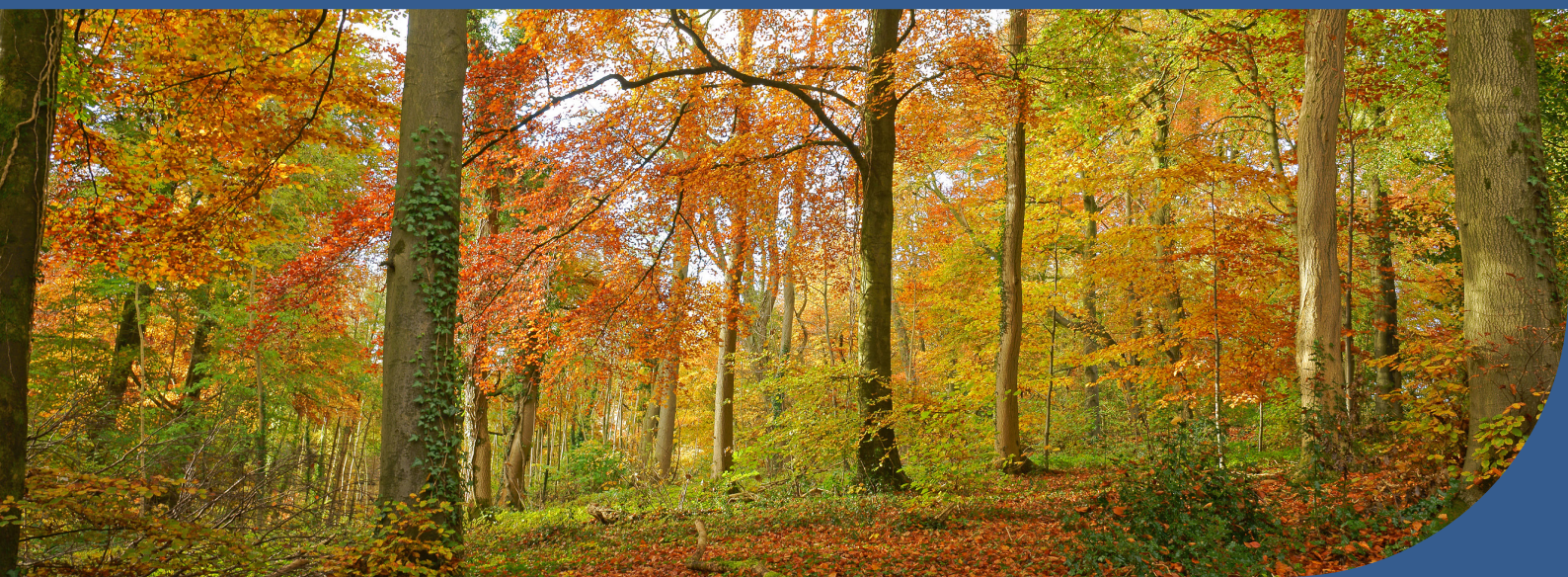


Focused Implementation Plan: Measures to Avoid Recreational Impacts at the Cotswold Beechwoods SAC

September 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Focused Implementation Plan: Measures to avoid recreational impacts at the Cotswold Beechwoods SAC

Cheltenham Borough Council

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Acronyms & Abbreviations

AA	Appropriate Assessment
AGSt	Access to Greenspace Standards
BNG	Biodiversity Net Gain
CBC	Cheltenham Borough Council
CP	Cheltenham Plan
DEFRA	Department for Food and Rural Affairs
GI	Green Infrastructure
HIPs	Physical Infrastructure Projects
HRA	Habitats Regulations Assessment
JCS	Joint Core Strategy
LHN	Local Housing Need
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LSE	Likely Significant Effect
NL	National Landscape
NPPF	National Planning Policy Framework
PRoW	Public Right of Way
SAC	Special Area of Conservation
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Alternative Natural Greenspace
SCI	Site of Community Importance
SIP	Site Improvement Plan
SLP	Strategic and Local Plan
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Drainage Systems
TBH	Thames Basin Heaths
WFA	Whole Feature Assessment
ZOI	Zone of Influence

Executive summary

- E1. This Focused Implementation Plan has been prepared on behalf of Cheltenham Borough Council (CBC) to set out a clear and deliverable approach to the provision of Suitable Alternative Natural Greenspace (SANG) and Infrastructure Projects with the aim of avoiding adverse recreational impacts on the Cotswold Beechwoods Special Area of Conservation (SAC). This Plan provides the mechanism for implementing Council-led SANG / Infrastructure Projects mitigation as set out in the adopted Cotswold Beechwoods SAC Recreation Mitigation Strategy (2024).
- E2. The Cotswold Beechwoods SAC Mitigation Strategy establishes a coordinated approach to addressing recreational impacts associated with housing growth across the SAC's Zone of Influence; an area within which residents are likely to visit the Cotswold Beechwoods SAC. The Strategy comprises two complementary mitigation streams:
- Strategic Access Management and Monitoring (SAMM), delivered on-site within the SAC; and
 - SANG / Infrastructure Projects, delivered off-site to provide attractive alternative recreational opportunities and divert visitors away from the SAC.
- E3. This Focused Implementation Plan addresses the delivery of the Council-led SANG / Infrastructure Projects mitigation stream within Cheltenham Borough Council's administrative area.
- E4. Due to the urban nature of Cheltenham and constraints on land availability, this Focused Implementation Plan adopts a flexible approach to mitigation delivery. The use of traditional SANG remains an important component of this mitigation stream where feasible and also includes Infrastructure Projects that enhance existing accessible green spaces and green infrastructure to increase their attractiveness and recreational capacity to divert visitors from the SAC.
- E5. SANG / Infrastructure Projects have been identified and assessed with reference to the criteria set out in the Mitigation Strategy, existing recreational demand, green infrastructure priorities and opportunities to target the key recreational user groups associated with the SAC. Three locations have been identified as suitable for SANG / Infrastructure Projects, incorporating measures including improvements to access, connectivity, path networks, signage, facilities, habitat quality and overall user experience:
- Priors Farm
 - Benhall Open Space
 - Pittville Park (western component)
- E6. High-level visitor count data collected by the Council at the preferred sites has been used to explore baseline levels of recreational use and the potential recreational headroom available at each location. This provides an initial basis for estimating the capacity of Infrastructure Projects to accommodate additional recreational use associated with future development in Cheltenham, thereby providing a ready-made mitigation solution for development that cannot provide bespoke SANG. The limitations of this initial approach are acknowledged. More detailed visitor surveys and analysis are recommended to test

and refine the methodology, improve understanding of recreational capacity and confirm that the Infrastructure Projects are functioning effectively as mitigation. Future monitoring should therefore include surveys at the emerging Infrastructure Project locations as well as at the Cotswold Beechwoods SAC, enabling changes in recreational use at the mitigation sites and the SAC to be considered together.

