

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We extend our thanks to all those involved in the workshop in October 2025 for their input into ideas for the SAMM.

1. Introduction

- 1.1 This strategy sets out measures relating to the Strategic Access Management and Monitoring (SAMM) for the Wealden Heaths, comprising the Wealden Heaths Phase I and II Special Protection Area (SPA), Woolmer Forest Special Area of Conservation (SAC), Shortheath Common SAC and Thursley & Ockley Bogs Ramsar.
- 1.2 It has been commissioned by East Hampshire Council District Council on behalf of three local authorities which fall within 5km of the Wealden Heaths complex: East Hampshire District Council (EHDC), South Downs National Park Authority (SDNPA) and Waverley Borough Council (WBC).
- 1.3 The Wealden Heaths are of exceptional nature conservation importance and are afforded strict protection for the biodiversity and habitats present. New housing growth surrounding the Wealden Heaths has the potential to result in more recreation use and development pressure and it is therefore necessary to ensure adequate protection measures are in place.
- 1.4 SAMM measures form the basis of all strategic mitigation schemes (see Beveridge et al., 2024 for overview). SAMM comprise measures targeted at or around the European sites, such as signage, interpretation, ranger provision etc and extend to include monitoring linked to mitigation delivery to ensure the mitigation is targeted appropriately.
- 1.5 This SAMM strategy addresses those risks up front, providing a carefully planned and comprehensive suite of mitigation measures that ensures cumulative impacts of growth are taken into account and that the necessary resources and costs are identified.
- 1.6 Alongside the SAMMs mitigation set out in this strategy, mitigation is also delivered through alternative greenspace to divert recreation use, including SANG ('Suitable Alternative Natural Greenspace'). The alternative greenspace provision is additional to the SAMM and secured by the relevant local authorities or as bespoke SANG by developers.

2. Background and wider context

- 2.1 This section sets out the background to the relevant legislation and provides wider context in terms of countryside access, nature recovery and changes to planning and local government that may be relevant.

Legislative context

- 2.2 This strategy has been produced in order to meet particular legislative requirements. Habitats sites are those afforded the highest level of legislative protection for biodiversity. Public bodies, including LPAs, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For LPAs, this means that the combined effect of individual development proposals must be assessed collectively for their cumulative impact.
- 2.3 The designation, protection and restoration of habitats sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the ‘Habitats Regulations’. They include Special Protection Areas (SPAs) classified under the 1979 Birds Directive and Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive. In addition, Ramsar sites are afforded the same level of protection as habitats sites, through long-established Government policy¹. In this strategy we use the term ‘European site’ to refer to both habitats sites and Ramsar sites.
- 2.4 European sites are the cornerstone of UK nature conservation policy. Each forms part of a ‘national network’ of sites that are afforded the highest degree of protection in domestic policy and law. Public bodies are referred to as ‘competent authorities’ within the legislation. The duties set out within the Habitats Regulations in relation to the consideration of plans and projects are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so.

¹ ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

- 2.5 The legislation is founded on the ‘precautionary principle’ and it is necessary to rule out harm, rather than demonstrate impacts. Assessment (Habitats Regulations Assessment) requires consideration of effects either alone or in combination, and this strategy therefore relates to the cumulative effects of plan-led development across the combined authorities.
- 2.6 The strategy is therefore necessary to allow the LPAs, as competent authorities under the Habitats Regulations, to rule out adverse effects on integrity for relevant European sites, as a result of recreation linked to future, plan-led growth. The strategy is therefore focussed on future risk and being able to have the necessary certainty, under the Habitats Regulations, that harm can be ruled out.

Planning and Infrastructure Act

- 2.7 The UK government has set ambitious targets for house building over the current parliament. The Planning and Infrastructure Act², enacted in December 2025, is proposed to speed up and streamline the delivery of new homes, with a focus on strategic mitigation to enable development. The Act establishes Natural England (as the delivery body) responsible for the production and administration of Environmental Delivery Plans (EDPs), determining standardised levels of environmental mitigation needed for certain types and scales of development in a specific area. At the time of writing, EDPs will initially focus on nutrient related issues such as water and air quality, but that there is scope for these to cover recreation impacts, individual species and other sensitive features in time.
- 2.8 Until EDPs are adopted in a given area it is important to ensure mechanisms are in place for strategic mitigation to be delivered. As such this SAMM is intended to run as long as necessary to ensure continued mitigation and compliance with the relevant legislation. Regular reviews will be undertaken to ensure the strategy remains aligned with any legislative changes or new regulatory requirements.

The importance of access to the countryside

- 2.9 It is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, for example through enforcing pro-environmental behaviours and instilling a greater respect for

² The Planning and Infrastructure Act received Royal Assent on 18th December 2025, see <https://bills.parliament.uk/bills/3946> for background and details.

the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Bragg and Atkins, 2016; Kondo et al., 2020; Lee and Maheswaran, 2011) and economic benefits (Bateman et al., 2014; Dasgupta, 2021; Day, 2020). In recent years there have been shifts in government policy and debate around enhancing access to the countryside.

3. Relevant European Sites

- 3.1 This section sets out the context and background to the strategy, in terms of the sites covered, visitor infrastructure, visitor use, impacts of recreation and mitigation undertaken to date.

The sites and their qualifying features

- 3.2 The European sites covered by the strategy comprise the Wealden Heaths and cover East Hampshire and part of Waverley (Map 1), with their qualifying features listed in Table 1. Relevant European sites comprise the following;
- Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) Special Protection Area (SPA);
 - Wealden Heaths Phase II SPA;
 - Woolmer Forest Special Area of Conservation (SAC);
 - Shortheath Common SAC; and
 - Thursley & Ockley Bogs Ramsar.
- 3.3 The two SPAs are the focus for the strategy and are classified for their breeding populations of three species of ground-nesting heathland birds (Nightjar *Caprimulgus europaeus*, Woodlark *Lullula arborea*, and Dartford Warbler *Curruca undata*). The latter two species are resident on the heaths throughout the year whilst Nightjar are a summer-breeding migrant to the UK, which winters in sub-Saharan Africa.
- 3.4 The two SACs are designated for their lowland heath, peat, and wetland habitats, with Shortheath Common SAC also designated for bog woodland. Both SACs incorporate areas of European dry heath, transition mire and quaking bog, whilst Woolmer Forest SAC also supports areas of wet heath, dystrophic lakes and ponds, and depressions on peat substrates. Woolmer Forest SAC lies entirely within the Wealden Phase II SPA and Shortheath SAC lies outside but in close proximity. Shortheath is known to be used by breeding birds associated with the Phase II SPA (see Appendix 1) and potentially provides supporting habitat, functionally-linked to the SPA (see Chapman and Tyldesley, 2016 for definitions and background to functionally-linked land).
- 3.5 Similarly, the Thursley and Ockley Bogs Ramsar is entirely within the Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA and is in part listed for similar features, as the Ramsar includes breeding populations of Nightjar and Woodlark. The Ramsar listing also extends to

include a community of rare wetland invertebrates, including notable numbers of breeding dragonflies and it is listed as one of the few sites in the country to support all six species of native reptile.

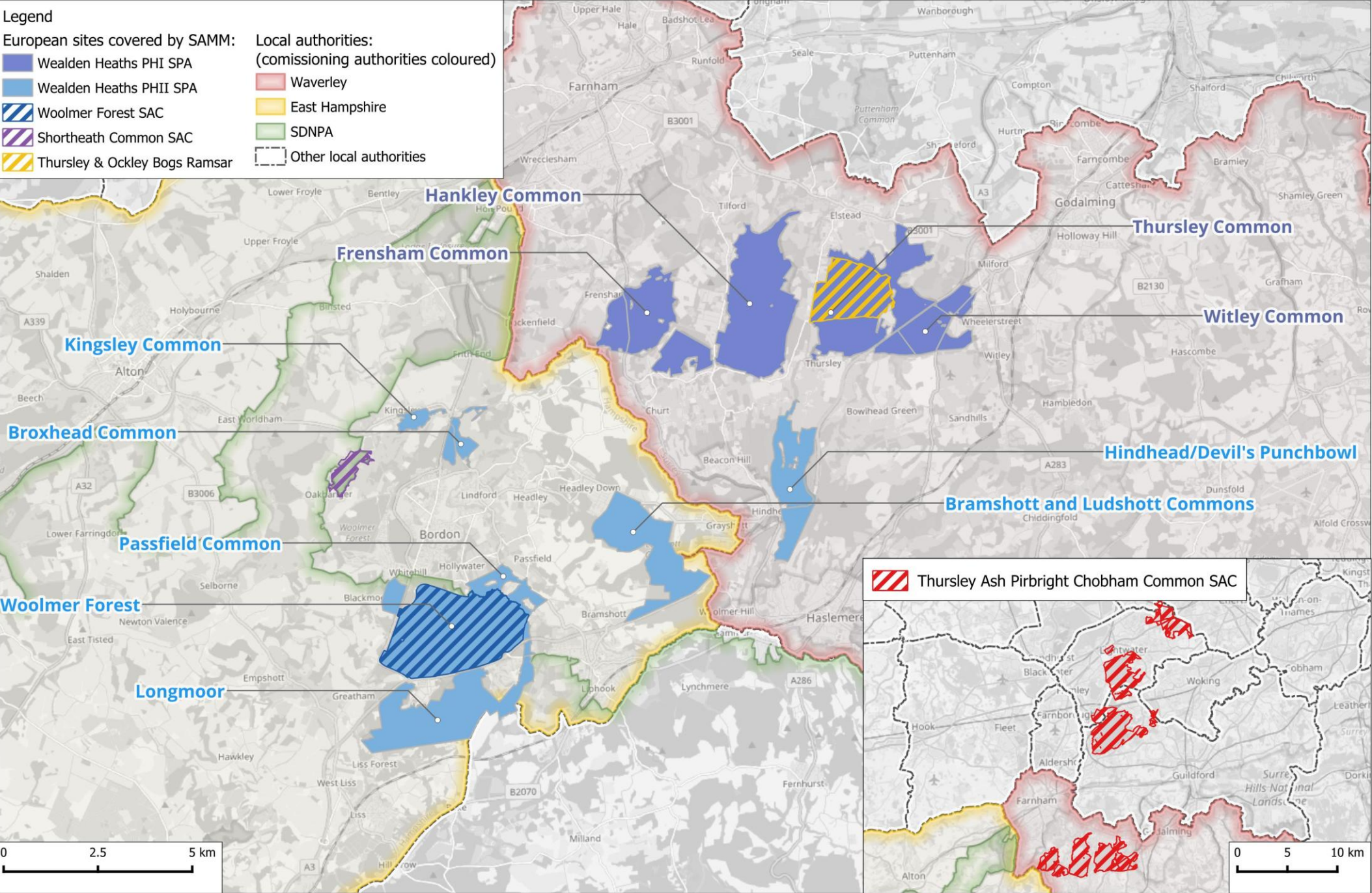
- 3.6 There are a suite of species that, while not qualifying features of the European sites themselves, are nonetheless necessary to consider and relevant to the strategy. In particular, the supplementary conservation advice for Woolmer Forest SAC³ lists a number of key structural, influential and/or distinctive species that make a particularly important contribution to the necessary structure, function and/or quality of an Annex I feature. For the dry heaths feature of Woolmer Forest these species include the assemblage of native reptiles and amphibians that includes Natterjack Toad *Epidalea calamita*, Smooth Snake *Coronella austriaca*, and Sand Lizard *Lacerta agilis*. Woolmer Forest is unique in the UK in supporting natural populations of all 12 British amphibians and reptiles. Natterjack Toads are also a key feature of the dystrophic ponds Annex I habitat at the site. These species are important to note as they are relevant to any HRA and recreation impacts are a potential concern (see 3.22 below).
- 3.7 One additional European site also overlaps with the Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA but extends well outside the area of focus for the strategy (see inset on Map 1) and is therefore not a focus for the strategy. Thursley, Ash, Pirbright & Chobham SAC qualifies for Northern Atlantic wet heaths with *Erica tetralix*, European dry heaths, and depressions on peat substrates of the Rhynchosporion. The breeding birds (features of the Phase I SPA and the Ramsar) occur on dry heathland (an SAC feature), and as such the strategy in part will address risks for the SAC, however, all areas of this SAC that are outside the Wealden Heaths are not covered by the strategy.

