



# Hartlepool Local Planning Framework Emerging Local Plan

## Matter 10

### Other Housing Sites



September 2017



## Policies HSG3, HSG4, HSG7 and HSG8

### Issue 1 – whether the proposed housing site allocations are justified, effective and consistent with national policy.

#### *HSG3 Coronation Drive, Seaton Carew*

- Q1. What is the basis for proposing housing at Coronation Drive, Seaton Carew? [Was this an area of public open space in the 2006 Local Plan?] How would this affect open space provision in the area? Is the approach justified and is it consistent with the NPPF?**

The emerging Local Plan allocation and wider site (extending up to Newburn Bridge) were identified through the Strategic Housing Land Availability Assessment (SHLAA) (HLP06/3&4). The site, including the current allocation, is Council owned and it was noted in the SHLAA that the site was suitable for housing development and deliverable in the medium term, in addition to there being developer interest.

The south western portion of the proposed Urban Local Plan Site (emerging policy HSG3) at Coronation Drive (between Lithgo Close and Gala Close) is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan, with the remainder of the site adjacent to the highway left as unallocated white land. The current allocation of green space within the 2006 Local Plan that would be released to accommodate the emerging Local Plan housing allocation at this site is considered to be of relatively low value with limited access and contamination issues still present and remediation work required. Given the extent of the local green corridor allocation in this area (emerging policy NE2e), the Council considers that there would still remain substantial open space provision within the area and this is unlikely to change in future due to the land north of Warrior Drive remaining undevelopable.

Whilst the site is grassed over at present, the site comprises part of the former Coronation Drive landfill site, operated by Hartlepool Borough Council between 1977 and 1987 for the deposit of construction and demolition wastes, inert process waste, general factory waste and incinerator plant residues (Ash and Clinker). As such, the Council considers this to be of lesser environmental value, in accordance with paragraph 17 of the NPPF. Paragraph 109 of the NPPF also stipulates that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate, and it is considered the Coronation Drive site allocation is consistent with this. In addition, the site is within the limits to development adjoining an established urban area and is therefore considered to be a sustainable location for development and consistent with paragraph 7 and 14 of the NPPF.

- Q2. Is the site deliverable in terms of flood risk, contamination and ecology? Has the Council undertaken additional work to address the Environment Agency's "significant concerns" regarding potential contamination / landfill gas?**

Whilst the Council accepts there are deliverability challenges in relation to the site, particularly with respect to contamination / landfill gas concerns, the site has been assessed as deliverable in the strategic housing land availability assessment (SHLAA) (HLP06/3&4).

Whilst the full extent of the site stretching up to Newburn Bridge was assessed through the SHLAA, the assessment identified that the yield should be limited to 100 dwellings to reflect the only developable area, which is south of Warrior Drive, with the northern part of the site remaining undevelopable.

Whilst the site was subsequently proposed to accommodate 100 homes within the Preferred Options Local Plan, further ground investigation works were undertaken in July 2016, given concerns raised by the Environment Agency regarding the allocation of the site, and these revealed that the full extent of the site could not be developed. Due to this and following comments from a number of parties during the Preferred Options stage public consultation, the quantum of development has been reduced to approximately 65 dwellings in the Local Plan Publication Draft (HLP01/1), with more space retained as open space and protected under Policy NE2(e) Green Corridors.

The Council appreciates that The Environment Agency has previously raised significant concerns regarding potential for ground contamination at the site, given its history, however since the Publication Stage consultation, the Environment Agency has confirmed that it now finds the Local Plan to be sound and has withdrawn from participating in the Examination in Public through their letter dated 16<sup>th</sup> August 2017.

Whilst no additional ground investigation work has been undertaken since July 2016, the Council is currently in discussion with the Homes & Communities Agency (HCA) with respect to grant funding and any other assistance that may be available to support delivery of the site and address outstanding contamination issues.