- E7. The Focused Implementation Plan sets out estimated costs for each preferred project and establishes a framework for delivery, governance and the collection and allocation of developer contributions. Delivery will be phased to align with the trajectory of housing growth, ensuring that mitigation is provided in a timely and proportionate manner.
- E8. A monitoring and review framework is included to ensure that SANG / Infrastructure Projects remain effective in diverting recreational pressure away from the Cotswold Beechwoods SAC. The Plan will be kept under review and updated as necessary to reflect changes in housing delivery, funding availability, recreational patterns and monitoring evidence.

1 About the project

1.1 Purpose of this report

- 1.1.1 The Cotswold Beechwoods Special Area of Conservation (SAC) is vulnerable to the effects of recreational impacts. The purpose of this Focused Implementation Plan is to establish an approach for Cheltenham Borough Council (CBC) to deliver Council-led Suitable Alternative Natural Greenspace (SANG) / Infrastructure Projects within the borough as set out in the established Cotswold Beechwoods SAC Recreation Mitigation Strategy¹.
- 1.1.2 SANG / Infrastructure Projects are intended to avoid recreational impacts arising from new residential development, by providing alternative recreational opportunities away from the SAC and therefore reduce recreational pressure. SANG / Infrastructure Projects will work in parallel with Strategic Access Management and Monitoring (SAMM) measures to deliver the Cotswold Beechwoods SAC Recreation Mitigation Strategy and therefore protect the integrity of the Cotswold Beechwoods SAC.

1.2 Habitats Regulations Assessment

- 1.2.1 The purpose of the Habitats Regulations Assessment (HRA) process is to assess the potential implications of a plan or project against the conservation objectives of sites designated under the Habitats² and Birds³ Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'.
- 1.2.2 In the England, the requirements of these Directives are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017 (as amended)⁴, commonly referred to as the Habitats Regulations. Under Regulation 8 of the Habitats Regulations, a European site is defined to include SACs, Sites of Community Importance (SCIs), Special Protection Areas (SPAs) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive.
- 1.2.3 The HRA process ensures that any plan or project likely to have a significant effect on a European site, either alone or in combination with other plans or projects, is subject to appropriate assessment (AA) and may only proceed if it will not adversely affect the integrity of that European site.
- 1.2.4 CBC is defined as a 'competent authority' and holds a legal duty under the Habitats Regulations to consider whether planning applications would affect the integrity of any European designated site.

¹ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy.

² Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

³ Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

⁴ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 23/09/25] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 23/09/25]

1.3 Sustainable development in Cheltenham

- 1.3.1 The planning policy framework relevant to CBC is established through the adopted Joint Core Strategy (JCS)⁵ and the Cheltenham Plan (CP)⁶. Respectively, these documents set out the strategic and local planning policies that guide development within the borough, including policies related to environmental protection and the mitigation of impacts on designated European sites.
- 1.3.2 The JCS was adopted in December 2017 and is a joint plan between the three local authorities of Cheltenham, Gloucester and Tewkesbury. It sets out the long-term vision, strategic objectives, and policies for guiding development across the area over the duration of the plan period. As part of the plan-making process an HRA⁷ was undertaken for the JCS, along with a subsequent addendum⁸. These assessments identified concerns regarding potential recreational impacts on the Cotswold Beechwoods SAC and concluded that further discussions were required between the JCS authorities and Natural England to address the management and mitigation of these impacts. The JCS is in the process of being replaced by the emerging Strategic and Local Plan (SLP), which is being jointly prepared by the same three authorities: Cheltenham Borough Council, Gloucester City Council, and Tewkesbury Borough Council⁹.
- 1.3.3 The CP was adopted in July 2020 and covers the CBC administrative area. It sets out the quantum, type and distribution of new development needed to meet the identified needs of the borough, along with indicative timescales for delivery over the plan period. The HRA¹⁰ undertaken in support of the CP identified Likely Significant Effects (LSEs) regarding air quality and recreational disturbance at the Cotswold Beechwoods SAC. Following an AA, it was concluded that there would be no adverse effects on the integrity of the SAC, either alone or in-combination with other plans and projects, following implementation of mitigation secured in policy wording set out in the JCS and CP. The AA also identified the need for strategic mitigation to address recreational pressures. In response, the Cotswold Beechwood SAC Recreation Mitigation Strategy was prepared, following the adoption of the JCS and CP, to address this issue in more detail.
- 1.3.4 The CBC administrative area and its location in relation to the Cotswold Beechwoods SAC is shown in **Figure 1.1**.

⁵ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2017) Joint Core Strategy (2011-2031). Available at: <https://static1.squarespace.com/static/5e85a551516ba567644e3166/t/664b5f09701d2b48dc7fc9f7/1716215575995/JCS+Plan+Adopted+Verison+%28PDF.+10MB%29+Formatted+%281%29.pdf> [Date accessed: 17/02/25]

⁶ Cheltenham Borough Council (2020) The Cheltenham Plan (2011-2031). Available at: https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan [Date accessed: 17/02/25]

⁷ Enfusion (2014) Gloucester, Cheltenham and Tewkesbury Pre-Submission Draft Joint Core Strategy HRA Report.

⁸ JCS Authorities (2015) Gloucester, Cheltenham and Tewkesbury Submission Joint Core Strategy HRA Addendum: Potential Recreational Impacts on the Cotswold Beechwoods SAC.

