

North Red Lodge – Allocation SA10

**Document to Inform a Habitats
Regulations Assessment for the
Development Masterplan**

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1 Introduction

1.1 Background & Proposals

- 1.1.1 Aspect Ecology has been commissioned by R J Upton '87 Trust and RJ Upton (Kings Warren) Ltd. to prepare a document to inform a Habitats Regulations Assessment (HRA) in respect of proposed development to the north of Red Lodge, Suffolk, centred at grid reference TL 706 713.
- 1.1.2 The proposals are for mixed use development of the site to provide around 300 dwellings, 8ha of employment land, a new local centre, and opportunities for the Pines Primary School to expand.
- 1.1.3 The site is allocated for a mixed use development in the Forest Heath area of West Suffolk Councils Site Allocations Local Plan (SALP)¹ under Policy SA10.
- 1.1.4 Requirement A of that policy states planning applications will only be determined once the masterplan for the whole site has been approved by the Local Planning Authority, and that this should be subject to a project-level HRA. Accordingly, this document carries out an assessment of the Masterplan Document. An HRA will also accompany any future planning application.

1.2 Site Overview

- 1.2.1 This document assesses the masterplan boundary, as shown on Figure 3 in the Masterplan document.
- 1.2.2 The site lies to the north of the settlement of Red Lodge and comprises circa 28 hectares (69 acres). It is a triangular shape and comprises agricultural land and The Pines Primary School. The site is bound to the west by the A11 to the south by residential development, an allocation site known as SA9(b) Land East of Red Lodge: North, and Park Wood. Open fields and three Estate farm cottages to the north east beyond Park Farm Drive and one to the south east.
- 1.2.3 The site allocation wraps around Hamelin's office and warehouse which is located in the middle of the new development area. A small area located to the north and west of Hamelin's primary access sits outside the allocated site. As it is located within the settlement boundary it has been included within the masterplan boundary to enable a comprehensive development for the area to be brought forward. Conversely, Hamelin's tree belt immediately north of the warehouse and its eastern SUDs ditch are included within the SALP site allocation boundary. As these are within separate ownership, they have been excluded from masterplan.

¹ West Suffolk Council (September 2019) Site Allocations Local Plan.

2 Legislation and Assessment Methodology

2.1 Legislation

2.1.1 All areas in England classified as Special Areas of Conservation (SACs) or Special Protection Areas (SPA), also known as European sites, receive statutory protection under the Conservation of Habitats and Species Regulations 2017 (the Regulations). These Regulations transpose into UK legislation the ‘Habitats Directive’ 1992 (92/43/EEC) and the ‘Birds Directive’ 2009 (2009/147/EC). National planning policy in the form of the National Planning Policy Framework (NPPF, 2021) explicitly sets out that listed or proposed Ramsar sites should be considered in the same way, as if they had been classified or designated as SACs or SPAs.

2.1.2 The Regulations impart a duty on Local Planning Authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European designation, either alone or in combination with other plans or projects. In most circumstances, permission may only be given for a plan or project to proceed if it has been ascertained that it will not have an adverse effect on the integrity of any such designation.

2.2 Assessment Methodology

2.2.1 The approach to the formalised assessment of potential impacts arising on a European site from any proposals (termed plans or projects) is set out within the Regulations. Guidance on the process and procedures for assessment are contained in a number of documents, principally:

- National Planning Policy Framework (NPPF) and the accompanying ODPM/DEFRA Circular (ODPM 06/2005, DEFRA 01/2005);
- Managing Natura 2000 sites ‘The Provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC’. April 2000;
- Assessment of plans and projects significantly affecting Natura 2000 sites. European Commission November 2001.

2.2.2 As set out within the above documents, the procedure for assessment is an ordered process following a number of key stages, as laid out within the chart (Figure 1) within ODPM circular 06/2005, reproduced at Appendix 4683/1 and discussed below.

2.2.3 As set out in box 1 of the flow chart, the first step is to identify whether the proposals are directly connected with or necessary to site management for conservation.

2.2.4 The proposals would not be concerned with the management of the European sites; hence, following the flow lines set out, the assessment procedure should follow on to a Stage 1 assessment to screen for likely significant effects (set out within box 2 of the flow chart).

Stage 1 – Screening for Likely Significant Effects

2.2.5 In this stage it is necessary to examine if the proposals will result in any ‘likely significant effect’ on the internationally important features of the European sites, either alone or in combination with other plans or projects.

- 2.2.6 Where it is considered that plans or projects will result in no such ‘likely significant effects’, no further assessment is necessary, and permission should not be refused under the assessment.
- 2.2.7 If any ‘likely significant effects’ are identified or where it remains unclear whether effects will be significant the assessment procedure should follow on to Stage 2.

Stage 2 onwards

- 2.2.8 Should it be determined that a plan or project will result in ‘likely significant effects’ on a European site, as set out on the flow chart, the Competent Authority should proceed to boxes 3 and 4 onwards, where further assessment is required. In order to apply the tests set out within boxes 3 and 4 a full ‘Appropriate Assessment’ of the likely effects of the plan or project must be undertaken by the Competent Authority.

Ecological Survey Work

- 2.2.9 This document and the masterplan is informed by ecological survey work undertaken at the allocation site, carried out in 2016 and updated in 2018 and 2020. The results are set out in an Ecological Appraisal Report², which will be submitted alongside a planning application at a later date. Ecological survey work undertaken includes:

- Desk study including biological records obtained from Suffolk Biodiversity Information Service (SBIS) and Cambridgeshire and Peterborough Environmental Records Centre (CPERC);
- Extended Phase 1 Habitat Survey;
- Breckland arable flora survey;
- Bat Inspection Survey of trees and buildings;
- Bat dusk/dawn surveys on a single building;
- Bat activity surveys;
- Badger Survey;
- Reptile survey;
- Breeding bird surveys; and
- Targeted Stone Curlew survey.

² Aspect Ecology (2020) Land North of Red Lodge – Ecological Appraisal

3 Planning Context and Policy HRAs

3.1.1 To inform the development of policies and action plans to guide growth in the area, several HRA studies have been undertaken; the most relevant are summarised below along with other relevant studies and policies.

3.2 West Suffolk Local Plan HRAs

3.2.1 West Suffolk Council have commenced a review of the Local Plan which will set out the long-term planning and land use policies for the area. The adopted and emerging Local Plans for the St Edmundsbury and Forest Heath areas will continue to apply until a new Local Plan for West Suffolk is adopted.

3.2.2 The Single Issue Review (SIR) of Policy CS7 (Overall Housing Provision and Distribution) and the Site Allocations Local Plan (SALP) document, were adopted in September 2019. The Local Plan also includes Forest Heath Core Strategy (2010)³ and the Joint Development Management Policies Document (2015)⁴.

3.2.3 Part of the evidence base for the SIR and SALP comprise (separate) HRAs^{5,6}. These were prepared in September 2019 and therefore take into account relevant recent European Court of Justice (ECJ) case law, such as the “People Over Wind” judgement. These documents are reviewed in relation to the proposals below.

3.3 Local Plan SIR and Evidence Base

3.3.1 The SIR of Policy CS7 sets out that to meet the Council’s need for housing, provision must be made for at least 6800 new dwellings and associated infrastructure to be delivered between 2011 and 2031. Within Red Lodge, a total of 1,786 dwellings are to be delivered (1,081 existing completions/commitments between 2011 and 2017, and 705 additional provision).

3.3.2 The HRA of the SIR identified at the screening stage that likely significant effects could not be ruled out in relation to Breckland SPA, as the whole of Red Lodge and the undeveloped land around the existing settlement boundary is located within the identified 7.5km zone of influence for recreational pressure. The HRA sets out a number of mitigation measures which are secured via policy commitments in relation to the provision and enhancement of open space and rights of way in order to provide attractive opportunities for recreation close to home and outside of the SPA.

3.3.3 The HRA refers to the Accessible Natural Greenspace Study⁷, which also forms part of the evidence base for the SIR and SALP. The study was carried out to provide evidence on appropriate accessible natural greenspace that will support the planned growth in the district. The study reviews accessible natural greenspace provision at the District’s main settlements, explores the opportunities for new greenspace and access routes

³ Forest Heath District Council (2010) Forest Heath Local Development Framework – Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031), adopted May 2010

⁴ Forest Heath & St Edmundsbury Councils (2015) Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document

⁵ LUC (September 2019) Habitats Regulations Assessment of the Single Issue Review of Forest Heath Core Strategy Policy CS7 Overall Housing Provision and Distribution

⁶ LUC (September 2019) Habitats Regulations Assessment of the Forest Heath Site Allocations Local Plan

⁷ Forest Heath District Council (2017) Evidence Paper for Single Issue Review of Core Strategy Policy CS7 and Site Allocations Plan – Accessible Natural Greenspace Study

that could be delivered to support the planned growth, and outlines a recreation pressure mitigation strategy for each main settlement.

3.3.4 The HRA of the SIR cross references to the HRA of the SALP, which concludes that:

“It is judged that the mitigation offered by policies to provide and enhance open space and rights of ways networks and the linkage of these to a coherent Recreation Mitigation and Monitoring Strategy set out in the Accessible Natural Greenspace study is sufficient to avoid adverse effects on integrity due to recreation pressure on any European site, including Breckland SPA”.

3.3.5 Accordingly, the HRA of the SIR states that this conclusion demonstrates that it is feasible to implement the overall housing provision set out in the SIR without adverse effects on integrity on Breckland SPA in relation to recreation pressure either alone or in combination with the Core Strategy. As such, the HRA of the SIR concludes that:

“Adverse effects on integrity from the SIR in combination with other plans or projects can therefore be ruled out and reliance placed on assessment at a lower tier of plan making but carried out in parallel (HRA of the SALP) to ensure that site-specific allocations incorporate appropriate elements of FHDC’s Recreation Mitigation and Monitoring Strategy to avoid adverse effects on integrity.”

3.4 Local Plan SALP and Evidence Base

3.4.1 The site is allocated as SA10, and is therefore subject to Policy SA10: Focus of Growth – North Red Lodge. The SALP notes that the main focus for development in the plan period will be to the north of Red Lodge, as this is one of the least environmentally constrained parts of the settlement.

3.4.2 Policy SA10 states that the following relevant specific requirements should be met:

“The masterplan and any future planning applications will require a project level Habitats Regulations Assessment. The development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA and an increase in recreational activity in adjacent farmland. Measures should include the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes into the immediate vicinity of the development, barriers to access and/or other agreed measures.

