

Forest Heath District Council

**Evidence paper for
Single Issue Review (SIR) of Core Strategy Policy CS7 and
Site Allocations Local Plan**

Accessible Natural Greenspace Study

January 2017



Forest Heath
District Council

Accessible Natural Greenspace Study

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1. Introduction

- 1.1. This study has been prepared to support Forest Heath District Councils Single Issue Review (SIR) of Core Strategy Policy CS7 and separate Site Allocations Local Plan (SALP). The purpose of the study is to provide evidence on appropriate accessible open space that will support the planned growth in the district. The study is required because there is concern that increased development in the district has the potential to contribute to recreational pressure on Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC). The SPA and SAC are shown on figure 1

- 1.2. Natural England, in their response to the Regulation 18 Consultation for the 2015 issues and options documents, remarked in relation to the potential for recreational disturbance:

we recommend that, effort is placed into ensuring that each area has an appropriate level of green infrastructure, including sufficient amenity grasslands, improvements in access for walkers and cyclists and facilities for dog walkers. In our view there are areas, such as in Lakenheath for example, that are lacking local green infrastructure. The provision of an appropriate level of green infrastructure within local communities is likely to alleviate pressure on designated sites, as well as supporting the health and wellbeing of residents.

- 1.3. This study will review the evidence to support the provision of suitable alternative natural green-space (SANG) in the district. The study will provide a strategic level audit of accessible greenspace and access provision within the main settlements, the sensitivities and constraints and explore the opportunities for new green space and access routes that could be delivered to support the growth agenda. This work could contribute to a comprehensive mitigation strategy for the whole of the Brecks area should this be necessary in the future.

Consultation

- 1.4. The natural greenspace study forms part of the evidence base for the SIR and SALP. The first draft study (April 2016) was included in the background papers during the statutory consultation of the preferred options drafts of the documents in spring 2016. Comments on the documents were received from Natural England which are summarised in Appendix 2.
- 1.5. In addition the study was brought to the attention of local communities through focused consultation undertaken by the Councils relevant families and communities officers. Parish Councils were asked to comment particularly on the opportunities in the settlement strategies in Section 6 of the document. Comments are summarised in appendix 2 and have, where appropriate, been included in the relevant sections.
- 1.6. Suffolk County Council Ecologist has reviewed the document during the drafting and made comment about content and the approach taken.

2. Context and Growth Agenda

- 2.1. Forest Heath adopted their Core Strategy Local Plan document in May 2010. The adopted Core Strategy was subsequently challenged in the High Court and the judgment of the High Court, delivered on 25 March 2011, ordered the quashing of certain parts of Policy CS7 (overall housing provision), with consequential amendments being made to Policies CS1(spatial strategy) and CS13 (infrastructure and developer contributions).
- 2.2. Essentially, the High Court Order removed the spatial distribution of housing numbers and phasing of delivery across the district. This left the council with an overall number of new dwellings that it needed to provide land for and in general terms the spatial strategy (Policy CS1), but no precise plans for where these dwellings should be located and when they should be built.
- 2.3. As a result, the council is reconsidering the most appropriate locations for housing growth throughout the district. This process is termed a Single Issue Review (SIR) and requires all of the relevant legislative processes and procedures as identified within the Town and Country Planning (Local Planning) (England) Regulations 2012 to be followed.
- 2.4. In addition, the council is also working on its Site Allocations Local Plan document. The Site Allocations Local Plan will identify future housing sites and services to support local everyday needs of people within Forest Heath.

Plan area

- 2.5. The plan area is shown in Figure 1. Forest Heath is located in western Suffolk. The area has borders with Kings Lynn and West Norfolk Borough and Breckland District to the north, St Edmundsbury Borough to the south-east, and East Cambridgeshire to the west. The district has three market towns, Brandon in the north, Mildenhall in the centre and Newmarket in the south. It is a predominantly rural district covering an area of over 37,398 hectares (144 square miles) with two strategic national routes passing through it: the A11 from London to Norwich and the A14 from the Midlands to Ipswich and the East Coast Ports.
- 2.6. The district is characterised by a range of different landscapes ranging from the Brecks, fens, chalk downland, clay downland to Britain's largest lowland pine forest. The Brecks is an area that straddles the Norfolk/Suffolk border, in the north and east of the district, and is characterised by sandy, free-draining soils, acid grasslands, dry heaths, arable fields and belts of scots pine.
- 2.7. Nearly 50% of Forest Heath district is designated for nature conservation value. There are three sites designated at European level (known as *Natura 2000* sites), 27 nationally important sites of special scientific interest (SSSI) and over 70 county wildlife sites (CWS). The designated sites are concentrated predominantly in the east and north-east of the district, although some sites are scattered throughout the district. There

are also seven other international sites within 20 km of the district boundary.

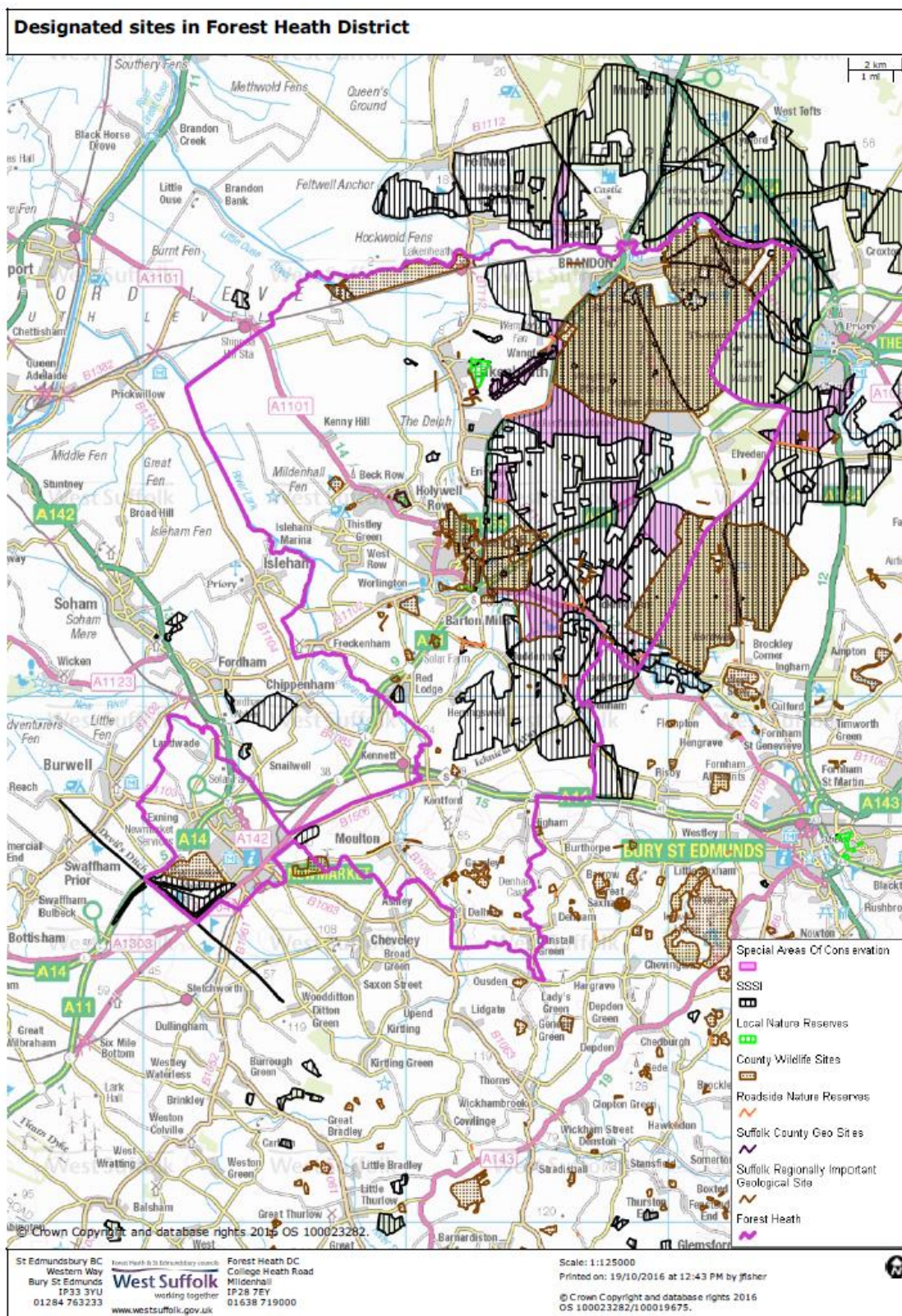


Figure 1 Forest Heath District plan area showing location of designated sites

Scale and distribution of development in FHDC

The growth agenda

- 2.8. The council has the responsibility for setting the district's overall housing requirement. This target must be set in the context of a collaborative approach, with a duty to cooperate, as set out in the NPPF (2012). The evidence that has been used to develop options for the overall housing provision to 2031, (thereby meeting needs for the next 15 years) is set out in the Single Issue Review (SIR) consultation document¹.
- 2.9. The overall housing provision for the district has been refined as part of the local plan process having regard to all the evidence available and the Submission draft of the SIR (January 2017) document is proposing 6800 homes
- 2.10. The SIR document also presents the option for distributing the overall housing requirements across the district. The settlements where houses will be distributed are the main towns of Brandon, Newmarket and Mildenhall, the key service centres of Lakenheath, and Red Lodge and the primary villages of Kentford, Exning, Beck Row and West Row.
- 2.11. The Site Allocation Local Plan allocates sufficient land to ensure there is a good supply for homes and jobs, and the necessary supporting infrastructure including shops and services taking into account the land that is available for development and the known constraints. The document also includes the policies that allocate the sites and set the requirements for provision of any required infrastructure including the provision of open space.

Population projections

- 2.12. Census based population projections have been generated along with estimates of dwelling stock and occupancy rates; this information is used to inform the number of homes in the SIR. The increase in dwelling stock is 6800 homes over the plan period; the ratio of household population to households for Forest Heath is 2.34 persons per household; the increase in population of 17,000 in the district².

¹ Single Issue Review (SIR) of Core Strategy Policy CS7 Overall Housing Provision and Distribution – (Further) issues and options consultation August 2015

²Forest Heath Objectively Assessed Housing Need January 2016, updated August 2016Cambridgeshire Research Group

3. Planning Policy Context

- 3.1. This section reviews the planning policy context. It draws on the Habitats Regulations Assessments for the Core Strategy and the preliminary assessment work undertaken for the emerging SIR and SALP.
- 3.2. Existing planning policies that support the provision and delivery of new green space and access routes are also presented.

Findings of the Habitats Regulations Assessment of FHDC Core Strategy DPD (March 2009)

- 3.3. The Habitats Regulations Assessment³ of Forest Heath Core Strategy⁴ assessed the potential for development to have an impact on Breckland SPA and SAC. The document assessed the potential effects of a total of 5740 new homes (section 8 Housing Provision CS7) distributed mainly in the market towns and key service centres with the balance within the primary villages.
- 3.4. The Appropriate Assessment of the Core Strategy considered the potential for adverse recreational effects on the integrity of Breckland SPA in respect of its three Annex I bird species (Stone Curlew, Nightjars and Woodlark). The assessment concluded that increases in visitor disturbance as a result of planned housing growth would be small and unlikely to reach the same levels experienced by broadly comparable SPAs such as the Thames Basin Heaths and Dorset Heaths also designated for Woodlark and Nightjar. This was based on HRA work carried out for the neighbouring Breckland Core Strategy⁵. The Appropriate Assessment also observed that many of the Breckland grass heaths have 'open access land' designated under the Countryside and Rights of Way Act 2000 (CRoW) but that restrictions are put in place each year due to the presence of Stone Curlews and this will minimise disturbance effects on those sites. The study found evidence that some areas of habitat would be less likely to be used by Stone Curlews as a result of new housing development and there is further uncertainty because bird distributions change over time, particularly those of Nightjar and Woodlark, in relation to forestry management. The conclusion of the Appropriate Assessment of the Forest Heath Core Strategy was that, whilst the increase in recreation associated with the Core Strategy was likely to be low, an adverse effect on the integrity of Breckland SPA in relation to its Annex I birds could not be ruled out on a precautionary basis.
- 3.5. The Appropriate Assessment went on to consider options for avoidance and mitigation and concluded that indirect disturbance effects on the three Annex I species of Breckland SPA could be avoided by the following amendment to the Core Strategy:

³ Habitats Regulations Assessment: Forest Heath District Council Core Strategy DPD(March 2009)

⁴ Forest Heath District Council Core Strategy DPD Adopted May 2010

⁵ Breckland Core Strategy and Development Control Policies DPD December 2009

Include policy wording or supporting text to explain that the council is committed to ensuring sustainable levels of recreation in and around the Breckland SPA, and work with partners including Natural England, RSPB and Forestry Commission to develop a strategy that sets out an access management and monitoring programme that provides measures to prevent increasing visitor pressure, and suitable mitigation (should monitoring indicate that Annex I species are failing to meet conservation objectives due to recreational pressure).

- 3.6. In response to this the council undertook a recreational study⁶ of the Brecks jointly with St Edmundsbury Borough Council. The results are summarised in section 4 below.
- 3.7. The Appropriate Assessment to the Core Strategy also considered other 'Urban Effects' and concluded that these would be likely to operate synergistically to adversely affect the conservation interest of heathland European sites that are close to areas of high housing density. The distance over which likely significant effects might occur was not defined.
- 3.8. The assessment concluded that adverse effects on the integrity of heathland European sites could be avoided by the following Core Strategy requirement:

The Council will need to commit to developing a framework of developer contributions, secured by legal agreement, for any new development where heaths are likely to be used as local greenspace by the new residents or employees. Contributions will be used for the implementation of an urban heaths management plan, with the primary purpose of achieving SPA/SAC conservation objectives.

- 3.9. In response to this the council later adopted a policy in the joint development management DPD (see section 3.4 below).

HRA screening for the SIR and the SALP

- 3.10. A Habitats Regulations Assessment (HRA) forms part of a European directive that requires 'appropriate assessment' of plans and projects that are, either alone or in combination with other plans and projects, likely to have a significant impact on certain designated habitats. The allocations in the SALP document are subject to a Habitats Regulations Assessment under the requirements of the Habitats Directive 92/42/EEC.

Existing planning policies

Forest Heath Core Strategy DPD Adopted May 2010

- 3.11. Core Strategy Policy CS2 Natural Environment requires that *areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged*. The policy also requires *promotion of Green Infrastructure enhancement and/or provision on all*

⁶ Fearnley H, Liley D and Cruickshanks K (2010) Visitor survey results from Breckland SPA. Footprint Ecology

new developments, incorporation of adequate and appropriate natural areas informed by Landscape Character Assessment, and increased public access to the countryside through green corridors.

3.12. Policy CS2 also sets constraint zones surrounding Breckland SPA as listed and mapped (figure 2)below:

- *new built development will be restricted within 1,500m of components of the Breckland SPA designated for Stone Curlew. Proposals for development in these areas will require a project level Habitats Regulations Assessment (HRA) (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed;*
- *where new development is proposed within 400m of components of the Breckland SPA designated for Woodlark or Nightjar a project level Habitats Regulation Assessment (HRA) will be required (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed;*
- *new road infrastructure or road improvements will not be allowed within 200m of sites designated as SACs in order to protect the qualifying features of these sites (see Figure 3);*
- *new development will also be restricted within 1,500m of any 1km grid squares which has supported 5 or more nesting attempts by stone curlew since 1995. Proposals for development within these areas will require a project level HRA (see Figure 3). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.*

Figure 2 HRA constraints zones adopted in the Core Strategy

3.13. The stone curlew population is currently increasing and the birds use areas outside the SPA boundary for both breeding and foraging. There is still strong evidence that the 1500m distance is appropriate, however it is important to ensure up-to-date data are used to reflect the areas of the SPA used by Stone Curlews and the areas outside the SPA that are also important. More recent stone curlew data (2011-2015 inclusive) were used to review the constraint zones relating to supporting habitat outside the SPA. This new data reflects the areas of the SPA used by Stone Curlews and the areas outside the SPA that are also important. The new evidence supports and strengthens the requirements of policy CS2

3.14. Policy CS13 Infrastructure and Developer Contributions states that *release of land for development will be dependent on there being sufficient capacity in local infrastructure, with one of the areas to be addressed being open space. The policy also requires that: all development in the plan area will be accompanied by appropriate infrastructure to meet site specific requirements and create sustainable communities. The infrastructure will be provided in tandem with the development and where appropriate arrangements will be made for its subsequent maintenance.*

Joint Development Management Policies Document February 2015 (Forest Heath District and St Edmundsbury Borough Councils)

- 3.15. Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance of the JDMPD requires that *proposals for development which would adversely affect the integrity of areas of international nature conservation importance, as indicated on the Policies Map, will be determined in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended).*
- 3.16. Policy DM12 requires *"all new development (excluding minor household applications) shown to contribute to recreational disturbance and visitor pressure within the Breckland SPA and SAC will be required to make appropriate contributions through S106 agreements towards management projects and/or monitoring of visitor pressure and urban effects on key biodiversity sites."*
- 3.17. Policy DM42 Open Space, Sport and Recreation Facilities protects against the loss of existing open space as a result of development and further requires that *where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate.*
- 3.18. Policy DM44 Rights of Way protects against the loss of existing or proposed rights of way and enables improvements to rights of way to be sought *in association with new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites.*

4. Evidence on Recreation Pressure and mitigation options

- 4.1. This section provides a review of the existing information and evidence available to inform an understanding of the likely impacts of recreational pressure in the district particularly in relation to the Breckland European sites, and to inform how this issue might be addressed through the provision of suitable alternative natural green space.