³ See <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030304.pdf>

Table 1: European sites covered by the SAMM and their qualifying features, alongside their constituent Sites of Special Scientific Interest (SSSIs). Links cross reference to the relevant page on Natural England's designated sites view and provide further information on the qualifying features and conservation objectives.

European site name	Area (ha)	Constituent SSSIs	Qualifying features
Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA	1,879.8	Thursley, Hankley & Frensham Commons SSSI	- Nightjar - Woodlark - Dartford Warbler
Wealden Heaths Phase II SPA	2,056.5	Bramshott and Ludshott Commons SSSI Broxhead and Kingsley Commons SSSI Devil's Punch Bowl SSSI Woolmer Forest SSSI	- Nightjar - Woodlark - Dartford Warbler
Woolmer Forest SAC	670.2	Woolmer Forest SSSI	- Natural dystrophic lakes and ponds - Northern Atlantic wet heaths with Erica tetralix - European dry heaths - Transition mires and quaking bogs - Depressions on peat substrates of the Rhynchosporion
Shortheath Common SAC	58.5	Shortheath Common SSSI	- European dry heaths - Transition mires and quaking bogs - Bog woodland
Thursley and Ockley Bogs Ramsar	265.7	Thursley, Hankley & Frensham Commons SSSI	- Native reptile assemblage - Nightjar - Wetland invertebrate assemblage - Woodlark

Map 1: European sites within the Wealden SAMM



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Recreation use

- 3.9 Recreation use has been quantified through a range of visitor surveys including surveys in 2016 (at Frenchem Common only, Lake and Panter, 2016), 2018 and 2023 (Panter, 2018; TSE Research, 2023) and visitor work relating to the HRA for the Whitehill and Bordon Eco-town in 2012 (Brookbank, 2012). More recently, a wider Heathland Connections study (Natural England, 2024) covers some of the same area and includes visitor footfall data collected by Heathlands Reunited⁴ for the period 2023 to 2025.
- 3.10 Data from the various studies show levels of access vary both spatially and temporally between the component blocks of the European sites, with Bramshott, Kingsley, and Ludshott identified as busiest in the morning throughout the year. Conversely, Woolmer was identified as being busiest in the afternoon, based on footfall data, whilst levels and times varied at both Longmoor and Broxhead. Across all sites, late morning (between 7am and 10am) was thought to be the most popular time for visiting however, for those who professed a preference in both 2018 and 2023 visitor surveys.
- 3.11 The main activity undertaken by visitors is dog walking (45% of interviewees in 2023 and 71% in 2018), with walking the second most frequent (Panter, 2018; TSE Research, 2023). There is however variation between the component blocks, with 81% of interviewees at Ludshott and Bramshott, compared to 52% at Woolmer Forest, identified as dog walking during the 2018 survey (Panter, 2018). Cycling is also a popular, albeit less frequently recorded, activity across the SPA, with angling also comprising a frequently recorded activity at Shortheath during the 2018 survey. A range of other, less frequently recorded, activities are also carried out across the sites, and antisocial behaviour has been identified as an issue at some.
- 3.12 Seventy-one percent of groups recorded during the 2023 survey contained at least one dog, with 40% of dogs off-lead (ranging from 22% at Kingsley Common to 72% at Shortheath Common), compared to 75% recorded off lead overall in 2018. Amongst the two most frequent activities, dog walkers had a mean route length of 2.5km, and walkers 3.4km, during the 2018 surveys.
- 3.13 The footfall data from Heathlands Reunited shows that average monthly footfall had increased across the Wealden Heath Phase II sites between April

⁴ Data provided directly by Heathlands Reunited on 09/09/2025.

2023 and February 2025, with footfall at Longmoor significantly higher than at all other component blocks. The same data shows that Kingsley and Broxhead were also marginally busier than either Bramshott, Ludshott, or Woolmer, on a monthly basis over the same period.

- 3.14 This contrasts with tally data collected during separate visitor surveys undertaken in 2018 and 2023, which showed that Ludshott and Bramshott comprised the busiest locations (Panter, 2018; TSE Research, 2023), with the 2018 study also identifying Shortheath as the quietest location. The 2023 study also identified Longmoor Common as having a higher number of cyclists than any other location, whilst Kingsley Common recorded the highest number of horse riders (TSE Research, 2023).
- 3.15 There is diffuse access across many of the component blocks via a network of paths, with much of the recreation radiating from parking locations (as most visitors arrive on site by motor vehicle). A key exception is Woolmer Forest, which limits access between 8am and 4pm due to live firing operations but is encircled by a 24-hour accessible track. Visitor routes are therefore largely concentrated around the perimeter of the block, although the 2018 visitor survey did identify a particular density of routes on the western side of the looped track, close to Bordon and the cycleway (Panter, 2018). Evidence from the 2023 visitor survey also suggests that many interviewees visit other blocks within the SPA, and that some visitor routes will incorporate multiple blocks.
- 3.16 Most visitors are local residents, with only a small number of overnight visitors recorded at Woolmer Forest. Home postcode data collected from interviewees showed that most people were resident in Hampshire and the Surrey borders, with a large majority residing in East Hampshire District during the 2023 surveys (TSE Research, 2023). 75% of interviewees from the 2018 survey lived within 3.9km of the survey location, and proximity to home was identified as one of the key reasons for site choice in both the 2018 and 2023 surveys. Other important reasons included the quiet nature of the sites and the benefit that they provided to visitors' dogs, as well as to maintain physical/mental wellbeing (Natural England, 2024).
- 3.17 The majority of people visiting the sites are adults and visit equally across the year, based on both the 2018 and 2023 visitor survey data. The majority also visit frequently, with 40% of visitors in 2018 and 52% in 2023 visiting most days, and a quarter visiting at least daily in both years (Panter, 2018; TSE Research, 2023). Most visitors during both survey years were spending

2hrs or less on site (with approximately half spending between half an hour and one hour), although this varied with activity (with anglers, for example, spending much longer on site). Furthermore, most people have also been visiting for a long time, with approximately half of interviewees in 2018 having been visiting the site for more than 10 years (Panter, 2018), and approximately a third having done so in 2023 (TSE Research, 2023).

- 3.18 The Heathlands Connections project (2024) supported previous visitor work to suggest that most visitors to heathland locations in the Thames-Solent area are local residents who visit frequently with notable site exceptions such as Devil's Punchbowl/Hindhead and Frensham Great Pond. These locations are instead perceived as destination visits, offering more facilities (e.g. café, visitor centre and marked trails at Devil's Punchbowl) or alternative activities (e.g. inland beach at Frensham Great Pond) for visitors coming from further afield. In addition, while there was a general lack of knowledge from visitors in the importance of heathland sites for nature conservation, there was some understanding of acceptable behaviour on heathland sites (e.g. no barbeques, staying on the paths although not necessarily enforced for their dogs).
- 3.19 Ultimately, the majority of recreation access is undertaken by local dog walkers and walkers, who mainly access the site by motor vehicle and visit frequently (generally for less than one hour) across the year. A general preference is shown for visiting in the morning, and a sizeable proportion of dogs are walked off-lead. Cycling is also widespread, and some of the component blocks are particularly attractive to other activity types (e.g. angling and horse riding).

Condition

- 3.20 The five European sites considered in the SAMM are underpinned by six separate SSSIs. Table 2 provides a summary of the SSSI unit conditions within each. The majority of units across all SSSIs (65%) are in Favourable condition, with the remainder in Unfavourable – Recovering condition. There is however some variation at the site level, with the majority of SSSI units in Unfavourable – Recovering condition at both Bramshott and Ludshott Commons SSSI and Shortheath Common SSSI, compared to the other sites which exhibit a majority Favourable condition.

Table 2: Summary of unit conditions for constituent SSSIs

SSSI	Area (ha)	No. of units	Unit condition
Bramshott and Ludshott Commons SSSI	380.6	4	1 Favourable 3 Unfavourable - Recovering
Broxhead and Kingsley Commons SSSI	104.8	4	3 Favourable 1 Unfavourable - Recovering
Devil's Punch Bowl SSSI	279.9	5	5 Favourable
Shortheath Common SSSI	58.0	5	1 Favourable 4 Unfavourable - Recovering
Thursley, Hankley & Frensham Commons SSSI	1,838.2	39	30 Favourable 9 Unfavourable - Recovering
Woolmer Forest SSSI	1,293.9	32	18 Favourable 14 Unfavourable - Recovering

3.21 Key reasons for Unfavourable status across the SSSIs largely comprise an absence of suitable historic management (including grazing), resulting in extensive stands of dense scrub, uneven age classes of dwarf shrubs, and excessive cover by trees, Bracken, and Purple Moor-grass. Uncontrolled fire has also been identified as an issue for some SSSI units, as well as the presence of invasive species (including non-native fish in waterbodies and encroaching Rhododendron). Some SSSI waterbodies are also in Unfavourable condition due to excess turbidity and drainage issues, whilst historic declines in the water quality in one waterbody was linked to visitors feeding bread to ducks.

Impacts of recreation

3.22 There are a range of potential impacts arising from recreation across the relevant European sites (for examples, see Figure 1). These are set out in detail within Appendix 2 which draws on evidence from the literature and other UK sites. Drawing on the information in Appendix 2, potential risks from recreation for the relevant European sites, and the issues that the SAMMS needs to mitigate, are:

- **Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA:** disturbance to breeding Annex I birds (dogs off leads likely to be a particular concern) and fire incidence. In addition, there are potentially a suite of wider issues such as trampling, dog fouling, contamination, grazing issues and visitor perceptions that could have implications for the habitat quality and therefore the bird interest.
- **Wealden Heaths Phase II SPA:** as for the Phase I SPA.

- **Woolmer Forest SAC:** covers part of the Phase I SPA, additional concerns around dogs in water bodies and contamination (water bodies are an SAC feature and Natterjack a key species).
- **Shortheath Common SAC:** disturbance to breeding Annex I birds (dogs off leads likely to be a particular concern) and fire incidence, as site functionally-linked to the Wealden Heaths Phase II SPA. Additional risks such as trampling, dog fouling, contamination, grazing issues and visitor perceptions could have implications for the SAC features, with potential implications for the birds (in terms of deterioration in habitat quality).
- **Thursley & Ockley Bogs Ramsar:** disturbance to breeding Annex I birds (dogs off leads likely to be a particular concern) and fire incidence (impacts to the birds and also damaging for the reptile interest). In addition, contamination from dogs in waterbodies could harm the wetland invertebrate assemblage and potential risks from dogs to the reptile assemblage (from disturbance and dog attacks).