The developer is required to submit information that clearly demonstrates that the above measures would result in no adverse effects on the integrity of Breckland SPA. This information will include:

- details of the timetable for implementation of all measures;
- availability of measures at the time of occupation of the new dwellings – including any phasing plan if applicable;
- details of adoption and future management of measures (as required);
- a concept design for the SANGS.

Planning permission will not be granted unless this information is sufficient to allow the local planning authority (as competent authority) to conclude that the requirements of the Habitats Regulations 2017 (or any replacement regulations) are satisfied.”

- 3.4.3 The HRA of the SALP identifies that likely significant effects cannot be ruled out (either alone or in combination with other plans or projects) at the screening stage, as the SALP allocates development across the district, and European sites are present which are sensitive to the types of activities that result from development. The HRA is therefore taken through to the Appropriate Assessment stage.
- 3.4.4 The Appropriate Assessment considers the potential for each site allocation to affect the integrity of the identified European sites. In relation to site SA10, the results of the assessment are summarised in Table 3.1 below.

Table 3.1: Summary of the assessment of site SA10 in the HRA of the SALP

Types of Potential Impact from the SALP identified in the HRA	Appropriate Assessment: Initial Assessment	Appropriate Assessment: Further Assessment	Overall conclusion in the HRA of the SALP
Direct loss or physical damage due to construction	Site does not overlap any European site or Stone Curlew nesting habitat functionally linked to Breckland SPA.	n/a	Adverse effects on integrity of Breckland SPA can be ruled out, both alone and in-combination.
Disturbance and other urban edge effects from construction or occupations of buildings	Potential adverse effects on integrity. A small area in the south-east of the site is within the 1,500m buffer of components of Breckland SPA designated for Stone Curlew.	Further assessment was carried out in relation to presence of buildings (including light pollution, domestic cat predation and noise pollution). The assessment notes that any small residual risk can be avoided via the allocation policy's requirement that the masterplan and any future planning applications will require a project level HRA.	Adverse effects on integrity of Breckland SPA can be ruled out, both alone and in-combination.
Disturbance from construction or operation of roads	n/a	n/a	n/a
Recreational Pressure	Potential for adverse effects on integrity, as the site is within the recreation zone of influence for Breckland SPA.	The HRA refers to the Accessible Natural Greenspace Study and sets out the proposed recreation mitigation strategy (in Box 1), and the wording of Policy SA10.	The mitigation offered by policies to provide and enhance open space and the mitigation strategy set out in the Greenspace Study is sufficient to avoid adverse effects on integrity due to recreation pressure, both alone and in-combination.
Water Quantity and Quality	The HRA of the SIR did not highlight any water quantity/quality effects that required more detailed assessment in relation to any individual site allocation.		Adverse effects on integrity of Breckland SPA can be ruled out, both alone and in-combination.
Air Quality	The HRA of the SIR revealed the need for further HRA work in relation to air quality, which were presented in a separate	The separate report carried out further assessment in relation to air quality.	The separate report concluded that: "no adverse effect on Breckland SAC, SPA or Rex Graham Reserve SAC is expected to occur from growth in Forest Heath District alone, or in-

	document ⁸ .		<i>combination with other projects and plans”.</i>
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3.4.5 Overall, the HRA of the SALP concludes that Appropriate Assessment was able to rule out an adverse effect on the integrity of any European site from the SALP, either alone or in combination with other plans and projects. In relation to site SA10, this conclusion is based on the implementation of the recreation mitigation strategy set out in the Accessible Natural Greenspace Study.

3.5 HRA of Joint Development Management Policies Document

3.5.1 A Joint Development Management Policies Document (JDMPD) was produced and adopted by Forest Heath District Council and St Edmundsbury Borough Council in February 2015. The policies will be used in the day-to-day determination of planning applications across both areas, replacing many of the policies within each council's existing adopted Local Plan.

3.5.2 Three key Policies are:

i) DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance. The Policy states that when considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and a number of criteria (such as the presence of protected species).

ii) DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity states that: *“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.”*

iii) Policy DM42: Open Space, Sport and Recreation Facilities protects against the loss of existing open space as a result of development and further states 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.”*

3.5.3 The JDMDP was subject to a Stage 2 HRA⁹ which concludes that the Policies with the document would not result in likely significant effects on European sites. This is due to the inclusion of specific policies allowing for their protection (Policy DM10 “Impact of Development on Sites of Biodiversity and Geodiversity Importance”) and mitigation of any potential recreational effects (Policies DM12 and DM42 as above).

⁸ AECOM (2019) Forest Heath District Council, Single Issue Review of CS7 and Site Allocations Local Plan - Updated Air Quality Assessment Regarding Breckland SAC, Breckland SPA and Rex Graham Reserve SAC.

⁹ St Edmundsbury Borough Council & Forest Heath District Council (2015) Development Management Policies Document Habitats Regulations Assessment: Stage 1 – Screening Record of Assessment of Likely Significant Effect on a European Site

3.6 Forest Heath Council Supplementary Planning Document for Open Space, Sport and Recreation Facilities

3.6.1 This Supplementary Planning Document (SPD)¹⁰ sets out the Council's approach to the provision of open space, sport and recreation in conjunction with new housing development. The standard for natural greenspace in the SPD is 1ha per 1000 residents with a walk of at least 960m, and 0.5ha/1000 of informal open space with a walk of at least 480m.

3.7 Stone Curlew Studies

3.7.1 A study undertaken by Footprint Ecology for Breckland District Council¹¹ examined Stone Curlew nesting data with locations of new housing, road data and traffic data between 1988 and 2006.

3.7.2 The study identified that Stone Curlew nesting density was significantly lower on land within 0-500m of existing settlement than in successive distance bands, and that beyond 1500m no significant effects were seen. This 1500m distance was identified as a primary buffer and embedded into local policy as described above. A significant avoidance of trunk roads was also identified with nesting densities within 500m of a trunk road also significantly lower than at further distance bands.

3.7.3 The study also notes however, that numbers of Stone Curlew have increased in the Brecks (from 83 in 1988 to 246 in 2006), despite an increase in housing from circa 150,000 houses in 1988 to circa 210,000 houses in 2006.

3.7.4 Following this study, Footprint Ecology conducted further examination to gain a better understanding of the causal mechanism(s) for the avoidance of housing and roads¹² and analysed additional nesting records since the original study.

3.7.5 The study confirmed that with the additional nesting data, the 1500m constraint zone remains applicable. In addition, as the Stone Curlew population has increased, more breeding attempts have been found outside the SPA, suggesting the range has changed over time and birds have expanded into new areas, rather than densities increasing in already occupied habitat. However, it was found that this expansion did not correlate with a higher proportion of breeding attempts being found close to settlements i.e. birds are still avoiding these areas to some extent. This may suggest that there remains sufficient suitable habitat within the Breckland area to support an expanding Stone Curlew population without the need for them to colonise sub-optimal habitat close to settlements.

3.7.6 Effects of different building types were considered within the models by comparing different combinations of building types. These comparisons indicate a consistent negative effect of residential and other/unclassified buildings. No detectable effect was found for commercial buildings, whilst agricultural buildings tended to be associated with areas of relatively higher nest densities. The study also notes that where there is existing development close to suitable Stone Curlew habitat, or high

¹⁰ Forest Heath District Council (2013) Supplementary Planning Document for Open Space, Sport and Recreation Facilities

¹¹ Footprint Ecology (2008) The effect of housing development and roads on the distribution of Stone Curlew in the Brecks – Evidence to support the Appropriate Assessment of development plans and projects in Breckland

¹² Footprint Ecology (2013) Further assessments of the relationship between buildings and Stone Curlew distribution

levels of development already, then further development has relatively little additional impact. This would suggest that ‘infill’ developments in larger settlements will have much less impact than equivalent sized developments in undeveloped areas.

3.7.7 In 2016, Footprint Ecology undertook a review of the above buffer distances using the most recent nesting data provided by the RSPB (2011-2015)¹³ to produce a revised map of the buffer zones around the SPA. Key features of the revised map are:

- The primary 1500m buffer drawn around the SPA excluded portions of statutory designations with unsuitable Stone Curlew Habitat (including Rex Graham Reserve SAC, Cranberry Rough, Hockham SSSI and the majority of Breckland Forest SSSI);
- The 2011-2015 nesting cluster data was used to create 1500m secondary buffers around 1km squares where nesting clusters are present (within 3km of the SPA boundary and defined as five nesting attempts between 2011 and 2015 within the square);
- Analysis was excluded for any kilometre squares more than 3km from the SPA boundary, defined as the point at which the habitat is no longer functionally linked to the SPA. The distance was arrived at through reference to studies of Stone Curlew home ranges, and concludes that the 3km distance should adequately encompass the majority of the birds foraging requirements and absorb any impact of development; and
- One kilometre grid squares identified as being deficient in survey data (defined as less than half the area having monitoring data from the RSPB and being located within 3km of the SPA boundary). The study notes that additional data checks or surveys may be required in these areas to check for use by Stone Curlew.

3.7.8 Most recently, a GPS tracking study was carried out on Stone Curlew in the Brecks to examine whether interventions (ground disturbance plots) created to provide nesting habitat in semi-natural grassland were also used for foraging¹⁴. The study recorded that most foraging locations were close to the nest during the nesting period or day roost post-breeding. Birds were 2-3 times more likely to select disturbed grassland over unmodified grassland for foraging during nesting, and 15 times more likely post-breeding. Spring sown crops, pig fields and manure heaps were also selected over grassland for nocturnal foraging.

¹³ Footprint Ecology (2016) Stone Curlew Buffers in the Brecks

¹⁴ R. W. Hawkes, J. Smart, A. Brown, R. E. Green, H. Jones, P. M. Dolman (2021) Effects of experimental land management on habitat use by Eurasian Stone-curlews, *Animal Conservation Journal*

4 Stage 1 - Screening

- 4.1.1 This section carries out a screening exercise to identify the designations and potential impact pathways which require further assessment.