Visitor survey results from Breckland SPA

- 4.2. In 2010 a visitor survey of Breckland SPA⁷ was commissioned by Forest Heath District and St. Edmundsbury Borough Councils to explore the consequences of development on Annex 1 bird species associated with Breckland SPA.
- 4.3. The study, in section 2, reviewed the existing information and research which has led to the current concern about visitor pressure on the Annex 1 birds in Breckland. In brief the evidence supports concern that disturbance has an impact on the three Annex 1 bird species, nightjar, stone curlew and woodlark, in the Brecks and draws links between housing, access and disturbance.
- 4.4. The visitor monitoring was conducted during early summer 2010 to assess the current level and type of visitor use across the SPA by local residents. Counts of people and visitor interviews were conducted at 16 different locations involving 176 hours of survey work, split equally between weekdays and weekends.
- 4.5. A summary of the key findings from the visitor work which are of relevance in light of an increase in development within the catchment area of the SPA were presented in the report and are reproduced below.

176 hours of visitor fieldwork with 297 visitor interviews were conducted

Visitor numbers were significantly different between sites.

The majority of visitors (87%) had travelled from home and were local to the general area.

The local residents interviewed tended to visit frequently (i.e. at least weekly or daily) and throughout the year (47% indicated that visitation patterns were not influenced by seasonality). Slightly higher visitor numbers were recorded at weekends, but this was not consistent across all sites.

Visits were typically short, with 79% spending two hours or less.

Dog walking was the main activity undertaken (36% of local residents), with walking and cycling also popular. The proportion of visitors undertaking different activities varied between sites. Interviewees often chose to visit particular locations for to their suitability to the visitors activity (31% interviewees), the proximity to interviewee's homes (25%) and a range of other reasons.

Just over 1 in 10 interviewed groups (91%) made their visit by car. Half of all interviewees that were local residents lived within 8.8km, and local residents included those living in a range of locations; the most interviews were residents of Brandon (23 interviewees) and Bury St. Edmunds (22 interviewees). Dog walkers tended to live closer to the sites where interviewed (half of all dog

⁷ Fearnley H, Liley D and Cruickshanks K (2010) Visitor survey results from Breckland SPA. Footprint Ecology

walkers lived within 5.6km of the interview location), wildlife/bird watchers (had a home postcode a median distance of 22.7km from the survey location) whereas cyclists (home postcode a median distance of 31.7km from the survey location) travelled the furthest.

Visitor rate declined with distance in that beyond 10km there was very little variation in visitor rates with increasing distance. At distances of less than 10km there was a relatively steep decline in visitor rates with increasing distance and that local residents make more visits the closer to the site they live.

Route lengths on site were recorded using maps and GPS units given to interviewees. Route length varied with activity, for example dog walkers typically undertook routes of around 2.5km whereas for cyclists the median route length was 15.6km.

Car-park transects were undertaken to assess levels of visitor use in the areas outside the forest blocks. Parking was concentrated in the forested areas rather than the open farmland surrounding the Forest, indicating that levels of access – at least from people driving from home – in the farmland areas may be low.

- 4.6. The study went on to make recommendations for taking forward local development documents and planning for future growth in Forest Heath District highlighting a need for a precautionary approach yet the need to also take a proactive approach to avoiding the deterioration of populations of bird species.
- 4.7. An important finding of the study was that Thetford Forest is a large area, surrounded by relatively low levels of housing, and at present it seems apparent that recreational pressure may be adequately absorbed by the Forest. The Annex I heathland bird interest features are not yet indicating that they are negatively affected by the recreational disturbance. However there are still some gaps in our understanding of the Thetford Forest populations of Annex 1 birds, their current status and potential changes that may be occurring. It is not currently understood whether distribution is affected by recreation, for example.
- 4.8. Housing development in close proximity to the SPA should be thoroughly assessed for potential impacts, and appropriate measures to counteract the potential effects of increased recreational disturbance incorporated.
- 4.9. Development within 10km of Breckland visitor facilities (including car parks) is likely to result in increased access, and therefore potentially increased recreational disturbance. Any new housing within that zone should be identified as development that would be likely to have a significant effect as a result of recreational disturbance upon the SPA, in the absence of any counteracting measures and taking a precautionary approach. It is also likely that, the closer new housing is to the Forest, the greater the additional recreational pressure will be.
- 4.10. The study made reference to work undertaken as part of the HRA for Breckland District Council Site Specific Policies and Proposals DPD4. Similar results are presented in relation to visitor rates with distance, but derived from a different data set (visitor data collected at points within the forest, rather than at access points and undertaken using a different methodology). Considering the different approach, the results are similar – the data in the Breckland HRA appears to flatten out at around 7.5km, plotted from the edge of the Forest rather than the survey locations. Visitor rates also appear to be lower, which may be accounted for the

survey locations (i.e. it is to be expected that more people will be interviewed at car parks, picnic sites etc. rather than points inside the forest)

- 4.11. The study went on to make recommendations to potentially divert some of the recreational pressure away from the SPA through the provision of alternative greenspaces. These would need to be at least equally, if not more attractive than the European sites. Such an approach could link into any green infrastructure initiatives as part of the local development frameworks. Important factors to consider in the design of such spaces are the distance to travel to the site, the facilities at the site, and experience and feel of the site. This visitor survey has identified that people are travelling up to 10km to use the SPA as their local greenspace. The provision of an attractive alternative in closer proximity to a new development would increase its likelihood of use.
- 4.12. A high percentage of visitors, 91%, were found to arrive by car to the Brecks and so consideration of car parking facilities at any alternative site was noted as being of importance in ensuring its attractiveness and accessibility to visitors. This also implies that a reduction in car parking at sensitive SPA locations may reduce access at those points. In addition the majority of visitors are using the country park locations which could also be the focus of further enhancements, to increase their capacity for further visitors, but these 'honey pots' may also inform design of alternative sites.
- 4.13. Part of the suite of counteracting measures could include both monitoring of visitor levels and activities as development comes forward, and also ecological monitoring of the Annex 1 birds to determine whether any deterioration in their ecological integrity is starting to occur. As well as providing further much needed data, this monitoring could act as an early warning system to trigger further counteracting measures to come forward with housing growth.
- 4.14. It was also recommended that local planning authorities work in partnership, both in the assessment of potential effects, and also in a co-ordinated approach to providing measures to counteract the future effects of recreational disturbance. Joint working with partners such as the Forestry Commission was also suggested.
- 4.15. This study gives a clear steer on the measures required to support development in the district that is located within 7.5km of the forest and heath areas of Breckland SPA.

**PPG 17 Study (March 2009);
Indoor sports facility study and Playing pitch study**

- 4.16. The overall aim of the PPG17 Study (March 2009) was to undertake research, analyse and present conclusions meeting the requirements of *Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation*. The report includes identification of local need, existing provision audit, proposed standard and strategic options and recommendations.

Local need

- 4.17. The local need was established through a consultation by questionnaire, the key points as highlighted in section 4.6 of the study were:
- the local importance attached to the provision of a variety of open spaces and facilities;
 - the value attached to informal and natural green space;
 - the need when planning for all types of recreation opportunity to take into account people's preparedness to travel, and requirement for different types of space. For children and young people this means easy access by foot/cycle, although this should be a universal aspiration in planning and locating all local community open spaces and recreation opportunities.

Audit of existing provision

- 4.18. The audit of existing provision used defined typologies (Annex 1) to provide a general indication of the overall supply, and demonstrate how provision is dominated by natural green space, followed by parks, gardens and recreation grounds, and informal green space. The figures did not include large areas of accessible countryside woodland, and other managed sites available for countryside recreation or golf courses identified. A summary of provision is shown below:

Table 2 Summary of existing open space provision by typology

Typology	ha/1000	Hectares
Parks, Gardens & Recreation Grounds	1.00	71.45
Outdoor Sport	0.14	10.26
Equipped Play Space	0.07	4.65
Informal Open Space	0.47	33.67
Natural Green Space	89.69	6,381.76
Allotments	0.26	18.85
Cemeteries & Chruyards	0.18	13.12
Outdoor Sport (Limited Access)	0.68	49.06
Natural Green Space (Limited Access)	17.22	1,225.58

Access standards for informal open space and natural green space

- 4.19. The report goes on to set access standards for each of the typologies (which were later adopted in the SPD, see section 5.2).
- 4.20. The quantity of informal open space was based on the National Playing Fields Association (NPFA) six acre standard which proposes that there should be provision of casual or informal playing space within housing areas as part of the overall standard. This is equivalent to 0.4 – 0.5 ha/1000 of informal space for play. The study found that informal space is valued by local people and as such must be recognised especially within housing areas, where it can provide important local opportunities for play, exercise and visual amenity that are almost immediately accessible. On the other hand open space can be expensive to maintain and it is very important to strike the correct balance between having sufficient space to meet the needs of the community for accessible and attractive space, and having too much which would be impossible to

manage properly and therefore a potential liability. The existing average level of provision of informal open space across the district is 0.47 ha per 1000 people. A distance of 480 metres (straight-line), or about 10 minutes walking time is proposed for informal open space.

- 4.21. The quantity of natural green space was based on Natural England's Accessible Natural Green Space Standard (ANGSt) which suggests that provision should be made of at least 2 ha of accessible greenspace per 1000 population. This recognises it is probably unrealistic to aim for a general minimum level of provision of 2 hectares per 1000 within towns, in particular, as it would be largely impossible to find the additional land available to achieve such an objective.
- 4.22. The existing average level of provision of accessible natural greenspace across the District is 89.69 ha/1000 people but with an uneven distribution. The proposed quantity standard for natural greenspace, has particular significance for new provision.
- 4.23. The study went on to note that space provided should be of an appropriate shape and character to allow for meaningful recreational use, and its possible integration with other types of open space opportunity. Wherever possible, local provision should be of at least 2 hectares in size but in the longer term there might be value in developing a hierarchy of provision as suggested by the ANGSt guidance, offering a range of smaller and larger opportunities set within a geographical dimension.
- 4.24. The consultation asked people how far they were willing to travel to different types of open space, including natural greenspace. The household survey identified that almost 80% of people were willing to travel up to 20 minutes to natural greenspace. In general, people were willing to travel further to natural greenspace than any other forms of open space and as a result a distance of 960 metres (straight-line) or between 20 minutes walking time is applied to natural greenspace.
- 4.25. The study suggested that no standards are proposed for routeways and corridors. However, the standards for informal open space and accessible natural greenspace can be applied and interpreted flexibly to create or improve existing routes for walking, cycling and riding in both built up and rural areas. For example, one hectare of informal open space is sufficient to create a route 10 metre wide and a kilometre long. In rural and urban fringe locations contribution to both the informal open space, and natural green space standards might be invested in helping to expand, and/or improve parts of the Rights of Way network. In built up areas, contributions might be used to improve links by foot and bike between important destinations such as work places, schools, shopping areas, parks, and leisure facilities. They might also be used to help improve access by foot and bike to the outlying Rights of Way network.

Application of standards

- 4.26. For each of the typologies, access to each typology of open space by Parish was established to inform where open space is required as part of new developments in order to achieve the Forest Heath access

standards. The information is reproduced below for the settlements of interest across all typologies.

Table 3 Access to open space by Parish – for main settlements

	No access	Partial Access	Good access				
Parish	Parks gardens and recreation grounds	Outdoor sports space	Children and young people's provision		Informal open space	Natural green space	Allotments
			Children's	Young people			
Brandon	Gap to E	Gap to E	Gap to E and SW		Gap to W		
Mildenhall			Gap to E and N				Gap to N
Newmarket		Gap to E and SE	Gap to N	Gap in Centre	Gap in centre	Gaps in access across whole settlement	Gap in centre and N
Lakenheath	Gap in N	Gap in N	Gap in centre	Gap to N	Gap to S		Gap to N
Red Lodge			New provision in progress	New provision in progress			
Beck Row		Gap in W			Gap in W		
Exning			Gap in centre		Gap in centre		
Kentford							
West Row	No information was given						

- 4.27. In general, the quality of informal open space was found to be above average or good, and sites were generally well maintained. Informal open spaces provide a significant opportunity to provide additional facilities and where sites have been identified as having the potential to improve, generally, this can be achieved relatively easily and at a reasonable cost.
- 4.28. The district is well provided for in terms of natural greenspace, offering a rich and wide variety of habitats with both biodiversity and recreational value. This asset should be maintained and protected. The quality of management for biodiversity is good, with appropriate levels of access balanced with areas for biodiversity. This is mostly achieved as a result of the large size of many of the areas. There is a need to improve provision of information and signage across many of the sites and in relation to the footpath and bridleway network.

Table 4 Summary of provision of open space – for main settlements

	Sufficient supply		Under supply
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Parish	Provision of open space (hectares)					
	Parks gardens and recreation grounds	Outdoor sports space	Equipped play space	Informal open space	Natural green space	Allotments
Brandon	7.00	6.79	2.04	2.06	2150.55	2.48
Mildenhall	7.19	8.49	2.11	2.00	693.67	0.04
Newmarket	11.44	11.28	3.24	2.46	15.00	3.63
Lakenheath	1.30	4.08	1.06	2.00	330.51	0.98
Red Lodge	4.97	1.80	0.15	3.18	18.84	0.18
Beck Row	2.03	3.15	0.60	1.36	703.43	1.22
Exning	0.05	1.94	0.47	0.45	1.94	2.66
Kentford	0.21	0.42	0.12	0.00	0.42	0.12
West Row	No information was given					

Recommendations of the PPG17 Study

4.29. The study recommends a strategic option with four basic components:

- existing provision to be protected;
- existing provision to be enhanced;
- existing provision to be relocated in order to meet local needs more effectively or make better overall use of land;
- proposals for new provision.

4.30. The report stated that new provision may be required where there will be a planned increase in population and will be required where development is proposed outside of the catchment of existing provision or the level of existing provision fails to accord with the quantity standard.