⁹ Cheltenham, Gloucester and Tewkesbury Strategic Local Plan. Available at: <https://strategiclocalplan.org> [Date accessed: 17/04/25]

¹⁰ Enfusion (2018) Cheltenham Local Plan: Pre-submission Habitats Regulations Assessment Revised Screening Report and Appropriate Assessment Report. Available at: https://www.cheltenham.gov.uk/downloads/file/6544/sd013_-_pre-sub_revised_hra_screening_report_and_appropriate_assessment [Date accessed: 23/09/25]

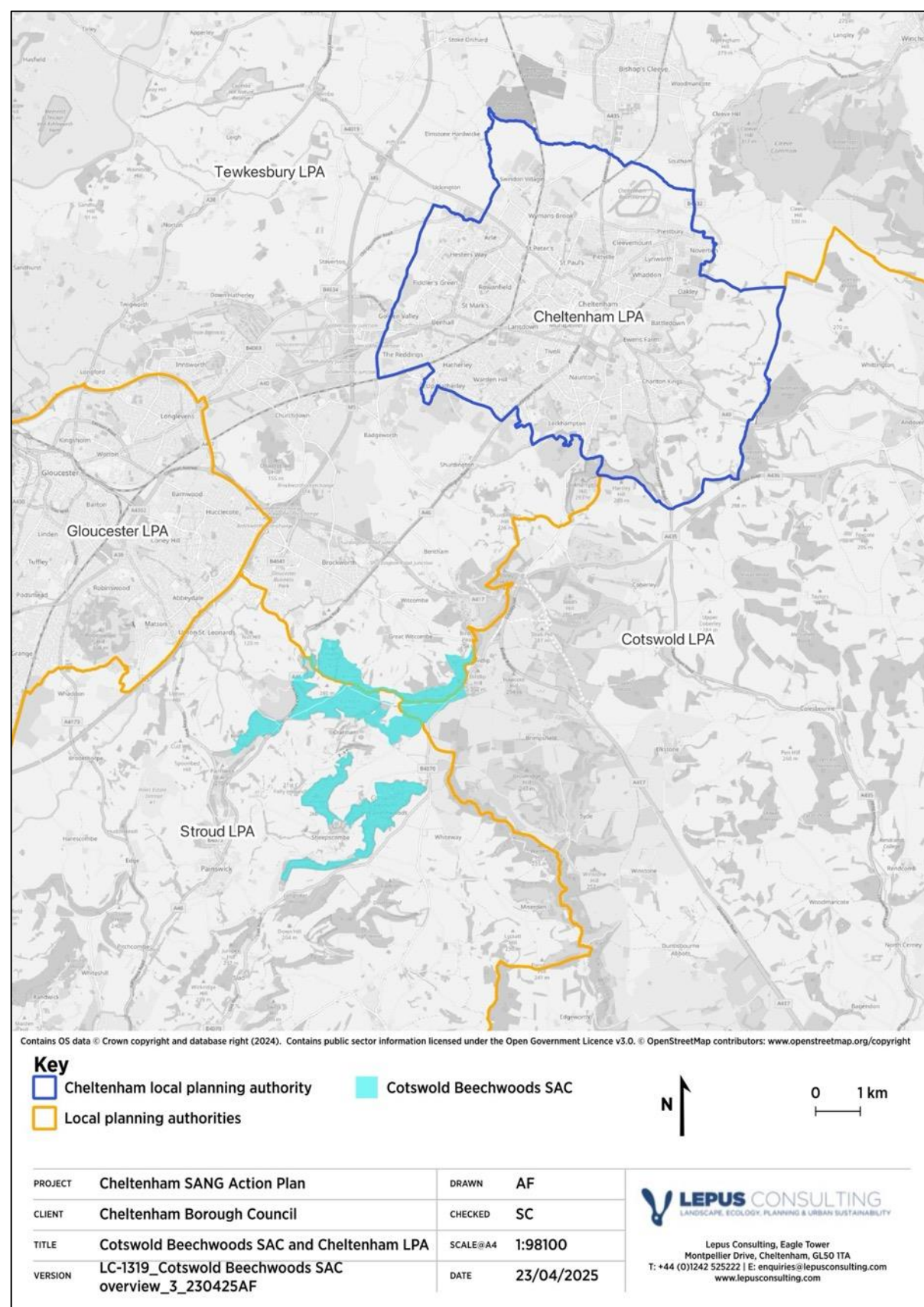


Figure 1.1: Cheltenham Borough Council Local Plan area and location in relation to the Cotswold Beechwoods SAC

1.4 The Cotswold Beechwood SAC Recreation Mitigation Strategy

- 1.4.1 In 2024, CBC adopted the Cotswold Beechwoods SAC Mitigation Strategy. The purpose of the Mitigation Strategy is to set out a strategic approach to mitigate recreation impacts, associated with new housing growth, on the Cotswold Beechwoods SAC.
- 1.4.2 The Cotswold Beechwood SAC Recreation Mitigation Strategy establishes a framework of mitigation measures designed to ensure that recreational impacts arising from new residential development can be effectively mitigated or avoided. The strategy is structured around two primary mitigation streams (listed below):
1. Strategic Access Management and Monitoring (SAMM) - involving access management interventions, visitor engagement, monitoring, and other on-site initiatives, wholly within the boundary of the Cotswold Beechwoods SAC, aimed at reducing recreational pressure and safeguarding the SAC's ecological integrity.
 2. Suitable Alternative Natural Greenspace (SANG) / Infrastructure Projects – providing alternative recreation opportunities away from the Cotswold Beechwoods SAC, including SANG and Infrastructure Projects. These measures are intended to attract visitors away from the SAC by providing high-quality alternative destinations for recreation.
- 1.4.3 This report provides a Focused Implementation Plan for the delivery of Council-led SANG / Infrastructure Projects mitigation stream within Cheltenham to ensure no adverse impacts upon the integrity of the Cotswold Beechwoods SAC. It should be noted that developers are able to choose to provide their own SANG / Infrastructure Projects in compliance with the Cotswold Beechwood SAC Recreation Mitigation Strategy. Any development which will provide its own bespoke SANG / Infrastructure Projects since adoption of the Cotswold Beechwood SAC Recreation Mitigation Strategy in 2024 falls outside the scope of this Focused Implementation Plan.

2 Cotswold Beechwoods Special Area of Conservation

2.1 Conservation objectives

- 2.1.1 The Cotswold Beechwoods was designated as a SAC in April 2005¹¹. It is protected under the Habitats Regulations and forms part of the UK National Site Network.
- 2.1.2 The Cotswold Beechwoods SAC comprises ancient beech woodland and unimproved calcareous grassland, the most westerly extensive blocks of *Asperulo-Fagetum* Beech forests in the UK. The woodlands are diverse and species rich, supporting a mosaic of habitats of high nature conservation value including rare plant species such as Red Helleborine (*Cephalanthera rubra*), Stinking Hellebore (*Helleborus foetidus*), Narrow-Lipped Helleborine (*Epipactis leptochila*) and Wood Barley (*Hordelymus europaeus*), as well as rich mollusc flora and areas of remnant beech coppice¹². The SAC's qualifying features include¹³:
- H6210: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco- Brometalia*); Dry grasslands and scrublands on chalk or limestone.
 - H9130: *Asperulo-Fagetum* beech forests; Beech forests on neutral rich soils.
- 2.1.3 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco Brometalia*) are found on thin soils associated with chalk and limestone. A number of rare plants are associated with this type of grassland including important orchid assemblages and rare orchids. This type of grassland also supports bryophytes, lichens and invertebrate fauna¹⁴.
- 2.1.4 *Asperulo-Fagetum* Beech forests occurs on calcareous soils and reflects the topography of the SAC, drainage and soil type. The woods are floristically rich and include a number of rare plants and a rich mollusc fauna¹⁵.