European Designations that could be affected by the proposals

The following European designations are located within 15km of the site:

- Breckland Special Protection Area (SPA) (1.4km south east at its nearest point in Herringswell);
- Breckland SAC (3.8km east, also within Breckland SPA);
- Rex Graham Reserve SAC (4.1km north east, also within Breckland SPA);
- Fenland SAC, incorporating Chippenham Fen Ramsar (4.5km west) and Wicken Fen Ramsar (13.1km west);
- Devil’s Dyke Special Area of Conservation (SAC) (12.7km south west);

The HRA of the SALP does not identify any potential effects from allocation SA10 on Devil’s Dyke SAC, Fenland SAC (incorporating Chippenham Fen Ramsar and Wicken Fen Ramsar). Potential for effects on these designations were scoped out in the SALP Preferred Options document, which was subject to an HRA Screening exercise¹⁵ which analysed the site allocations and previous HRAs, visitor studies and scientific research. The designations were scoped out from that assessment due to distance and a lack of potential impacts pathways (e.g. lack of vulnerability to recreational pressure). These designations are therefore also scoped out from this assessment for the same reasons, leaving Breckland SPA and SAC, and Rex Graham Reserve SAC to be considered further.

In relation to these three designations, the HRA Screening exercise of the SALP Preferred Options document identified three key areas where likely significant effects may occur to European designations as a result of the proposed allocations. These are:

- Direct loss/damage;
- Disturbance/urban edge effects; and
- Recreation pressure.

The SA10 allocation will not result in any direct loss or damage to Breckland SPA, SAC or Rex Graham Reserve SAC, as the site does not overlap the designations. The allocation will also not result in any direct loss or damage to Stone Curlew nesting habitat functionally linked to Breckland SPA.

Based on the above, this assessment will therefore consider the potential for likely significant effects of an increase in recreational pressure at Breckland SAC, Breckland SPA and Rex Graham SAC. It will also assess the potential for likely significant effects from disturbance/urban edge effects on Stone Curlew at/associated with Breckland SPA. This will be carried out for the site alone and in-combination with other relevant consented developments. The location of the site in relation to these designations is shown on Plan 4683/HRA1.

Further information on the three designations which will be considered is set out below.

Breckland SAC	<p><i>Description and Qualifying Features</i></p> <p>The Breckland area is a gently undulating plateau with free-draining soils, which has led to the development of internationally important dry heath and grassland communities. Breckland is the most extensive surviving area of the rare <i>Festuca ovina – Hieracium pilosella – Thymus praecox</i> (Sheep’s-fescue – Mouse-ear-Hawkweed – Wild Thyme) grassland type. The grassland is rich in rare species typical of dry, winter-cold, continental areas, and approaches the features of grassland types in central Europe more than almost any other semi-natural dry grassland found in the UK.</p> <p>Annex 1 habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> • Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands;
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¹⁵ Land Use (2016) HRA Screening of the Forest Heath Local Plan Preferred Options Document.

	<ul style="list-style-type: none"> • Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> - type vegetation; • European dry heaths; and • Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites). <p>Annex 1 habitats which are a qualifying feature but not a primary reason for the selection of the site: “Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)”.</p> <p>There are no Annex 2 species which are a primary reason for selection of the site. Great Crested Newt <i>Triturus cristatus</i> is an Annex 2 species which is a qualifying feature but not a primary reason for selection of the site.</p> <p><i>Conservation Objectives</i></p> <p>The conservation objectives of the SAC are defined as to: “Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.” <p><i>Vulnerabilities</i></p> <p>The Natura data form for the SAC identifies the following key threats, pressures and activities which affect the designation:</p> <ul style="list-style-type: none"> • Forest and Plantation management and use; • Grazing; • Air pollution and airborne pollutants; and • Changes in biotic conditions.
Breckland SPA	<p><i>Description and Qualifying Features</i></p> <p>The site qualifies under article 4.1 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of Stone Curlew (60.1% of the GB population), Woodlark (28.7%) and Nightjar (12.2%).</p> <p><i>Conservation Objectives</i></p> <p>The conservation objectives of the SPA are defined as to: “Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features; and • The distribution of the qualifying features within the site.” <p><i>Vulnerabilities</i></p> <ul style="list-style-type: none"> • The key threat to the SPA are habitat loss, fragmentation, and changes in habitat composition which may affect the population and distribution of the qualifying species.
Rex Graham Reserve SAC	<p><i>Description and Qualifying Features</i></p>

	<p>Rex Graham Reserve comprises a small disused chalk pit, together with surrounding grassland and woodland, which supports a large number of Military Orchids <i>Orchis militaris</i>. Only two other wild populations of this plant are known in the UK and the Rex Graham Reserve population is by far the largest, comprising more than 95% of the current total UK population.</p> <p>The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the Annex I habitat “Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites). (Dry grasslands and scrublands on chalk or limestone, including important orchid sites)*”.</p> <p><i>Conservation Objectives</i></p> <p>The conservation objectives of the SAC are defined as to “Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • <i>The extent and distribution of qualifying natural habitats;</i> • <i>The structure and function (including typical species) of qualifying natural habitats; and</i> • <i>The supporting processes on which qualifying natural habitats”.</i> <p><i>Vulnerabilities</i></p> <p>The Natural England Site Improvement Plan (SIP) for the SAC identifies the following key pressure and threats to the site:</p> <ul style="list-style-type: none"> • <i>Changes in species distributions;</i> • <i>Air pollution (risk of deposition of atmospheric nitrogen);</i> • <i>Habitat fragmentation;</i> • <i>Deer browsing;</i> • <i>Invasive species; and</i> • <i>Public access/disturbance.</i>
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Summary

The above exercise concludes that further assessment is required in relation to increases in recreational pressure at Breckland SAC, Breckland SPA and Rex Graham SAC and disturbance/urban edge effects on Stone Curlew at/associated with Breckland SPA.

The proposals do not relate to the management of these designations and therefore a Stage 2 assessment is required to identify any likely significant effects, both alone and in-combination with other plans and projects.

5 Stage 2 – Likely Significant Effects

5.1.1 This section will examine the likelihood of significant effects arising as a result of recreational pressure at Breckland SPA, SAC, and Rex Graham Reserve SAC, and the disturbance/urban edge effects on Stone Curlew, as a result of the proposals.

Potential Effect	Analysis
Recreation Effects, Breckland SAC, SPA and Rex Graham Reserve SAC	<p>As a result of the proposals, potential recreational effects may arise from the increased local population, as the site is allocated for around 300 dwellings. Such effects have the potential to affect the integrity of the above sites, as the proposals are within the 7.5km travel zone identified in the above studies, meaning new residents of the development could visit the SAC/SPA.</p> <p>Activities which may result in effects include: walking, cycling, horse riding, trampling, dog fouling, dogs disturbing nesting SPA species, increase in antisocial activities such as littering and fly-tipping and an increase in plant collection (in particular illegal picking of Military Orchid in Rex Graham Reserve).</p> <p>The potential resulting adverse effects from these activities may result in loss of habitat, decrease in habitat quality, species mortality/disturbance and changes in species composition/abundance.</p>
Disturbance/Urban Edge Effects on Stone Curlew	<p>Disturbance and other urban edge effects may arise from both the construction and occupation/use of buildings and roads. As described above in section 3, Stone Curlew currently nest significantly less in areas within 500m of settlements. Potential effects on Stone Curlew may arise from factors such as noise, lighting, visual presence of buildings and people within the development, increased number of pets in surrounding habitats, and increased recreational use of the land surrounding the development. However, the causal mechanism(s) resulting in avoidance of areas by Stone Curlew is currently unknown.</p> <p>Potential adverse effects from development on the favourable conservation status of Stone Curlew include:</p> <ul style="list-style-type: none"> • “Shadowing effect” whereby habitat outwith the development footprint is rendered significantly less likely to be used for Stone Curlew nesting, effectively reducing the amount of available habitat; • Abandonment of nesting attempt due to disturbance event(s) (e.g. construction noise); • Reduction in quality of available habitat for example by increased use of Public Rights of Way, creation of new informal paths outside the development; • Accidental damage to nests/eggs for example by trampling (less likely on arable land but more likely in semi-natural habitats); and • Predation of eggs or chicks by cats and dogs. <p>The potential for these effects to occur is assessed further below.</p>

Likelihood of Effects – The Proposals Alone	
Rex Graham SAC	
Increase in Recreational Pressure	<p>As set out in section 4, public access/disturbance is considered to be a vulnerability of the SAC, however this relates to plant collecting (i.e. illegal picking of Military Orchid) as opposed to recreational activities such as walking or dog walking.</p> <p>The SAC comprises a 2.67ha former chalk pit as is only open to the public during open days where the orchids can be viewed from a boardwalk. Accordingly, the site is unlikely to be attractive to residents of the new development for recreation and significant effects are considered unlikely to occur.</p>
Breckland SAC	
Increase in Recreational Pressure	<p>The Site Improvement Plan for the SAC identifies a potential <u>future</u> threat of increased recreation through eutrophication (dog fouling, unauthorised fires) and disturbance of soils, it does not list any SAC designated features as currently being under pressure from public access / disturbance.</p> <p>Natural England has confirmed that it does not hold evidence to suggest that recreation pressure is currently affecting any specific interest features in the SAC. Accordingly, it is not considered the proposals would generate likely significant effects in relation to increases in recreational pressure at Breckland SAC. This concurs with the findings of the HRA of the SALP, which considers the potential for recreation pressure on Breckland SPA only.</p>
Breckland SPA	
Increase in Recreational pressure	<p>The Site Improvement Plan for the SPA states that designated populations of Nightjar and Woodlark could be threatened by future increases in recreational visitors. Whilst not highlighted in the Site Improvement Plan, the designated population of Stone Curlew is also likely to be vulnerable to public access / disturbance since it is a ground-nesting bird and Natural England has confirmed that Stone Curlew are thought to be disturbed by people walking at a distance of 500 m from a nest.</p> <p>The nearest potential access point to the SPA from the site is at Herringswell. There are no Public Rights of Way (PRoW) linking the site with Herringswell. Any pedestrian visitors would need to walk through Red Lodge, east along a Byway and then along a minor road with no pavement to reach Herringswell, a distance of 2.9km (i.e. a 5.8km round trip even before the SPA is reached). In light of the length of potential walking routes, it is considered highly unlikely residents of the development would regularly visit the SPA on foot, and are therefore most likely to visit by car. This concurs with the finding of the SPA visitor study where 91% of visitors surveyed arrived by car. Therefore, a potentially significant increase in visitors would be limited to the areas within the designations close to existing car parking facilities.</p> <p>Given the above, within the SPA, key areas for recreational activity are most likely to be focussed on car parks with visitor facilities such High Lodge and Brandon Country Park. Outside these primary areas, a number of more low-key sites offer access opportunities with small informal car parks, such as at Cavenham Heath and King's Wood. A tertiary level of access is identified in informal lay-bys with capacity for less than five cars, for example along the A1101 from the A11 to Lackford.</p> <p>Given the above, it is considered unlikely large numbers of residents of the development would visit the SPA itself on a regular basis, e.g. for daily dog walking. However there remains the possibility that a proportion of new residents would visit the SPA itself, and with a lack of appropriate access controls and greenspace provision on the site, may also adversely affect habitat functionally linked to the SPA. This could occur for example by residents walking from the</p>