4.31. More specific recommendations relating to informal open space and natural green space include:

- flexible Use of informal open space; depending on local circumstances it may be appropriate to additional or improved park space, natural space, recreation ground space as there is clearly some interchangeability of function;
- Informal open space can provide an extremely valuable play resource to complement equipped provision, maximised by good design;
- the shape and size of space provided should allow for meaningful and safe recreation. It will not be appropriate for highway verges and other small pieces of roadside space (for example) to be counted towards such provision. However, these smaller spaces can serve another important function in improving the visual environment;
- the focus of the quantity standard for natural greenspace is that of new provision to reflect local circumstances and potentially include elements of woodland, wetland, heathland and meadow, and also informal public access through recreation corridors;
- for larger areas, where car borne visits might be anticipated, some parking provision will be required. The larger the area the more valuable sites will tend to be in terms of their potential for enhancing local conservation interest and biodiversity;

- the aim should be to create areas of accessible natural green space of at least 2 hectares that are well distributed throughout the urban areas. Wherever possible these sites should be linked which will help to improve wildlife value;
 - there should be parallel commitments to maintain natural green space through appropriate maintenance techniques reflecting the primary purpose of promoting natural habitats and biodiversity that can also be accessed and enjoyed by local people. Access by people should not be restricted to narrow corridors, but should allow freedom to wander;
 - in areas where it may be impossible or inappropriate to provide additional natural greenspace consistent with the standard other approaches should be pursued which could include (for example); changing the management of marginal spaces; creation of mixed species hedgerows; use of long grass management regimes; improvements to watercourses and water bodies; use of new drainage schemes / Sustainable Drainage Systems (SuDS); and use of native trees and plant. The above should in any event be principles to be pursued and encouraged at all times.
- 4.32. The recommendations of the PPG17 study, although dated, highlights the value of natural greenspace to the community. The study strongly supports the provision of new greenspace alongside development particularly the creation of multifunctional greenspace of at least 2ha in size which is linked to provide accessible corridors for all members of the community. Information of indoor sports facilities and playing pitches has been updated by two new studies however these do not add any further evidence on provision of informal or natural greenspace typologies. The studies are:
- *West Suffolk Indoor Sports Facility strategy 2015-2031 (2015)* is a sports facilities strategy which aims to deliver a network of community sport and leisure facilities. The community network of facilities and partnerships will provide local opportunities to participate in sport and leisure activities for the broadest range of customer groups;
 - *Playing Pitch Strategy West Suffolk Council September 2015* is a combined Playing Pitch Strategy (PPS) for Forest Heath District Council and St Edmundsbury Borough Council.

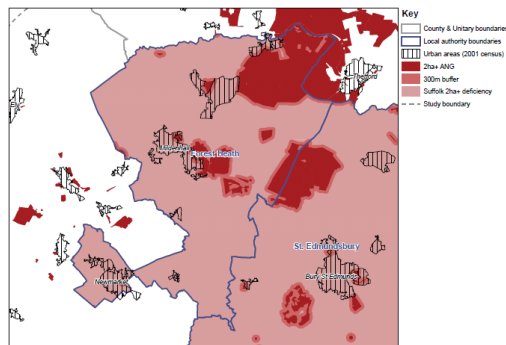
Analysis of Accessible Natural Greenspace Provision for Suffolk

- 4.33. Natural England's accessible natural green space standard (ANGSt) is a tool for assessing current levels of accessible natural greenspace, and planning for better provision. The three underlying principles of ANGSt are:
- improving access to greenspaces;
 - improving naturalness;
 - improving connectivity.
- 4.34. The ANGSt approach is based on distance thresholds, and defines the maximum distance that any resident should have to travel to reach accessible natural or semi-natural green space. The four tiers which are set out below recommends that everyone, wherever they live, should have one accessible natural green space:

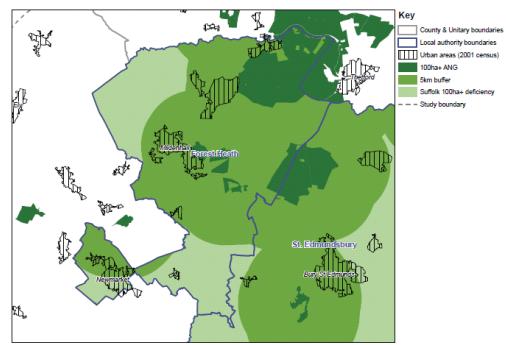
- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
 - at least one accessible 20 hectare site within two kilometres of home;
 - one accessible 100 hectare site within five kilometres of home; and
 - one accessible 500 hectare site within ten kilometres of home; plus
 - a minimum of one hectare of statutory Local Nature Reserves per thousand population.
- 4.35. The Natural England report 'Analysis of Accessible Natural Greenspace Provision for Suffolk⁸' considers the accessible natural greenspace provision across Suffolk using the ANGSt, and provides the evidence for greenspace planners and managers to look at improving both the quantity and quality of this important resource.
- 4.36. Within Suffolk, Forest Heath has the highest proportion of its area made up of ANG, at 13.5% it is over three times the county average. Forest Heath Council provided open space data which contributed to a slightly above average result at the 2ha+/300m and 20ha+/2km levels. Forest Heath performs particularly well at the 100ha+/5km and 500ha+/10km levels; at 77.9% it is three times the county average, at 60.9% it is over twice the county average respectively. At 15.6% Forest Heath has the highest proportion of households meeting all the ANGSt when compared to the other county figures.
- 4.37. Application of the ANGSt thresholds to FHDC settlements and its environs allows an understanding of the extent to which the population is served by green infrastructure at a range of scales. Accessible natural green space provision and deficiency is shown below.

⁸ Analysis of Accessible Natural Greenspace Provision for Suffolk Natural England June 2010

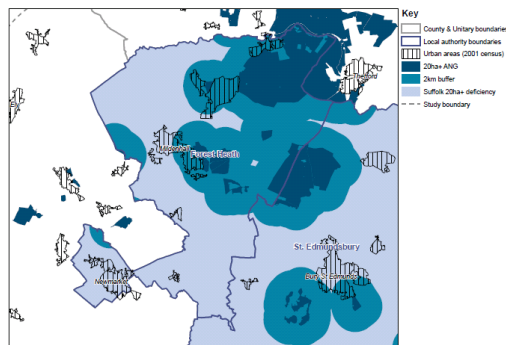
Plan 5a Accessible natural greenspace provision (2ha and above)



Plan 5c Accessible natural greenspace provision (100ha and above)



Plan 5b Accessible natural greenspace provision (20ha and above)



Plan 5d Accessible natural greenspace provision (500ha and above)

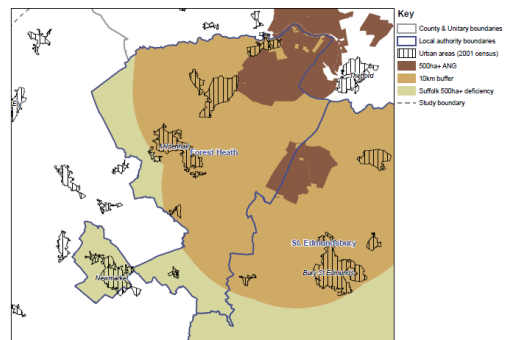
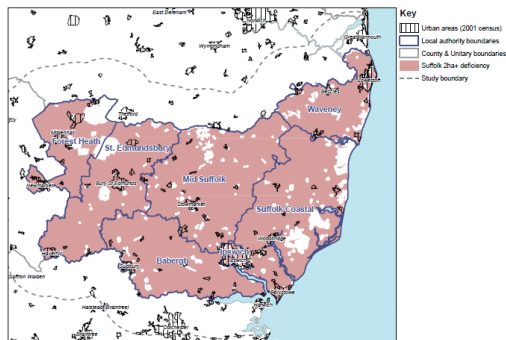


Figure 3 Accessible natural greenspace provision

4.38. The ANGSt analysis for Suffolk shows that the first priorities are to address ANG provision in the areas of deficiency highlighted in particular:

- the provision of 2-20 hectare sites and above in locations where they will be most effective in meeting the ANG needs of existing populations (below left);
- provision of 500 hectare sites within the 'corridor' of deficiency that runs through the centre of the study area from south-west to north-east covering most of Babergh, Mid Suffolk, Ipswich and to a lesser extent; Forest Heath, Suffolk Coastal, St. Edmundsbury and Waveney (below right).

Plan 11a Highlights those areas with no accessible natural greenspace provision at the 2ha level of ANGSt analysis



Plan 11d Highlights those areas with no accessible natural greenspace provision at the 500ha level of ANGSt analysis

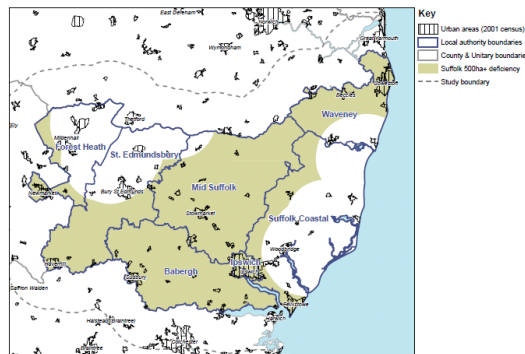


Figure 4 Areas with no accessible natural green space at the neighbourhood and sub-regional level

Interpretation of Suffolk ANGSt information for Forest Heath settlements

- 4.39. As part of this study, the accessible natural greenspace maps presented within the Suffolk ANGSt study have been used to indicate the provision and deficiency of accessible natural green space at the four different tiers for the settlements in Forest heath where development will be focused. The findings of this analysis are presented in the table below.

Table 5 Interpretation of Suffolk ANGSt information for Forest Heath settlements in 2010

Settlement	ANGSt (ha)				
	2 - 20	20 - 100	100 - 500	> 500	
Brandon					2-20ha provision is absent except within 300m of Thetford Forest edge
Mildenhall					2-20ha provision is absent except to the east within 300m of Mildenhall Woods
Newmarket					There is poor provision at all levels although Chippenham Fen provides coverage to the northern part of Newmarket. This analysis does not reflect that access to the gallops is available to the public in the afternoon
Lakenheath					2-20ha provision is absent except within 300m of Maidscloss Hill
Red Lodge					The Suffolk ANGSt shows no provision at the 2ha and 20ha scale however Red Lodge Heath SSSI is located within the built up area of Red Lodge and whilst this site cannot totally provide neighbourhood provision (2-20ha), it does provide provision at the district scale (20-100ha)
Beck Row					2-20ha provision is absent except within 300m of Aspal Close and 20ha provision is absent except in the east of the settlement
Kentford					
Exning					
West Row					Provision at the >500ha level is available in the east only

	No provision at that level		Some provision at that level – see notes		Provision at that level
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- 4.40. The results suggest that there is a consistent absence of accessible greenspace sites at a neighbourhood level which would provide a more convenient alternative for residents including the residents of any new homes. It appears that there is presently little alternative for residents than to travel by car to the larger sites which include many areas that are component parts of the Breckland *Natura 2000* sites.

FHDC Core Strategy - infrastructure and capacity requirements

- 4.41. Chapter 4 of the 2010 FHDC Core Strategy includes an assessment of infrastructure capacity for each of the settlements and sets out how these might be delivered in the plan period. Under the theme of green infrastructure and biodiversity the key types of infrastructure are: natural open space; sports pitches and non-pitch sports; and allotments. Natural open space information from the table on pages 83-120 of the Core Strategy is presented below:

Table 6 Core strategy assessment of Natural open space infrastructure capacity

Settlement	Capacity and Delivery/ Phasing – Natural open space
Brandon	Brandon has excellent natural areas – but nearest nature reserve is at Thetford Heath, Elveden. No provision needed
Mildenhall	Very good provision especially to east of town.
Newmarket	None – Chippenham Fen NNR and Wicken Fen NNR are nearest natural areas. Constrained by horse racing land. Provision as part of developments
Lakenheath	Local Nature Reserve at Maids Cross Hill No provision needed
Red Lodge	No Local Nature Reserve. Nearest at Thetford Heath. Develop options for developer support
Beck Row	Local Nature Reserve at Aspal Close. No addition necessary
Kentford	No Local Nature Reserve. However other green infrastructure available. Developer contributions to provide additional greenspace
Exning	No Local Nature Reserve. Development to provide additional natural greenspace
West Row	No Local Nature Reserve locally (but is one at Beck Row). Improve access to Beck Row

- 4.42. The assessment relies on access to Breckland Forest SSSI at Brandon and Mildenhall and on existing Local Nature Reserves of Maids Cross Hill and Aspal Close at Lakenheath and Beck Row respectively. The delivery of additional open space is recommended at Newmarket, Red Lodge, Kentford and Exning through development schemes and improvements to access between Beck Row and West Row.
- 4.43. This represents the situation in 2009 at the time when the evidence to support the Core Strategy was written.

Natural England's guidelines for the creation of SANG

- 4.44. Suitable Alternative Natural Green-space (SANG) provide mitigation for the likely impact of residential development on an SPA by preventing an increase in visitor pressure. The concept was developed for use in the Thames Basin Heaths but has been widely applied in other locations, including the New Forest.
- 4.45. SANG may be created from:
- existing open space of SANG quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public;
 - existing open space which is already accessible but which could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SPA;
 - land in other uses which could be converted into SANG.
- 4.46. The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires.
- 4.47. Concern over the impact of development on heathland habitats in the Thames Basin Heaths and in particular on the potential to provide suitable alternative accessible natural greenspace (SANG)⁹ resulted in Natural England's guidelines for the creation of SANG⁹. This document provides some guidance on the requirements of effective SANG. The following list of design requirements appear in Appendix 1 of that document.
- 4.48. Must/ should have¹⁰
- for all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANG and the SPA;
 - it should be possible to complete a circular walk of 2.3-2.5km around the SANG;
 - car parks must be easily and safely accessible by car and should be clearly sign posted;
 - the accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for;

⁹Natural England's guidelines for the creation of SANG version dated 03.07.07

¹⁰The wording in the list below is precise and has the following meaning: requirements referred to as "must" or "should have" are essential; and the SANG should have at least one of the "desirable" features.

- the SANG must have a safe route of access on foot from the nearest car park and/or footpath/s;
- all SANG with car parks must have a circular walk which starts and finishes at the car park;
- SANG must be designed so that they are perceived to be safe by users; they must not have tree and scrub covering parts of the walking routes;
- paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel;
- SANG must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable;
- all SANG larger than 12 ha must aim to provide a variety of habitats for users to experience;
- access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead;
- SANG must be free from unpleasant intrusions (e.g. sewage treatment works smells etc.);
- SANG should be clearly sign-posted or advertised in some way;
- SANG should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.

4.49. Desirable

- it would be desirable for an owner to be able to take dogs from the car park to the SANG safely off the lead;
- where possible it is desirable to choose sites with a gently undulating topography for SANG;
- it is desirable for access points to have signage outlining the layout of the SANG and the routes available to visitors;
- it is desirable that SANG provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable;
- where possible it is desirable to have a focal point such as a view point, monument etc. within the SANG.

4.50. The SANG at Thames Heath were intended to divert recreational use of the Thames Heath as local greenspace and design pointers are transferable to the situation in Forest Heath.

4.51. The principle of SANG would suggest that the council should also consider carefully the hierarchy of designated sites within the district to ensure that the current reliance on existing LNR is not also causing damage to these sites through recreational pressure.

5. Developing a Recreation Mitigation Strategy for Forest Heath District

- 5.1. This section considers the evidence presented and how this can be used to inform a strategy for suitable accessible natural greenspace in Forest Heath to support planned development.

Identification of distance within which recreational effects occur

- 5.2. Natural England has advised that 7.5km encompasses the distance at which the majority of recreational effects on Breckland SPA will be captured. This reflects the findings of the two visitor surveys undertaken in Breckland and was accepted following lengthy discussions held during the Breckland Local Plan process. This distance applies to the woodland and heathland areas of the SPA rather than the farmland areas as it is considered that visitors are likely to travel some distance to forest/heathland areas, but would only use farmland (for walking dogs etc.) near to home. With this in mind, the distance was largely put in place to protect nightjar and woodlark. Having considered the issue further, Natural England has further advised that it should also be applied to stone curlew, as this species also uses heathland (but not forested) areas. However, given the above, this distance does not need to apply to farmland areas.

Updated Core Strategy Assessment of Natural Open Space

- 5.3. The Core Strategy provided information on the presence of natural open space and this has been updated below based on current knowledge. Aspal Close LNR and CWS, Maidscross Hill LNR and SSSI and Red Lodge Heath SSSI are all located immediately adjacent to existing settlements. Evidence on the condition of the SSSI's suggests that the two SSSI's are reaching capacity to absorb additional visitors as follows:

- Maidscross Hill SSSI and LNR is a sizeable area (45ha) of very dry Breck grassland on a range of soil types, including the grassland covering a nearby reservoir. The site is recorded to be 99% in unfavourable declining condition;
- Red Lodge Heath SSSI (20ha) is a mosaic of dry acid grassland, chalk grassland, lichen heath and wet woodland with ponds. The site is recorded to be 100% in unfavourable recovering condition;
- Aspal Close LNR and CWS (20ha) is a remnant wood pasture with a grassland mosaic and veteran oak pollards. The site is heavily used by the community for recreational and social activities which continue to put pressure on the habitats and damage is not uncommon.