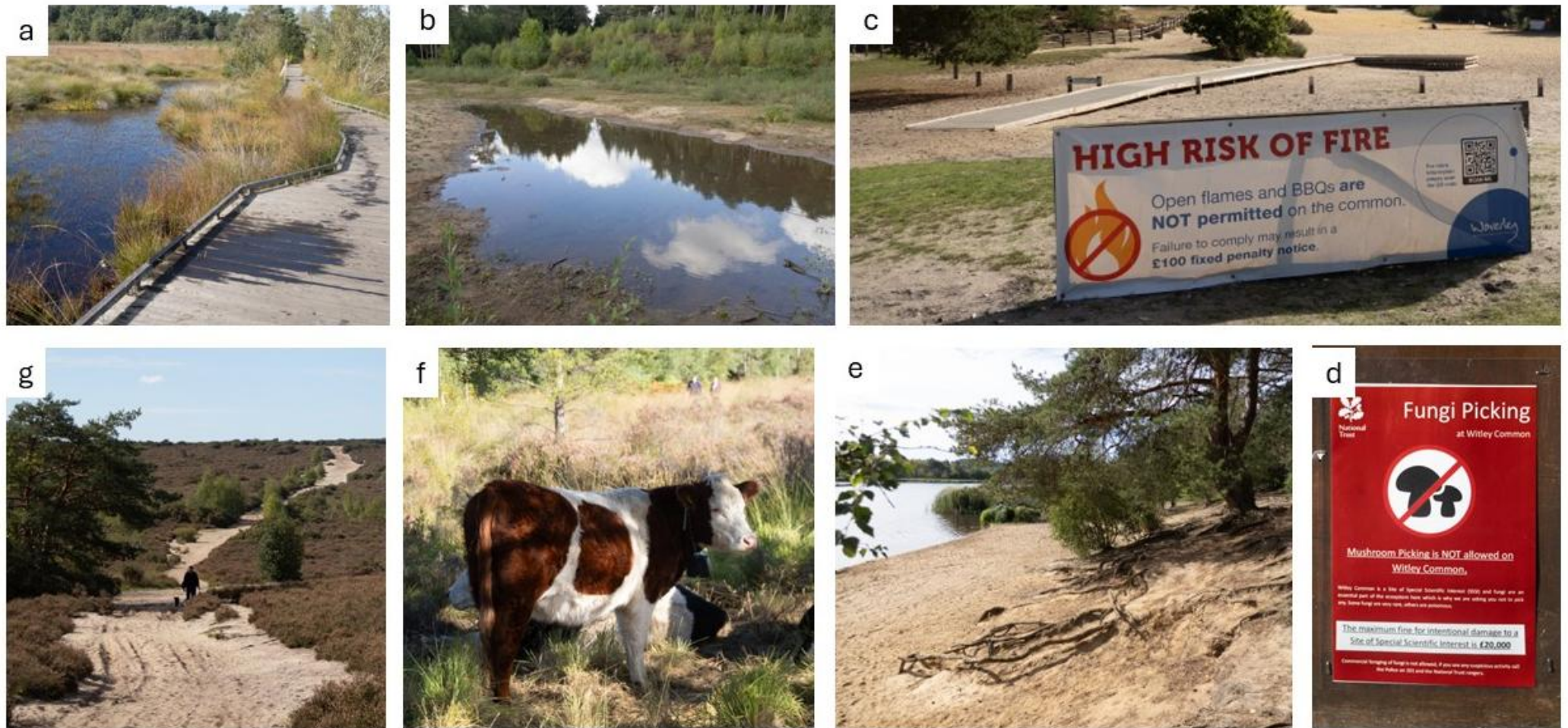


Figure 1: Examples of recreation issues: a) dogs accessing water bodies at Thursley (note the wet area on the boardwalk); b) Natterjack breeding pool at Woolmer, adjacent to perimeter track and easily accessible to dogs; c) fire risk sign at Frensham Great Pond; d) fungi picking sign at Witley Common; e) erosion at Frensham Little Pond; f) cattle grazing at Thursley; g) trampling at Frensham Little Pond.

Visitor management and mitigation delivery to date

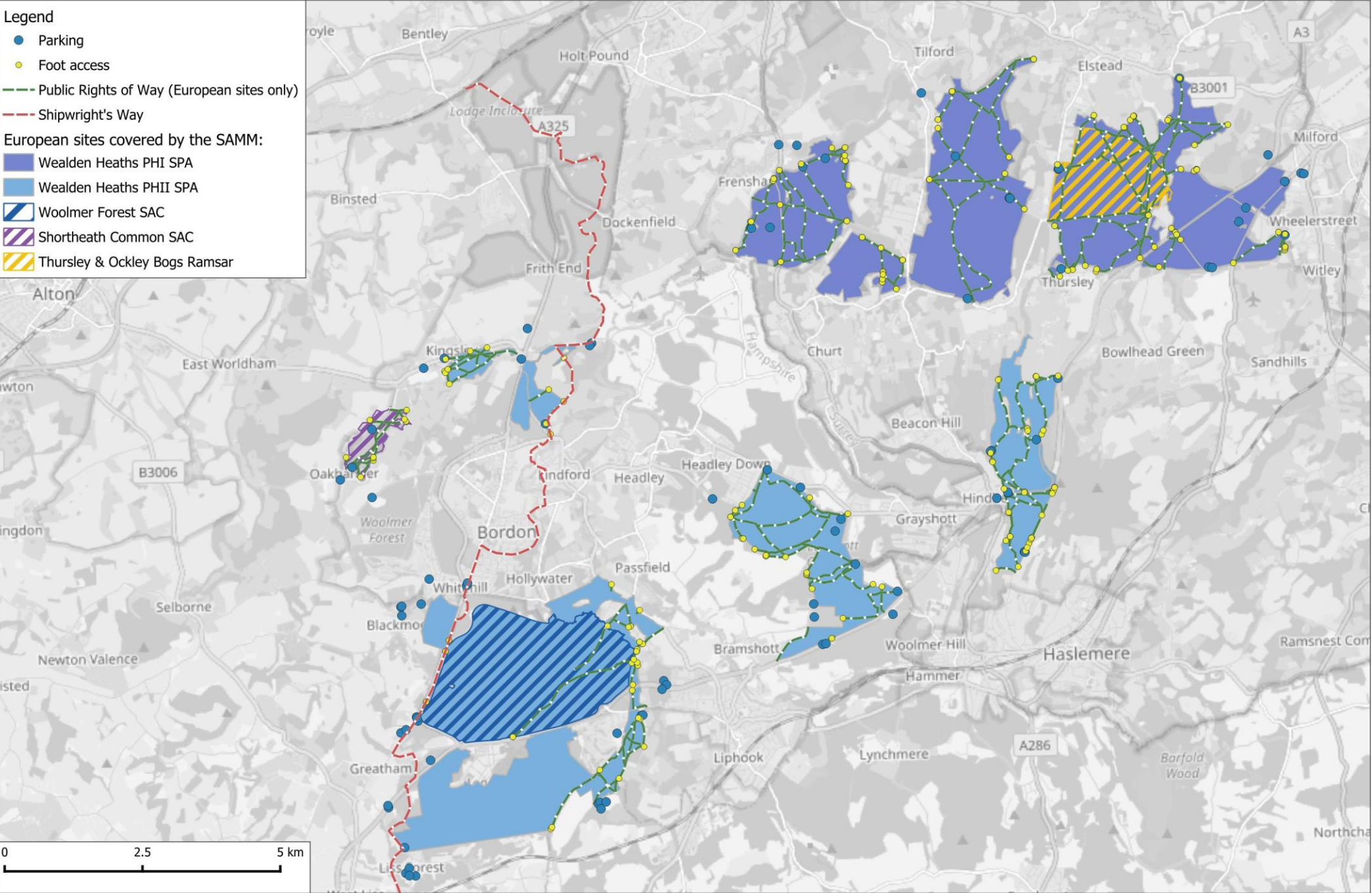
Visitor infrastructure

- 3.23 The heathland and commons are mostly across open access land, with the exception of Woolmer Forest SAC and parts of Hankley Common where access is managed by the military and some areas are closed to the public during military training. Even so, parts of these sites (such as the perimeter track at Woolmer Forest) remain open to the public at all times. Away from the military areas, the sites are owned and managed by a range of different organisations, including the National Trust and Natural England. There are around 89 car parks within 500m of the sites and a minimum of 285 entry points for access on foot (see Map 2). Some examples of the infrastructure present on sites are shown in Figure 2.

- 3.24 The Shipwrights Way, which joins Portsmouth in the south to Alice Holt Forest in the north, spans 50 miles in total and crosses through Wealden Heaths Phase II SPA and Woolmer Forest SAC. This is a popular route and provides access to the heaths from the coast. A further 14km forms the network of public rights of way, byways and bridleways across the relevant European sites.

- 3.25 Visitor centres are advertised at two locations (Devil's Punchbowl which is run by the National Trust and at Frensham Great Pond owned by Waverley Borough Council), with a few other locations having toilet blocks, cafés and other facilities which may be a focus for visitors. Information boards, signage, surfaced paths, boardwalks etc are often present in a range of locations, provided/maintained by the relevant organisation responsible for the site.

Map 2: Visitor infrastructure



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Figure 2: Examples of existing infrastructure and visitor management. a) meet and greet facilities at Frensham Little Pond; b) interpretation at Frensham Little Pond, c) parking at Ludshott Common, d) visitor centre and café at Frensham Great Pond, e) barrier to contain access, Thursley, f) interpretation at Ludshott; g) boardwalk at Thursley.

Existing mitigation

- 3.26 To date protection from recreation and urban effects associated with housing growth has been afforded by a 400 metre SPA 'exclusion zone' for no net gain in residential dwellings or Gypsy, Traveller and Travelling Showpeople pitches and/or plots. This zone is secured through policy in the East Hampshire adopted Joint Core Strategy and applies to the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC.
- 3.27 EHDC, SDNPA and WBC have also to date required some mitigation provision from larger developments beyond 400m, again secured through policy and adopted in the Local Plans. Development sites of 20 to 49 dwellings may require some form of mitigation (this would be on a case-by-case basis); and 50 dwellings or greater will require bespoke SANG. In East Hampshire, SANG provision has included Hogmoor Inclosure (linked to the development at Prince Philip Park) and Bordon Inclosure SANG (linked to developed at Quebec Park and Lousiburg).
- 3.28 There has also been a bespoke SAMM strategy which addresses the growth aligned to the Strategic Allocation at Whitehill & Bordon, as set out in the East Hampshire adopted Joint Core Strategy. This SAMM strategy was set up in 2020 and has been managed by the SDNPA (currently contracted to undertake the SAMM until 31st March 2026) on behalf of EHDC and Whitehill Town Council. It is understood that Whitehill Town Council have extended the management of this SAMM for a further four years to cover the two sites for which they are responsible. S106 SAMM contributions have been collected and used to fund mitigation on Bramshott Common, Ludshott Common, Longmoor Inclosure, Woolmer Forest and Shortheath Common SAC. In addition, Broxhead Common and Kingsley Common are managed by Whitehill Town Council who also commission SDNPA to deliver SAMM on those areas.
- 3.29 Mitigation implemented to date has been through the Heathlands Reunited Project⁵, led by the SDNPA. The mitigation has included ranger presence on sites (e.g. Figure 3), undertaking site patrols, guided walks and community events. The ranger team has comprised two full-time staff employed year-round and an additional two staff employed on a seasonal basis each summer and these employed to cover a range of locations, supplementing

⁵ <https://www.southdowns.gov.uk/help-your-heaths/heathlands-reunited/>

and boosting any face-face engagement undertaken by the various site managers/owners. Rangers are typically paired when out doing patrols. Their role extends to include some monitoring and some ad hoc biological recording while out on site.

- 3.30 Communication has included promoting the SDNPA ‘take the lead’ campaign⁶ which includes targeted messaging around dogs and dog walking. The campaign includes material on ground-nesting birds and on livestock issues. Rangers have been conducting counts of dog faeces and spray-painting faeces to highlight the scale of the issue to local dog walkers.