	<p>development in the farmland surrounding the site in areas within the 1.5km zones around a Stone Curlew nesting attempt grid square (as shown on Plan 4683/HRA2).</p> <p>Accordingly, in the absence of mitigation, likely significant effects on the SPA as a result of recreational pressure cannot be ruled out. This concurs with the findings of the HRA of the SALP.</p>
<p>Disturbance/Urban Edge Effects on Stone Curlew</p>	<p>As set out above, there are several potential impact pathways which could generate significant adverse effects in relation to disturbance/urban edge effects on Stone Curlew, including presence of buildings (including light pollution), domestic cat predation and noise.</p> <p><u>Presence of buildings</u></p> <p>As set out in the Masterplan Document (page 14), the south-eastern tip of the masterplan boundary lies within the outermost extent of the 1,500m buffer of components of Breckland SPA designated for Stone Curlew. This area is shown on Plan 4683/HRA2 and also on the Ecology Plan in the Masterplan Document (Figure 5). The site does not fall within any of the 1,500m secondary buffers for grid squares with Stone Curlew nesting attempts as shown on Plan HRA2.</p> <p>The area of the site that lies within the 1,500m SPA buffer is very small in size at approximately 0.1ha and comprises a triangular area in the south east corner of an arable field and a portion of a semi-improved grassland verge, as shown on Figure 5 of the Masterplan. Outside of the masterplan boundary, the buffer zone continues north-east taking in the southern corner of David’s Belt woodland and arable land beyond, and continues south-west taking in part of Park Wood and allocation SA9(b) beyond as shown on Figure 5. Where the buffer falls within the masterplan boundary, this land is not considered to form functional nesting habitat for Stone Curlew, due to the habitats present, the enclosure by the surrounding woodlands, an existing house, other residential development within 1,500m at Red Lodge, and the presence of the A11 which lies 600m away. This conclusion is supported by an absence of any Stone Curlew nest records in the area concerned.</p> <p>As shown on the Land Use Parameter Plan (Figure 20) of the Masterplan Document, the area of land within the SPA buffer zone will be incorporated as informal open space and no development will take place in this area. As there will be no development within the buffer zone there would correspondingly be no effects from light pollution, On that basis significant effects due to presence of buildings would not occur.</p> <p><u>Noise</u></p> <p>Approximately 0.1ha of the south eastern corner of site lies at the outer extent of the 1,500 m buffer zone around the SPA, however it is separated from arable land in the buffer zone (which may support Sone Curlew) by large areas of woodland which would attenuate noise, including Park Wood, Bungalow Belt, Round Clump, Chalkpit Clump, Manor Wood, Waterloo Plantation and First Mure’s Plantation. In addition, no development is proposed within the area of the buffer zone which lies within the masterplan boundary. On that basis and due to the separation from potentially suitable Stone Curlew habitat, it is considered that significant effects as a result of noise are unlikely to occur.</p> <p><u>Domestic cat predation</u></p> <p>While the site is not separated from the SPA by significant physical barriers to cats (such as rivers), the risk of significant cat predation is considered to be very small because the site lies at the outermost extent of the 1,500m SPA buffer zone, and where the site lies within the buffer zone no development will take place. As set out above, areas of arable land potentially suitable for Stone Curlew in the wider surroundings are in any event separated from the site by large areas of woodland, such that Stone Curlew are unlikely to be present in proximity to the site. Accordingly, significant effects as a result of cat predation are unlikely to occur.</p>

Conclusion: In the absence of mitigation, are the proposals alone likely to have a significant effect?

Yes.

In relation to the proposals alone, likely significant effects cannot be ruled out in relation to recreational pressure at Breckland SPA and associated functionally linked habitat. Accordingly, an Appropriate Assessment is required.

No likely significant effects are predicted in relation to recreational pressure at Rex Graham Reserve SAC or Breckland SAC. No likely significant effects are predicted in relation to disturbance/urban edge effects on Stone Curlew associated with Breckland SPA. Accordingly, no further assessment is required in relation to these elements.

Likelihood of Effects – The Proposals in-combination with other plans and projects

Rex Graham SAC

Increase in Recreational Pressure	No likely significant effects are identified in relation to the proposals alone, and therefore the masterplan would not combine with other plans or projects to generate additive cumulative effects.
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Breckland SAC

Increase in Recreational Pressure	No likely significant effects are identified in relation to the proposals alone, and therefore the masterplan would not combine with other plans or projects to generate additive cumulative effects.
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Breckland SPA

Disturbance/Urban Edge Effects on Stone Curlew	No likely significant effects are identified in relation to the proposals alone, and therefore the masterplan would not combine with other plans or projects to generate additive cumulative effects.
Increase in recreational pressure	Likely significant effects in relation to the masterplan alone cannot be ruled out, and therefore in the absence of mitigation, development of the site has the potential to combine with other plans and projects to create additive cumulative effects.

Conclusion: In the absence of mitigation, are the proposals likely to have a significant effect when considered in-combination with other plans or projects?

Yes.

Likely significant effects on Breckland SPA as a result of recreational pressure as a result of the proposals alone cannot be ruled out, and therefore the proposals have the potential to combine with other plans or projects to create additive cumulative effects. Accordingly, a Stage 3 Appropriate Assessment is required.

No likely significant effects are identified in relation to the proposals alone, in relation to increased recreational pressure at Rex Graham SAC, and Breckland SAC and for disturbance/urban edge effects on Stone Curlew at Breckland SAC, and therefore the proposals would not combine with other plans or projects to generate additive cumulative effects. Accordingly, no further assessment is required in relation to these elements.

6 Stage 3 – Appropriate Assessment

- 6.1.1 This section carries out an Appropriate Assessment in relation to the potential for the proposals to adversely affect the integrity of Breckland SPA in relation to increases in recreational pressure.

Do the proposals alone have the potential to affect the integrity of the European designation, given the sites' conservation objectives?

In order to mitigate effects of recreational pressure on Breckland SPA, local policy and the evidence base identifies the following measures and opportunities:

Relevant general measures from Proposed Recreation Mitigation and Monitoring Strategy in the Accessible Natural Greenspace Study (referred to in HRA of the SALP)

- New green space should be connected to the existing GI network through retention of existing and creation of new features such as tree belts, hedges, grasslands and river corridors.
- For development sites in settlements that are within 7.5km of the heathland and forest components of Breckland SPA, improve and connect the wider green infrastructure network to provide access and walking routes of approximately 2.5km in length.

Red Lodge specific opportunities identified in section 6 of the Accessible Natural Greenspace Study

- Larger sites 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 greenspace next to existing facilities or 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 existing tree belts and woodland blocks to increase the amenity and character of the route and connecting into the existing network

Site specific measures from Policy SA10 of the SALP

- Measures for influencing recreation in the surrounding area
- Provision of Suitable Alternative Natural Greenspace (SANG) which is well connected
- Enhancement and promotion of dog friendly access routes in the immediate vicinity of the development
- Barriers to access and/or other agreed measures
- Details of a timetable for the implementation of all measures
- Availability of measures at the time of occupation of new dwellings (including a Phasing plan if applicable)
- Details of adoption and future management of measures (as required)
- A concept design for the SANGS

The Appropriate Assessment considers whether the Masterplan for the site delivers, or can deliver at the detailed design stage, the above measures. It also considers whether the Masterplan can deliver a functional SANG in line with current guidance.

Proposed Mitigation Measures

SANG Guidelines

The concept of SANG was originally developed for use at the Thames Basin Heaths SPA and has since been widely applied in other locations. As part of the work carried out at Thames Basin Heaths, Natural England created guidelines on the creation of SANG, which includes a list of essential and desirable design features. The guidance states that SANG may be created from:

- Existing open space of SANG quality with no existing public access or limited public access, for 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; or
- Land in other uses which could be converted into SANG.

Importantly, the guidance states that the identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers.

The Forest Heath Greenspace Study considers the Natural England SANG design criteria in relation to the district itself, and notes that while the points in the Natural England guidance give all the elements of an excellent SANG, within the District much of the area is designated and therefore in some areas there is simply very little space within settlements to include greenspace.

The Greenspace Study therefore concludes that the approach within the District should be to increase greenspace and green networks in a flexible way, for example by providing smaller areas of greenspace where space does not allow but ensuring it is connected to other greenspace by attractive walking and cycling routes. Accordingly, the Greenspace Study sets out key features which should be prioritised for SANG design which are adapted from the Natural England guidance and made relevant to the District (acknowledging smaller areas will not be able to accommodate all these), as set out below.

Forest Heath Key SANG Design Features Which Should Be Prioritised

- 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 being 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 viewpoint, monument etc. within the SANG; and
- 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.

SANG Strategy

The masterplan incorporates a 5.3ha SANG, as shown on Figure 46 of the Masterplan Document. The SANG strategy for the site is set out on pages 68 and 69 of the document.

As set out on page 68, the aim of the SANG strategy is to design, create and manage a SANG which will function to deflect visitors away from Breckland SPA, so as to ensure the proposals do not adversely affect the integrity of the designation.

Following approval of the Masterplan by the Council, the strategy set out in the Masterplan Document will be further developed so as to produce a SANG Concept Design in accordance with the requirements of Policy SA10.