¹¹ Natural England (2005) Cotswold Beechwoods SAC Citation. Available at: <https://publications.naturalengland.org.uk/publication/6200815333146624> [Date accessed: 17/02/25]

¹² Natural England (2015) Site Improvement Plan: Cotswold Beechwoods (SIP048). Available at: <https://publications.naturalengland.org.uk/publication/6276086220455936> [Date accessed: 17/02/25]

¹³ Natural England (2018) European Site Conservation Objectives for Cotswold Beechwoods SAC. Available at: <https://publications.naturalengland.org.uk/publication/6200815333146624> [Date accessed: 18/02/25]

¹⁴ Natural England (2018) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Cotswold Beechwoods SAC. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013658.pdf> [Date accessed: 09/04/25]

¹⁵ Natural England (2018) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Cotswold Beechwoods SAC. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013658.pdf> [Date accessed: 09/04/25]

- 2.1.5 Natural England's Conservation Objectives for the Cotswold Beechwoods SAC¹⁶ aim to maintain or restore the integrity of the site, ensuring it contributes to achieving Favourable Condition Status (FCS) for its qualifying features. This is to be achieved by maintaining or restoring the following:
- The extent and distribution of qualifying natural habitats (4.13ha for the grassland habitat and 472.16ha for the beech forest);
 - The structure and function (including typical species) of qualifying natural habitats, and
 - The supporting processes on which qualifying natural habitats rely.
- 2.1.6 Natural England's Site Improvement Plan (SIP) notes that the SAC's qualifying habitats (dry grasslands and scrublands on chalk or limestone and Beech forests on neutral to rich soils) are sensitive to a number of threats and pressures which include public access and disturbance. This threat includes recreation impacts associated with mountain biking, horse riding and dog walking¹⁷. The following information is provided in the SIP in relation to the public access and disturbance theme:
- 2.1.7 *"Public use of the Beechwoods has grown considerably over recent years and damage is becoming more widespread. A particular increase has been the use of mountain bikes and horseriding which use the woods far beyond the limited network of bridleways. This has created numerous additional trackways and so increasing the erosion of the ground flora and potentially opportunities for water erosion. Although the routes away from bridleways are not usually permitted, much of the SAC woodland is NNR or has public access by foot. Hence efforts have been made to provide agreed permissive routes with local bike groups with the aim of minimising damage whilst still allowing some use. This is still experimental and much will depend on the scale of use and whether the users stick to the permissive routes. This approach could also be tried with horseriders. Additionally, dog walking has increased within the SAC especially at Coopers Hill where car parking is available. This has become a particular issue where professional dog walkers release large numbers of dogs (up to 12) to run uncontrolled through the woods. This causes disturbance to wildlife as well as local nutrification through dog faeces."*
- 2.1.8 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. An SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. It is considered that the conservation status of SSSI features that overlap with European sites offer a useful indicator of habitat/species health at a particular location.
- 2.1.9 NE conducts Whole Feature Assessments (WFA) which measure the condition of each notified feature across the whole of the SSSI. The conservation status of each notified feature highlights any areas which are particularly vulnerable to threats/pressures. Conservation status is defined as below.
- Favourable;

¹⁶ Natural England (2018) European Site Conservation Objectives for Cotswold Beechwoods SAC. Available at: <https://publications.naturalengland.org.uk/publication/6200815333146624> [Date accessed: 31/03/25]

¹⁷ Natural England (2015) Site Improvement Plan: Cotswold Beechwoods (SIP048). Available at: <https://publications.naturalengland.org.uk/publication/6276086220455936> [Date accessed: 18/02/25]

- Unfavourable – recovering;
 - Unfavourable – no change; or,
 - Unfavourable – declining.
- 2.1.10 SSSI features in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that SSSI features may be in an unfavourable state due to the condition of features unrelated to a European designation.
- 2.1.11 The Cotswold Beechwoods SAC is underpinned by Cotswold Commons and Beechwoods Site of Special Scientific Interest (SSSI). The conservation features of this SSSI include lowland Beech and Yew woodland and lowland calcareous grassland.
- 2.1.12 Natural England assessed the overall WFA of the SSSI in 2013 and found the lowland beech and yew woodland feature and the lowland calcareous grassland feature to both be in an ‘Unfavourable- Recovering’ status. The Cotswold Commons and Beechwoods SSSI is comprised of 41 units, of which 31 are currently in a favourable condition status and 10 are in unfavourable recovering condition status (see **Figure 2.1**). Recreational disturbance is listed as one of the pressures at the SSSI units¹⁸.

¹⁸ Natural England Designated Sites View. Available at:
<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1003801&SiteName=cotswold&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=> [Date accessed: 19/02/25]