Table 7 Updated assessment of natural open space infrastructure capacity

Settlement	Capacity and Delivery/ Phasing at Core Strategy 2009	Update on Capacity and Delivery - Natural open space
Brandon	Brandon has excellent natural areas – but nearest nature reserve is at	Brandon continues to benefit from high quality natural open space as it is surrounded by forest,

Settlement	Capacity and Delivery/ Phasing at Core Strategy 2009	Update on Capacity and Delivery - Natural open space
	Thetford Heath, Elveden. No provision needed	heathland and the River Little Ouse corridor; in addition Brandon Country Park is located to the south. The SPA designated areas of the forest are considered to be sensitive to recreational disturbance
Mildenhall	Very good provision especially to east of town	Mildenhall continues to benefit from natural open space to the east and the River Lark corridor to the south. The SPA designated areas of the forest are considered to be sensitive to recreational disturbance. There is little provision to the west of the town
Newmarket	None – Chippenham Fen NNR and Wicken Fen NNR are nearest natural areas. Constrained by horse racing land. Provision as part of developments	Many of the gallops in Newmarket are accessible to the public after 1pm but not in the mornings. The Yellow Brick Road is a blue/green corridor which follows the alignment of the No 1 Drain between the A14 and the centre of the Town The town is constrained by horse racing land.
Lakenheath	Local Nature Reserve at Maids Cross Hill No provision needed	Maids Cross Hill LNR and SSSI is itself sensitive to recreational pressure and has a limited capacity for additional visitors.
Red Lodge	No Local Nature Reserve. Nearest at Thetford Heath. Develop options for developer support	Red Lodge Heath SSSI is located centrally within the settlement with public access however the site has a limited capacity for additional visitors. Recent development to the east of the settlement has provided new POS and retained tree belts.
Beck Row	Local Nature Reserve at Aspal Close. No addition necessary	Aspal Close LNR and CWS is located within the eastern part of the village. The site is constrained by development and has a limited capacity for additional visitors.
Kentford	No Local Nature Reserve. However other green infrastructure available. Developer contributions to provide additional greenspace	There is little natural open space at Kentford which is poorly served by PRow. Recent approvals within the village have the potential to provide some – river corridor greenspace adjacent to Kentford Hall and community greenspace to the rear of the Kentford PH
Exning	No Local Nature Reserve. Development to provide additional natural greenspace	Recent planning consent has included the provision of a 0.8ha accessible natural greenspace to the north-west of the village with adjacent POS delivered as part of the adjacent development.

Settlement	Capacity and Delivery/ Phasing at Core Strategy 2009	Update on Capacity and Delivery - Natural open space
		Development to provide additional
West Row	No Local Nature Reserve locally (but is one at Beck Row). Improve access to Beck Row	The village has good POS facilities and there are good PRow but no natural greenspace.

Approaches to calculating SANG in Forest Heath District

Existing provision standards

- 5.4. The Forest Heath District Council Supplementary Planning Document (SPD) for Open Space, Sport and Recreation Facilities October 2011¹¹ sets out the councils approach to the provision of open space, sport and recreation in conjunction with new housing development. This guidance details how the Council will implement:
- Forest Heath Local Plan (1995) Policies 10.2, 10.3 and 10.5, now covered in DM42 Open Space, Sport and Recreation Facilities;
 - Core Strategy Policy CS13; and
 - National Planning Policy Guidance Note 17: Open Space, Sport and Recreation (2002).
- 5.5. The SPD has been informed by a number of key studies:
- Forest Heath Playing Pitch Strategy (2002);
 - Forest Heath Play Strategy (2007);
 - Forest Heath PPG17 study (2007);
 - Forest Heath Green Space Strategy (2009);
 - Forest Heath Built Facilities Study (2009).
- 5.6. The standard for open space set out in the SPD is in table 8 below. The standards are for a minimum level of provision.

¹¹ Forest Heath District Council adopted supplementary planning document - Open space, sport and recreation - October 2011

Table 8 Standard for open space: quantity and access

Open Space Typology	Quantity Standard	Access Standard
Parks, Gardens and Recreation Grounds	0.5 ha/1000	480 metres (10 minutes straight line walk time)
Outdoor Sports Space	1.0 ha/1000	480 metres (10 minutes straight line walk time)
Children & Young people's Space	0.30 ha/1000	<ul style="list-style-type: none"> • Junior Provision - 450m (just under 10 minutes straightline walk time) • Youth Provision - 800 m (15 minutes straightline walk time)
Informal Open Space	0.5 ha/1000	480 metres (10 minutes straight line walk time)
Natural Greenspace	1.0 ha/1000	960 metres (20 minutes straight line walk time)
Allotments	0.3 ha/1000	480m (10 minutes straight line walk time)

- 5.7. This standard provides a starting point for the analysis of green space provision per head of population, and for the development of recommendations for open space provision in future developments. The typologies set out in the SPD are defined in the document (Appendix 1) however not all types would make a contribution to SANG. Those which should be excluded include allotments, some formal recreational spaces and outdoor sports space except where they are openly accessible to the public and multi-functional. The PPG17 study suggests a flexible approach with informal open space able to provide for other recreational uses. This is because such 'formal' open spaces provide for different types of recreation and offer a different experience to the semi-natural environments of the Brecks. The SPD therefore promotes a minimum provision of 2.3ha of open space per 1000 population that could contribute to SANG. Current advice on the implementation of the SPD within the district by officers guides developers to provide well connected useable spaces onsite wherever practicable.

SANG provision by population

- 5.8. Population growth assumptions are in section 2.2. The option for housing distribution has not yet been finalised however, based on the proposed increase of 17,000 people in the district and quantitative standards for accessible green space that could reliably contribute SANG in the Open Space SPD (2.3ha/1000 population), at least 39ha of new accessible open space will need to be created across the district.

Broad locations of SANG

- 5.9. A key issue will be to ensure that any new urban extensions are well provided for both in terms the provision of high-quality, neighbourhood scale open spaces and linkages for access. The distribution of houses will therefore influence where the SANG will need to be delivered. SANG sites will need to be readily accessible to the new residents of Forest Heath district they are designed to attract to ensure they will divert trips away from the Breckland European sites, preferably within a 300m walking

distance or connected by a green corridor. This will allow recreation pressure to be mitigated close to its source, enhancing its likely effectiveness.

- 5.10. The distribution of SANGs between the settlements and villages will broadly reflect the distribution of development. A proportion of the new homes have already been provided and the appropriate natural greenspace provision or alternative measures should have already been secured during the planning process for these developments. The quantity of greenspace in each settlement has been calculated using the distribution of houses in the SIR and the SALP 2017 submission documents and is shown in table 9 below. Figures have been calculated based on the number of homes to be provided (assuming occupancy of 2.34 persons per household) and a provision of 2.3ha per 1000 population.
- 5.11. The figure based on increase in number of homes is likely to be below that required using the Forest Heath SPD which is more refined because it takes into account the number of bedrooms of the dwellings to be built.

Table 9 Minimum open space requirements

Settlement	Number of homes and percentage distribution		Minimum open space (based on occupancy of 2.34 persons per household and 2.3ha/1000 population)(hectares)	
	SIR	SALP	SIR	SALP
Brandon	71	33	0.4	0.2
Mildenhall	1412	1412	7.6	7.6
Newmarket	321	321	1.7	1.7
Lakenheath	828	828	4.5	4.5
Red Lodge	1129	1129	6.1	6.1
Primary villages	454		2.4	
windfall	225		1.2	
Beck Row		206		1.1
Kentford		97		0.5
Exning		205		1.1
West Row		152		0.8
Total provision			23.6	23.3

Addressing the potential impact of additional visitors on the existing natural greenspaces in settlements

- 5.12. Natural England has expressed concern that the further development in some of the districts settlements could lead to recreational pressure that could damage the interest features of the existing sensitive open spaces that are designated nationally and/or locally. Although many of the settlements have access to a form of greenspace, much this is designated. In Lakenheath and Red Lodge the two sites of special scientific interest (SSSI) act as the main areas of natural greenspace for recreation and are therefore under increasing recreational pressure. In order to ensure that development is sustainable, there is a need to

ensure that either site protection is put in place or sufficient greenspace is available to take pressure off these sites.

- 5.13. Red Lodge Heath SSSI supports a nationally important assemblage of invertebrates, chiefly associated with dry grassland and wet woodland with ponds, including a nationally important population of the nationally rare five-banded tailed digger wasp *Cerceris quinquefasciata*. The site also supports a nationally important assemblage of rare plants. The SSSI is privately owned although there is access on a public right of way through the site as well as permissive access on a series of paths and tracks around the site.
- 5.14. The heathland and grassland habitats at Red Lodge SSSI are sensitive to inappropriate recreational use. The SSSI is actively managed including by a local interest group supported by FHDC and is under an HLS scheme in an agreement with Natural England.
- 5.15. Maidscross Hill Site of Scientific Interest (SSSI) is designated as Local Nature Reserve (LNR). The SSSI is already subject to significant recreational use and is currently in unfavourable condition. Maidscross Hill supports nationally rare plant species associated with the open calcareous grassland. These are; Breckland Wild Thyme *Thymus serpyllum*, Spanish Catchfly *Silene otites*, Grape Hyacinth *Muscari neglectum* and Sickie Medick *Medicago falcata*. Early Spider orchid, *Ophrys sphegodes* was recorded on the site but has not been seen in recent years. The main reason for the unfavourable status is the decline in the Grape Hyacinth population. The SSSI is owned by Elveden Estates and leased to Forest Heath DC under a 25 year lease; FHDC is the managing authority however some of the management work is undertaken by Elveden maintenance teams.
- 5.16. An increase in recreation pressure, as a direct result of additional development in Lakenheath will likely exacerbate the already unfavourable condition of the SSSI. Excessive trampling may result in a localised loss of vegetation and an increase in dog fouling may cause damage to rare plants at the site.
- 5.17. In considering proposals for development in both Lakenheath and at Red Lodge, detailed discussion between Natural England and the council (who manage these sites) and the local planning authority has concluded that the most effective mitigation (and possibly the only approach) currently available would be the provision of a warden for the sites who would also promote community involvement and education.
- 5.18. A wardening service, which could be partially funded through developer contributions, would have a number of roles including:
- Regular visits to the reserve by a trained warden will help re-enforce positive messages associated with responsible dog ownership and an understanding of the sensitive flora and fauna within the reserve.
 - A warden presence will establish the opportunity to inform and encourage the community to be involved with the site and develop a sense of ownership. The warden would aim to develop interest, over time, in being actively involved in the management of the site with a

view to run regular volunteer work parties, once every 1-2 months depending on uptake.

- A schedule of works can be delivered by a warden on a regular basis to maintain a good standard of cleanliness and safe and well-kept facilities.
- A warden would also have a direct input in to the site management plan. A warden could for example lead volunteer work parties, repair furniture and keep pathways clear.

Monitoring

- 5.19. Taking a precautionary approach and in accordance with the requirements of Article 6(2) of the Habitats Directive which requires a proactive approach to avoiding the deterioration of populations of species for which the SPA is classified, and the habitats upon which the bird interest features rely, before that deterioration is actually found to be occurring, monitoring is likely to be appropriate. Consultation with Natural England will be necessary to agree the level of monitoring.
- 5.20. Monitoring is likely to be required at a strategic scale for example monitoring of visitor levels and activities as development comes forward, and also ecological monitoring of the Annex 1 birds to determine whether any deterioration in their ecological integrity is starting to occur. In addition monitoring at a project scale in association with development may also be appropriate for example monitoring the success of SANG would inform future decision making in respect to strategic mitigation. Policies in the existing Forest Heath local plan (see section 3.18 – 3.24) allow the local planning authority to secure monitoring or contributions towards the cost where they are directly related to development.
- 5.21. As well as providing further much needed data, this monitoring could act as an early warning system to trigger further counteracting measures to come forward with housing growth.

Design of SANGs

- 5.22. The points set out in the Natural England SANGs guidance give all the elements of an excellent SANG, but in Forest Heath District much of the area is designated; in some areas there is simply very little space within settlements in which to include greenspace. Therefore the approach should be to increase greenspace and green networks in a flexible way, for example by providing greenspace which may be smaller than 2ha where space does not allow but ensure it is connected to other greenspace by attractive walking and cycling routes. The following, adapted from the Natural England guidance, are the key features that should be prioritised where possible remembering that smaller areas will not be able to accommodate all of these; :
- it should be possible to complete a circular walk of 2.3-2.5km around the SANG however this could be achieved through connected networks;
 - the accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for;

- the SANG must have a safe route of access on foot for the target users for example new residents or dog walkers and must be designed so that they are perceived to be safe by users;
- paths must be easily used and well maintained with a mix of surfaced and unsurfaced finishes to avoid the site becoming too urban in feel;
- SANG must be perceived as semi-natural spaces, with intrusion of artificial structures limited to areas close to developed edges except for the essential infrastructure such as way-markers and benches. Larger SANG larger must aim to provide a variety of habitats for users to experience;
- access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead;
- SANG should be clearly sign-posted or advertised in some way. This is particularly relevant where the provision is being made through connected networks or improvements to PRow. In this case SANG should have leaflets and/or websites advertising their location to potential users and it would be desirable for leaflets to be distributed to new homes in the area;
- For larger SANG it is desirable for access points to have signage outlining the layout and the routes available to visitors;
- For larger SANG it is desirable to provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable;
- where possible it is desirable to have a focal point such as a view point, monument etc. within the SANG;
- for larger sites there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it.

6. Proposed Recreation Mitigation and Monitoring Strategy

- 6.1. Provide at least the level of open space as required in the SPD as a minimum on all development sites in Forest heath District.
- 6.2. Where there is already sports pitch and formal provision available within the community that is easily accessible, take a flexible approach to increase the natural open space through the SPD provision.
- 6.3. In those settlements shown through the ANGSt study to be deficient in 2-20ha local green space, aim to create new open space of 2-20ha in association with new development. These locations are shown in table 10. This new local greenspace should be located within 300m of the new dwellings so there is easy access for the new residents, and the design should, as much as is practicable, follow the guidelines set out in section 5.12 above.
- 6.4. Secure the provision of a large SANG area, at least 10ha, such as a country park with adequate car parking facilities and natural areas which fulfil many of the requirements of the Natural England SANG design
- 6.5. New green space should be connected to the existing GI network through the retention of existing and creation of new features such as tree belts, hedges, grasslands, and river corridors.
- 6.6. For development sites in settlements that are within 7.5km of the heathland and forest components of the SPA, improve and connect the wider green infrastructure network to provide access and walking routes that will be approximately 2.5km in length. This can be achieved through new paths, signage, new connections or bridges or safe crossings across busy roads.
- 6.7. A warden service as detailed in section 5 above should be established where development could lead to recreational pressure that could damage the interest features of the existing sensitive open spaces that are designated nationally and/or locally. These sites include Maids Cross Hill SSSI and LNR, Red Lodge Heath SSSI and Aspal Close LNR.
- 6.8. Where appropriate and proportionate to the scale and location of development monitoring should be secured. Consultation with Natural England will be necessary to agree the level of monitoring.

