

Briefing Note

Justification for Inclusion of Shortheath Common SAC within a 5 km Buffer Zone

Background

Shortheath Common is designated as a **Special Area of Conservation (SAC)** for internationally important heathland and mire habitats, including *European dry heaths, transition mires and quaking bogs, and bog woodland (a priority habitat)* (JNCC; Natural England). These habitat types are vulnerable to physical disturbance, nutrient enrichment and changes in hydrology associated with increased recreational activity.

The Council is required, as competent authority, to assess whether development proposals are likely to have a significant effect on the integrity of a European site, either alone or in combination with other plans and projects, in accordance with the **Conservation of Habitats and Species Regulations 2017**.

Recreational Pressure as a Pathway of Impact

Evidence has identified recreational pressure arising from new residential development as a key impact pathway affecting lowland heath European sites. Increased population within surrounding catchments typically results in higher levels of walking, dog walking and informal access, leading to trampling, erosion, nutrient enrichment and disturbance of sensitive habitats.

Evidence from previous Visitor Surveys¹ demonstrates that residential development within up to 5 km of such sites can contribute to likely significant effects through increased visitor pressure, particularly where sites are accessible and attractive for informal recreation.

Functional Relationship with Wealden Heaths Phase II SPA

Since adoption of the Joint Core Strategy, it has been confirmed that Shortheath Common SAC supports the same population of ground-nesting birds for which the Wealden Heaths Phase II SPA is designated, and exhibits comparable sensitivity to recreational pressure.

Natural England informally advised back in May 2020 that “while Wealden Heaths Phase II SPA and Shortheath Common SAC are considered sensitive for differing features (species vs habitats), it is recommended that they are treated similarly in planning terms ie. 400m exclusion zone for dwellings and mitigation for dwellings 400m-5km.” They then stated that “there is considerable documented information showing that residential development in the area around lowland heathland has an adverse effect on the quality of heathland interest features underlying the designation of the European sites. Effects include recreational disturbance, increased risk of wildfire and predation by domestic pets.”

At a recent appeal *Ms Jane Stevens v East Hampshire District Council* (APP/M1710W/24/3352249), Land adjacent to Oak Tree Farm, Shortheath Common, Bordon it was agreed that Shortheath Common SAC and Woolmer Forest SAC should be treated

¹ Footprint Ecology Visitors Survey 2018

consistently with the Wealden Heaths Phase II SPA in terms of development impact assessment, due to their functional ecological linkage and shared vulnerabilities.

It is now widely recognised that additional housing development has the potential to adversely affect the Wealden Heaths Phase II SPA interest features, namely nightjar, woodlark and Dartford warbler, which are the three internationally rare bird species for which it is classified. Shortheath Common SAC is recognised for hosting the same population of birds and has shown the same sensitivities to recreational pressure. Shortheath Common is therefore functionally-linked to the SPA designation and should therefore be treated in the same manner. This justification is also supported by the most recent Footprint Ecology Report (dated March 2026)².

Established Buffer Zone Approaches

Across southern England, avoidance strategies for ecologically similar lowland heath European sites supporting similar/same bird species (including the Thames Basin Heaths SPA and Wealden Heaths Phase II SPA) apply:

- a **400 m exclusion zone**, within which new residential development is not permitted; and
- a **5 km zone of influence**, within which residential development is considered capable of contributing to likely significant effects unless proved otherwise or appropriate avoidance and mitigation measures are secured.

These distances are derived from visitor survey data, recreational behaviour evidence and Natural England guidance, and are now well-established in adopted local plans and supplementary planning documents.

Applying a 5 km buffer to Shortheath Common SAC ensures a consistent and evidence-based approach to recreational impact assessment, reflecting the same disturbance mechanisms and population catchments identified for comparable European heath sites.

Emerging Strategic Access Management and Monitoring (SAMM) project

Work is currently underway to develop a cross-boundary emerging Strategic Access Management and Monitoring (SAMM) strategy for the Wealden Heaths complex (including Shortheath Common SAC), which will provide a coordinated and strategic mitigation framework for managing recreational impacts arising from new development. It is important that the wider mitigation approach for Shortheath Common SAC is brought into alignment with this evolving strategy to ensure a consistent and effective response to recreational pressure across functionally-linked sites.

The co-ordinated approach is particularly important given the anticipated increase in recreational pressure arising from larger residential sites coming forward within the 5km zone of influence of Shortheath Common SAC and will provide a consistent mechanism for

² Footprint Ecology, Initial Wealden Heaths Strategic Access Management and Monitoring (SAMM) Strategy, dated March 2026

securing and delivering strategic mitigation measures across affected authorities and will support a comprehensive, strategic and precautionary approach in accordance with the Habitats Regulations.

In Combination and Precautionary Considerations

The Habitats Regulations require a **precautionary approach** at the screening stage. Given:

- the SAC's sensitivity to recreational disturbance;
- its functional relationship with the Wealden Heaths Phase II SPA; and
- ongoing housing growth within the surrounding area.

In accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the competent authority must adopt a precautionary approach where there is uncertainty as to the potential for likely significant effects. On this basis, and having regard to the available evidence on recreational disturbance and the functional relationship with the Wealden Heaths Phase II SPA, it is not possible to rule out likely significant effects from residential development within 5 km of Shortheath Common SAC at the screening stage. The application of a 5 km zone of influence therefore represents a precautionary and evidence-based approach to ensure that potential impacts are appropriately assessed and, where necessary, mitigated.

Residential development within 5 km of Shortheath Common SAC therefore has the potential to give rise to in-combination effects, and excluding such development from consideration would risk underestimating cumulative impacts and would not meet the requirements of Regulation 63.

Planning Balance and Conclusion

Including Shortheath Common SAC within a 5 km buffer zone:

- provides a robust and legally compliant framework for screening development proposals;
- aligns with Natural England advice and established heathland avoidance strategies;
- enables proportionate mitigation to be secured where necessary; and
- reduces the risk of adverse effects on the integrity of the SAC.

On this basis, it is considered appropriate and necessary for Shortheath Common SAC to fall within a 5 km zone of influence for recreational impacts, to ensure compliance with the Habitats Regulations and to support sound and defensible decision-making.

Figure 1 – Map showing the 5km Zone of Influence and 400 metre buffer zone around Shortheath Common SAC