With respect to flood risk, The Strategic Flood Risk Assessment (SFRA) Development Sites Spreadsheet (EX/HBC/27) indicates that 1.29% of the Coronation Drive site is within Flood Zone 2 and that Recommendation D applies. The SFRA Level 1 Report (Ex/HBC/26) indicates that Strategic Recommendation D suggests that development could be permitted, assuming a site specific FRA shows that the site can be safe, and that the developer / LPA can demonstrate that the site is sequentially preferable. Strategic Recommendation D applies to 49 sites which equates to 51% of the 96 sites for which strategic recommendations have been made. As set out in the Hartlepool Flood Risk Sequential Test Report (EX/HBC/29), 1.29% is considered to be a marginal amount of land and the Exception Test is not considered to be necessary. Whilst a site specific risk assessment would be required, taking into account the height of the existing coastal defences, the risk of flooding to this site is considered negligible and no properties will be located within the area with a medium probability of flooding. It is considered that flood risk can therefore be mitigated and managed through site layout and design to reduce it to an acceptable level.

Furthermore, the locational strategy for the distribution of housing includes locating new housing development within the urban area on suitable and deliverable brownfield sites. Although the site is greenfield, the SHLAA shows that no alternative suitable and deliverable sites within the urban area to those proposed for allocation have been identified. Moreover, development of the site would deliver the benefit of the environmental remediation of the site. Therefore there are no sites available that are sequentially preferable. It is considered that the Sequential Test has been passed.

With respect to ecology, the Habitats Regulations Assessment (HLP01/9) concluded that there is no direct Likely Significant Effect (LSE) on any European Sites from Local Plan policies. The assessment also concluded that, with respect to emerging policy HSG3, the indirect impact of atmospheric pollution, nutrient increase through dog faeces and recreational disturbance is insignificant on all European Sites except the Teesmouth and Cleveland Coast SPA/ Ramsar. The source (new housing) to receptor (SPA) pathway is established and there is indirect LSE of recreational disturbance on the Teesmouth and Cleveland Coast SPA/ Ramsar and this requires mitigation.

The updated Hartlepool Local Plan Mitigation Strategy and Delivery Plan, associated with the Local Plan Habitats Regulations Assessment, is to be reported to the Council's Regeneration Services committee on Friday 15<sup>th</sup> September, once endorsed this document will be added to the Examination Library. The Mitigation Strategy and Delivery Plan indicates that mitigation is required for indirect recreational disturbance and the appropriate assessment notes that these will be delivered through three pathways:

- Strategic policy guidance from Hartlepool BC

- Hartlepool BC day to day Foreshore Services provision
- Developer contributions

Based on the mitigation strategy, the Coronation Drive site is expected to contribute approximately £300 per dwelling or approximately £19,500 in total and this has been factored into the Deliverability Risk Assessment (EX/HBC/64) which demonstrates the proposed market quality urban housing sites are deliverable.

**Q3. Should additional land be released for development in this vicinity including land north of HSG3 zoned under Policy NE2e as Local Green Corridor? [Pub017]**

With respect to the site within the ownership of R Newcomb & Sons referred to in publication consultation response Pub0017, the designation of the southern part of the site in the Publication version of the Proposals Map as NE2e (local green corridors) land appears to have been a minor error in the extent of the shape file and, as such, an amendment (ref: PM/CHP16/03) to the Proposals Map (HLP01/2) has been set out in the Amendments to Proposals Map Document (EX/HBC/18) and Proposals Map Modifications (EX/HBC/17) document, removing the entirety of the site from the NE2e designation.

However, with respect to the removal of the NE2e designation from the adjacent bund and green space to the east of the site, or any further loss of the NE2e designation along Coronation Drive, this has been addressed under the relevant section of the Regulation 22 Consultation Statement (HLP01/4). The Council maintains that this area forms an important part of the local green corridor on the approach to Seaton Carew, particularly given the narrowness of the northern section of this green allocation and the presence of industry/railway to the west. As such, the continued designation of this land as green infrastructure is considered to be appropriate. Furthermore, the SHLAA (HLP06/3&4) has identified the area north of Warrior Drive as undevelopable.

***HSG4 South West Extension***

**Q4. Are the detailed requirements for the site clear and justified, including on-site education provision?**

The section 106 agreement is approaching completion, the agreement is written with flexibility in mind. There is sufficient space for a two form entry school if required, the s106 allows for a new school to be built on site or for the surrounding primary schools to be extended, this gives the developer and council flexibility and the change to go with the best option for the borough.

**Q5. Are the boundaries and extent of the site correctly defined?**

Yes the boundaries and extent of the site correctly defined on the proposals map.