Table 10 Summary of evidence and mitigation strategy for each settlement

Settlement and no of homes	Minimum amount of open space based on increase in no of dwellings Table 9	Updated Capacity and Delivery of Natural Open Space	ANGST (ha)				Approach to mitigation
			2	20	100	500	
Brandon	0.2 ha	Brandon continues to benefit from high quality natural open space as it is surrounded by forest, heathland and the River Little Ouse corridor; in addition Brandon Country Park is located to the south. The SPA designated areas of the forest are considered to be sensitive to recreational disturbance					<p>Any development would need to provide accessible natural green space and walking routes proportionate to the size of development.</p> <p>Improvements to existing public open space and footpaths links would divert residents from using the forest designated as SPA for recreational use. Focus could be the River Little Ouse corridor.</p>
Mildenhall	7.6ha	Mildenhall continues to benefit from natural open space to the east and the River Lark corridor to the south. The SPA designated areas of the forest are considered to be sensitive to recreational disturbance. There is little provision to the west of the town					<p>There is little provision to the west of the town and new natural greenspace should be created as an alternative to Mildenhall woods. There is an opportunity to provide this with strategic development in this location. This location would be appropriate for a large SANG (10ha+) which would totally accommodate dog walkers, by providing adequate facilities for this user group as well as others.</p> <p>Any development would need to provide accessible natural green space and walking routes proportionate to the size of</p>

							development, including improvements to the existing footpath network and links to existing greenspace. Focus could be the River Lark corridor.
Newmarket	1.7ha	Many of the gallops in Newmarket are accessible to the public after 1pm but not in the mornings. The Yellow Brick Road is a blue/green corridor which follows the alignment of the No 1 Drain between the A14 and the centre of the Town The town is constrained by horse racing land.					Provision of new greenspace as part of developments and by improvements to existing green spaces including new links to the Yellow Brick Road blue/green corridor.
Lakenheath	4.5ha	Maidscross Hill LNR and SSSI is itself sensitive to recreational pressure and has a limited capacity for additional visitors.					<p>Additional provision of natural open space is required as part of any developments in particular provision of new natural green space to divert pressure away from the SPA and existing Maidscross Hill SSSI.</p> <p>In addition new access routes are required which could potentially focus on the Cut-Off Channel</p> <p>A warden service for Maidscross Hill SSSI and LNR would increase the capacity of the site to accommodate visitors.</p>
Red Lodge	5.8ha	Red Lodge Heath SSSI is located centrally within the settlement with public access however the site has a limited capacity for additional visitors. Recent development to the east of					<p>Additional provision as part of future developments in particular extension of the existing greenspace provision and/or improvements to divert pressure away from the SPA and Red Lodge Heath SSSI</p> <p>In addition new access routes are required</p>

		the settlement has provided new POS and retained tree belts.					<p>potentially focusing on the River Kennet corridor and routes connecting the existing and proposed greenspace.</p> <p>A warden service for Red Lodge Heath SSSI would increase the capacity of the site to accommodate visitors.</p>
Beck Row	Proportionate share of 1.1ha	Aspal Close LNR and CWS is located within the eastern part of the village. The site is constrained by development and has a limited capacity for additional visitors.					<p>Any further development must provide accessible natural green space and/or walking routes proportionate to the size of development. There is potential to focus on links to the east and to the Cut Off Channel.</p> <p>A warden service for Aspal Close CWS and LNR would increase the capacity of the site to accommodate visitors. Aspal Close LNR could also be improved if a new location for the football ground were to be found in the future.</p>
Kentford	Proportionate share of 2.4ha, approx. min 0.5ha	There is little natural open space at Kentford which is poorly served by PRow. Recent approvals within the village have the potential to provide some river corridor greenspace and community greenspace to the rear of the Kentford PH					<p>Recent approvals within the village have the potential to provide some river corridor greenspace and community greenspace to the rear of The Kentford PH, which could be connected.</p> <p>Any further development must provide accessible natural green space and walking routes. Potential to focus on safe pedestrian routes connecting the various parts of the village away from the main B1506 Bury Road and potentially on the River Kennet corridor</p>
Exning	Proportionate share of 2.4ha, approx. min	Recent planning consent has included the provision of a 0.8ha accessible					<p>Additional provision as part of future developments. There is potential to extend the existing new provision northeast of the</p>

	1.1ha	natural greenspace to the north-west of the village with adjacent POS delivered as part of adjacent development. Development to provide additional					settlement; and provide additional links to the existing GI including tree belts and PRow network
West Row	Proportionate share of 2.4ha, approx. min 0.8ha	The village has good POS facilities and there are good PRow but no natural greenspace.					Any further development must provide accessible natural green space and walking routes proportionate to the size of the development. There is potential to focus on the existing PRow network and the River Lark corridor

Brandon

Sensitivities

- 6.9. The town is located within 7.5km of heath and forest components of Breckland SPA.
- 6.10. The town is also located on the River Little Ouse Valley.
- 6.11. The town is located close to the following SSSI's which are component parts of Breckland SPA and SAC: Breckland Farmland SSSI (nearest component is 0.8km); Breckland Forest SSSI (nearest component is immediately adjacent to the settlement boundary); Lakenheath Warren SSSI (3.5km); Grime's Graves SSSI (3.2km); Thetford Golf Course & Marsh SSSI (4.4km); RAF Lakenheath SSSI (2.3km); Wangford Warren & Carr SSSI (1.8km); and Weeting Heath SSSI(1.3km).
- 6.12. There is an accessible CWS at Brandon Playing Fields.

Existing facilities

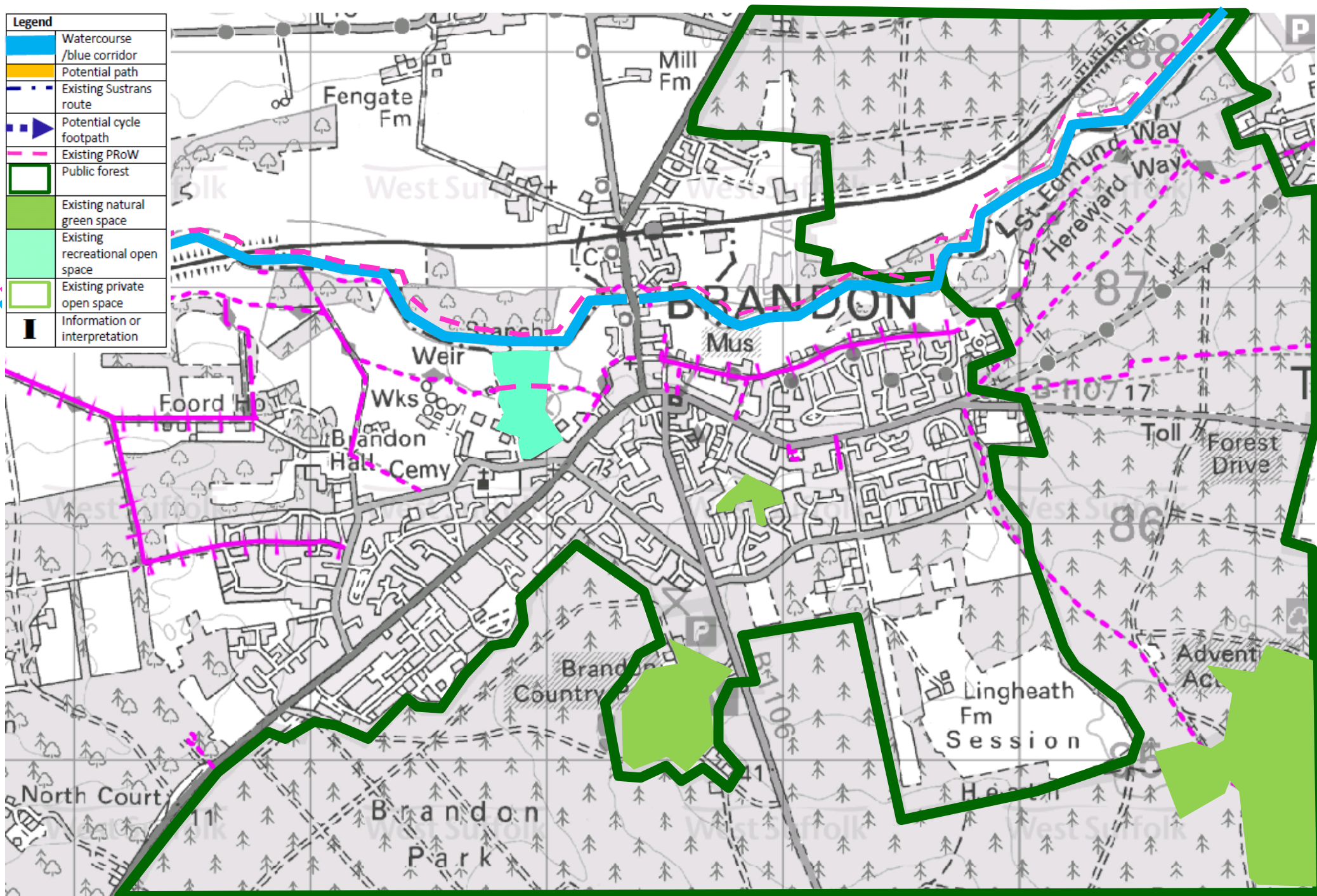
- 6.13. The town has a recreation ground located to the west of the town centre with a number of facilities including a playground, skate park, leisure centre and bowls club. There is also a fishing lake to the north on the boundary close to the River Little Ouse.
- 6.14. Brandon Country park is located south of the town (approximately 1.2km from the town centre) on the B1106. High Lodge Forest Park Centre is located to the south-east (approximately 3.3km from the town centre) and accessed off the B1107. These two locations are popular honey pots and a focus for recreational use of Thetford Forest.
- 6.15. There are a number of Public Rights of Way giving access to the countryside in the vicinity of the town including the Little Ouse path which follows the route of the river, and the St Edmunds and Hereward Way which runs parallel to, but south of the River Little Ouse in the vicinity of Brandon.
- 6.16. The Public Forest around Brandon (north-east, east and south-west) which is designated for its biodiversity interest is available for recreational access by foot.

Opportunities

- 6.17. Opportunities to increase and improve public access to the River Little Ouse corridor should be explored including routes to Santon Downham and Thetford and to Lakenheath railway station and Lakenheath Fen RSPB reserve.
- 6.18. Improved footpath and cycle links to Brandon Country Park should be promoted to encourage sustainable travel to this site. Improved footpath/cycle access to High Lodge should also be explored.

- 6.19. Any development, excepting small town centre sites, that comes forward must include significant strategic open space and recreational routes outside of sensitive areas that provides options for new residents to exercise their dogs. Smaller developments should focus on providing safe access to existing facilities particularly for children and young people.

Legend	
	Watercourse /blue corridor
	Potential path
	Existing Sustrans route
	Potential cycle footpath
	Existing PRoW
	Public forest
	Existing natural green space
	Existing recreational open space
	Existing private open space
	Information or interpretation



Mildenhall

Sensitivities

- 6.20. The town is located within 7.5km of heath and forest components of Breckland SPA.
- 6.21. The town is located close to the following SSSI's which are component parts of Breckland SPA and SAC: Berner's Heath, Icklingham SSSI (6.3km); Breckland Farmland SSSI (nearest component is 1.1km); Breckland Forest SSSI (adjacent to the eastern settlement boundary); Cavenham-Icklingham Heaths SSSI (1.1km); How Hill Track SSSI (3km); Deadman's Grave, Icklingham SSSI (4.5km); Eriswell Low Warren SSSI (4km); Foxhole Heath, Eriswell SSSI (2.4km); Lakenheath Warren SSSI (5km); RAF Lakenheath SSSI(5.6km); Weather & Horn Heaths, Eriswell SSSI (6km); and West Stow Heath SSSI (7km).
- 6.22. Rex Graham Reserve SSSI is located 1.3km to the east and Wilde Street Meadow, Mildenhall SSSI is located 2.8km to the north;
- 6.23. Mildenhall Wood CWS is located to the north and west of the town and is designated for its biodiversity interest. The woods form a gateway to the public forest with good access for recreation. There are additionally other CWS's in the area including College Heath Road CWS.

Existing facilities

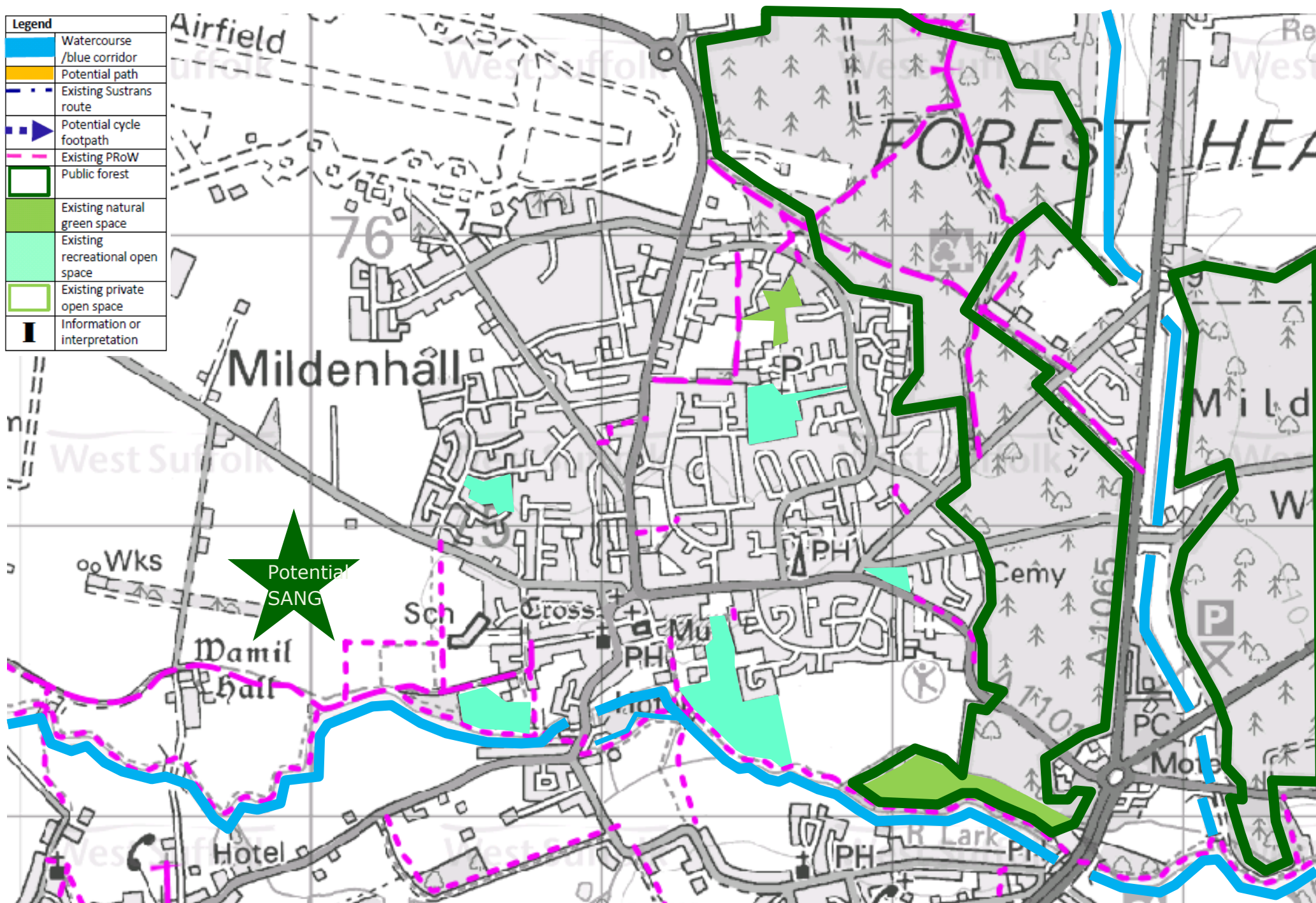
- 6.24. The town has a recreation ground located to the south-east of the town centre known as the Jubilee fields. There is also a football ground, cricket ground and additional facilities to the south west of the town centre. Additional parks are located on St Johns Close, Douglas Park on Comet Way and Half Moon Park on Bury Road.
- 6.25. The town is also located immediately to the north of the River Lark valley blue/green corridor.
- 6.26. There are a number of Public Rights of Way giving access to the countryside in the vicinity of the town including the River Lark Path which follows the route of the river, and to Mildenhall woods in the north-east.
- 6.27. Barton Mills Riverside reserve is a Local Nature Reserve located south-east of the town within the River Lark Valley.
- 6.28. The Public Forest to the east of Mildenhall is available for recreational access by foot.

Opportunities

- 6.29. Opportunities to increase and improve public access to the River Lark should be explored including connecting routes, providing access to West Row.

- 6.30. Improved footpath and cycle links should to be promoted to encourage sustainable travel to sites to the south of the River Lark and to the east of the A11 if development were to be considered in those locations.
- 6.31. Within the forest to the east and to the north-east of Mildenhall, there is a large existing bridleway network which could be sympathetically enhanced through improvements to existing routes and additional linkages having regard to the qualifying features of the SPA and SSSI's. Linkages to the River lark Valley and any new green infrastructure would be beneficial in management of recreational users.
- 6.32. Any development that comes forward must include significant strategic open space that provides options for new residents to exercise their dogs ideally with specific off lead areas. Strategic growth to the west would provide an opportunity to provide a significant open space of at least 10ha in size, which could function as a SANG. It is important that this SANG totally accommodates dog walkers, by allowing visitors to take their dog off lead, providing numerous dog bins, interesting areas in which to walk and allow their dog to run and signed walking routes (if large enough). The SANG site would require a management plan and potentially a warden. Connectivity to other existing resources in the River Lark valley would significantly increase the value of any such space.
- 6.33. A pedestrian/cycle link to the north of the town should also be considered to promote sustainable access.