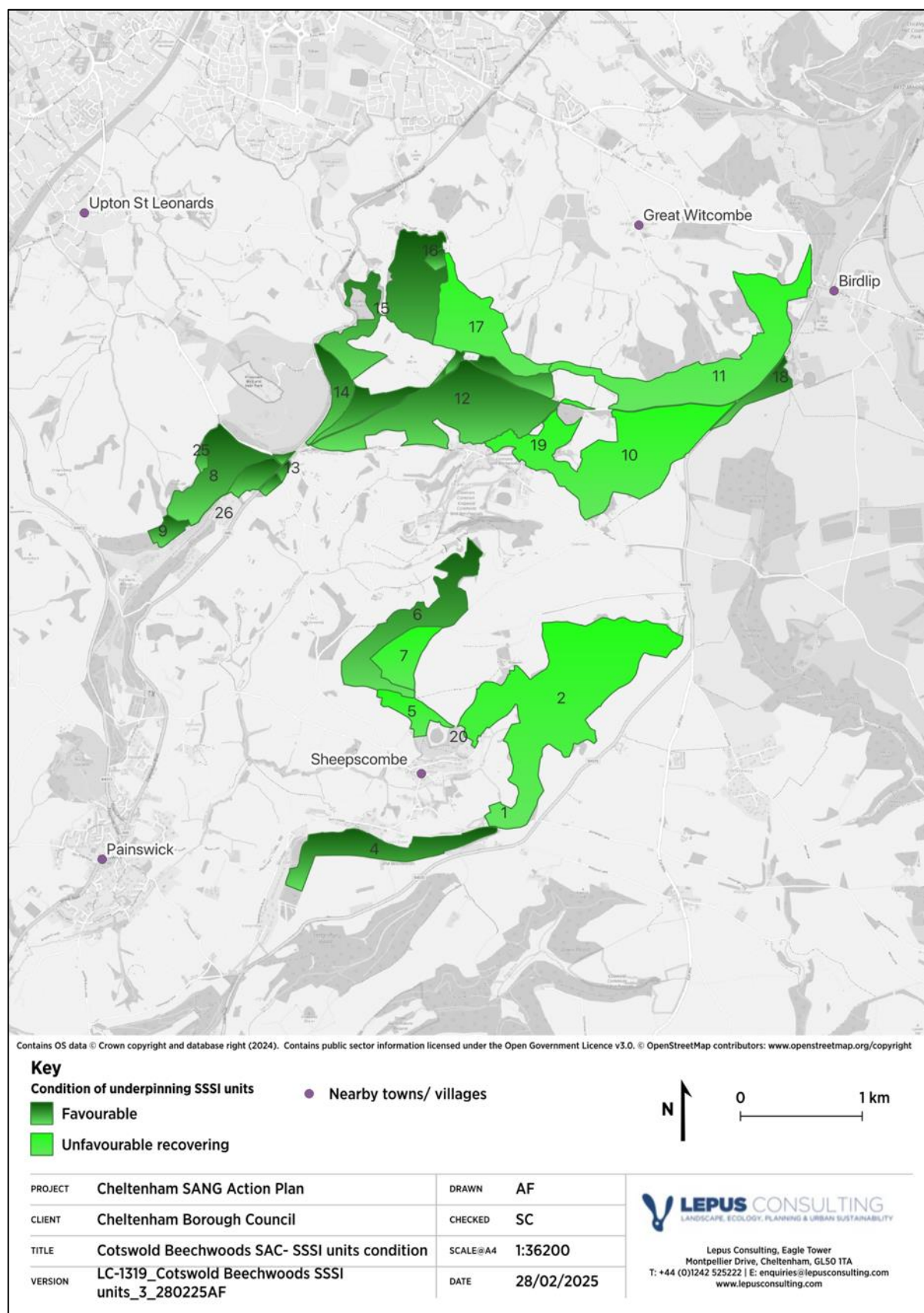


Figure 2.1: Cotswold Beechwoods SAC and condition status of the underpinning SSSI units

2.2 Potential adverse recreational impacts on site integrity

- 2.2.1 The Cotswold Beechwoods SAC is located to the south-west of Cheltenham, falling within the planning administrations of Tewkesbury, Stroud and Cotswolds Local Planning Authorities (see **Figure 1.1**). As noted in **paragraph 2.1.6**, the Cotswold Beechwoods SAC is vulnerable to existing recreational pressure predominantly due to dog walkers, mountain bikers and horse riders¹⁹.
- 2.2.2 Increased recreational pressure associated with new development has the potential to compromise the features for which the SAC has been designated and can adversely affect the site's conservation objectives.
- 2.2.3 The Cotswold Beechwoods SAC is owned and managed by a number of different landowners. There are 27 parking locations, with approximately 325 parking spaces in and around the SAC, of varying types and sizes, which are likely to be used by people accessing the SAC for recreation²⁰. The Cotswold Way runs through the SAC as well as a network of other pathways which bring many recreational visitors through the area.
- 2.2.4 Impacts associated with recreation pressure at the SAC include²¹:
- Damage: encompassing trampling and vegetation wear, soil compaction and erosion, trampling can also cause direct mortality for some fauna;
 - Contamination: including nutrient enrichment (e.g. dog fouling), litter, invasive species;
 - Fire: increased incidence and risk of fire; and
 - Other: all other impacts, including harvesting and activities associated with site management, for example the difficulties in achieving necessary grazing.
- 2.2.5 Visitor surveys were conducted in June/July 2019²² to determine where visitors were coming from, reasons for visiting the SAC, how long and where within the SAC they were visiting, how they reached the SAC, and if they drove, where they parked. These surveys focused on 12 survey points across the SAC. Surveys consisted of tally counts of visitor numbers and face-to-face interviews with members of the public. Tally counts were conducted for a total of 192 hours, during this time 770 people (including 201 minors and 43 cyclists) and 213 dogs from 367 groups were counted. A total of 139 people, either as lone individuals or members of a group were interviewed (approximately 38% of the groups passing). A total of 126 interviewees (91%) provided a full postcode which were georeferenced. Of these postcodes, a total of 12 interviewees (11%) provided a home postcode within CBC's administrative area.

¹⁹ Natural England (2015) Site Improvement Plan: Cotswold Beechwoods (SIP048). Available at: <https://publications.naturalengland.org.uk/publication/6276086220455936> [Date accessed: 18/02/25]

²⁰ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

²¹ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

²² Footprint Ecology (2019) Cotswold Beechwoods Visitor Survey 2019. Available at: <https://strategiclocalplan.org/wp-content/uploads/2023/12/Cotswold-Beechwoods-Visitor-Survey-2019.pdf> [Date accessed: 25/03/25]

- 2.2.6 The 2019 visitor survey recorded an average of approximately four people passing surveyors per hour across the Cotswold Beechwoods SAC survey locations. This represents a low recorded intensity of recreational use across the SAC at the time of the survey, particularly when considered in the context of the extensive geographic area encompassed by the Zone of Influence. The figure represents an average across different survey locations and periods and does not indicate a uniform level of recreational use across the SAC; some locations and survey periods experienced higher levels of use than others. Nevertheless, the findings provide important empirical context for understanding the scale and distribution of recreational pressure recorded at the SAC.
- 2.2.7 Having collated this data, a 15.4km Zone of Influence (ZOI) around the SAC was established based on visitor postcode data, representing the 75% percentile of visitors using the SAC (see **Figure 2.2**). Within this ZOI any new residential development has the potential to result in adverse recreational impacts on the Cotswold Beechwood SAC and as such will require suitable mitigation.
- 2.2.8 The Cotswold Beechwoods SAC ZOI covers multiple local authority administrative boundaries. It is this group of local authorities which must coordinate to manage and mitigate the impacts of recreational activity at the Cotswold Beechwoods SAC. The local authorities include:
- Cheltenham Borough Council (forming 11% of the visitors interviewed who provided a home postcode)
 - Cotswold District Council (forming 9% of the visitors interviewed who provided a home postcode)
 - Gloucester City Council (forming 19% of the visitors interviewed who provided a home postcode)
 - Stroud District Council (forming 28% of the visitors interviewed who provided a home postcode)
 - Tewkesbury District Council (forming 15% of the visitors interviewed who provided a home postcode)