Objectives

In order to achieve the above aim, the objectives of the SANG strategy are as follows and are incorporated in the SANG Key Principles found on page 69 of the Masterplan Document:

- *Identify the target users and design the SANG accordingly so as to be attractive to identified user group(s);*
- *Develop a design which incorporates as many of the Forest Heath SANG design priority features as possible (e.g. taking size restrictions into account);*
- *Where possible, identify design features set out in the Natural England guidance which could be deliverable in the site and incorporate these features into the SANG design where feasible;*
- *Develop a strategy which incorporates other elements set out in policy SA10 (e.g. retaining Breckland tree belts); and*
- *Develop a strategy which will contribute to the proposed recreation mitigation strategy and identified opportunities for Red Lodge, as set out on pages 49-51 of the Greenspace Study.*

Identification of Target Users

As set out above, the HRA screening exercise identified the potential for the proposals to affect Breckland SPA resulting from an increase in recreational pressure. The HRA of the SALP states that adverse effects on the SPA could occur as a result of:

- *Designated species mortality or disturbance - direct mortality of ground nesting birds' eggs or young by visitor trampling or dogs off leads; disturbance of ground nesting birds by recreational visitors and their dogs; mortality due to increased incidence of fires; mortality due to tipping/littering.*
- *Designated habitats loss or damage - path erosion or soil compaction by walkers, cyclists, horse riders etc.; eutrophication of soils by dog faeces; increased incidence of fires; tipping/littering; illegal plant collection.*

Policy SA10 refers to the promotion of dog friendly access routes in the immediate vicinity of the development, whilst visitor studies carried out at the SPA¹⁶ recorded that dog walking was the most popular activity (followed by walking and cycling), and most people visited daily or weekly. Accordingly, the target user group of the SANG is to be those who might otherwise use the SPA for the purposes of daily dog walking. This is incorporated into the SANG Strategy on page 68 of the Masterplan Document.

Analysis of Deliverable Design Features

An analysis of the SANG design features and other design elements referred to in Policy SA10 has been carried out and measures incorporated into the Masterplan as far as possible. The results of the analysis are set out in Appendix 4683/2.

The analysis first considers the Forest Heath SANG Design priority features. In the main, these overlap to some degree with the Natural England SANG Design Criteria, albeit with some slight alterations to the wording. Where there is no overlap, the essential and desirable elements of the Natural England guidance are also considered to determine whether any of those measures are deliverable within the proposals. A number of measures in both sets of guidance relate to the provision of car parking – as the SANG will be serving local residents, no car parking is proposed and therefore elements related to car parking has been excluded from the analysis in Appendix 4683/2.

The analysis in Appendix 4683/2 finds that the Masterplan can deliver SANG which meets all of the design features for priority which are set out in the Greenspace Study. The Masterplan also incorporates features to ensure that the other requirements of Policy SA10 can be delivered. The analysis also sets out a number of other elements which would be considered as points of detail at the concept/detailed design stage.

Further consideration of the other measures and opportunities set out in policy SA10 and the Local Plan evidence base is set out below.

¹⁶ Footprint Ecology (2011) Visitor Survey Results from Breckland SPA

<p>New green space should be connected to the existing GI network through retention of existing and creation of new features such as tree belts, hedges, grasslands and river corridors.</p>	<p>Figure 25 of the Masterplan Document shows the Street Hierarchy, Access and Movement Plan for the site, which shows how greenspace will connect with the existing GI network to the south. The tree belts within the site will be retained and will form linked greenspace joining to an existing east-west footpath which runs adjacent to the southern boundary of the site. This footpath links to three existing tree-lined footpaths to the south which run through existing development.</p> <p>As mentioned above, existing features of ecological interest are retained in the Masterplan as far as possible, including woodland edges, tree belts and hedgerows, which will be incorporated into greenspace and will be subject to long-term management to benefit biodiversity. The creation of the SANG also presents the opportunity to create new habitat features such as wildflower grassland in the concept design.</p> <p>Accordingly, it is considered that the Masterplan complies with this element of the recreation mitigation strategy set out in the Accessible Natural Open Space Study.</p>
<p>For development sites in settlements that are within 7.5km of the heathland and forest components of Breckland SPA, improve and connect the wider green infrastructure network to provide access and walking routes of approximately 2.3 - 2.5km in length.</p>	<p>The site lies within 7.5km of the SPA heathland and forest components and therefore this point is relevant. As above, it has been demonstrated that the Masterplan delivers greenspace which connects the wider green infrastructure network.</p> <p>As shown on page 69 of the Masterplan Document, a circular walk of ~2.4km is achievable within the site itself.</p> <p>Walks of greater length are also possible if desired by utilising existing and proposed links to create larger loops (see orange dashed lines on Figure 46 of the Masterplan Document).</p> <p>Accordingly, it is considered that the Masterplan complies with this element of the recreation mitigation strategy set out in the Accessible Natural Open Space Study.</p>
<p>Larger sites 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 greenspace next to existing facilities or tree belts and woodland. This is particularly relevant to the east of the settlement where the existing access network should be expanded.</p>	<p>As set out above, existing features of ecological interest including boundary hedgerows, woodland and tree belts are retained and have been incorporated into greenspace. These features are also buffered by further greenspace, creating a larger area of strategic greenspace which can incorporate a variety of habitat types.</p> <p>Accordingly, it is considered that the Masterplan complies with this element of the Red Lodge specific measures set out in the Accessible Natural Open Space Study.</p>
<p>A particular asset would be a route on the eastern edge of the settlement taking advantage of existing tree belts and woodland blocks to increase the amenity and character of the route and connecting into the existing network</p>	<p>As described above and as shown on the Landscape Masterplan (Figure 45), greenspace is proposed along the entire eastern and south-eastern boundary of the site, the majority of which is designated as SANG. The inclusion of existing habitats into the greenspace and the creation of new habitat types as part of the detailed design will increase the amenity and character of the route by creating a variety of habitat types, landscapes and vistas. The provision of a woodland edge walking route creates an option for recreation which is currently not available in Red Lodge.</p> <p>Accordingly, it is considered that the Masterplan complies with this element of the Red Lodge specific measures set out in the Accessible Natural Open Space Study.</p>

<p>Measures for influencing recreation in the surrounding area</p>	<p>The provision of on-site SANG and other greenspace which links well with the existing network and the proposed greenspace in allocation SA9(b) will influence recreation in the surrounding area, by not only being attractive to residents of the site, but by drawing in existing residents of Red Lodge. The development of greenspace at the site will open up a new range of route lengths, route options and walking landscapes for existing residents who might otherwise have visited the SPA for example for a longer weekend dog walk.</p> <p>The proposals also present the opportunity to influence recreation in the surrounding area with the provision of interpretation boards and residents information packs. This information could for example highlight specific dog walking routes away from the SPA and promote responsible recreation (e.g. adherence to the Countryside Code).</p> <p>Accordingly, it is considered that the Masterplan complies with/or is capable of complying with (e.g. provision of information board designs at the detailed design stage) this element of Policy SA10.</p>
<p>Provision of suitable alternative natural greenspace which is well connected</p>	<p>See above.</p>
<p>Enhancement and promotion of dog friendly access routes in the immediate vicinity of the development</p>	<p>As described above, the creation of a range of dog friendly walking routes of a suitable length and variety is deliverable within the site itself, whilst longer routes are also possible by utilising the links into existing green space in Red Lodge. Enhancement (e.g. provision of seating or dog waste bins) and promotion (e.g. provision of information boards and residents leaflets) of dog friendly routes is deliverable within the Masterplan but is a point of detail and should therefore be incorporated into the SANG concept design at a later date.</p>
<p>Barriers to access and/or other agreed measures</p>	<p>The provision of barriers to access is deliverable within the Masterplan, with the purpose being to stop/deter residents from leaving the site and walking in the surrounding farmland where potentially suitable Stone Curlew habitat may be present (see page 18 of the Masterplan Document). The risk of this occurring is considered to be low, as there are no Public Rights of Way present and so residents would either need to walk along existing farm tracks or trespass onto private land to do this. However, taking the precautionary approach, barriers to access will be incorporated into the detailed design.</p> <p>No barriers to access are required along the north-western or southern boundaries as the A11 and existing development already provide this. The eastern boundary of the site currently comprises an established hedgerow which runs along the east side of Park Farm Drive and David's Belt woodland. The hedgerow is dense in nature which forms a natural barrier, however there are one or two openings for farm machinery to access the fields to the east of the site. David's Belt to the east and Park Wood to the south of the site are also open, i.e. there are no fences currently present, which would give residents access to arable land beyond (although as noted above this would be trespassing).</p> <p>The detail on the location and method of creating barriers to access is a point of detail and should therefore be considered in the SANG concept design, however as set out above, such measures are deliverable within the Masterplan. It is considered that barriers to access should be provided at the following locations:</p> <ul style="list-style-type: none"> - Stop up existing gaps in hedgerow along Park Farm Drive - The western edge of David's Belt - The northern edge of Park Wood where it lies within the site boundary <p>Methods for stopping/detering access could include:</p> <ul style="list-style-type: none"> - Provision of surfaced waymarked paths to deter residents from leaving the path

	<ul style="list-style-type: none"> - New gates to stop up existing gaps - New hedgerow planting to stop up existing gaps - Defensive planting using thorny species - Earth bunding with planting - Fencing - A ditch - Creation of linear log/brush piles - Signage
Details of a timetable for the implementation of all measures	This is not relevant to the masterplan stage and will therefore be included within any future planning application alongside the SANG concept design.
Availability of measures at the time of occupation of new dwellings (including a Phasing plan if applicable)	This is not relevant to the masterplan stage and will therefore be included within any future planning application alongside the SANG concept design.
Details of adoption and future management of measures (as required)	This is not relevant to the masterplan stage and will therefore be included within any future planning application alongside the SANG concept design.
A concept design for the SANGS	The above assessment considers that the masterplan can deliver a 5.3ha SANG with a 2.4km circular walking route which meets policy and other guidance, and identifies a number of measures which are points of detail. These points of detail, such as information boards and barriers to access, should be incorporated into the SANG concept design, which would be submitted with any future planning application.
Conclusion - with the implementation of mitigation, will the proposals, taking account of the designations' conservation objectives, result in an adverse effect on integrity of a European designation?	
<p>No.</p> <p>The requirements for measures and opportunities to mitigate effects of recreation on Breckland SPA for the Red Lodge settlement is set out in policy and SANG guidance. The assessment above considers that the Masterplan can deliver all the required elements. A number of elements are points of detail – the Masterplan is capable of delivering these and full details would be brought forward in a SANG concept design which it is anticipated would be submitted with any future planning application, and would therefore also be subject to an HRA. Therefore, it is considered that the proposed mitigation set out above, in view of the designations' conservation objectives, is appropriate and proportional and will not result in an adverse effect on the integrity of Breckland SPA.</p> <p>Therefore, it is considered that no further assessment is required and proceeding to Stage 4 is not necessary.</p>	