**Q6. Are there reasonable alternatives for a larger allocation at this location?**

There are no reasonable alternatives for a larger allocation in this location. Any larger allocation is likely to have significant impacts upon the road network and any increase in numbers would require a full assessment of any highway implications.

It is considered that the existing planning permission for 1250 dwellings is the maximum that could be delivered over the plan period on this site given that the start date of the plan is 2016. To plan for more than

this would be over ambitious and more likely to be unachievable given previous completion rates on other sites delivered by Persimmon such as Middle Warren.

**Q7. Are there any comments on the Council's suggested changes in response to the Persimmon Homes representation [Pub0115]?**

The Council's suggested changes to Policy HSG4 in response to the Persimmon Homes representation area s follows:

- Agree to amend Diagram 1 to show school land under Policy INF4 (Community Facilities). Also agree to amend the key on Diagram 1 to read "indicative route of land safeguarded for the future road."
- Note concerns regarding the current wording of criterion 4 and propose to remove the wording "...will be provided" from the end of the criterion.

The Council welcomes any comments in relation to these proposed changes.

**Q8. Can the Council confirm that safety measures at the A689/Dalton Back Lane junction are not necessary for the development of the site in the Plan to proceed?**

The development of the south west extension will, as a consequence of the works necessary to provide a new junction onto the A689 and associated speed reductions, provide safety improvements to the junction of the A689/Dalton Back Lane by way of reduced speeds on the A689 at this location. It is proposed that speed limits will be reduced to 50mph (from 70mph) well in advance of this junction for town bound traffic which will provide longer and safer reaction times for drivers wishing to turn right into Dalton Back Lane across this flow.

**Q9. Does the Plan's proposal for housing at this location take account of the proximity of the gas pipeline? [see HSE letter dated 15 July 2016 – Annex1]**

Yes the Plan's proposal for housing at this location does take account of the proximity of the gas pipeline? The indicative master plan shows that the area along the gas pipeline will be used as green space and is not developable land.

***HSG7 Elwick Village Housing Development***

**Q11. Are the criteria in the policy justified and sufficiently flexible?**

The Council considers the criteria in the policy to be justified and sufficiently flexible. The Council has sought to draw a balance between ensuring that any development of the site represents sustainable development and that ensuring that the requirements of NPPF paragraph 173 are met. For instance, the development will create a minimum of 0.40ha of green infrastructure and informal open space but this still leaves up to 1.67ha available for housing development. In incorporating this requirement into the policy, the Council has taken into consideration the lack of safe pedestrian access from the site to the village green, for children.

**Q12. Is a landscape buffer to the north of the site justified?**

The north of the site fronts onto open countryside. The Council considers that it is desirable to soften the impact of the development on views towards the village through a buffer. The buffer would also provide mitigation for future residents of the development with regards to the bypass to the north.

**Q13. The proposal adjoins the boundary of the Elwick Conservation Area. Has the effect on the setting of this heritage asset been taken into consideration in allocating the site? Does the policy require any specificity, in addition to criterion 4 of Policy HSG7 and over-arching national and local policy to preserve or enhance the character or appearance of conservation areas?**

The Strategy for the Historic Environment (December 2016) (Core Document ref HLP09/1) assesses any potential detrimental impact / opportunities for impact of the housing allocation on the Park Conservation Area. It states that *'development which does not follow the pattern of the hierarchy of the buildings on the site or greatly reduces the open space would significantly harm the heritage assets. A development brief is in place for this site. This should guide development in order to mitigate any harm to the heritage assets'*.

The Council considers that criterion 4 is adequate in conjunction with over-arching national and local policy to preserve or enhance the character or appearance of the conservation area.

***Policy HSG8 Hart Village Housing Developments***

**Q14. Is Hart a sustainable location for additional development of the scale proposed in the Local Plan? Is there a shop within reasonable walking/cycling distance?**

The two proposed development sites within Hart Village will increase the village by approximately 50 dwellings. The additional population will help to sustain the existing services and facilities within the village. As part of any development, Policy HSG8 (Hart Village Housing Developments) requires the inclusion of green infrastructure, informal open space and recreational and leisure land. The policy also requires the enhancement of pedestrian and cycle linkages to the surrounding area.