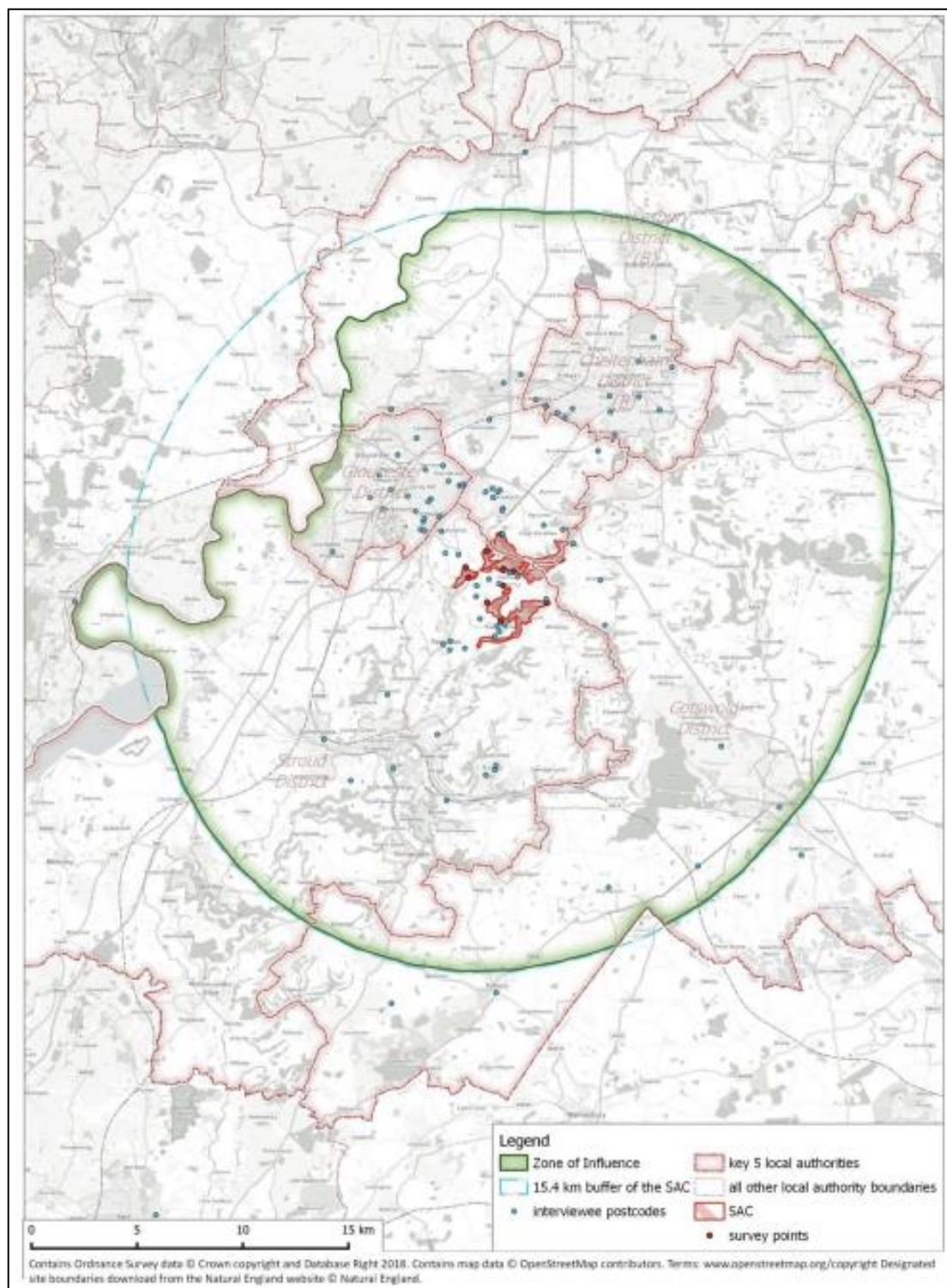


Figure 2.2: Cotswold Beechwoods SAC Zone of Influence (identified from the 2019 visitor surveys)²³

²³ Source: Footprint Ecology (2019) Cotswold Beechwoods Visitor Survey 2019. Available at: <https://strategiclocalplan.org/wp-content/uploads/2023/12/Cotswold-Beechwoods-Visitor-Survey-2019.pdf> [Date accessed: 25/03/25].

Note: the ZOI excludes the Forest of Dean and Wiltshire LPA and also follows the River Sever as there are limited crossing points over the river and it acts as a barrier to access. For simplicity the zone also dovetails to the Stroud District boundary and includes the peninsula of land which includes the village of Arlingham, just beyond 15.4km.

- 2.2.9 The survey data indicated that 85% of interviewees were on a short visit directly from home, with 13% on holiday and 2% staying with friends or family locally. Walking (without a dog) was the most common activity (45%) followed by dog walking (40%). Overall, the data showed that 67% of interviewees arrived by car and 28% on foot. Visitor routes showed the overall average route was 5.0 km (mean) and 3.0 km (median). The data shows that these routes were not evenly distributed across the SAC. The long-distance routes (49, 35%, greater than 5 km) were heavily focused to the Cotswold Way²⁴.
- 2.2.10 Interviewees' full list of reasons for visiting the survey location commonly related to proximity of the site to their home (30%), followed closely by the scenery/ views (29%). When selecting a single main reason 20% of interviewees stated they chose the location because it was close to home. A total of 13 interviewees stated they were following the Cotswold Way and a further 21 gave a reason of "following a marked trail". The most popular alternative recreational destinations given by interviewees included Painswick Beacon, Robinswood Hill, Crickley Hill, Leckhampton Hill and Sheepscombe, all of which have far reaching views and / or undulating topography. Approximately 53% of interviewees indicated that they would use a new country park if provided and prioritised the following range of features; animals, picnic and BBQ areas, flat areas, hilly areas, quiet sites with not many people and outdoor wild swimming. In addition, views / scenery (13%), cafés and woodland (both 11%) were given as important features for interviewees²⁵.