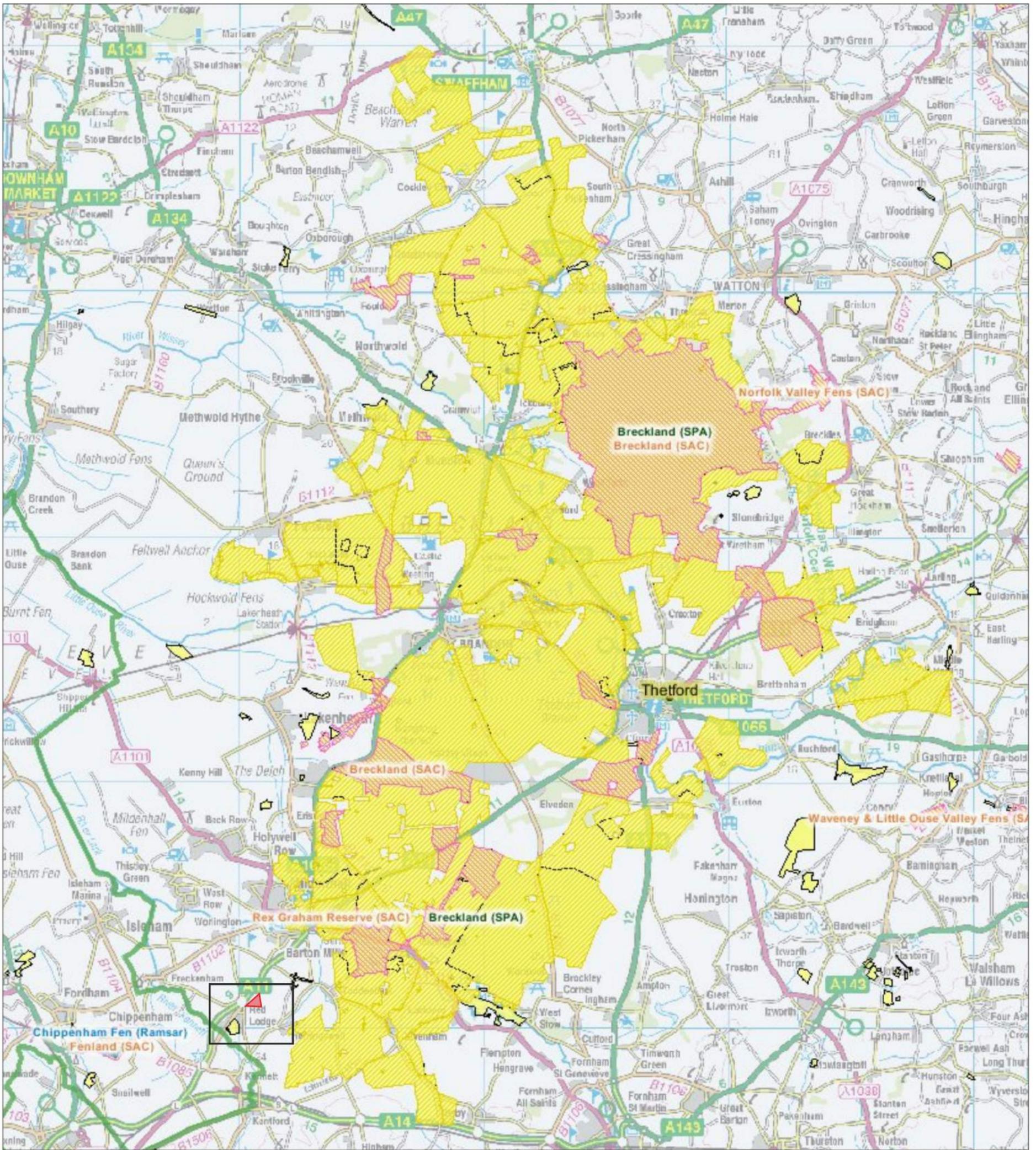
With the implementation of mitigation, do the proposals in-combination with other relevant plans and projects, have the potential to affect the integrity of the European designation, given the sites' conservation objectives?	
<p>No.</p> <p>It is considered that the proposed mitigation set out above fully mitigates the potential effects of the proposals alone, and no residual effects have been identified. Therefore, the proposals would not combine with other plans or projects to generate new significant negative effects, or increase the magnitude of the existing non-significant effects, when considered in-combination.</p> <p>Therefore, it is considered that no further assessment is required and proceeding to Stage 4 is not necessary.</p>	

7 Conclusions

- 7.1.1 Policy SA10 of the SALP requires the site Masterplan to be subject to a project level Habitats Regulations Assessment.
- 7.1.2 A screening exercise identified the potential for effects to occur in relation to recreational pressure at Rex Graham Reserve SAC, Breckland SAC and Breckland SPA. The exercise also identified the potential for adverse effects to occur in relation to urban edge/disturbance effects on Stone Curlew associated with Breckland SPA.
- 7.1.3 An assessment was carried out to identify likely significant effects. Likely significant effects could not be ruled out in relation to the proposals alone and in-combination with other plans or projects for recreational pressure at Breckland SPA and accordingly an Appropriate Assessment was carried out in this regard. Likely significant effects were not identified in relation to the other elements and therefore no further assessment was carried out.
- 7.1.4 The Appropriate Assessment identified a number of measures and opportunities set out in local policy and the associated evidence base which would/could mitigate effects of increased recreational pressure on Breckland SPA. These measures allowed the HRA of the SALP to conclude there would be no effects on the integrity of the SPA.
- 7.1.5 The Appropriate Assessment considered these measures in relation to the Masterplan Document to assess their deliverability, and whether any of the additional opportunities set out in the Accessible Natural Greenspace Study could be incorporated. The assessment concluded that the Masterplan does deliver the measures set out and all identified opportunities can also be/are capable of being delivered. A number of other elements (such as provision of access barriers) are identified which are capable of being delivered in the Masterplan, but are points of detail and would therefore be considered in full in a SANG concept design. It is anticipated this design would accompany any future planning application and would therefore also be subject to a separate HRA at the appropriate time.
- 7.1.6 With the implementation of the measures set out, it is considered there would be no adverse effects on the integrity of Breckland SPA in view of the designations' conservation objectives in relation to the proposals alone. Accordingly, there would be no residual effects which could combine with other plans or projects to generate new or additive effects, such that no effects on integrity are anticipated in-combination with other plans or projects.
- 7.1.7 Based on the screening exercise and Appropriate Assessment, further assessment (i.e. proceeding to stage 4) is not required.

Plan 4683/HRA1:

Site Location and Relevant Designations



KEY:

-  SPECIAL PROTECTION AREA (SPA)
-  SPECIAL AREA OF CONSERVATION (SAC)
-  SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
-  ALLOCATION LOCATION

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NORTH RED LODGE PROJECT

Site Location and Relevant Designations TITLE

Taken from Natural England's online resource MAGIC

4683/HRA1 DRAWING NO.

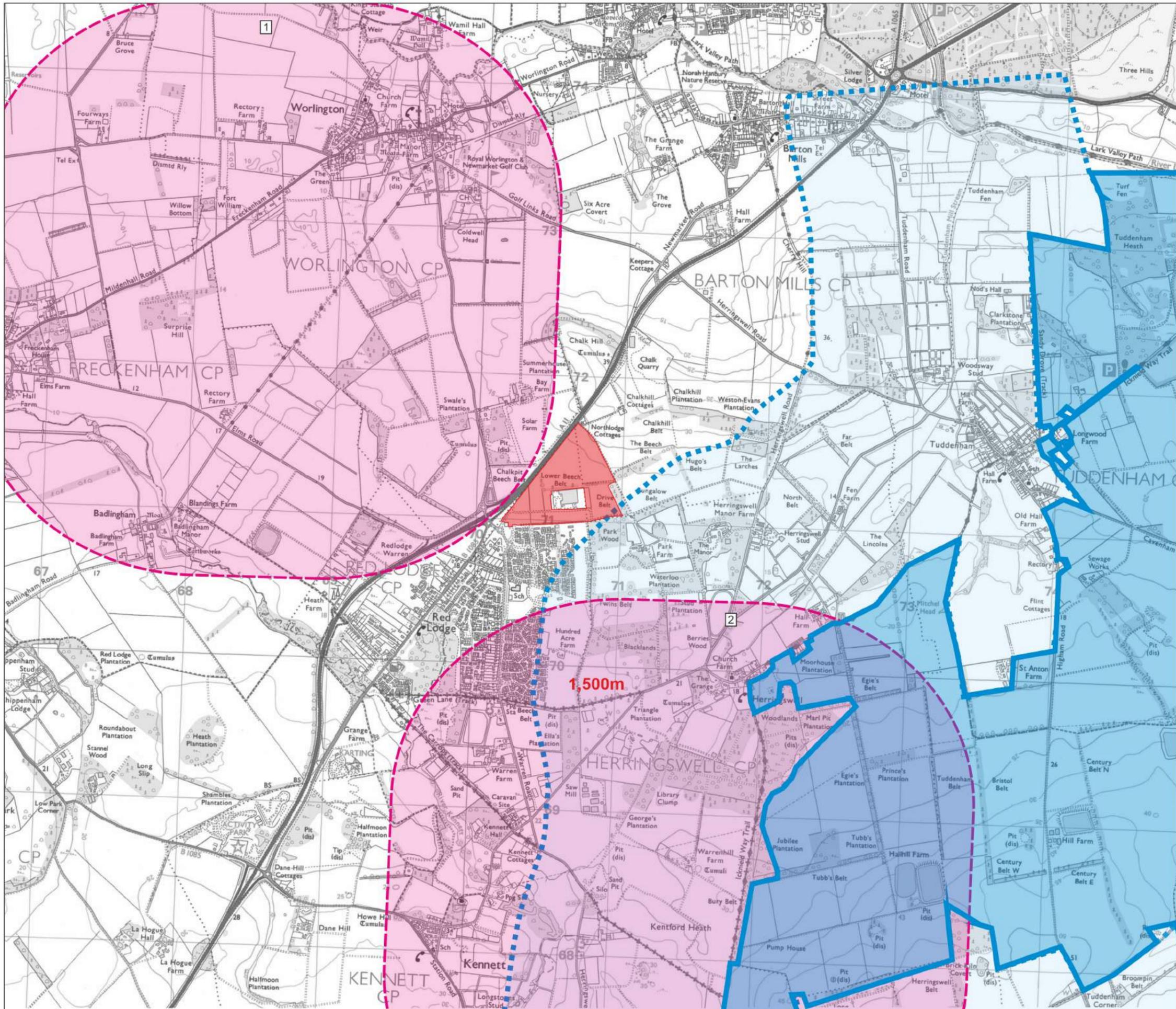
- REV.