Legend	
	Watercourse /blue corridor
	Potential path
	Existing Sustrans route
	Potential cycle footpath
	Existing PRoW
	Public forest
	Existing natural green space
	Existing recreational open space
	Existing private open space
	Information or interpretation



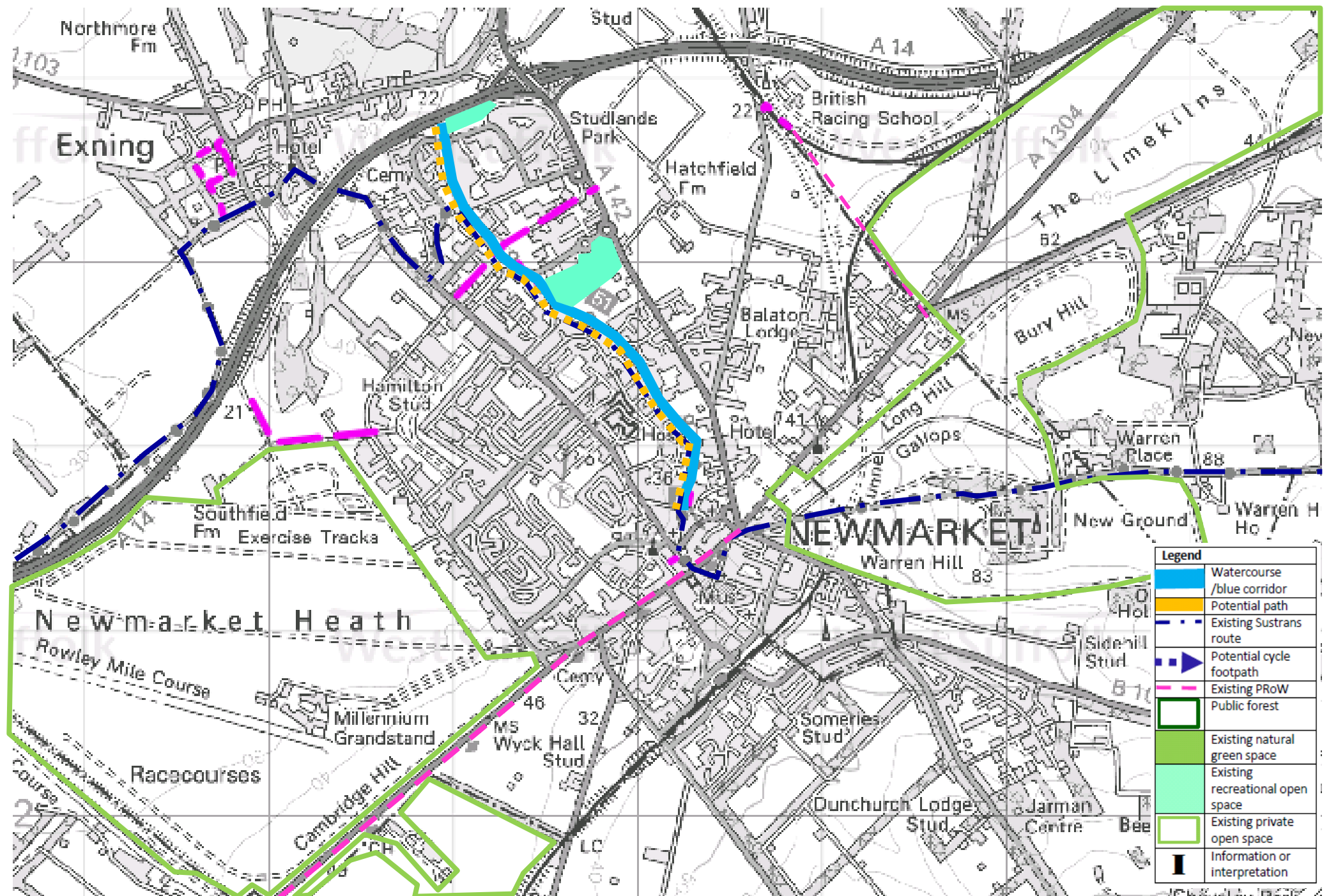
Newmarket

Sensitivities and Existing Facilities

- 6.34. Newmarket is approximately 7km from the most westerly part of the SPA (Breckland Farmland SSSI) but more than 11km from the nearest heathland location at Cavenham-Icklingham Heaths SSSI and from the nearest woodland location at Mildenhall Woods.
- 6.35. Brackland Rough SSSI (100% favourable condition), Chippenham Fen & Snailwell Poor's Fen SSSI (100% unfavourable recovering condition), and Snailwell Meadows SSSI (87% favourable condition, 13% unfavourable recovering condition) are all located to the north of Newmarket, and Devils Dyke SSSI is to the south-west. Chippenham Fen SSSI is also a National Nature Reserve and RAMSAR site.
- 6.36. There are a number of statutory and non statutory designated sites around the town, important for their grassland, these include Newmarket Heath SSSI (87% favourable condition, 13% unfavourable recovering condition) to the north-east and south-west of the town, and Newmarket Heath CWS is located to the west of the town. Side Hill CWS is located to the east of Newmarket. There are additional county wildlife sites close to the town but located within East Cambridgeshire; the Limekilns and adjacent areas CWS, and Warren Hill and adjacent areas CWS both to the east. Litter is recorded as being an issue at Newmarket Heath SSSI.
- 6.37. The gallops are available for recreational purposes in the afternoon however public access is not available in the mornings when these areas are used by the town's racehorses.
- 6.38. The Yellow Brick Road is the local name used for a blue/green corridor and recreational access route from the A14 at Studlands Park to central Newmarket at Exeter Road along the watercourse known as the *No 1 Drain*. Public open space is situated in a number of locations along and connected by this route in particular at: Studlands Park close to the A14; Studlands Park community centre; and George Lambton playing fields.
- 6.39. There are also local parks in a number of locations around the town.

Opportunities

- 6.40. Suffolk County Council are working through the Newmarket Vision structure to consider opportunities to improve walking and cycling routes in Newmarket, such as the Yellow Brick Road route from Studlands through to the Town Centre.
- 6.41. Additional public open space should be delivered with any development to meet the needs of the new residents. It would also be beneficial to provide safe links to the Yellow Brick Road.
- 6.42. There are opportunities to further improve the safe sustainable route for walkers and cyclists between Exning and Newmarket.



Lakenheath

Sensitivities

- 6.43. The settlement is located with 7.5km of heath and forest components of Breckland SPA.
- 6.44. The settlement is close to the following SSSI's which are component parts of Breckland SPA and SAC: Breckland Farmland SSSI (2.7km), Breckland Forest SSSI (3.2km), How Hill Track SSSI(6km), Eriswell Low Warren SSSI (2.6km), Foxhole Heath Eriswell SSSI (3km), Lakenheath Warren SSSI (1.8km), RAF Lakenheath SSSI (0.9km), Wangford Warren & Carr SSSI (3.3km), and Weeting Heath SSSI (5km).
- 6.45. Maidscross Hill LNR and SSSI is a sizeable area (45ha) site however it is recorded to be 99% in unfavourable declining condition and is already subject to visitor pressure. The site also has a limited capacity to accommodate visitors because of the proximity to RAF Lakenheath.
- 6.46. Pashford Poors Fen SSSI is also located to the east of Lakenheath and is accessible from Station Road in the north of the village by a footpath. This site is recorded to be in 100% unfavourable- no change condition with the reason reported to be water levels and abstraction.
- 6.47. Lakenheath Poors Fen is located to the west of the village recorded to be in 100% unfavourable –declining condition owing to drainage of the surrounding land.

Existing Facilities

- 6.48. There is an existing recreation ground located to the south-west of the village which includes a community pavillion and formal play facilities.
- 6.49. There is a small playground at Brisco Way.
- 6.50. Maidscross Hill LNR provides as area of natural greenspace that is available for recreation.

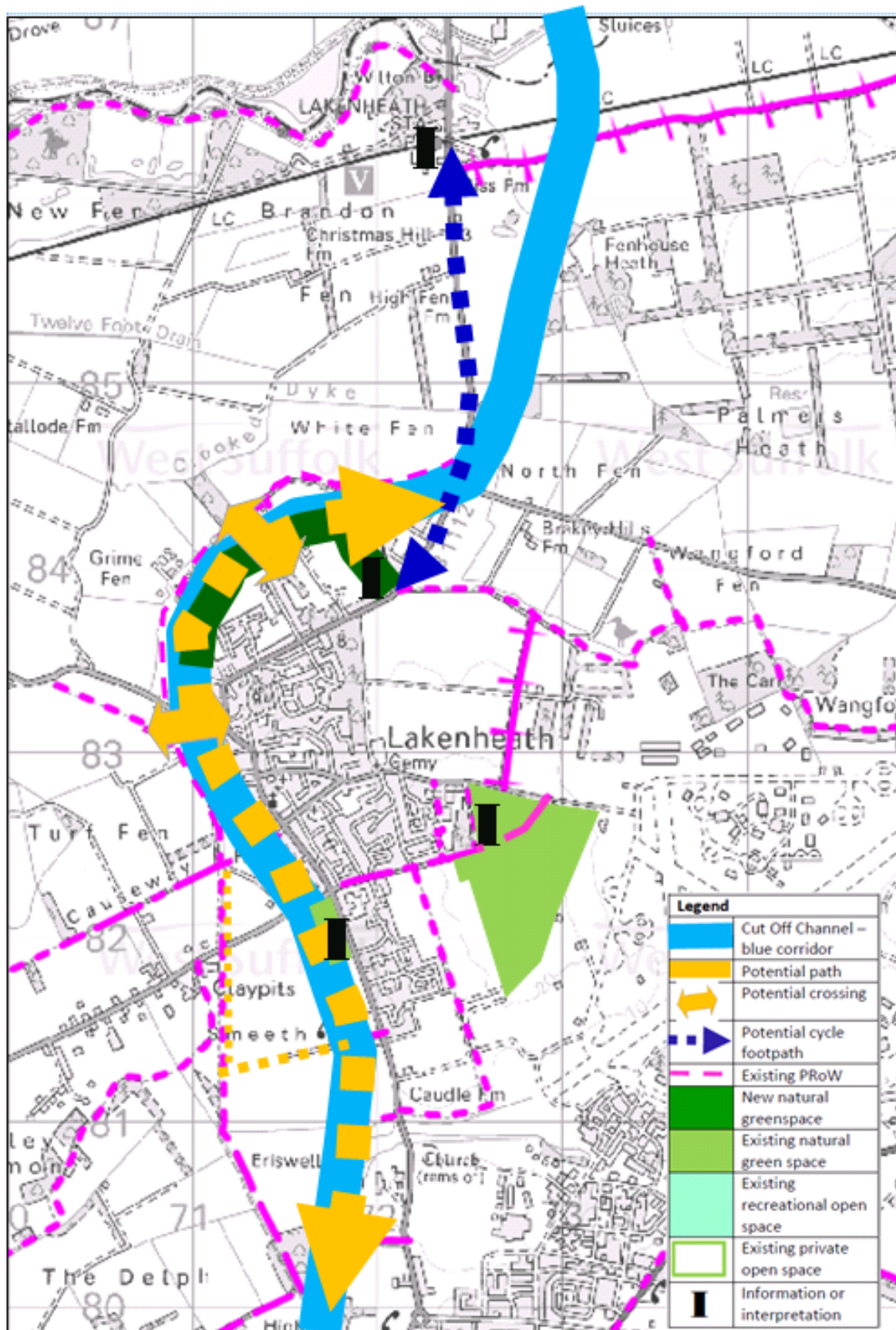
Opportunities

- 6.51. Walking connectivity between the south and the north of the village utilising the Cut-off channel connecting with the recreation ground and pavilion. Projects would include:
- public access along the Cut Off Channel embankment on the natural surface from the existing PRoW north of Eriswell Hall in the south, to Hiss Farm/Lakenheath Station in the north.
- 6.52. Potential to develop (through improvements and signage) village walks utilising the raised bank of the Cut-off channel for example from Eriswell Hall, north to Lakenheath and continuing to the B1112, on to Lakenheath

Station and the RSPB reserve, and incorporating footpaths in the fens to the west and the Brecks to the east. Projects would include:

- cycle and footpath connection adjacent to the B1112 to Lakenheath Station including improvements for pedestrians at the Cut-off Channel/B1112 bridge;
- bridge across the Cut-off Channel north of Drift Road;
- public access across the EA bridge at Sedge Fen Road;
- improvements to existing footpath adjacent Lakenheath Lode (drain);
- Fenland footpath link (Smeeth Drove track) to existing footpath adjacent Lakenheath Lode (drain).

- 6.53. Larger sites (or adjoining sites that can be planned together) have the potential to provide strategic open space or SANG. This could be achieved through setting aside an area of land for natural greenspace preferably utilising the existing blue green corridor of the Cut-off Channel and retention of any existing onsite habitats. This area should be well connected to the proposed new housing and existing footpath network.
- 6.54. Sites adjacent to Maids Cross Hill SSSI and LNR may present an opportunity to extend open space for use as accessible natural green space, however there is concern that addition housing close to the LNR will impact on this site and this has been confirmed by Natural England. Potential projects to ease pressure on the LNR from housing located immediately adjacent are restricted to the provision of a warden service. This would include aspects of site maintenance to ensure a good standard of cleanliness and safe and well-kept facilities and community engagement inform and encourage the community to be involved with the site and develop a sense of ownership.



Lakenheath greenspace and opportunities plan

Red Lodge

Sensitivities

- 6.55. The settlement is located within 7.5km of heath and forest components of Breckland SPA.
- 6.56. The settlement is close to the following SSSI's which are component parts of Breckland SPA and SAC: Black Ditches, Cavenham SSSI (7km); Breckland Farmland SSSI (1.4km); Breckland Forest SSSI (3.4km); Cavenham-Icklingham Heaths SSSI (4km); How Hill Track SSSI (7km); and Deadman's Grave, Icklingham SSSI (6.5km).
- 6.57. Red Lodge Heath SSSI is located within Red Lodge. The site is recorded to be 100% in unfavourable recovering condition. Whilst the trampling and disturbance created by public access is considered to be positive, this needs to be balanced by other urban issues of, for example, vehicle access for fly-tipping and unofficial off-road recreation.
- 6.58. Red Lodge Warren CWS is located to the north west of the village