Figure 3: Ranger speaking to visitors at Ludshott Common.

⁶ <https://www.southdowns.gov.uk/take-the-lead/>

4. **SAMM ('Strategic Access Management and Monitoring')**

- 4.1 This section sets out the details of the SAMM delivered through this strategy. These build on and expand the existing mitigation established in 2020. Mitigation measures have been identified through: conversations with current mitigation delivery team at the South Downs National Park, site visits and a workshop held with stakeholders in October 2025. Details on the outcomes from the workshop are given in Appendix 3.
- 4.2 Measures are summarised in Table 3 and further details set out below.

Table 3: Overview of SAMMs measures. ‘fte’ refers to full-time equivalent.

Mitigation measure	Description	Justification	Notes
Delivery manager	Full time post managing the ranger team and providing overall steer for mitigation delivery and link to the steering group, project partners, stakeholders, planners etc. Role will cover recruitment, line management, budget management and any strategy updates and also provide strategic links and wider policy liaison.	Manager post to ensure smooth delivery and oversight of implementation, surveys and monitoring undertaken as part of the SAMM. Liaison (including with LPAs) is key to ensuring contact with other organisations and securing enforcement options (e.g. fines, PSPOs, MOD).	
Ranger team leader	Ranger team leader post will be responsible for the coordination of the team, have oversight of rotas, ensure cover for holidays & sickness etc, health & safety oversight, transport logistics etc.	Rangers are the cornerstone of mitigation. Leader is necessary to ensure coverage and co-ordinate work.	Previous ranger team established, expansion necessary.
Ranger team (2 full time and two seasonal)	Ranger team expanded slightly on previous. Total of 4 posts (one full-time and two seasonal). Key function is patrolling on the European sites and directly engaging with visitors to those sites.	Rangers are the cornerstone of mitigation.	Previous ranger team established, expansion necessary.
Vehicle for rangers	Running costs to cover vehicle for rangers.	Budget required for transport and operational work. A dedicated vehicle has benefit in providing additional branding.	
Education/community engagement officer	Part-time post undertaking work with schools including school visits and attending events.	Education lead able to go into schools and community events (fetes etc), working directly with children in local communities to raise awareness with young people. Community engagement with volunteers could also be included with this role. Potential to link up with Thames Basin Heaths Partnership (TBHP).	
Dedicated dog project (one part-time post & resources)	Part-time post undertaking dedicated to engaging with the dog walking community. Resources required for running of events etc.	Staff costs to build project - dog walkers the main user group to influence with the largest impact. Engagement focused and potential to link up with TBHP.	
Ponds project	Singular commission around water quality, access points and potential to reduce dogs access to ponds. Work would involve mapping	Work would enable ponds to be identified where protective measures need to be targeted and potentially those where dogs could be allowed to	Further costs needed to actually implement any recommendations.

W e a l d e n H e a t h s S A M M

Mitigation measure	Description	Justification	Notes
	ponds, testing water, identifying which are at risk from dogs and specific measures for each.	enter. Management options such as dead hedging, diverting access routes around ponds, fencing etc could be identified where required.	
Fire consultancy support	Funds to cover specialist consultancy support (for example review of fire management plans) and potential for collaboration (i.e. events or training bringing local site-based staff together).	Fire an increasing threat with climate change and has been identified as an issue (particularly bbqs and associated anti-social behaviour).	
Small infrastructure projects	Rolling budget required to cover small infrastructure projects including work around ponds, signage, interpretation, parking, gates, barriers and dog bins.	Covers a range of gaps where additional or replacement infrastructure needed to supplement existing provision. Need for barriers to stop 4x4 incursions, additional dog bins, changes to gates/entry points and parking all identified through workshop with stakeholders.	Oversight by delivery manager and scope for funds to be phased and flex with housing delivery.
Monitoring strategy	A monitoring strategy that sets out the different monitoring threads, timing and how the data will be used to inform mitigation delivery.	Monitoring results will be important to inform strategy review and update, support the work of rangers and target mitigation. It is essential that the monitoring is carefully planned and fits together.	Relatively simple strategy setting out recording systems, timing and how different monitoring strands will work.
Visitor survey	Visitor survey to cover all European sites and surrounding GI (SANGs etc) at 5 year intervals.	Provides data on changing use patterns, demographics, visitor numbers and visitor origins.	Repeat surveys of a selection of locations in line with previous studies.
Vehicle counts	Car park counts undertaken across all parking locations including small car parks, lay-bys etc.	Provides overview of where people go and variation at different times.	May be possible for ranger team to do, however will require systematic and careful design to ensure comparability over time and between locations.
Coordinated bird surveys	Surveys of SPA species across all sites, coordinated to ensure complete coverage.	Provides overview of how well species are doing, helps target mitigation delivery and provides material for engagement (e.g. when rangers are talking to visitors).	Currently undertaken by volunteers, aim would be to ensure good coverage at 5 yearly intervals with surveys conducted by volunteers with boost from ranger team and local conservation organisations.

Delivery manager

- 4.3 A delivery manager will oversee the implementation and delivery of the mitigation strategy and provide the point of contact for planners, developers, rangers and site managers. The delivery manager's role will cover recruitment and line management of the other staff, budget management and strategy updates. They will be responsible for commissioning some elements of the work, disseminating information and keeping oversight of the different threads of mitigation delivery. They may also need to play a role in covering for rangers and other staff (e.g. during holiday periods).

Expanded ranger team

- 4.4 A ranger team is fundamental to the mitigation delivery and the ranger team's core work will involve providing a presence on-site through their patrols of the relevant European sites, primarily targeting locations where there is no existing engagement presence. This provides the confidence that mitigation is targeted towards direct engagement with those visiting the European sites and the ability to directly influence those spending time on those sites. The funds provide the rangers with the necessary resources (such as vehicles) to deliver this mitigation, working with existing ranger provision in the area such as the National Trust rangers at Devil's Punchbowl and Frensham Little Pond and Waverley Borough Council at Frensham Great Pond. Ranger time should be ring-fenced and focussed on maximising their time out on the sites and talking to visitors.
- 4.5 Specific work areas for the various staff in the team and that apply across the whole geographic area will include:
- Spending time on heathland sites, patrolling and talking to visitors, providing a visible presence on-site to influence visitor behaviour (e.g. relating to picking-up, dogs off lead, dogs in water bodies);
 - Patrolling during high fire risk periods specifically to watch for smoke and be vigilant for any activity that could be associated with increased fire risk;
 - On the ground familiarity with access and fire procedures so that – in the case of fire – emergency services can be directed to the right access locations and relevant site staff are contacted;
 - Work with key parties around signage re: fire risk – with the potential for signage about no barbeques, fires etc., or high fire risk to be used across sites and on roads approaching sites;

- Complete parking audit and use to identify and prioritise locations where changes (such as formalising parking, reducing parking spaces, need for height restriction barriers or other infrastructure);
- Review signage and waymarking and support site managers and organisations where benefit in providing additional infrastructure;
- Maintaining an incident log and collecting basic data around engagement;
- Leading some guided walks on heathland sites;
- Supporting monitoring work and biological recording.

4.6 Ranger provision is ideally delivered by a single, stand-alone team such as those that operate on the Dorset Heaths, Bird Aware Solent, Thames Basin Heaths and the Suffolk Coast (including the Suffolk Sandlings). The current ranger team is hosted by SDNPA, through Heathlands Reunited⁷. The Heathlands Reunited branding gives the ranger team a distinct identity and the branding is well established (Heathland Reunited being originally established in 2016). However, much of the area covered by the strategy is outside the area historically covered by Heathlands Reunited and extends well outside the National Park. It may therefore be necessary to change the geographical coverage of Heathlands Reunited or explore other options for hosting (some are listed in Table 4).

Table 4: Different options for hosting ranger team. Note these options are not necessarily exclusive and there could be hybrid variations.

Option	Description	Advantages	Disadvantages
Current approach continued (hosted by SDNPA)	Continuation of established ranger presence	Already up and running, good working relationships established	Many heaths well outside National Park boundary. Heathland Reunited project boundary currently runs south to Pulborough so would mean a shift in geography.
Dedicated stand-alone team with new branding	Team distinct identity and branding, similar to Bird Aware Solent or the Thames Basin Heaths Partnership	Single team has advantage of coherent branding, messaging, and ability to deploy across multiple sites	Will require work to set up identity and mean a new/different presence on the heaths
Staff hosted in existing organisations	Staff could be based within existing organisations such as Natural England, local authority countryside team or National Trust	No need for different branding or identity; staff can embed in site-based team and operations; support costs and hosting subcontracted and therefore	Risks of staff being deflected to other priorities, difficulty in achieving wide cover (e.g. how to cover MOD land if no staff based in DIO/MOD)

⁷ <https://www.southdowns.gov.uk/help-your-heaths/wealden-heaths-strategic-access-management-and-monitoring-samm-project/>

Option	Description	Advantages	Disadvantages
		no need to set up anything new.	
Extension of existing mitigation approach in other SPA/SAC areas	Could be potential to extend other existing schemes to cover the some or all sites	Existing schemes have an established team and system for deploying staff	Limited options for existing schemes and expansion may not be straightforward

Other staff

- 4.7 Two further posts (both part-time) are incorporated into the strategy: an education/community engagement officer and a dog project officer. The education/community engagement officer's role would be to deliver engagement away from the heaths, expanding the reach of the project while ensuring ranger time is focussed to time on the heaths. The education work would include visiting schools and working with schools to convey messaging around fires, disturbance, dog walking etc. Wider engagement with the community would cover events such as fetes and talks to local groups. The focus would be on the areas directly around the heaths, targeting local schools.
- 4.8 The dog project officer would promote responsible behaviour among local dog walkers, with key messaging around dogs on leads, picking up, dogs around livestock etc. Their role should extend to promoting sites for dog walking sites that are away from the heaths (SANG). The post is likely to be most effective if linked to the existing Heathland Hounds project⁸ on the Thames Basin Heaths and could even be an extension to that team. This would mean existing branding, leaflets, website etc are already available and in place. It would also ensure synergy and consistency in messaging.
- 4.9 The dog project officer would run guided dog walks, be on-site to support the rangers (e.g. running pit stops with a gazebo etc at key locations) and liaise directly with local commercial dog walkers. There would be scope for targeted engagement with local vets, pet shops and other relevant companies (dog grooming, dog training) to help promote key messaging.

⁸ <https://www.tbhpartnership.org.uk/heathland-hounds/>

Other

- 4.10 Dogs in ponds and contamination of waterbodies are a particular concern the SAMM needs to address. As such a ponds project would represent a stand-alone commission with water testing taking place at a suite of ponds and a prioritised list of actions produced. The work would require ecologist input and input from rangers (able to draw on direct observation of dogs use of particular waterbodies).
- 4.11 A range of small infrastructure projects will be likely to be needed to be funded through the SAMM, supplementing existing infrastructure already in place and maintained by partners. Locations and opportunities for these were identified through a workshop held with stakeholders in October 2025 (see Appendix 3). The list is not exhaustive and opportunities will change with time. Infrastructure works could include:
- Work on ponds (informed by pond project) such as dead hedging, fencing, steps;
 - Signage and waymarking (with scope for low key markers and signage to facilitate people sticking to key routes and limiting dispersal across heaths);
 - Interpretation and site information boards;
 - Changes to car parking (landscaping, layout, roadside signage);
 - Gates and access points;
 - Barriers or other infrastructure to limit off-road vehicles/quadbikes/motorbikes accessing areas where no right of access;
 - Dog bins.
- 4.12 The delivery manager, working with the ranger team and stakeholders will be responsible for the delivery of the different infrastructure and ensuring any maintenance and associated costs are covered. They will maintain a prioritised list of projects and it is anticipated that this will be flexible in terms of timing, providing scope for delivery to be accelerated if housing numbers change.