August 2021 DATE



Plan 4683/HRA2:

Site Location in Relation to Breckland SPA Stone Curlew
Constraints Zones



KEY:

-  ALLOCATION LOCATION
-  BRECKLAND SPA BOUNDARY

*Stone Curlew Nesting Buffers**

-  1,500m PRIMARY BUFFER FROM SPA
-  1,500m SECONDARY BUFFER FROM STONE CURLEW NESTING CLUSTER

* Nesting buffer of 1,500m applied to any 1km square containing 5 or more nesting attempts from last 5 years of nesting data

NORTH RED LODGE	PROJECT
BRECKLAND SPA STONE CURLEW BUFFERS	TITLE
4683/HRA2	DRAWING NO.
A	REV.
AUGUST 2021	DATE

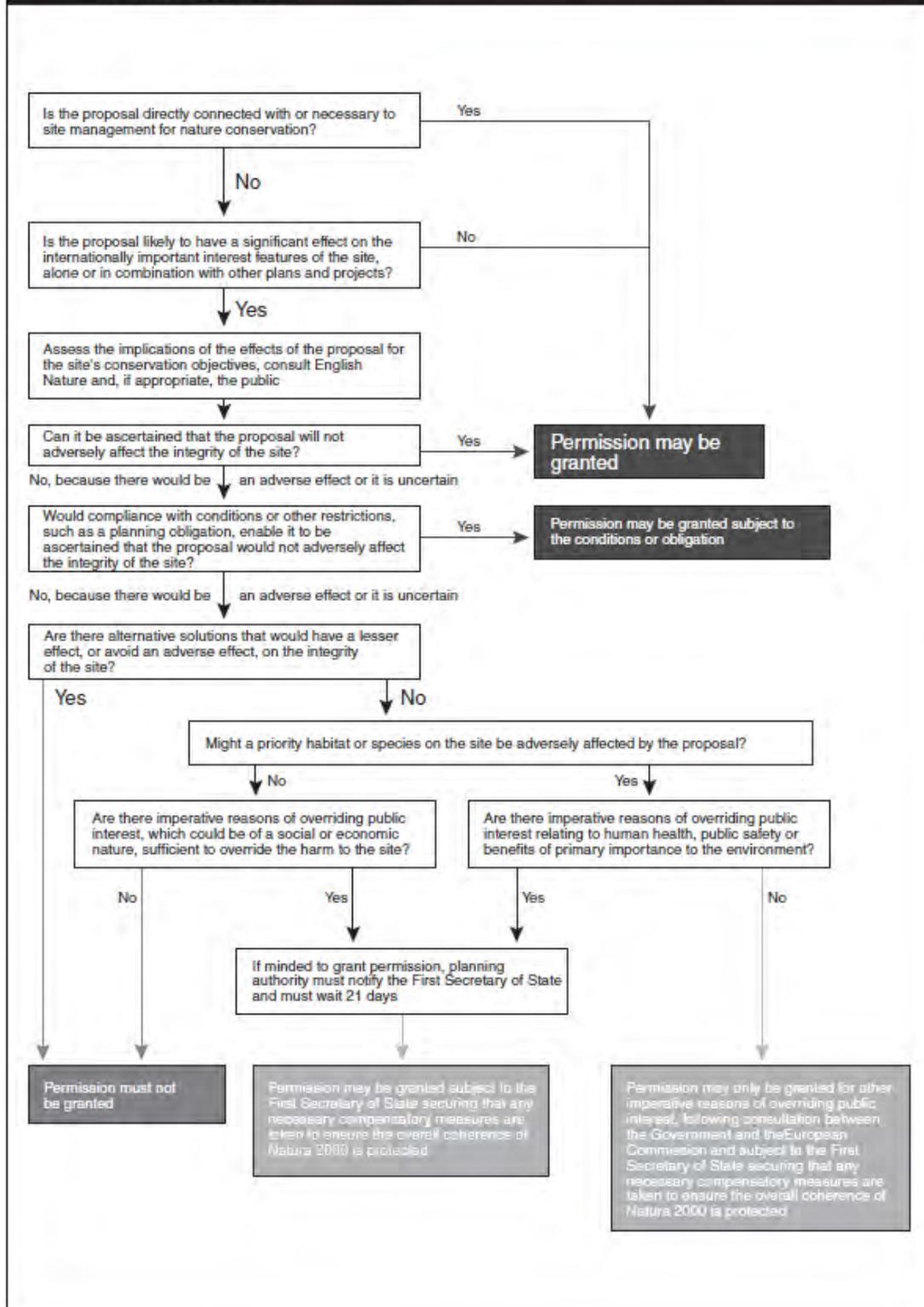
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Appendix 4683/1

Figure 1 within ODPM circular 06/2005

Figure 1: Consideration of development proposals affecting Internationally Designated Nature Conservation Sites



Appendix 4683/2

Analysis of Deliverability of SANG Design Features

Technical Note

Project: North Red Lodge – Allocation SA10

Technical Note TN1: SANG Design Strategy

Date: February 2022

1 Introduction and Purpose of this Document

- 1.1 Aspect Ecology is advising the landowner in respect of proposed development to the north of Red Lodge, Suffolk, centred at grid reference TL 706 713.
- 1.2 The proposals are for mixed use development of the site to provide around 300 dwellings, 8ha of employment land, a new local centre, and opportunities for the Pines Primary School to expand.
- 1.3 The site is allocated for a mixed use development in the Forest Heath area of West Suffolk Councils Site Allocations Local Plan (SALP) under Policy SA10.
- 1.4 Policy SA10 includes measures which must be incorporated into any development proposals to influence recreation in the surrounding area in order to avoid adverse effects on the integrity of Breckland SPA resulting from increased recreational pressure. These measures include delivery of Suitable Alternative Natural Greenspace (SANG) within the site, which is well connected. The policy also states planning applications should be accompanied by a Concept Design for the SANG.
- 1.5 The masterplan for the site has been developed, and in line with Policy SA10 is to be submitted to the LPA for approval prior to submission of any planning application. The masterplan has been developed to capture the requirements in relation to delivery of a 5.3ha SANG which will function to deflect visitors away from Breckland SPA and therefore ensure the proposals will not affect the integrity of the designation (see pages 68 and 69 of the Masterplan Document).
- 1.6 This Technical Note sets out the overall SANG strategy for the site so as to demonstrate an effective SANG is deliverable within the proposed Masterplan. Following approval of the masterplan, a SANG Concept Design, timetable, phasing plan etc. will be developed so as to meet the requirements of Policy SA10.

2 SANG Guidelines

- 2.1 The concept of SANG was originally developed for use at the Thames Basin Heaths SPA and has since been widely applied in other locations. As part of the work carried out at Thames Basin Heaths, Natural England created guidelines on the creation of SANG, which includes a list of essential and desirable design features. The guidance states that SANG may be created from:

- Existing open space of SANG quality with no existing public access or limited public access, for 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; or
- Land in other uses which could be converted into SANG.

2.2 Importantly, the guidance states that the identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers.

2.3 The Forest Heath Greenspace Study considers the Natural England SANG design criteria in relation to the district itself, and notes that while the points in the Natural England guidance give all the elements of an excellent SANG, within the District much of the area is designated and therefore in some areas there is simply very little space within settlements to include greenspace.

2.4 The Greenspace Study therefore concludes that the approach within the District should be to increase greenspace and green networks in a flexible way, for example by providing smaller areas of greenspace where space does not allow but ensuring it is connected to other greenspace by attractive walking and cycling routes. Accordingly, the Greenspace Study sets out key features which should be prioritised for SANG design which are adapted from the Natural England guidance and made relevant to the District (acknowledging smaller areas will not be able to accommodate all these), as set out below.

Forest Heath Key SANG Design Features Which Should Be Prioritised

- 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 being 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 viewpoint, monument etc. within the SANG; and
- 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.

3 SANG Strategy

3.1 Based on the above, an overall strategy for the SANG has been developed and incorporated into the site masterplan (see pages 68 and 69 of the Masterplan Document). The aim and objectives of the SANG strategy are set out below.

Aim

3.2 The aim of the SANG strategy is to design, create and manage a SANG which will function to deflect visitors away from Breckland SPA, so as to ensure the proposals do not adversely affect the integrity of the designation.

Objectives

3.3 In order to achieve the above aim, the objectives of the SANG strategy are as follows and are incorporated in the SANG Key Principles found on page 69 of the Masterplan Document:

- *Identify the target users and design the SANG accordingly so as to be attractive to identified user group(s);*
- *Develop a design which incorporates as many of the Forest Heath SANG design priority features as possible (e.g. taking size restrictions into account);*
- *Where possible, identify design features set out in the Natural England guidance which could be deliverable in the site and incorporate these features into the SANG design where feasible;*
- *Develop a strategy which incorporates other elements set out in policy SA10 (e.g. retaining Breckland tree belts); and*
- *Develop a strategy which will contribute to the proposed recreation mitigation strategy and identified opportunities for Red Lodge, as set out on pages 49-51 of the Greenspace Study.*

3.4 It is envisaged that, following approval of the masterplan by the LPA, this strategy will be further developed so as to produce a SANG Concept Design. The Concept Design would be submitted with any planning application in accordance with Policy SA10.

Identification of Target Users

3.5 As set out above, the HRA of the SALP identified the potential for the proposals to affect Breckland SPA in relation to disturbance and urban edge effects resulting from an increase in recreational pressure. The HRA states that adverse effects on the SPA could occur as a result of:

- *Designated species mortality or disturbance - direct mortality of ground nesting birds' eggs or young by visitor trampling or dogs off leads; disturbance of ground nesting birds by recreational visitors and their dogs; mortality due to increased incidence of fires; mortality due to tipping/littering.*
- *Designated habitats loss or damage - path erosion or soil compaction by walkers, cyclists, horse riders etc.; eutrophication of soils by dog faeces; increased incidence of fires; tipping/littering; illegal plant collection.*

3.6 Policy SA10 refers to the promotion of dog friendly access routes in the immediate vicinity of the development, whilst visitor studies carried out at the SPA¹ recorded that dog walking was the most popular activity (followed by walking and cycling), and most people visited daily or weekly. Accordingly, the target user group of the SANG is to be those who might otherwise use the SPA for the purposes of daily dog walking. This is incorporated into the SANG Strategy on page 68 of the Masterplan Document.