The Middle Warren Local Centre, which includes a Sainsbury's superstore, this is 1.3 miles from the site. There is a safe pedestrian and cycle route from the proposed sites to the local centre, a map of this route can be found at (EX HBC 69), this is approximately a 20minute walk or a 6minute cycle, these are considered to be within a reasonable walking /cycling distance. There is a signalised pedestrian crossing across the A179 adjacent to the Middle Warren Local Centre to allow safe access to pedestrians and dismounted cyclists.

**Q15. Can services and facilities in Hart village sustainably accommodate the proposed scale of development?**

In terms of education infrastructure, HBC Education Team have confirmed that the pupil yields generated from the developments in Hart will be accommodated within schools in the local area, this includes Hart Primary School. In terms of other services and facilities within Hart Village, there is the Village Hall which is offers a range of weekly classes for the local community to attend as well as community space to hire, full details are available at [www.hartvillagehall.co.uk](http://www.hartvillagehall.co.uk) . The village is served by two pubs and a limited bus service, additional population within the village has the potential to assist with the sustainability of such services. The village is also served by a parish Church; this has recently been granted planning permission to extend the church building to provide community facilities.

**Q16. Are the junctions on the A179 for Hart capable of safely accommodating additional traffic? Are there proposals under Policy INF2 for improvement?**

It is considered that development to the western edge of Hart would result in unacceptable road safety implications. The western most access is an uncontrolled junction at present very little traffic turns right into the A179 which is subject to the national speed limit, it is expected that the proposed development would increase this traffic manoeuvre to the detriment of highway safety. Requirements have been or will be imposed on development in Hart to fund pro rata the signalisation of this junction to allow the safe traffic movement into and out of Palace Row. An assessment of the most appropriate junction has been undertaken and preliminary designs and costings have been carried out. The proposed scheme will help regulate traffic flow through Hart by providing an alternative safe access. It is expected that the Council will fund the improvements initially through the Local Transport Plan.

The eastern access onto the A179 is considered to be a safe access.

**Q17. Is there broad consistency between the Local Plan and Rural Neighbourhood Plan (RNP) proposals for Hart village? Is there evidence from the RNP process that the housing site at Glebe Farm (20 dwellings) would not be sound?**

The Rural Neighbourhood Plan (RNP) has recently been independently examined to assess the neighbourhood plan to ensure that it meets the basis conditions. The Independent Examiner recommended a number of changes to the plan to ensure that it delivers sustainable development and has proper regard to national policy and guidance. The examiner's overall conclusions are that the plan, if amended in line with his recommendations, meets all the statutory requirements including the basic conditions test and should proceed to referendum.

The Examiners report and Addendum report are available in the Local Plan Examination Library (EX/HBC/65 and EX/HBC/66 respectively), giving full detail of all of the recommendations made. This includes the recommendation to include the Glebe Farm Housing site, to ensure that the RNP is in conformity with the emerging Local Plan. The Rural Plan Group has accepted all recommendations made in order to proceed with the RNP to referendum. A report was presented to the Council's Regeneration Services Committee on 4<sup>th</sup> September 2017, where the recommendations detailed in report (EX/HBC/67) were accepted. The sites set out within the Rural Neighbourhood Plan in relation to Hart Village are now considered to be in full conformity with the emerging Local Plan.



## Issue 2 – Omission Sites

***SHLAA Site 9 – East of Millbank Close (Gentoo Homes): does this site have planning permission for 15 homes? Is the site within the proposed development limit for Hart?***

The site does have planning permission for 15 homes. The Council has proposed a Main Modification to the Proposals Map for the village boundary to be amended to include the site.

***SHLAA Site 19 – Land east of A1086 Easington Road (Mr H Tones): submitted that site could accommodate approximately 55 dwellings to add to overall supply***

**Q18. What is the ecological status of this site? Was there a re-survey in Summer 2017? Does it remain a Local Wildlife Site as set out in Policy NE1c? Is this status been reviewed by the Tees Local Nature Partnership?**

Background to the site:

Detailed habitat surveys are based on the British National Vegetation Classification (NVC), which is a series of habitat types (in this case grassland ones). NVC is the system that Natural England use to classify nationally designated Sites of Special Scientific Interest (SSSI).

The professional botanist, who surveyed the Hartville Meadow site on 23/08/2011, identified the habitat as an MG6/5 grassland.