Monitoring

- 4.13 Monitoring will play an important role in supporting the strategy and mitigation delivery. Data will be important to highlight changes in access, pick-up emerging trends and flag where new issues emerge. Mitigation delivery in terms of ranger time, levels of engagement and some ecological

data will be important to inform future updates to the strategy. Data on levels of compliance and effectiveness will be useful to inform future reviews of the strategy and any need for different approaches (such as enforcement). Sharing successes will be important to capacity building and the long-term success of the mitigation.

- 4.14 A monitoring strategy will set out the key strands and methods, ensuring data collection is joined-up, targeted and effective. The strategy will set out how data collected by rangers (incident log etc.) will be collated and used alongside other data. It will ensure the right data are collected in an efficient and timely manner and reported/fed-back appropriately (to LPAs, Natural England, project partners and landowners, the ranger team, the delivery manager and members of the public).
- 4.15 This SAMM includes cost estimates for visitor surveys, vehicle counts and bird surveys. The detail, format and timing for these will be covered in the monitoring strategy.

5. Implementation

Types of development covered

- 5.1 This strategy applies to any future development granted planning permission that results in a net increase in residential units (i.e. C3 Use Class), located within the relevant zone of influence.
- 5.2 While the strategy is focussed towards C3 Use Class, the strategy extends to other uses and forms of development that may have impacts on the European site and could trigger likely significant effects for relevant European sites (see Table 5). For residential development, contributions will be on a per unit basis, but this may not necessarily be directly transferable to other situations such as visitor attractions, food outlets or tourist development. Nonetheless it should be possible for such applications to be mitigated through the strategic approach, on a bespoke basis should the need arise. Such cases will require more detailed consideration, checks with Natural England and the mitigation checked through appropriate assessment. For example, the SAMM rate could be adapted according to occupancy rates for tourist accommodation, such that one unit is equivalent to one residential dwelling and then this further adjusted according to projected occupancy rates.

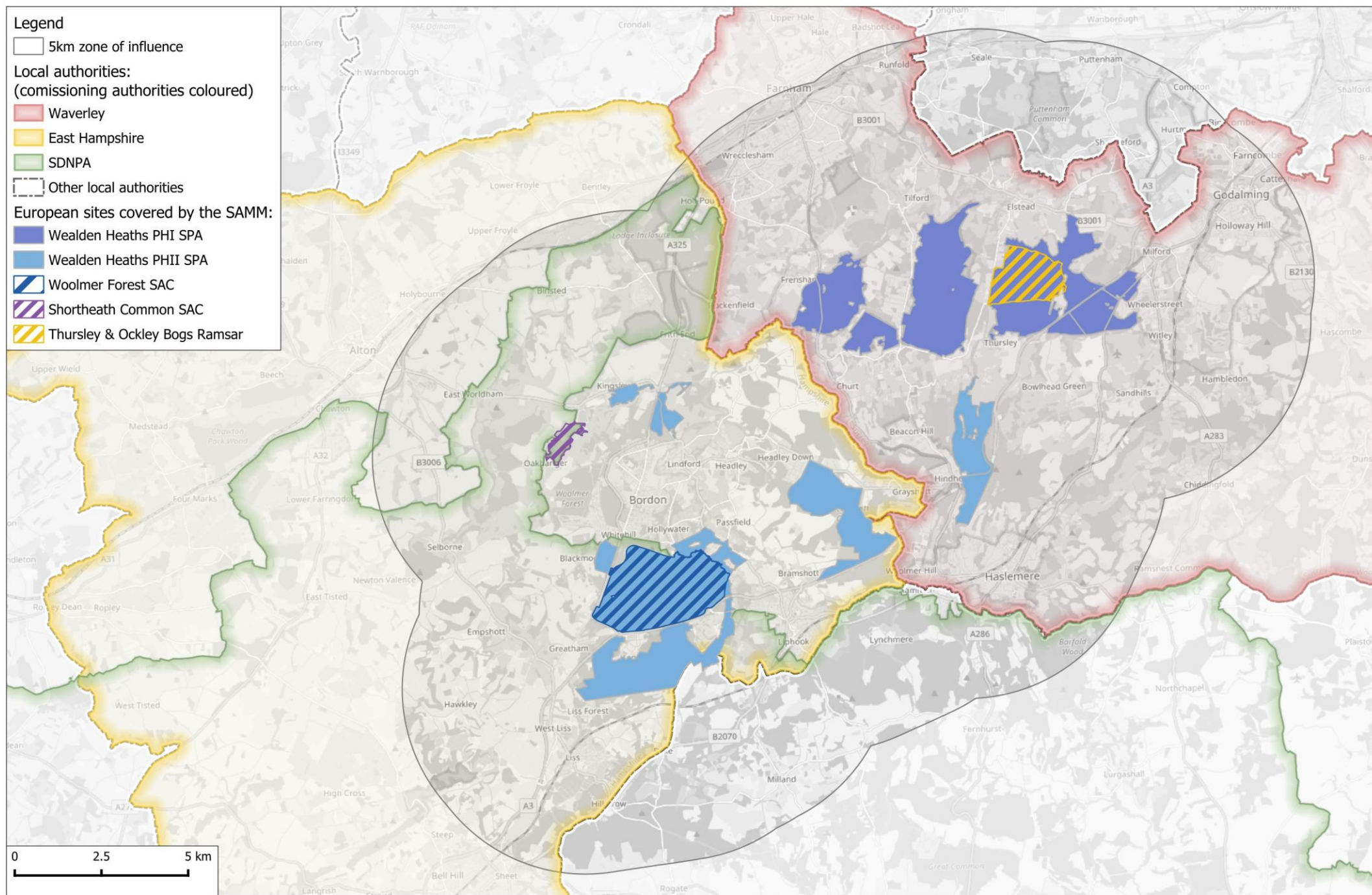
Table 5: Relevant types of development.

Use Type/Class	Likely Significant Effect	Mitigation requirements
Dwelling houses (C3) Any net increase	Yes	Per dwelling contribution.
Dwelling houses (C3) Replacement dwelling	No, if demolition and replacement linked through same planning consent.	Per dwelling contribution possibly needed where there is a significant delay between demolition and replacement.
Residential Institutions (C2/C2A) Accommodation and care to people in need of care including nursing homes, hospitals and secure institutions	Possibly, case-by-case decision depending on whether residents likely to be mobile and independent.	Per unit contribution for relevant schemes.
Residential Institutions (C2/C2A) School, college or training centre	Possibly, case-by-case decision. If a training centre or college has associated adult accommodation, then residents can visit the heaths.	Per unit contribution for relevant schemes (where residents potentially likely to visit heaths).
Hotel (C1) Including boarding houses and guest houses	Possibly, case-by-case decision depending on location and type.	Contribution per room equivalent to a per dwelling contribution (possible exceptions if it can be clearly demonstrated residents won't access the heaths).
Houses in Multiple Occupation (C4/Sui Generis) Including managed student accommodation	Yes	Adjusted contribution per bedroom (adjustment necessary to reflect occupancy rates).
Holiday Dwellings (Sui Generis)	Possibly, case-by-case decision depending on location and type.	Contribution per dwelling or pitch equivalent to a per dwelling contribution (possible exceptions if it can be clearly demonstrated residents won't access the heaths).
Gypsy, Traveller and Travelling Showpeople Pitches and plots (Sui Generis) Net new pitches that are either temporary or permanent.	Yes	Per pitch/plot contribution.
Café, food outlet or visitor attraction	Possibly, case-by-case decision based on application, location and links to the heaths.	Level of contribution could be determined on a case-by-case basis, should mitigation be required.

Zone of influence and the area covered by the strategy

- 5.3 The commissioning authorities have applied a 5km zone of influence, which reflects the distance already in use within East Hampshire and mirrors that used on the Dorset Heaths and the Thames Basin Heaths. The zone of influence is shown in Map 3.

Map 3: 5km zone of influence



Scale of future development

- 5.4 Currently, there are 58,843 residential dwellings (based on national postcode data from 2025) within the 5km zone of influence and Map 4 shows the current distribution of housing growth.
- 5.5 Some of the relevant authorities are at a relatively early stage in their local plans and there is uncertainty around the extent of housing that may come forward within the zone of influence (and therefore require mitigation). It is necessary to have some indication for this strategy of the potential level of mitigation required, but this can only be estimated at this stage and will need to be reviewed regularly as emerging Local Plans are progressed and during their implementation.
- 5.6 In order to estimate future housing, it is necessary to understand how much housing is within the 5km zone within each relevant authority. These figures are given in Table 6 and it can be seen that the percentage within 5km ranges from 13% (SDNPA) to 58% (Waverley). Overall, across the relevant authorities, 38% of all current housing is within the 5km zone of influence.

Table 6: Total housing within each relevant authority in 2025 and number (%) within the 5km zone. Note only those authorities covered by the strategy included in the table. Housing numbers extracted from national postcode data and the number of residential delivery points

Local Authority	Total number of dwellings	Number of dwellings within 5km (%)
East Hampshire District (outside SDNPA)	41,751	16,977 (41)
Waverley Borough	58,079	33,932 (58)
South Downs National Park Authority	52,824	6,592 (13)
Total housing	152,654	57,501 (38)

- 5.7 Housing data from the period 2021-2025 are summarised in Table 7. This shows, across the three authorities, there have been just over 6000 new dwellings. It can be seen that over the period 2021-2025 the proportion of new housing within the 5km zone has been higher than 38%, with 42% of new housing within 5km.

Table 7: Housing growth 2021-2025 by relevant authority and % within the 5km.

Local Authority	No. dwellings in 2021	No. dwellings in 2025	Housing growth 2021 to 2025 (% change)	Housing growth 2021 to 2025 within 5km (% of overall housing growth within 5km)
East Hampshire District (outside SDNPA)	39,883	41,751	1,868 (5)	1,035 (55)
Waverley Borough	54,941	58,079	3,138 (6)	1,338 (43)
South Downs National Park Authority	51,826	52,824	998 (2)	155 (16)
Total housing	146,650	152,654	6,004 (4)	2,528 (42)

5.8 In Table 8, annual housing need figures (provided by each authority) are given. We have applied the percentages from Table 7 to adjust the need to represent the 5km zone of influence only. These figures suggest that the annual housing that might be anticipated within 5km, were housing needs to be met, would be around 1,138 dwellings per annum. Extrapolating this to a 15-year period (roughly reflecting the plan periods) gives an overall total of 17,070 houses potentially requiring mitigation.

Table 8: Housing need figures per local authority (figures provided by each authority) adjusted to reflect recent percentage of growth within the 5km zone of influence.

Local Authority	Housing need	% adjustment (based on housing growth over period 2021-2025)	Extrapolated housing need per annum within 5km
East Hampshire District	832	55	458
Waverley Borough	1,460	43	628
South Downs National Park Authority	323	16	52
Total	2,615		1,138

Costs per dwelling

5.9 The total cost of SAMM measures is estimated to be £18,952,000 (see Appendix 4 for full breakdown). As some of the authorities are at a relatively early stage in their local plan making, there is uncertainty around the extent of housing that may come forward within the zone of influence. A 5% contingency has therefore been added to the overall total cost of mitigation. The estimated per dwelling costs are set out below, calculated using the annual housing growth applied over a 15-year period.