²⁴ Footprint Ecology (2019) Cotswold Beechwoods Visitor Survey 2019. Available at: <https://strategiclocalplan.org/wp-content/uploads/2023/12/Cotswold-Beechwoods-Visitor-Survey-2019.pdf> [Date accessed: 25/03/25]

²⁵ Footprint Ecology (2019) Cotswold Beechwoods Visitor Survey 2019. Available at: <https://strategiclocalplan.org/wp-content/uploads/2023/12/Cotswold-Beechwoods-Visitor-Survey-2019.pdf> [Date accessed: 25/03/25]

2.3 Details of the Cotswold Beechwoods SAC Recreation Mitigation Strategy

- 2.3.1 Housing delivery will lead to a significant rise in population within the ZOI with a total of 193,349 dwellings calculated in 2020, and 191,848 of these within the five local authorities (see **paragraph 2.2.8**). This estimate of potential housing growth would mean an increase in housing of around 14% within the ZOI up to 2031²⁶. This future housing growth has the potential to increase recreational pressures at the SAC.
- 2.3.2 Stroud District Council, on behalf of Cheltenham Borough Council, Cotswold District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council therefore commissioned the production of the Cotswold Beechwoods SAC Recreation Mitigation Strategy²⁷. The purpose of this strategy is to address recreational impacts from new development by providing a strategic mitigation solution to ensure conservation objectives of the SAC are achieved.
- 2.3.3 As noted in **Section 1.4**, the Cotswold Beechwoods SAC Recreation Mitigation Strategy incorporates a suite of interrelated measures to ensure that adverse recreational effects from new housing growth are mitigated and avoided. The Mitigation Strategy is comprised of two key streams:
- Strategic access management and monitoring measures (SAMM) at the SAC itself to mitigate on site recreational impacts; and
 - SANG / Infrastructure Projects which aim to divert visitors away from the SAC and avoid recreational impacts.
- 2.3.4 The aim of SAMM is to protect designated sites from recreational pressures associated with new housing development. SAMM is implemented at the SAC itself and provides mitigation for recreational impacts. SAMM measures include education, guidance and raising awareness of the sensitivities of the sites, access management, on-site management and ongoing monitoring projects.
- 2.3.5 SAMM measures are proposed in the Cotswold Beechwoods Recreation Mitigation Strategy and include dedicated staff, signs and interpretation, education and awareness raising, measures to address contamination, parking and travel related measures, and monitoring. The costs estimated for implementing the SAMM measures have been calculated at £5,031,620²⁸.

²⁶ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

²⁷ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

²⁸ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

- 2.3.6 Provision of SANG / Infrastructure Projects aim to divert visitors away from the SAC and therefore avoid recreational impacts. These solutions are delivered off-site away from the SAC. SANG is the name given to greenspace that is of a quality and type suitable to be used as mitigation to avoid impacts at designated sites by providing alternative recreational space for new residents. SANG can either be provided by a development itself (known as bespoke or developer-led SANG) or by a Council (known as strategic or Council-led SANG). Infrastructure Projects comprise improvements to existing open spaces which are already accessible, but which could be managed or improved to make them more attractive to visitors who might otherwise visit the Cotswold Beechwoods SAC. In some mitigation schemes, Infrastructure Projects have included the provision of mitigation schemes targeted at specific user groups, such as BMX tracks close to heathland in Dorset. The Cotswold Beechwoods Recreation Mitigation Strategy provides criteria for delivery of both SANG and Infrastructure Projects.
- 2.3.7 The Cotswold Beechwoods Mitigation Strategy sets a rate for delivery of SANG / Infrastructure Project contributions at £480 per dwelling. This financial contribution will be collected from development where bespoke (developer-led) SANG cannot be provided (and has been collected in CBC since adoption of the Strategy in 2024). This contribution was calculated on the assumption of the following:
- £25,000 per ha as typical land price (agricultural land)
 - 0.0192 ha of SANG per dwelling (based on the 8ha per 1000 people originally used in the Thames Basin Heaths to estimate SANG delivery; assumed 2.4 people as typical numbers of people per dwelling)
 - $0.0192 \times 25,000 = £480.00$.
- 2.3.8 As detailed in Appendix 4 of the Cotswold Beechwoods Mitigation Strategy *“the cost above does not allow any funds for in-perpetuity management of any land, simply the potential purchase cost. Land prices will however vary markedly and land for SANGs could well involve land that is not agricultural land and cheaper. The level of contribution can be refined further once an initial list of potential infrastructure projects has been established by the Delivery Officer. The charge will be adjusted annually to reflect inflation and ensure that the appropriate level of mitigation can be delivered over the plan period”*.
- 2.3.9 The requirement for new development within the ZOI to deliver recreational mitigation is secured through Policy BG1 of the CP: ‘Cotswold Beechwoods Special Area of Conservation Recreation Pressure’ (**Box 2.1**). This policy seeks to ensure that development will not be permitted where it would likely lead directly or indirectly to an adverse effect on the European site alone or in combination where the effects cannot be mitigated.

Box 2.1: Cheltenham Local Plan Policy BG1

POLICY BG1: COTSWOLD BEECHWOODS SPECIAL AREA OF CONSERVATION RECREATION PRESSURE

Development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the European Site network (alone or in combination), and the effects cannot be mitigated. In order to retain the integrity of the Cotswold Beechwoods Special Area of Conservation (SAC) all development within the borough that leads to a net increase in dwellings will be required to mitigate any adverse effects.

The ongoing work by relevant partner authorities will culminate in a mitigation and implementation strategy. Development proposals must contribute towards mitigation specified in the mitigation and implementation strategy or provide information for a bespoke Habitats Regulations Assessment.

This may include requiring housing developments to make contributions towards habitat management; access management and visitor infrastructure; publicity, education and awareness raising; the provision of suitable open and green space within development sites where this can be accommodated, and where it cannot, by contributions to off-site alternative green space.

While the evidence base and the mitigation and implementation strategy are in production development proposals must address the issues raised in any relevant Habitat Regulations Assessments. Mitigation measures should take into account and integrate with adopted JCS policy INF3 (Green infrastructure) and the associated JCS Green Infrastructure Strategy.