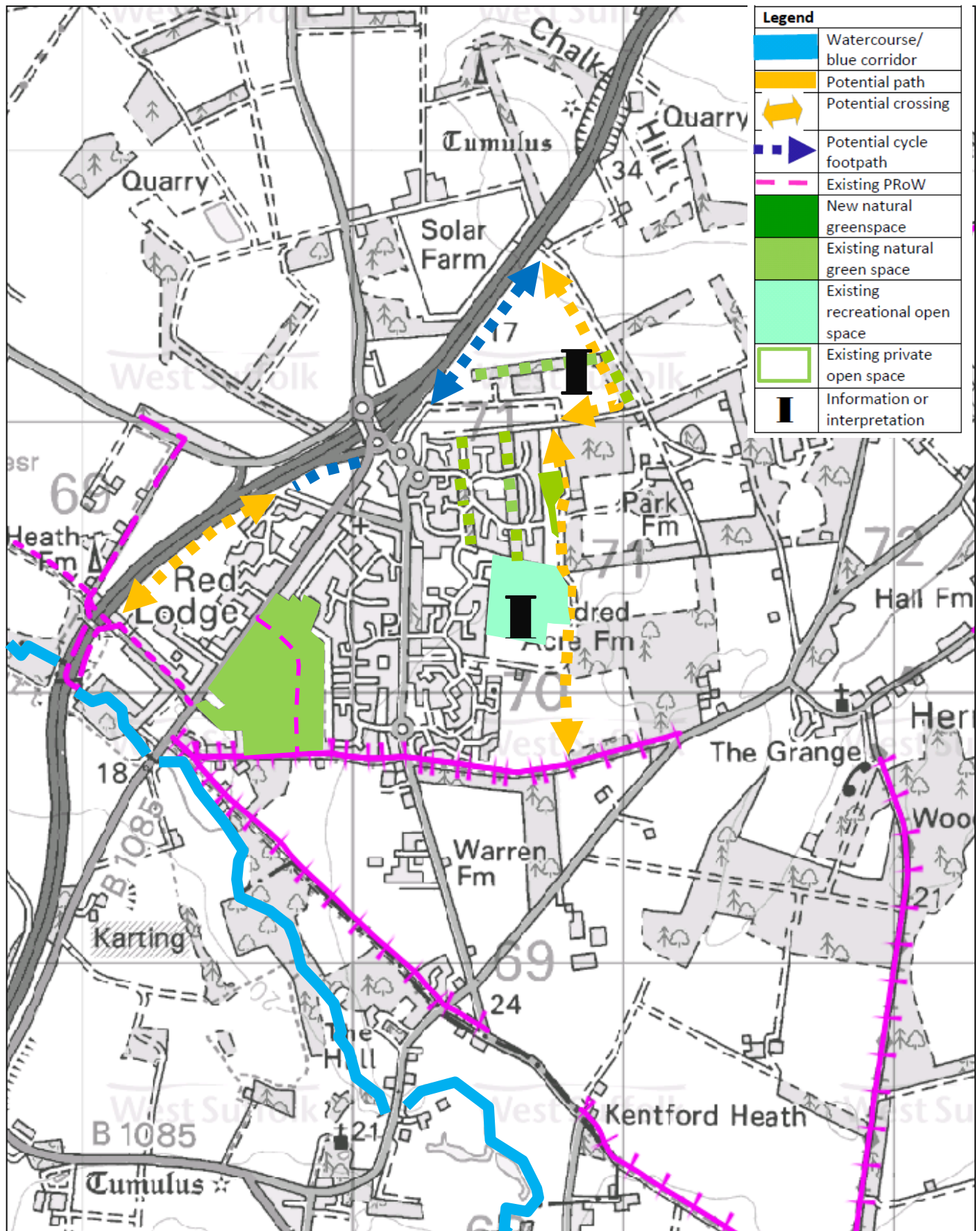
Existing facilities

- 6.59. The River Kennet is located to the south of the town. There are a number of existing rights of way which follow the route of the river and link across the A11. Green Lane and The Carrops are byways.
- 6.60. There is a public right of way through Red Lodge Heath and a network of informal paths.
- 6.61. Recent development to the east of the town has delivered a strategic open space which includes playing fields and other facilities connected to a network of footpaths through retained existing tree belts. Ongoing development to the west is retaining an informal area of grassland immediately adjacent to the A14 which will include public access.

Opportunities

- 6.62. Opportunities to provide sustainable routes to Mildenhall and to Kennet station should be explored,
- 6.63. Larger sites (or adjoining sites that can be planned together) have the potential to provide strategic open space that could form part of a mitigation strategy for recreational impacts on European sites. This could be achieved by locating new greenspace next to existing facilities or existing tree belts and woodland. This is particularly relevant to the east of the settlement where the existing access network should be expanded. A particular asset would be a route on the eastern edge of the settlement taking advantage of the existing tree belts and woodland blocks to increase the amenity and character of the route and connecting into the existing network.

- 6.64. Any development along the A11 should have regard to the issues associated with the road and its impact on residential amenity and should take the approach of providing an easement which could be used to provide pedestrian access with the view to linking the north of Red Lodge to the River Kennet valley.
- 6.65. All opportunities to provide public access and connectivity should be explored including village walks and also focusing on the River Kennet potentially providing links to Kennet and Kentford in the south. There is an existing link to Freckenham in the north-west.
- 6.66. There is potential to increase the capacity of Red Lodge Heath SSSI to accommodate visitors through a warden service. This would include aspects of site maintenance to ensure a good standard of cleanliness and safe and well-kept facilities and community engagement inform and encourage the community to be involved with the site and develop a sense of ownership.



Beck Row

Sensitivities

- 6.67. The settlement is located within 7.5km of heath and forest components of Breckland SPA.
- 6.68. The village is located close to the following SSSI's which are component parts of Breckland SPA: Breckland Farmland SSSI (2.8km); Breckland Forest SSSI (1.2km); Cavenham-Icklingham Heaths SSSI (4.6km); How Hill Track SSSI (4.9km); Eriswell Low Warren SSSI (3.8km); Foxhole Heath, Eriswell SSSI (3.1km); Lakenheath Warren SSSI(4.4km); RAF Lakenheath SSSI (4.5km).
- 6.69. Aspal Close Local Nature Reserve is located within the village of Beck Row and is surrounded by residential development. This is a remnant wood pasture with a grassland mosaic and veteran oak pollards. The site is heavily used by the community for recreational and social activities which continue to put pressure on the habitats and damage is not uncommon.

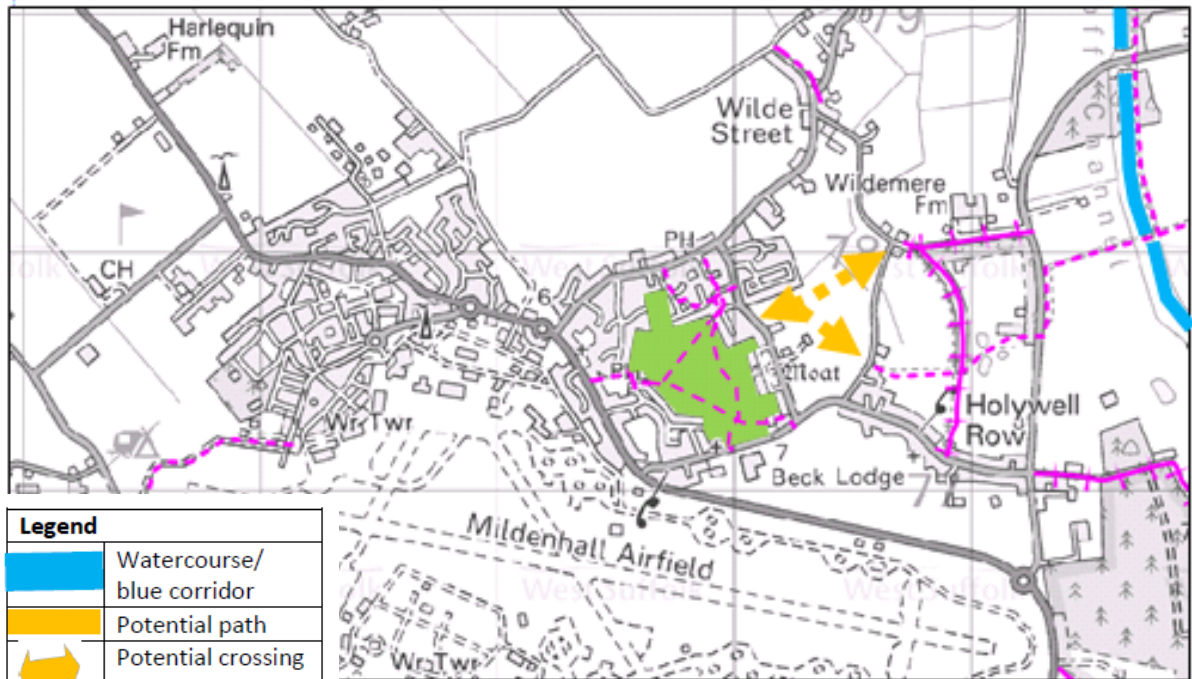
Existing facilities

- 6.70. Aspal Close LNR is crossed by a number of Public Rights of Way and a network of informal paths. The site is also the location of the football ground.

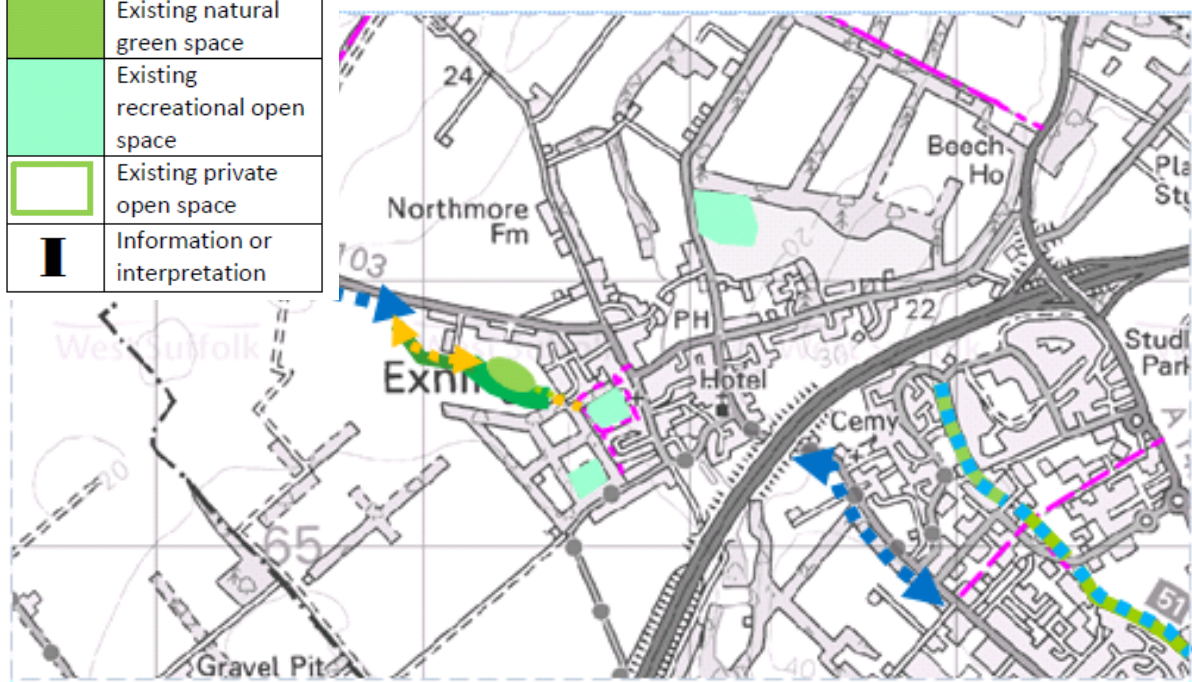
Opportunities

- 6.71. Development at Smoke House Inn, Skeltons Drove is proposing additional linked open space located immediately adjacent to an existing space on Harvester Way.
- 6.72. All opportunities to provide public access and connectivity should be explored including village walks and also focusing to the north of the settlement on the many Drovers, and to the south-west to West Row and the River Lark valley.
- 6.73. Development to the east of the settlement could deliver footpath links to the existing PRoW network at Holywell Row and Wildemere Lane.
- 6.74. Opportunities to extend and enhance Aspal Close LNR and create links to the wider countryside should be explored including the relocation and restoration of the football ground when an opportunity arises.
- 6.75. There is potential to increase the capacity of Aspal Close LNR to accommodate visitors through a warden service. This would include aspects of site maintenance to ensure a good standard of cleanliness and safe and well-kept facilities and community engagement inform and encourage the community to be involved with the site and develop a sense of ownership.

6.76.



Beck Row greenspace and opportunities plan



Exning greenspace and Opportunities plan

Exning

Sensitivities

- 6.76. The eastern side of Exning is approximately 9.5km from the most westerly part of the SPA (Breckland Farmland SSSI) but more than 13km from the nearest heathland location at Cavenham-Icklingham heaths.
- 6.77. Brackland Rough SSSI (100% favourable condition), Chippenham Fen & Snailwell Poor's Fen SSSI (100% unfavourable recovering condition), and Snailwell Meadows SSSI (87% favourable condition, 13% unfavourable recovering condition) are all located to the northeast of Exning. Chippenham Fen is also a National Nature Reserve and RAMSAR site.

Existing facilities

- 6.78. This village has good recreational facilities with a recreation ground and play facilities, football ground and cricket pitch.
- 6.79. There are no PRoW from the village into the wider countryside.

Opportunities

- 6.80. Development of Land off the Drift, Burwell Road , which has planning permission and construction has commenced, will deliver 0.8ha of the adjacent land for public open space as an additional community resource for the new residents and the village.
- 6.81. Any additional development should seek to extend this resource and additionally provide green corridors and/ or footpath/cycleway linkages to:
- the adjacent recreational resources;
 - the Burwell Road and beyond to Burwell and the fenland PRoW network;
 - Newmarket.

Kentford

Sensitivities

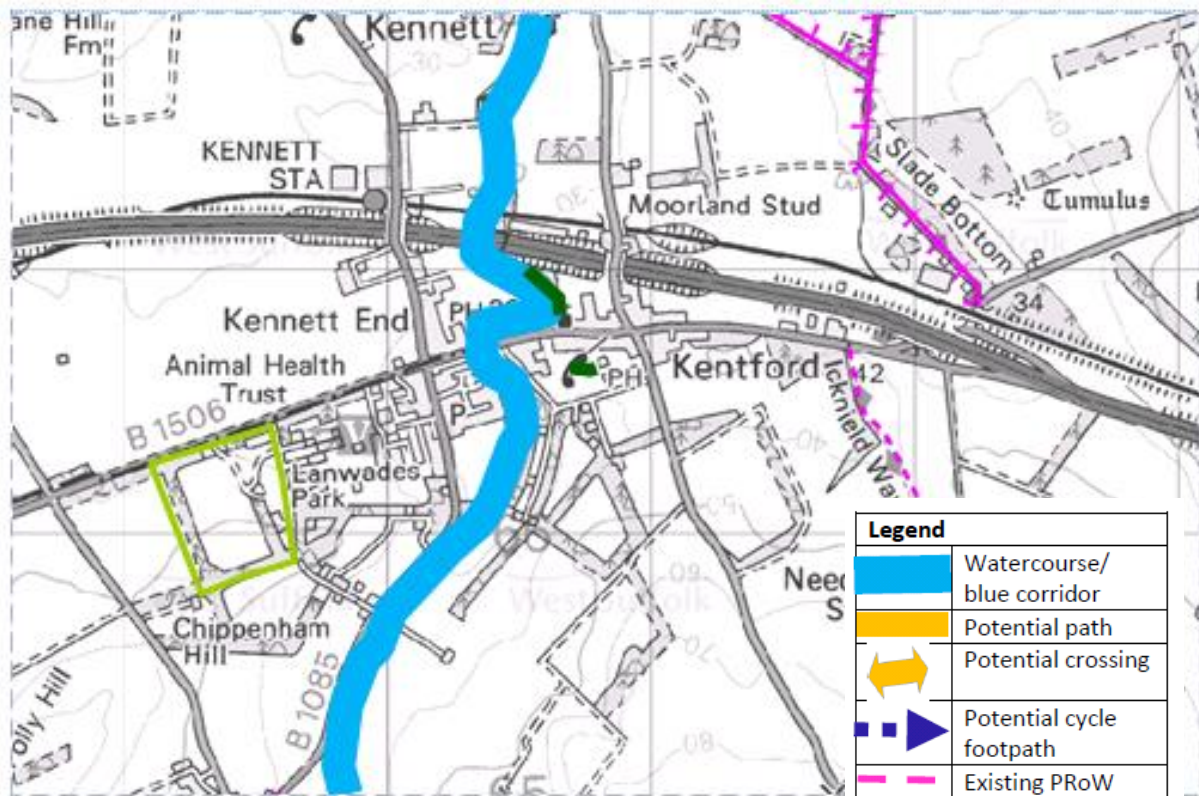
- 6.82. The settlement is located within 7.5km of heath and forest components of Breckland SPA.
- 6.83. The village is located close to the following SSSI's which are component parts of Breckland SPA: Breckland Farmland SSSI (1km); Breckland Forest SSSI (7.2km); and Cavenham-Icklingham Heaths SSSI (6.3km).