Cost of SAMM:	£18,952,000
5% contingency:	£947,600
Total cost:	£19,899,600
Number of dwellings (estimated from housing need):	17,070
Per dwelling cost:	£1,165.76

- 5.10 These per dwelling costs do not include green infrastructure/SANG costs and may need to be adjusted to take into account any reserves held by the local authorities at the point at which the new strategy supersedes the previous one. The tariff will be further adjusted on an annual basis to take into account inflation, any administrative costs (including costs to collect and manage contributions) and any other adjustments necessary (e.g. in relation to changing costs or variations in housing delivery).

Long term delivery and in-perpetuity costs

- 5.11 Mitigation is secured for the duration of the impact, and it is assumed the implementation of the mitigation will run for as long as it is required, with money set aside to provide long-term stability and in-perpetuity delivery. The strategy will operate on a rolling basis into the future, adjusting as necessary to changing levels of house building and impacts arising.
- 5.12 Some measures in this strategy are short-term, one-off measures while others need to run for many years, often extending well outside the Plan period. Changes to access infrastructure, the provision of SANGs (which are secured indefinitely) alongside the increased awareness raising and education work may ensure that the need and annual cost for SAMM can decrease with time. The expanded ranger team is funded for 80 years, ensuring in-perpetuity ranger coverage. Other measures such as the Delivery Manager are only required for a fixed period (20 years), as key components of their role – such as strategy review, liaison with planners, delivery of specific projects such as small infrastructure – are only relevant while housing is coming forward. Once the houses have been occupied and tariffs collected/money set aside, the Delivery Manager post becomes less relevant (but would be necessary were additional housing/new plans being promoted).
- 5.13 As SANGs become better used and behaviour change (such as responsible dog ownership) is accepted, high levels of ranger time and other such measures should change. It will be important for regular review and revision of costs as necessary to adjust the amount set aside for long term funding

and that used for more immediate funding. SAMM is highly unlikely to need to be constant over time. We have derived costs for different measures to cover different lengths of time (see Appendix 4) and these will be reviewed and adjusted on a 5 yearly basis. These reviews will provide the opportunity to revise and check that in-perpetuity costs are secured and sufficient funds invested for the long-term provision of mitigation.

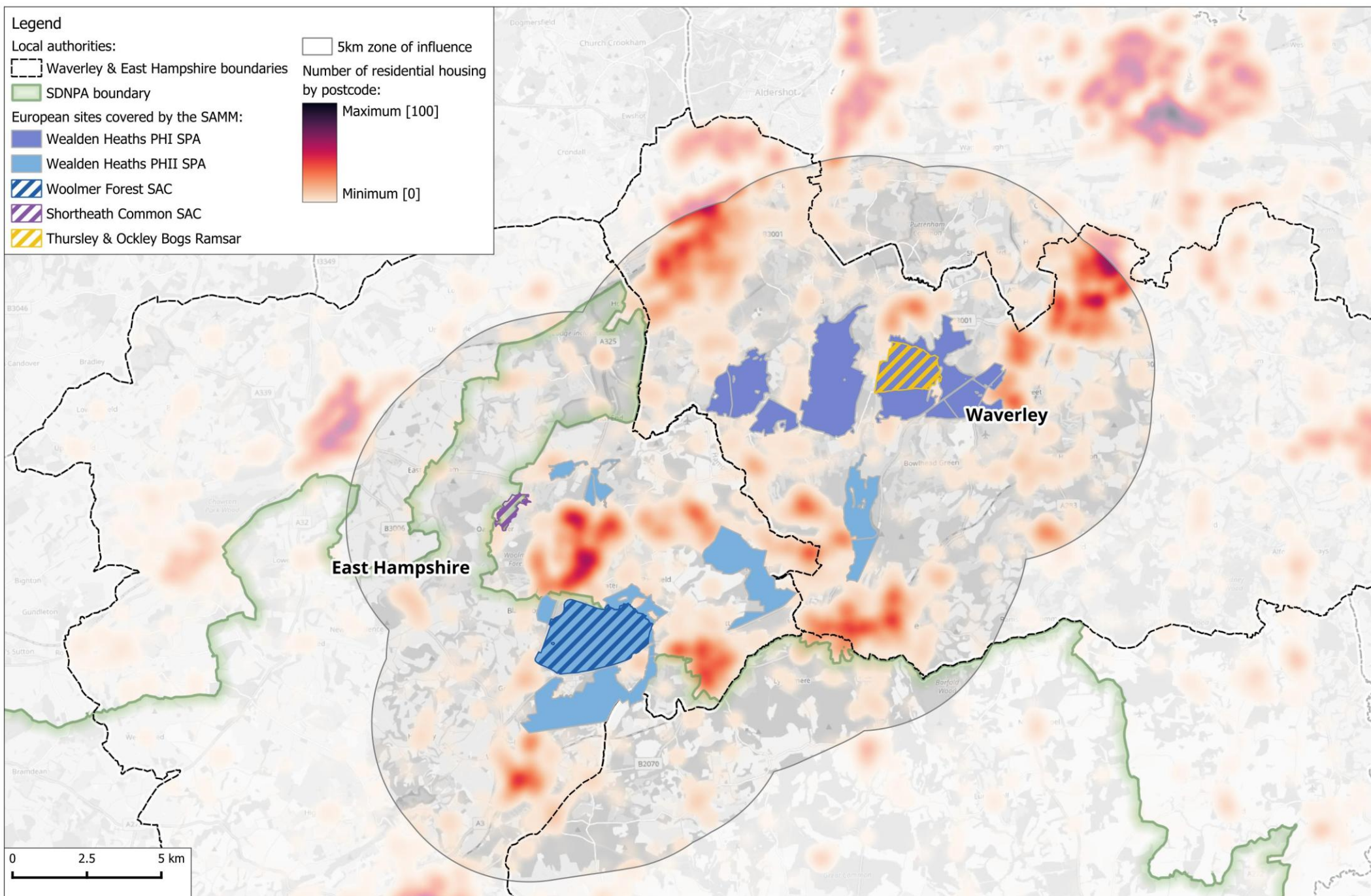
Governance

- 5.14 Oversight of the strategy will fall to a steering group comprising a member or representative from each authority, alongside a representative from Natural England, as the statutory conservation body. The role of this group will be to sign off budgets, agree spend, agree any funding to delivery bodies and review monitoring data to ensure the mitigation is fit for purpose and working effectively. The steering group will meet at least quarterly.
- 5.15 An additional working group will provide support to the delivery manager and help direct and target mitigation. This working group will comprise local conservation partners, landowners and managers actively involved in the sites on the ground, for example staff in local authority countryside teams, National Trust, ARC, MOD and Natural England.
- 5.16 It will be important, looking forward, that there is flexibility and regular review as to how money is spent and what is needed on the ground. It will be essential that the mitigation delivery can respond to change and shifting priorities, for example relating to changing climate and changes in housing delivery, which may in turn affect how much mitigation revenue is collected and the scale of mitigation required. There is uncertainty as to how priorities might need to change in the future, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review.
- 5.17 Certain elements within the mitigation package have the scope to adapt and flex as conditions and priorities change. Furthermore, it is possible that additional opportunities may arise, for example as a result of changing land ownership. It is important therefore that the governance is responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability for the Delivery Manager to adjust finances as appropriate will be key.

Review and timing

- 5.18 The strategy has been written in the context of local plans and the likely levels of growth to around 2040. The strategy will nonetheless operate indefinitely on a rolling basis, with regular reviews/updates as necessary or every 5 years or so, with the reviews checking housing numbers, delivery, costs and mitigation priorities. This version is anticipated to run to around 2030. Given the relative uncertainty around housing numbers and also around the delivery body, an earlier revision or update may however be necessary.
- 5.19 The delivery body will produce a 1 year and 5-year plan that underpins the work of the partnership and their staff and fits with the budgets sets in the strategy and signed off by the steering group.

Map 4: Current housing distribution



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Appendix 1: Summary of bird data

Heathland bird surveys have been undertaken in some capacity (voluntary on an annual basis since 1994, formally by Natural England between 2015-2019 and more recently by 2Js Ecology since 2020) across the Wealden Heaths Phase II SPA. The number of bird territories from the 2024 report⁹ are summarised the table below.

European site	Components	Nightjar	Woodlark	Dartford Warbler
Wealden Heaths Phase II SPA	Bramshott Common	2	5	0
Wealden Heaths Phase II SPA	Ludshott Common	18	5	41
Wealden Heaths Phase II SPA	Broxhead Common	5	7	15
Wealden Heaths Phase II SPA	Kingsley Common	2	1	2
Woolmer Forest SAC	(Wealden Phase II SPA)	48	41	58
Shortheath Common	-	3	1	0

⁹ 2024 Birds on the Wealden Heaths SPA, authored by 2Js Ecology. Report shared with Footprint Ecology in August 2025.

Appendix 2: Impacts of recreation

- 5.20 This appendix provides further detail, information and background evidence on the impacts of recreation for the relevant European sites and qualifying features.

Disturbance

- 5.21 Disturbance occurs where human activity influences an animal's behaviour or survival. The presence of people in the countryside will influence behaviour in many ways. For many species, people or their pets (e.g. dogs) are a potential threat and as such it is to be expected that the response will be to modify behaviour, for example fleeing. The relative trade-off as to when to change behaviour and respond to the threat will relate to the perceived scale of the threat and the costs involved (e.g. lost foraging time). This perspective can be used to understand the behavioural responses to people and led one author to describe human disturbance as predation-free predators (Beale and Monaghan, 2004).
- 5.22 With people (and their pets) viewed as potential predators, there is clearly a greater threat posed (and therefore a greater behavioural response) when, for example, there are more people, in larger groups (Beale and Monaghan, 2005, 2004) or when people approach directly (Smith-Castro and Rodewald, 2010) or faster (Bellefleur et al., 2009).
- 5.23 Disturbance can therefore have a range of different impacts, potentially affecting distribution, breeding success and health. Impacts can be chronic, for example otherwise suitable nesting habitat being completely avoided (e.g. Liley & Sutherland, 2007) or more short-term in nature, for example birds becoming alert and then resuming the initial activity (e.g. Fernandez-Juricic et al., 2001). The Site Improvement Plan (SIP) for the Thames Basin European Sites¹⁰ identifies high levels of recreational use, and particularly dog walkers, as an issue likely to be affecting the numbers, distribution, and breeding success of SPA-qualifying bird species on Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA in particular. Additionally, the SIP for the Wealden Heaths Phase II SPA and Woolmer Forest SAC identify the need for co-ordinated management between sites to reduce impacts upon ground-nesting birds.