- MG6 is the 'perennial ryegrass/ crested dog's-tail grass' community. MG6 is regarded as being of lower botanical nature conservation interest.
- MG5 is the 'crested dog's-tail grass/ black knapweed' community. MG5 is regarded as being of higher botanical nature conservation interest.

Both of these grassland communities are neutral (as opposed to acidic or calcareous) and both are typical of lowlands.

The Natural England lead scientist on grasslands has assessed earlier botanical surveys undertaken in 2009, on 23/08/2011 and on 20/03/2017 and confirmed the grassland as being a MG6/5 community. This expert also emphasised the relative rarity of this grassland type in England and the North-east.

A lower survey standard than NVC is acceptable for designating Local Wildlife Sites (LWS) as these are local sites meaning their threshold for acceptance is lower than for SSSI (because they represent local value). The Tees Valley Nature Partnership (TVNP) Local Wildlife Sites System follows Defra guidance and clearly sets out criteria for acceptance. These are lists of representative species with a threshold for how many should be present. It is common practice to combine a number of survey visit results, as not all species are detectable at the same time.

The results of surveys at Hartville Meadow identified enough qualifying species for it to be a Grassland LWS. The proposed site was approved by the TVNP local wildlife sites panel and formally designated by HBC via a Cabinet Report.

What is the ecological status of this site?

The HBC Ecologist describes the current ecological condition of the site as 'unfavorable, possibly recovering'.

Was there a re-survey in summer 2017?

The site was re-surveyed in the summer (on 07/06/2017) by two Natural England botanists using the robust and scientific NVC methodology. The survey aimed to fit the site into an NVC community. The survey used



quadrats to measure species diversity and these were undertaken in two distinct zones – the central area which had been ploughed in January 2017 and the peripheral areas that contained intact turf.

Peripheral zones: The peripheral areas contained indicators of MG5 grassland (i.e. some of the suite of species that make up the MG5 community), but the ‘goodness of fit’ of the quadrats (a statistical analysis) was ‘very poor’ or ‘poor’. The quadrats did not fit any of the grassland communities very well, but was closest to the following two, which are of low nature conservation interest:

- OV23 perennial ryegrass/ cock’s-foot grass community.
- MG1 false oat grass community

Central, ploughed zone: None of the ploughed vegetation fits to any NVC community, as it is a collection of plants which have appeared since the field was ploughed. These pioneer species are largely those which thrive on disturbance, such as common fumitory and meadow buttercup, but some indicators of a meadow grassland community, particularly those found in the margins, are also appearing such as ribwort plantain, red fescue and Timothy grass. Most of the species occur only sparsely because of the high amount of bare ground still present in this area.

The meadow grassland indicators suggest that a return to grassland vegetation is possible, although the type of vegetation which becomes established will depend on a range of environmental factors (e.g. soil nutrient status, drainage) and management (e.g. whether grazing is re-introduced when vegetation cover is higher or whether species of neglect such as false-oat grass take over more). There are also questions over whether the “weedy” species such as broad-leaved dock and creeping thistle will become dominant.

The lack of a good NVC fit is understandable given the ploughing, however, the key finding is the presence of surviving indicator species and the opportunity for these to recover.

Does it remain a Local Wildlife Site as set out in Policy NE1c and has this status been reviewed by the Tees Local Nature Partnership?

Earlier this year, HBC initially proposed the de-designation of the site (based on the damage done and the landowner’s opposition to managing the site for nature conservation), but the Tees Valley Nature Partnership local sites panel recommended its retention (at least in the short-term) based on the chance that the grassland will recover.

As the HBC Ecologist, I assess that there is a chance that the grassland will recover from the damage caused by deep ploughing, as the soil still contains viable roots, rhizomes and seeds from the many of the key species. The soil structure has been disturbed and this has released a flush of common and vigorous species, but these may diminish over time.

The Defra Local Sites Guidance<sup>i</sup> states that a damaged site should be retained as a LWS if there is a chance that it will recover over a reasonable period (Section 37, below, which fits this situation perfectly).

HBC accepted the local sites panel’s recommendation and has retained the site as a LWS as set out in Policy NE1c.