¹ Footprint Ecology (2011) Visitor Survey Results from Breckland SPA

Analysis of Deliverable Design Features

- 3.7 An analysis of the SANG design features and other design elements referred to in Policy SA10 has been carried out and measures incorporated into the Masterplan Document as far as possible. The results of the analysis are set out in Table 3.1 below. The analysis first considers the Forest Heath SANG Design priority features. In the main, these overlap to some degree with the Natural England SANG Design Criteria, albeit with some slight alterations to the wording. Where there is no overlap, the essential and desirable elements of the Natural England guidance are also considered to determine whether any of those measures are deliverable within the masterplan. A number of measures in both sets of guidance relate to the provision of car parking – as the SANG will be serving local residents, no car parking is proposed and therefore elements related to car parking has been excluded from the table below.

Analysis of Deliverability of SANG design features

SANG Design Feature/Criteria	Deliverable?	Strategic elements incorporated into the Masterplan/Landscape Strategy Plan	Elements which will be considered as points of detail at the concept/detailed design stage
Forest Heath Key SANG Design Features Which Should Be Prioritised			
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.	✓	Figure 46 of the Masterplan Document shows a 2.4km circular walk is deliverable.	Consideration will be given to path surfacing, waymarking of particular routes and/or directional waymarking to guide new and existing residents to the largest areas of greenspace.
The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.	✓	<p>Figure 23 of the Masterplan Document shows the proposed street hierarchies, access and movement plan, and shows the proposed footpath/cycleway network around the site and connections into the existing network. As shown on the Figure, these are well connected around and across the site in order to create a comprehensive network with a number of different route options, which are well aligned to connect to the existing foot/cycle path network to the south of the site.</p> <p>Figure 46 shows the proposed area and location of the SANG and how the recreational route weaves through it, so as to deliver SANG in as close proximity to as many new residents as possible.</p> <p>The provision of access points and boundary treatments is examined at a high level in the “Key Spaces and Character Areas” section of the Masterplan Document, for example the “Park Edge Character Area” notes on page 30 of the Masterplan Document that soft landscape planting would provide a defensible but soft edge boundary treatment to that portion of the SANG.</p>	Consideration will be given to any required boundary treatments and access furniture at identified access points to ensure the SANG is easily accessible to users (e.g. including pushchairs and wheelchairs) whilst still preventing access by undesirable users e.g. motorbikes.
The SANG must have a safe route of access on foot for the target users and must be designed so that they are perceived to be safe by users.	✓	The masterplan has incorporated natural surveillance onto the larger areas of greenspace and the Pine lines by facing dwellings and turning heads towards it (e.g. see Park Edge Frontage on pages 30 -31 of the Masterplan Document).	Consideration will be given to safe routes of access e.g. provision of street furniture or pedestrians crossing at road crossings. The design will also take into account the guidance note “Planning

SANG Design Feature/Criteria	Deliverable?	Strategic elements incorporated into the Masterplan/Landscape Strategy Plan	Elements which will be considered as points of detail at the concept/detailed design stage
			for Dog Ownership ² ”, which includes a section on safety perception on Page 10. A key element of safety perception is lighting, as dog owners will often walk at dawn/dusk or even in the dark during winter. This would need to be balanced with a sensitive lighting design for bats. Other elements include sight-lines along pathways and some dog owners feeling less safe in enclosed areas etc.
Paths must be easily used and well maintained with a mix of surfaced and unsurfaced finishes to avoid the site being too urban in feel.	✓	Area marked as SANG on Figure 46 of the Masterplan Document includes areas of greenspace with potential to deliver a variety of different surfaced and unsurfaced path finishes. Different character areas can provide a mix of surfaced and unsurfaced finishes, for example, the paths running along the woodland edges (see “woodland Edges – Key Principles” on page 73) would be more informal in nature and be surfaced with bark chippings or comprise an informal mown grass path. Surfaced paths could be created in other areas of the SANG so they can function for a wide variety of users, e.g. cyclists and walkers with pushchairs.	The detailed SANG design will ensure paths are easily used for example by taking into account access points to more open areas and desire lines. The detailed design would set out in full the proposed path treatments in the different areas of the site.
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.	✓	The Landscape Masterplan (Figure 45 in the Masterplan Document) shows that the intrusion of artificial structures (e.g. houses) are limited to areas close to developed edges. When within the large areas of greenspace, views of artificial structures will be screened by blocks of strategic tree and shrub planting as shown on the Landscape Masterplan. Views of the employment land north of the SANG will be screened with the use of earth mounds which will also serve as acoustic bunds to attenuate noise as shown on Figure 47.	The detailed design will ensure the proposed new planting balances screening of artificial structures to create a naturalistic space with the need for natural surveillance and for the areas to be perceived as safe by users.
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.	✓	Access within the SANG will be unrestricted.	The two larger areas of greenspace within the SANG (Pine Park and Beech Belt Park as shown on Figure 45) are linked via a green corridor along the eastern site boundary and as such with suitable boundary treatments it is feasible to create a sizeable area where dogs can be walked off lead. The detailed design will

² Hampshire County Council (2013) Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value

SANG Design Feature/Criteria	Deliverable?	Strategic elements incorporated into the Masterplan/Landscape Strategy Plan	Elements which will be considered as points of detail at the concept/detailed design stage
			consider such boundary treatments or whether other solutions may be more appropriate e.g. provision of a specific fenced off-lead exercise area, with accompanying signage.
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.	✓	n/a	The detailed design will consider the provision and design of signage, information boards and a leaflet drop to new and existing residents.
For larger SANG it is desirable for access points to have signage outlining the layout and the routes available to visitors.	✓	Although the site is not providing a larger SANG, the SANG Key Principles on page 69 of the Masterplan Document includes provision for information boards setting out the layout of the SANG and suggested walking routes which will serve as entrance features.	The detailed design will consider the exact locations and design of information boards.
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.	In part	<p>Although the site is not delivering a larger SANG, it is evident from the Landscape Masterplan that a variety of habitat types are already present and will be retained (e.g. the Pine lines and woodland edges) or can readily be created (e.g. grassland, tree and scrub planting).</p> <p>The provision of open water is noted as being desirable, however it is unlikely to be achievable on this site due to the sandy soils which makes water retention extremely difficult.</p>	The detailed design will consider how habitats can be created/enhanced so as to provide a naturalistic space with a variety of diverse habitat types.
Where possible it is desirable to have a focal point such as a	✓	The SANG Key Principles on page 69 of the Masterplan Document include the provision of public art.	The precise location(s) and nature of any focal points (such as provision of public art) will be specified at the detailed design

SANG Design Feature/Criteria	Deliverable?	Strategic elements incorporated into the Masterplan/Landscape Strategy Plan	Elements which will be considered as points of detail at the concept/detailed design stage
viewpoint, monument etc. within the SANG.			stage and will be relevant to the local area e.g. by incorporating reference to local history/wildlife/landmarks.
Natural England SANG Criteria (where no overlap with the above) - Essential			
Must be free of unpleasant intrusions (e.g. smells)	✓	<p>The only existing feature with the potential to cause unpleasant intrusion is road noise from the nearby A11. However, the large areas of greenspace have been set well back from the A11, where in any event there is already an acoustic bund present alongside, between the road and the site. This will be supplemented with additional planting as shown on page 67 of the Masterplan Document. The presence of the employment buildings will also attenuate road noise within the site. The earth mounding within the SANG as shown Figure 47 will also attenuate noise, and so overall it is not considered that road noise will cause an unpleasant intrusion.</p> <p>There is the potential for the proposed employment land to generate unpleasant intrusions to the SANG, such as noise from loading/unloading vehicles, traffic and smells. However, this is considered to be unlikely, as development of that nature is unlikely to be permitted, and any individual planning applications for the employment land would need to give due consideration to such elements and include mitigation measures accordingly (e.g. filters to capture smells and traffic modelling to demonstrate there will not be excessive vehicle movements).</p>	n/a
Natural England SANG Criteria (where no overlap with the above) - Desirable			
Choose sites with gently undulating topography	x	Due to the nature of the site, which is completely flat, it has not been possible to select a SANG with gently undulating topography. However, as shown on Figure 47 , it is proposed to create earth mounds in the northern area of the SANG (Pine Park). This will have several functions (including attenuating noise and screening views of the employment land), one of which would be to introduce some topography to this flat area. This will create an area of visual	n/a

SANG Design Feature/Criteria	Deliverable?	Strategic elements incorporated into the Masterplan/Landscape Strategy Plan	Elements which will be considered as points of detail at the concept/detailed design stage
		interest for visitors and also contribute to creating a diverse range of habitat types and conditions in the SANG.	
Other SANG Requirements set out in Policy SA10			
Measures should include the provision of SANG which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development	✓	Figure 46 shows a number of walking and cycling routes around the SANG of varying lengths are possible, with a circular walking route 2.4km in length shown. Figure 46 also shows a number of linkages around the site and to the existing off-site greenspace network, which shows well connected linkages are deliverable.	As set out above, the concept/detailed design will consider the promotion of dog friendly access routes, for example with the use of waymarked trails, information boards and/or leaflets drops to new and existing residents.
Other General Biodiversity requirements set out in Policy SA10			
Proposals should incorporate measures to ensure the continued management of those parts of the site which contain Breck grassland species to maintain existing biodiversity	✓	This relates to an existing SuDS basin which had historically contained a good diversity of Breckland grassland species. The basin lies within the area of safeguarded land for the adjacent school, and as such will remain unaffected until such a time that the school is expanded. In the meantime, it will continue to be managed in line with the current regime. It does not form part of the SANG.	n/a
Strategic landscaping and open space must be provided to address the individual site requirements and location. Breckland tree belts should be retained and inform site layout and uses.		As shown on the Landscape Masterplan, the existing Pine lines which run north-south through the site will be retained within linear greenspace corridors and form part of the SANG as shown on Figure 45.	n/a

4 **Summary**

- 4.1 In summary, the analysis above has demonstrated that the proposed Masterplan can deliver SANG which meets all of the design features for priority which are set out in the Greenspace Study. The Masterplan also incorporates features to ensure that the other requirements of Policy SA10 can be delivered. The analysis also sets out a number of other elements which will be considered as points of detail at the concept/detailed design stage.
- 4.2 As the Masterplan can deliver the SANG design priority features, it is considered that it is compliant with the requirements of Policy SA10 and therefore the conclusions of the HRA of the SALP remain valid, in that the masterplan can deliver proposals which will not have an adverse effect on the integrity of Breckland SPA.

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