¹⁰ <https://publications.naturalengland.org.uk/publication/6249258780983296>

- 5.24 Nightjar nest on the ground, tending to lay their eggs on bare ground in among vegetation, such as patches of bare ground in heather. Woodlark prefer areas of taller vegetation amongst a mosaic of shorter vegetation and bare ground, whilst Dartford Warblers nest low to the ground in heather or gorse. The nests of all three species can be vulnerable to trampling, and eggs or chicks to predation by dogs, and there is a risk of flushing and increased predation (e.g. from crows) associated with disturbance. Studies of Nightjar have shown recreation use affects the distribution of birds within sites, such that busy areas are avoided or densities are lower on busier sites (Liley et al., 2006; Liley and Clarke, 2003; Lowe et al., 2014). Similarly, the probability of suitable habitat being settled by Woodlarks during the breeding season was reduced to below 50% when the site was subjected to around 8 visits per hour (Mallord et al., 2007).
- 5.25 For Dartford warblers, breeding productivity has been shown to be lower in heather-dominated territories where access levels are high (Murison *et al.* 2007), this is because disturbed birds nested later in the season and therefore had less time to breed. For Nightjar there is also evidence of breeding success being lower on busier sites and busier parts of sites (Murison, 2002; Raynor, 2016). The studies cited above are from heathland sites with relatively high levels of access, however such findings are not necessarily consistent across heathland sites. For example, a study of Nightjar breeding success in Thetford Forest, an area of plantation forestry with comparatively low levels of access, found no evidence to suggest that dogs flushed incubating Nightjar or predated Nightjar nests (Dolman, 2010). Nonetheless there is growing general evidence of the impacts dogs can have on ground-nesting birds – there are some recent documented examples of predation events on particularly rare or conservation priority species such as Wood Warbler *Phylloscopus sibilatrix* (Lake et al., 2020) and Curlew¹¹ *Numenius Arquata* in the New Forest.
- 5.26 The presence of people may also influence the distribution of predators, meaning disturbance and predation are interlinked. For example, the presence of crows has been shown to be focussed centred around campgrounds (Marzluff and Neatherlin, 2006), while Kays *et al.* (2017) used

¹¹ See Hampshire Constabulary website:
<https://www.hampshire.police.uk/news/hampshire/news/news/2022/june/dorset-woman-given-community-resolution-order-after-rare-curlew-eggs-destroyed-by-dog-in-the-new-forest/> accessed 19th October 2022

camera traps to show a range of predators actively selected human-made paths.

- 5.27 Even harder to measure and record are physiological effects, for example related to stress, and these may in turn affect fitness. While we are not aware of any such studies for Nightjar, Woodlark, and Dartford Warbler, there is evidence for other species of physiological effects in terms of increased heart rate (Ellenberg et al., 2013) and stress-hormones (Thiel et al., 2011).
- 5.28 The presence of people may therefore affect birds in a range of ways that are not always easy to measure or record. Many people simply assume disturbance to relate to birds taking flight or fleeing, but such behavioural responses are likely to be only part of a much wider picture.

Fire

- 5.29 Wildfire is a much greater issue on heathland than in wet habitats and woodland, as these are less flammable. It tends to be most common in the summer months (Rose and Clarke, 2005) when it is most harmful. Uncontrolled fires can result in direct mortality for a range of species including birds (nests and young being particularly vulnerable) and reptiles. On heathlands, fire can result in the loss of shallow peat soils (see review in Liley et al. 2010). Depending on the vegetation type and burn intensity, wildfires may result in a temporary shift from heathers to grasses (Bullock and Webb, 1995) or to birch woodland soils (see review in Liley et al. 2010), resulting in habitat change.
- 5.30 Wildfires can have a lasting impact on species distribution and abundance (Pons and Clavero, 2010) and have also been shown to affect breeding productivity. For example, around 80% of Dartford Warbler territories monitored by Murison (2007) were re-occupied within 1 year of a fire within the territory. The greater the proportion of the territory that was burned, the less likely it was to be occupied, particularly by breeding pairs, and pairs on territories disturbed by fire raised fewer broods and produced fewer young overall.
- 5.31 Fires can also open up new access routes by reducing the height of vegetation and thereby changing access patterns and recreational use. Furthermore, wildfire may decrease nutrient build up through the removal of the organic litter layer, but this is done more constructively during controlled burns carried out in winter for habitat management purposes.

- 5.32 Most UK wildfires are a result of inadvertent or deliberate human action (Arnell et al., 2021) and with an increase in population and visitors there may potentially be more risk. Some fires are a consequence of arson, others are the result of barbeques, campfires, discarded cigarettes etc. The incidence of heathland wildfires has been shown to increase with proximity to housing (Tantram et al., 1999) and paths (Murison, 2007). Climate change exacerbates fire risk and recent hot summers (such as 2022) have seen widespread fire incidence in grassland, heathland and woodland.
- 5.33 The absolute danger now and into the future is greatest in the south east of England (Arnell et al., 2021) and fire incidence is likely to become an ever more key issue and threat for heathland sites. The impacts from a single large wildfire can be devastating, and wildfire/arson are identified within the SIPs for the Wealden Heaths Phase II SPA and Woolmer Forest SAC, as well as that for the Thames Basin, as being a specific concern for site management. There have been a number of major fire issues on the Wealden Heaths in recent years, notably at Frensham, Hankley and Thursley.

Contamination

- 5.34 Dog fouling is a widely recognised issue in low-nutrient semi-natural systems. Impacts are reviewed by a number of sources (Bull, 1998; Groome et al., 2018; Harris, 2023; Taylor et al., 2005).
- 5.35 Dogs are fed high-protein diets and act as an outside source of nutrients. Nutrient levels in soil (particularly nitrogen and phosphorous) are important factors determining plant species composition. Enrichment from dog fouling can therefore have a marked effect. Few studies quantify the scale of impact, but in semi-urban woodlands in Belgium, one study attributed fertilisation rates from dogs to be an average 11kg of nitrogen (more or less equally from faeces and urine) and 5kg phosphorous (predominantly from faeces) per ha per year (De Frenne et al., 2022). These levels are sufficient to influence biodiversity and ecosystem functioning.
- 5.36 Increases in nitrogen and phosphorus changes vegetation communities, encouraging bulky competitive species at the expense of less vigorous species adapted to low-nutrient situations. Impacts can involve a change from typical heathland species to rank species-poor grassland communities along and on the margins of paths and tracks and around car parks.
- 5.37 Contamination may also result from persistent veterinary compounds that are transferred into the soil or aquatic environment by domestic animals

(mostly dogs and ridden horses). These may include worming treatments and external parasite treatments. Repeated incursions by dogs into ponds can also result in increased turbidity (Denton and Groome, 2017; Groome et al., 2018). This may pose particular issues for some habitats such as dystrophic ponds at Woolmer Forest SAC, as well as for important animal species, such as the Natterjack Toad.

- 5.38 Litter is another form of contamination that can be related to recreation pressure. In most cases this is unsightly rather than damaging to the interest features, however some litter can be a serious problem if ingested by livestock (e.g. plastic bags, inappropriate or contaminated food etc.). Fly-tipping of garden waste can also be a hazard to livestock, as shrub prunings and mown grass may be toxic; while this is not directly associated with recreational pressure, the provision of secluded car parks can mean fly tipping is more likely.
- 5.39 The spread of exotic species can also be associated with recreation pressure. Seeds can be transported on clothing or footwear for example and can be transferred considerable distances (Wichmann et al., 2009). The supplementary conservation advice for Woolmer Forest identifies the presence of non-native *Crassula helmsii* within on-site ponds and wetlands as an issue affecting habitat quality. Furthermore, the requirement for on-going control of invasive, non-native, *Rhododendron* and *Gaultheria* are identified in the SIP for the Thames Basin Heaths.



Figure 4: Contamination examples. Left: discarded dog waste (in bag) at Broxhead Common; Right: bright green grassy strips indicating enrichment alongside path near car park at Ludshott Common

Trampling & direct damage

- 5.40 Trampling can directly damage plants, lead to loss of vegetation and/or a change in plant species composition and cause compaction or poaching of the substrate, with implications for plant species composition. The level of trampling that will cause damage depends on a variety of factors including soil type and moisture content, aspect and slope, season, microclimate, behaviour of walkers etc. (e.g. whether walking up or down the slope) and the vegetation type (see Liley *et al.* 2010 for a review). Due to this range of factors, it is difficult to predict thresholds at which significant vegetation change will occur.
- 5.41 Soil compaction and erosion issues are not only related to footfall. Bicycles can damage soils and vegetation more than foot passage (Martin *et al.*, 2018) and the impact of a horse plus rider is even greater in terms of ground pressure (see Liddle, 1997 for review). Vehicles parking on road verges or pulling onto verges also have the potential for localised damage.
- 5.42 Heather-dominated communities are particularly vulnerable to trampling, which can shift communities towards grassland. Within the relevant sites, areas of wet heath and lichen-dominated areas of dry heath are likely to be the most vulnerable to persistent trampling.

- 5.43 In suppressing plant growth and creating bare ground, trampling can also result in conditions suitable for scarce heathland specialist species. There is a balance between sufficient trampling to create and maintain bare ground, and excessive wear (e.g. from horses or mountain bikes) that continually disturbs the substrate and damages or destroys any colonising species.
- 5.44 Trampling can also potentially result in direct mortality (including egg and chick loss) for the SPA-qualifying ground nesting birds (see paragraph 5.24), as well as for a range of sensitive (non-qualifying) animal species of conservation importance, such as Natterjack Toad and other herptile species.

Grazing issues

- 5.45 Livestock grazing is used as a traditional management tool on several of the heathland blocks incorporated within the relevant European sites, including Longmoor and Ludshott Common (parts of the Wealden Heaths Phase II SPA) and Woolmer Forest. Furthermore, aspirations to roll out grazing more widely identified in the SIPs for the Thames Basin (including Thursley, Hankley & Frensham Commons SPA) and Shortheath Common SAC. There are several pathways through which recreational pressure can impact on grazing livestock: worrying, road accidents (although not all are necessarily due to recreation), transfer of diseases, feeding and petting livestock (potentially leading to illness and behaviour change), damage to infrastructure and visitor perceptions and expectations of the relevant sites as an area for recreation.
- 5.46 Livestock worrying is generally considered to be a particular issue with sheep, but young calves and foals are also vulnerable to dog attacks. Dogs will approach and chase all livestock, and this can be dangerous, for example when animals run onto the road or towards people. Where young animals are killed, injured or threatened, adult livestock may be more likely to react badly to the presence of dogs, endangering both dogs and people.
- 5.47 Dogs are also an issue for the welfare of livestock through the transfer of pathogens such as *Neospora* from dogs to cattle through dog faeces. *Neospora* causes abortion in infected cattle.
- 5.48 Feeding and petting ponies and other livestock can be an issue at grazed sites. This can attract grazing animals to locations where they are more vulnerable to traffic accidents or dog attacks, such as roadsides and car parks, and influence their distribution. It can also result in incidents of

aggression, as it increases the number of interactions between livestock and people, for example ponies learn to expect food and may respond aggressively if it is not forthcoming. It may also result in the livestock being fed inappropriate foodstuffs.

- 5.49 There is a link between fire risk and grazing, as grazing can reduce fuel loads on heathlands and therefore the risk of major wildfires (e.g. Cavan and McMorro, 2009; Legg and Davies, 2009). Any future marked reductions in grazing (e.g. as a result of the challenges of grazing alongside high levels of access) could have knock on effects for fire risk across the relevant sites.

Visitor perceptions

- 5.50 Visitor perception of sites and how they are managed will influence behaviour and shape expectations. For example, well-maintained infrastructure is more likely to result in careful and considerate use of car parks, bins etc. and potentially also mean greater awareness of signs and their messages. In less well-maintained situations the reverse is more likely to be the case.
- 5.51 Where visitor expectations and understanding are not aligned with a site's rural nature/biodiversity value, conflict can arise. For example, in demand for facilities such as cafes, toilets or This is a component of some of the above issues, such as petting and feeding or harassment of livestock. It may also be an issue if visitors are not comfortable with some elements of traditional land-use, particularly livestock grazing and the associated practice of controlled burning. Visitors who consider the relevant sites first and foremost as recreational destinations may be less willing to take into account requirements dictated by land use or wildlife (such as keeping dogs under control). Increasing visitor use can lead to the expectation that certain areas should be primarily available for recreational pursuits or to a lack of willingness to see changes required for conservation or pastoral purposes, particularly changes that might result in a perceived loss of amenity. Even the presence of cow pats can be a source of complaint for some visitors.
- 5.52 Perceived visitor requirements can also influence management decisions, for example, surfacing heathland paths (to the detriment of specialist species that exploit the bare ground habitat) or creating additional routes, board walks etc. for recreational purposes.