Constraints

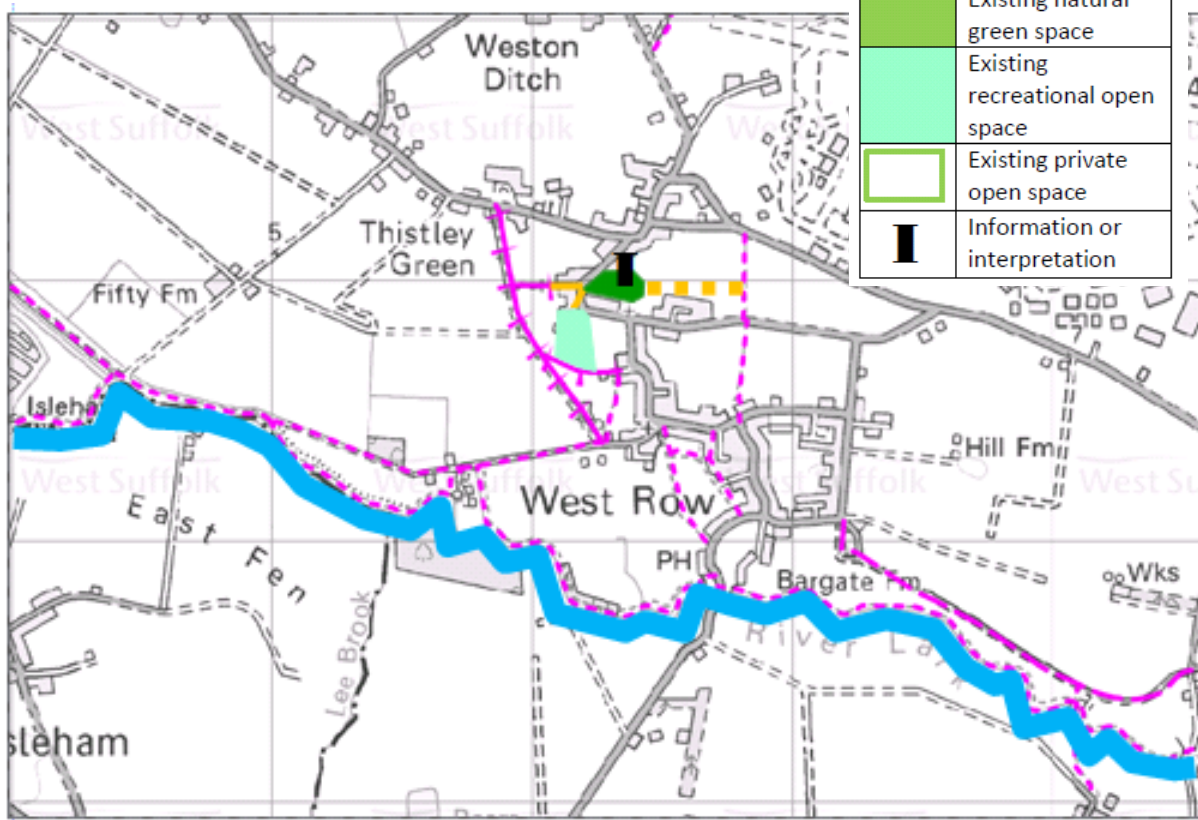
- 6.84. There are no open spaces within this settlement.
- 6.85. There are no footpaths which pass through the village. The nearest footpath is Icknield Way which is located 800m to the east of the Herringswell Road cross road.
- 6.86. Lanswade Park (home of the Animal Health Trust) is open to the public from May to September 11am - 4pm on Saturdays, Sundays and Bank Holidays. The park actively encourages visitors to bring their dogs and advertises two dog routes. The site also has a visitor centre, car parking, gift shop and café. These facilities could however be withdrawn at any time.

Opportunities

- 6.87. Development at Kentford Hall will deliver natural green space adjacent to the river including a community orchard.
- 6.88. The outline permission for development at Meddler Stud (DC/14/0585/OUT) includes use of the river corridor for HRI facilities although there is an open space adjacent; ideally the open character of river corridor and the strategic gap between the two settlements should be protected.
- 6.89. Outline permission for development on Land to the rear of Cock Public House presents the opportunity to safeguard the area to the rear of the public house which is currently used for community events.
- 6.90. All opportunities to provide new public access and connectivity should be explored in particular focusing on safe pedestrian routes connecting the various new residential parts of the village away from the main B1506 Bury Road
- 6.91. New access and connectivity associated with the River Kennet potentially providing links to Kennet and Red Lodge in the north and Moulton in the south.



Kentford greenspace and opportunities plan



West Row greenspace and opportunities plan

West Row

Sensitivities

- 6.92. The village is located within 7.5km of heath and forest components of Breckland SPA.
- 6.93. The village is located close to the following SSSI's which are component parts of Breckland SPA and SAC: Breckland Farmland SSSI (4.8km), Breckland Forest SSSI (3.3km), Cavenham-Icklingham Heaths SSSI (5.4km), How Hill Track SSSI (6.9km), Eriswell Low Warren SSSI (6.8km), Foxhole Heath SSSI (5.5km), Lakenheath Warren SSSI (8km), RAF Lakenheath SSSI (7km).

Existing facilities

- 6.94. The village has an existing recreation ground to the west of the village.
- 6.95. There are good PRow providing options for walks in the adjacent countryside and to the River Lark valley.
- 6.96. The River Lark valley is located to the south of the village and provides opportunities for recreation and walking connecting to Mildenhall in the east and Judes Ferry Bridge in the west.

Opportunities

- 6.97. Potential to develop (through improvements and signage) village walks to the river (Gravel Gardens, Judes Ferry Bridge and Kings Staunch Cottage) also utilising the Drovers to the west of the village.
- 6.98. Walking/cycling connectivity to Mildenhall.
- 6.99. Re-creation of village greens as part of developments (Suffolk LCA states -West Row, Beck Row, Holywell Row – each formerly had numerous small or linear greens that now only survive as place-names (e.g. Thistley Green and Holmsey Green).
- 6.100. Development adjacent to the existing village facilities could provide an opportunity to extend that open space.
- 6.101. Larger sites have the opportunity to provide strategic open space linked to the existing PRow network that could form part of a mitigation strategy for recreational impacts on the European sites. Outline planning application submitted for land at Beeches Road includes proposals for a large area of open space immediately adjacent to Beeches Road which would serve the new residents.

Appendix 1 - Open Space typologies set out in the SPD

Parks, Gardens and Recreation Grounds

These are generally multi-functional spaces which take on many forms, and may embrace a wide range of functions, including:

- informal recreation and outdoor sport;
- play space of many kinds (including for sport and children's play);
- providing attractive walks to work;
- offering landscape and amenity features;
- areas of formal planting;
- providing areas for 'events';
- providing habitats for wildlife.

Outdoor Sport Space

These include seasonal and fixed sports spaces that are openly accessible to the public. Facilities include sports pitches, including cricket, football and rugby. Also includes fixed sports spaces such as tennis courts, artificial turf pitches and bowling greens. Very often these facilities are located within parks or recreation grounds, and as such, many of the facilities, especially sports pitches are multi-functional.

That is they can be used for sport one day, and for the rest of the week function as a space to walk and play. Those facilities that are managed privately or by schools/colleges etc. would be included if they are subject to a public access agreement with the local authority.

Informal Open Space

The category is considered to include those spaces open to free and spontaneous use by the public, but neither laid out nor managed for a specific function such as a park, public playing field or recreation ground; nor managed as a natural or semi-natural habitat.

Children and Young People's provision

This includes equipped children's space (for pre-teens), and provision for teenagers.

The former comprises equipped areas of play that cater for the needs of children up to and around 12 years. The latter comprises informal recreation opportunities for, broadly, the 13 to 16/17 age group, and which might include facilities like skateboard parks, basketball courts and 'free access' Multi Use Games Areas (MUGAs).

Natural Greenspace

This includes a variety of natural spaces including meadows, river floodplain, woodland and copse all of which share a trait of having natural characteristics and wildlife value, but which are also open to public use and enjoyment. Some natural green-spaces have a nature

conservation designation in recognition of their biodiversity interest and these include Sites of Special Scientific Interest, (SSSI), Special Protection Areas, (SPA), Special Areas of Conservation, (SAC), Local Nature Reserves, (LNR) and County Wildlife Sites, (CWS). A project level Habitats Regulations Assessment, (HRA), will be required for any development that could have an adverse impact on the SPA qualifying features for Stone Curlew, Woodlark and Nightjar. Where it cannot be proven that development will not be not harmful then the development will not be allowed, in line with Policy CS2 of the adopted Core Strategy DPD.

Allotments

Allotments provide areas for people to grow their own produce and plants. It is important to be clear about what is meant by the term 'Allotment'. The Small Holdings and Allotments Act 1908 obliged local authorities to provide sufficient allotments and to let them to persons living in their areas where they considered there was a demand for allotments. The Allotment Act of 1922 defines the term 'allotment garden' as:

"an allotment not exceeding 40 poles in extent which is wholly or mainly cultivated by the occupier for the production of vegetable or fruit crops for consumption by himself or his family"

(n.b. 40 Poles equals 1,210 square yards or 1,012 square metres. A Pole can also be known as a Rod or Perch.)

Appendix 2 Natural England comments on Natural Green Space Study

Comment	Officer response and action
<p>Natural Accessible Greenspace Study</p> <p>We welcome this report, which has taken into account our comments regarding the Issues and Options consultations. We find the study has clearly used an evidence based approach and has correctly identified the areas which are lacking natural greenspace. We are keen to work with Forest Heath to improve the natural greenspace, ecological connectivity and green infrastructure provision within Forest Heath district.</p> <p>We note that this report refers to the 10km distance within which to assess potential cumulative recreational effects to Breckland SPA, in accordance with the Breckland Visitor Survey 2010, which found that residents may travel up to or over this distance to reach a site with visitor facilities. However, as explained in the draft HRA screening document, following extensive discussions at the time of the Statement of Common Ground for Breckland's Core Strategy, Natural England concluded that 7.5km encompasses the distance at which the majority of visitors travelling to the forest and heath areas of Breckland SPA will be captured. Therefore in order to avoid confusion during the appropriate assessment process, as the recommendations within this document are relevant to that document, we consider that this study document should either follow the same assumptions as the Habitats Regulations Assessment (HRA) or should include a section explaining why the two approaches differ.</p> <p>Note that to date it has not been proved that strategic recreational effects are having an effect on the qualifying species of Breckland SPA, but it is likely that key areas within Thetford forest that support nightjar and woodlark will be affected by increasing development in the district, so we welcome the approach set out in the report to address this potential issue. We welcome the</p>	<p>Comments noted</p> <p>An amendment to the Accessible natural greenspace study will set out a consistent approach based on a distance of 7.5km.</p> <p>Comments noted</p>

Comment	Officer response and action
<p>recommendations to increase natural greenspace in the district. The points set out in our guidance concerning SANGS give all the elements of an excellent SANG, but we fully appreciate that as much of the area is designated, in some areas there is simply very little space within settlements in which to include greenspace. Therefore we agree that you should aim to increase greenspace and green networks in a flexible way as suggested in the report, for example perhaps by providing a smaller greenspace than 2ha if space doesn't allow but then ensuring it is connected to other greenspace by attractive walking and cycling routes.</p> <p>That said, we consider it would be beneficial to the protection of the designated sites in the vicinity if Forest Heath and neighbouring authorities considered including a large (10ha+) SANG, such as a country park, with adequate parking, facilities and natural areas. In our view a SANG of this size would be likely to encourage visitors from settlements that are lacking undesignated natural greenspace in the vicinity, such as Brandon and Lakenheath if appropriately managed and promoted across the district. Studies of current SANGs suggest (Panter & Liley, 2015) that a SANG will not entirely divert residents from visiting the natural site, as they often visit those sites because they enjoy specific attributes of that site, such as nature for example, but these sites can certainly take some of the pressure of by absorbing some of the dog walking activities. It is very important that SANGs totally accommodate dog walkers, by allowing visitors to take their dog off lead, providing numerous dog bins, interesting areas in which to walk and allow their dog to run and signed walking routes (if large enough). Including dog bag machines at entrances appears to be a useful addition on some sites. For example, these have been added to entrances at Barnock Hills and Holes NNR in Suffolk and our site manager is happy with the result.</p> <p>We agree that many of the locally and nationally designated sites that provide the only natural greenspace for settlements are showing signs of recreational pressure. An excellent way to</p>	<p>Consideration has been give to where a SANG of approximately 10ha would most appropriately be located such that it could be effective and deliverable. West of Mildenhall is a strategic growth location where there is currently no accessible greenspace, excepting PRow available to meet the need of the new community. The existing green infrastructure such as the River Lark corridor could be the focus for this SANG. Additional wording will be added to SA4(a) to guide the size of the SANG in this location which could provide some of these facilities. The accessible natural greenspace study will also be amended to be consistent with the policy.</p> <p>Details on the type of facilities that should be considered will be added.</p>

Comment	Officer response and action
<p>increase the capacity of sites currently under pressure such as Red Lodge Heath and Maidcross Hill SSSIs would be to extend the sites with the addition of extra land adjacent to the sites or provide walking routes and enhancements to connect these sites to external greenspace. Furthermore these sites are likely to be able to support a greater capacity if a warden was employed to oversee all the sites, as discussed with your authority earlier this month. In our view Aspal Close Local Nature Reserve (LNR) would be able to support residents better if the football pitch is able to be relocated, if there is a more appropriate location available.</p> <p>We welcome suggestions to enhance the river corridor areas; blue corridors are good for both wildlife and people if managed correctly. We are very happy to discuss the levels of monitoring that will be required once you have firm proposals in place.</p>	<p>Consideration has been given to whether Maidscross Hill SSSI/LNR and Red Lodge Heath SSSI and Aspal Close can be extended, however there are currently no options that would facilitate this. The Accessible natural greenspace study includes numerous opportunities for the enhancement of PRow close to development sites and in the vicinity of thee sites that could be delivered as part of development proposals.</p> <p>The Council has updated the Accessible natural greenspace study evidence document and included a warden service to the suite of strategic measures recommended, that can be implemented to mitigate for increasing levels of recreation associated with the increase in housing. The Council will continue to work with Natural England to implement measures proportionate to the type, scale, and location of development in the plan. The policy wording in the SALP sets out the requirement for these measures to be included as part of the development proposals.</p>

Appendix 3 - Parish Council Comments on Natural Greenspace Study

Lakenheath PC	<p>This consultation paper was discussed at our last Planning Subcommittee meeting. We are encouraged that there is a desire to increase recreational and walking facilities within the district.</p> <p>There is no public right of way near the river bank for the cut off channel to the best of our knowledge. How can this area then be allocated as a footpath?</p> <p>We feel sure that the Ministry of Defence would be likely to object to the increase of the Maidscross Way site being extended bearing in mind that it falls within their safeguarding zone from the munitions storage areas.</p>	<p>Comments noted</p> <p>The Council is working with partners to deliver access along the route of the Cut-off Channel</p> <p>The MoD is a consultee for development proposals in the area and therefore have the opportunity to comment.</p>
Exning PC	<p>We have here at Exning a small riverside area which is a popular local amenity. Over the last few years it has become untidy and neglected and the Parish Council is now looking at how it can be tidied up somewhat.</p>	<p>The Parish Council could explore ways of improving this site irrespective of this natural greenspace study which aims to secure additional facilities to support new residential development,</p>
Kentford PC	<p>Would love to create a walking connection with Moulton (there is one that goes half-way from Moulton , but then stops)</p> <p>Worth noting that main building at Landswade park is up for sale and this right to walk might be lost.</p> <p>Very exciting – love the idea of orchard at area D. Some sort of Anglos-Saxon info board here would be good.</p> <p>Have our eye on this – as key focus for the village – we have potential funds to support some sort of outdoor community focus – wooden gazebo idea. I think this is a key area – access to the river at this point would allow a. potential to bridging the river and connecting both sides of the river away from the main road. There is potential for perhaps using the Anglia water access route</p>	<p>Comments noted and amendments made where appropriate. The Council will continue to work to deliver improvements as appropriate.</p>

	<p>to connect to the shop and beyond.</p> <p>b. I will explore getting access to the large boating lake (part of Landwades) and opening up a large area of natural river.</p> <p>Currently being used for Village Fete – I’m aware the proposed carpark will have to cut into this area, but with thoughtful planning, this lovely “effectively” village green area can be maintained and improved.</p> <p>Absolutely key – allowing villagers to move around away from the busy Bury Road would be vital for safe and non-motorised connectivity. I’m concerned that the main proposed cycle route is down the same busy road. Would prefer to see another path from the Kentford pub through pub development to meddler to shop, then to farrier’s and lambert, allowing a circular route and connecting back with Kentford lodge (via Church Bungalow.)</p> <p>Will continue to explore Old Packhorse bridge area</p>	
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