Summary:

- Prior to agricultural improvement, the site was a valuable lowland, neutral grassland (and permanent pasture under the EIA (Agric) Regs) in a national, regional and local context.
- The site was designated as a Local Wildlife Site to reflect its value in the Tees Valley.
- A large portion of the site was deep ploughed in January 2017, damaging the grassland.
- Survey has confirmed that the grassland is damaged.
- Survey has confirmed that indicator species of ‘good grassland’ are still present.
- A Natural England grassland expert, the local sites panel and the HBC Ecologist believe that there is a chance that the grassland will recover, but this is not guaranteed and will take time.
- The Defra Local Sites Guidance states that a damaged site should be retained as a LWS if there is a

chance that it will recover.

- HBC proposed the de-designation of the site (based on the damage caused linked to the landowner's opposition to managing the site for nature conservation), but the local sites panel recommended its retention for a trial period based on the chance that the grassland will recover.
- HBC accepted this view and has retained the site as a LWS.
- Independently, Natural England has assessed that the ploughing was a breach of the Environmental Impact Assessment (Agric) Regs 2017 and has damaged permanent grassland. A screening notice has been issued which requires the land holder to submit a screening application to Natural England before carrying out any further cultivation or restructuring work as set out in the EIA (Agric) regulations.

**SHLAA Site 65 – Tunstall Farm Phase 2 (Taylor Wimpey): submitted that the site could accommodate 400 dwellings (in lieu (in-part) of de-allocating High Tunstall)**

**Q19. Explain what other alternative sites could reasonably be allocated, with reference to sustainability appraisal or in response to representations, including the omission sites above.**

- SHLAA Site 9 – East of Millbank Close is not an omission site. It has planning permission and is included in the Five Year Supply of Deliverable Housing Sites Report.
- SHLAA Site 19 – Land east of A1086 is not considered by the Council to be a reasonable alternative for the reasons set out above.

The following alternative options were assessed as part of the Sustainability Appraisal Report. The recommendation for each of them is not take forward this policy alternative.

- SHLAA Site 65 – Tunstall Farm Phase 2 is discussed in the SA Addendum Report under Policy Hsg1 – Growth Scenario B – *Less Housing at Wynyard and the additional 400 dwellings at Tunstall Farm*. The alternative was assessed as having a positive impact in terms of housing, however not as positive as the preferred option. A number of negative impacts were also identified.
- Policy Hsg1 – Growth Scenario C – *Reduced Quantum at High Tunstall and increase the South West Extension*. This scenario considers the proposal to put additional housing at the South West Extension.
- Policy Hsg1 – Growth Scenario D – *Addition of North Burn site and removal of the High Tunstall allocation*. The Homes and Communities Agency own the land formerly allocated as employment land at North Burn within the 2006 Local Plan. They made representations to the Publication Stage of the Local Plan process suggesting a mixed use development included approximately 1000 homes.
- Policy Hsg1 – Growth Scenario E – *Additional Housing in the villages with a reduction at Wynyard*. This scenario considers whether some increased growth within the villages with slightly less growth at Wynyard would be acceptable.
- Policy Hsg1 – Growth Scenario F – *No development in the villages and an extension to Upper Warren*. As part of the consultation on the Publication Stage Local Plan a representation was received from Persimmon on behalf of a landowner to the west of Upper Warren proposing an extension to Upper Warren for development of up to 120 dwellings.

**Q20. Have these omissions sites been subject to sustainability appraisal?**

See answer to Q19.

Q21. **Would development on any of these omission sites cause such significant adverse impacts as to significantly and demonstrably outweigh the benefits of meeting the OANs for market and affordable housing? (NPPF Paragraph 14).**

The development of the omission sites that are not considered to be reasonable alternatives would cause such significant adverse impacts as to demonstrably outweigh the benefits of meeting housing needs. The planning balance for the sites that the Council considers to be reasonable alternatives is more evenly weighted but the Council has assessed them as being less sustainable options than the sites allocate in the Publication Local Plan. However, if in coming to a conclusion on OAN, if it were considered that the housing requirements set out in the Plan needed to be increased then the Officers consider that these sites would be suitable options for allocation.

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<sup>i</sup> Defra Local Sites Guidance link - <http://www.nebiodiversity.org.uk/docs/20.pdf>

Section 37: In considering whether to de-select a site, the partnership should consider any implications for the provision of contact with nature and the availability of sites for educational use. The potential for restoring the site's features of interest should also be a consideration. This is particularly relevant where a site has been deliberately damaged, or degraded through neglect or inappropriate management.