Appendix 3: Workshop outputs

A workshop was held on Wednesday 15th October 2025 and was attended by 27 people who suggested an overall suite of measures, and identified locations where engagement, infrastructure, support or other interventions and projects were needed across the Wealden Heaths Phase I and Phase II SPAs and Shortheath Common SAC. Participants also shared information outside the workshop. Numbering reflects the locations shown on in Map 5 below.

General issues:

The following were identified as general and widespread issues that are cannot easily be plotted on a map:

- Dogs and ground-nesting birds;
- Camp fires and increased fire risk;
- Dogs entering waterbodies;
- Roadside parking a growing issue at a range of locations;
- Dog attacks/chasing livestock;
- Scramblers and 4x4 vehicles going off BOATs;
- Cyclists creating own jumps and trails;
- Dog walkers and other access interrupting military training, creating knock-on consequences for conservation management.

Whole site measures:

- Wildfire project: potential for engagement with Hampshire Fire Service, establish a volunteer group and infrastructure provision (e.g. hydrants, signage for prevention, fire breaks, PSPOs)
- Enforcement options: harder line needed for dealing with mountain bikes, off-road vehicles and venturing off PROW. Potential for engagement with MOD, police and explore ASBOs.
- Greater provision of rangers in the evenings and at weekends, bank holidays. Particularly prevention of ASB and fires.
- Greater encouragement of cross-party working with neighbouring organisations (e.g. Wildlife Trusts, National Trusts) and other mitigation schemes (e.g. Thames Basin Heaths Partnership).
- Standardise/compile and explore visitor data to identify hotspots, which could inform on-site infrastructure (e.g. waymarking, screening, signage and engagement).
- Ponds project: Research water quality, access points and potential for reducing access from dogs (e.g. dead hedging around ponds, diverting access routes).
- SANG provision could include sports facilities such as a bike park to reduce activity on SPAs.

- Volunteer project: potential for a volunteer coordinator role to involve local people as ambassadors for the heaths. Could include helping with surveys, fire patrols, dog ambassadors etc.
- Waymarked trails across all sites, to divert access and better inform when visitors are on a trail or entering a protected area.
- Monitoring: Up to date habitat (quality) surveys, continue bird surveys, light pollution levels (particularly for nightjar).
- Fines for dog fouling, particularly targeted around nesting season.
- Education programme: working with schools, pop-ups/events, also addressing particular issues such as around wildfire. A youth forum/youth ambassadors could be included in this.
- Dog project: Dedicated patrols for engaging with dog walkers, events, engagement with professional dog walkers, including dogs on leads during GNB season.
- Establish a Heathland Code of Conduct (visible?) with consistent messaging across all sites.
- Building on point 34, look into the viability of Hogmoor Inclosure and other SANG provision. Potentially functionally-linked land, but is currently over-subscribed, which could be reduced with the introduction of parking charges.

Wealden Heaths Phase I SPA:

- 1) Vehicles blocking access for grazing management – engagement or signage needed to limit parking (and parking in general on roadsides a widespread issue/concern).
- 2) ANPR cameras at Frensham Common to address anti-social behaviour.
- 3) Fire management plans.
- 4) Fire management plans.
- 5) Fire management plans.
- 6) Fire management plans.
- 7) Look at effects of dogs in ponds (research on water quality and testing).
- 8) Ponds – dogs, water quality.
- 9) Ponds - dogs, water quality.
- 10) Roadside parking, access issues?
- 11) Overnight camping, ranger provision/enforcement of no overnight parking

Wealden Heaths Phase II SPA:

- 12) Ponds - dogs, water quality. Infrastructure needed to reduce access.
- 13) BOAT ends, Infrastructure resilience and signage. Bridleway conflicts, access infrastructure damage with gates (fencing for livestock).
- 14) BOAT ends, Infrastructure resilience and signage.
- 15) Mountain biking, e-bikes conflicts with walkers, horse ridings at Waggoners Wells. Co-ordinated signage needed to promote access routes.
- 16) Support for fire management plan, smoke detection systems etc.
- 17) Prevention of roadkill, wildlife corridors/habitat connectivity.
- 18) Prevention of roadkill, wildlife corridors/habitat connectivity.
- 19) Dogs in ponds, Natterjack issues.

- 20) Dogs in ponds, Natterjack issues. Keep no access.
- 21) Dogs in ponds, Natterjack issues. More infrastructure to protect the ponds.
- 22) Fire risks at Weaver's Down, summer evening ranger presence needed.
- 23) Waymarking needed? Gate/infrastructure damage and removal at Weaver's Down.
- 24) Engagement or enforcement needed with mountain bikers at Weavers Down.
- 25) Engagement or enforcement needed with mountain bikers at Liss Forest.
- 26) Engagement with regards to livestock and behaviour.
- 27) Infrastructure to deal with off road vehicles (leaving BOATs).
- 28) Engagement with cycling/mountain biking community to reduce building of own jumps/routes.
- 29) Engagement with regards to livestock and behaviour.
- 30) Engagement with dog walkers (fouling, on-lead during GNB season).
- 31) Infrastructure to reinforce access times onto MOD land.

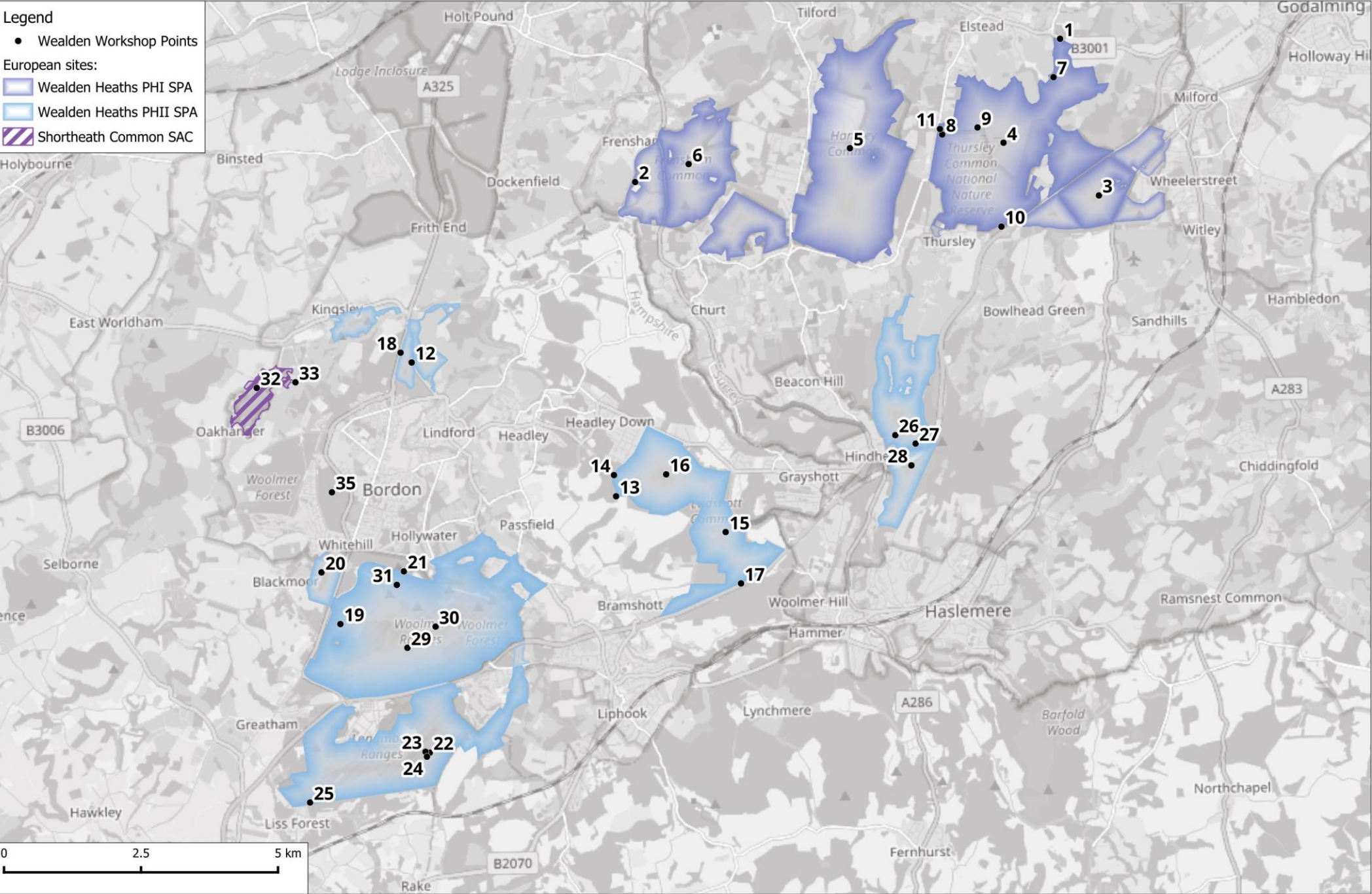
Shortheath Common SAC:

- 32) Evening (summer) ranger presence, ASB and fires from BBQ usually in the evenings
- 33) Signage needed, feel of entering a nature reserve.

Other:

- 34) Explore viability of Hogmoor Inclosure (and other areas) as functionally-linked land, ranger provision needed potentially if so.

Map 5: Suggested SAMM measures across the Wealden Heaths



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Appendix 4: SAMM costs

The table below summarises the mitigation measures as set out in the strategy and the relevant costs for each. These have been used to calculate the overall cost of mitigation. Costs are estimates only and intended to provide the overall level to set tariff, these costs should be reviewed and updated as strategy is implemented, and budgets adjusted according to housing growth. Where staff posts are referred to, 'fte' refers to full-time equivalent.

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Delivery manager		£69,800	20	£1,396,000	£48000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). 20-year timing covers plan period, ensuring monitoring/oversight over key period taking place at least.
Ranger team leader		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Ranger team (2 full time and two seasonal)		£136,500	80	£10,9200,000	£30000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc). 2 seasonals costed as together 1fte
Education/community engagement officer		£26,125	20	£522,500	Part time, so costed at 0.5 fte (£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc)).
Dedicated dog project (1 part-time post & resources)		£28,625	20	£572,500	Part time, so costed at 0.5 fte (£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc)).
Ponds project	£12,000			£12,000	One-off cost to undertake the survey work, and work with ranger team to identify, map and prioritise interventions at different ponds.
Fire consultancy support	£20,000			£20,000	Cost to provide a budget that could be phased over multiple years and provides sufficient funds for specialist input and support
Small infrastructure projects		£15,000	20	£300,000	Estimate of costs to provide annual budget for a range of small projects.
Monitoring strategy	£5,000			£5,000	
Visitor survey		£30,000	4	£120,000	Cost allows for 4 repeat surveys - potentially one survey every 5 years for 20 years - but could be adapted.

W e a l d e n H e a t h s S A M M

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Vehicle counts	£10,000	£8,000	3	£34,000	Counts coinciding with the visitor survey and undertaken in a single year. Costs higher for first survey as this would set up methods and establish baseline. Costs estimated roughly as 10 transects, each requiring 2 people to undertake (in separate vehicles) - and transects spread over spring/summer and covering a range of times of day and types of day.
Coordinated bird surveys		£7,500	4	£30,000	Cost allows for 4 repeat surveys - potentially one survey every 5 years for 20 years - but could be adapted. Budget estimate to provide consultancy support in terms of filling gaps in survey coverage and writing up.
Total				£18,952,000	