The Council is committed to the production of a mitigation and implementation strategy. A review of relevant parts of the Cheltenham plan will take place if the strategic mitigation and implementation scheme has not progressed to the implementation phase after five years.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme C – objectives b and e.

3 Understanding demand in Cheltenham

3.1 Future housing provision

- 3.1.1 The JCS (see to **Section 1.3**) establishes the strategic housing requirement across the JCS area, with provision for 35,175 new homes over the plan period to 2031²⁹. The CP sets out the requirement to deliver 11,632 dwellings over the plan period (2011-2031)³⁰. It should be noted that the CP housing figure forms part of the overall JCS requirement.
- 3.1.2 Since the adoption by CBC of the Cotswold Beechwoods SAC Recreation Mitigation Strategy in 2024, CBC has confirmed that 7,630 dwellings remain to be delivered in the borough over the remainder of the Local Plan period (to 2031)³¹.
- 3.1.3 The JCS reached the five-year mark on 11 December 2022. In accordance with Paragraph 78 of the National Planning Policy Framework (NPPF), where strategic policies are more than five years old, unless they have been reviewed and determined not to require updating, LPAs must assess their supply of deliverable housing sites against their Local Housing Need (LHN), as calculated using the standard method outlined in national guidance. Using this standard method, the minimum LHN for Cheltenham Borough is calculated at 821 dwellings per annum. CBC considers this figure to represent the most current and robust basis for calculating the Borough's five-year housing land supply.
- 3.1.4 This growth falls within the ZOI for recreational impacts on the Cotswold Beechwoods SAC (see **Figure 2.2**). As such, all new residential development within the ZOI permitted since 2022 is required to provide appropriate mitigation to address potential recreational disturbance effects on the SAC in the form of SAMM contributions and either provision of bespoke developer-led SANG / Infrastructure Projects or contributions towards Council-led SANG / Infrastructure Projects.
- 3.1.5 As listed below, a number of developments which contribute to the delivery of 7,630 dwellings have already, or will, provide bespoke (developer-led) recreational mitigation in the form of SANG as part of their own site-specific mitigation strategies. This SANG will meet requirements of traditional SANG as set out in Appendix C of the Mitigation Strategy. These developments are therefore excluded from this Focused Implementation Plan as they will not trigger developer contributions towards Council-led SANG / Infrastructure Projects.
- Elms Park (North-West) – 4,019 dwellings
 - West Cheltenham (CBC/HBD) – 1,019 dwellings
 - West Cheltenham (St Modwens) – 1,100 dwellings
 - West Cheltenham (Nema) – 365 dwellings

²⁹ Cheltenham, Gloucester and Tewksbury Joint Core Strategy (Adopted in 2017) 2011-2031. Available at: <https://static1.squarespace.com/static/5e85a551516ba567644e3166/t/664b5f09701d2b48dc7fc9f7/1716215575995/JCS+Plan+Adopted+Verison+%28PDF.+10MB%29+Formatted+%281%29.pdf> [Date accessed: 01/04/25]

³⁰ Cheltenham Borough Council (2020) The Cheltenham Plan (2011-2031). Available at: https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan [Date accessed: 17/02/25]

³¹ Based on information received from CBC on 04/04/25.

- 3.1.6 This Focused Implementation Plan includes an allowance for windfall over the plan period of 260 dwellings. Based on this, the total number of dwellings requiring mitigation through this Plan is 1,127 dwellings. This total includes:
- Windfall development expected through to 2031; and
 - Consented schemes since 2024 that fall within the ZOI and have already contributed to the mitigation strategy.
- 3.1.7 The total developer contributions available for the delivery of SANG / Infrastructure Projects from these dwellings is £559,280.00.

4 Recreational provision in Cheltenham

4.1 Existing recreational provision in Cheltenham

4.1.1 Cheltenham town is located in Gloucestershire, to the west of the Cotswolds National Landscape (NL) with a portion of the town to the east coinciding with the NL. Cheltenham is also located approximately 20km northeast of the Severn Estuary. In addition, the Cheltenham Escarpment National Nature Reserve (NNR), also designated as a SSSI, is located on the town's southern administrative boundary.

4.1.2 There are several watercourses which run through the town including the River Chelt, Wyman's Brook and Hatherley Brook. The three watercourses are culverted in parts where they run through the town centre but are also important features of the townscape providing green corridors for wildlife and people.

4.1.3 Urban development associated with the town extends up to the borough boundary, as illustrated in **Figure 1.1**. Despite the lack of green space around the periphery of the town, Cheltenham contains numerous parks and gardens which offer means of recreation for its residents. The parks and gardens vary in size with each offering a range of features such as promoted routes, cafes, toilets and playparks.

4.1.4 The larger parks and gardens within the Borough are listed below and all existing CBC owned parks are shown on **Figure 4.1**:

- Imperial Gardens
- Montpellier Gardens
- Pittville Park
- Sandford Park
- Naunton Park
- Jenner Gardens
- Winston Churchill Memorial Gardens
- Hatherley Park
- Springfields Park
- Hester's Way Park

4.1.5 The Honeybourne Line is a walking and cycling route which runs from Cheltenham railway station and Queens Road to Tommy Taylors Lane, Pittville Park and Wymans Brook, with branches connecting to the centre of town, Gloucester Road and other green spaces such as Winston Churchill Memorial Garden. The Honeybourne Line is approximately 3km in its entirety offering residents traffic free routes of varying lengths which connect with various parts of Cheltenham including existing green spaces, residential developments and the town centre.

- 4.1.6 Since its establishment, the Honeybourne Line has undergone a series of improvements to better serve Cheltenham's residents and visitors. In 2005 the line was repaved with street lighting added and overgrown vegetation removed to increase appeal to walkers and cyclists. Works to extend the Line to the railway station were completed in 2006, and in 2015 a new planting scheme in partnership with Taylor Wimpey was implemented which sought to make the space more inviting with lighting, security improvements including better CCTV coverage, preventing further root damage to footpaths and reducing annual maintenance costs³².
- 4.1.7 The Honeybourne Line has also been the focus of community related events, such as the Cheltenham Paint Festival which used parts of the line including free walls and tunnels to contribute to a series of art installations in 2017³³.
- 4.1.8 The National Cycle Network connects Gloucester with Cheltenham via Churchdown, allowing cyclists to travel actively and sustainably between these settlements.
- 4.1.9 Public Rights of Way (PRoW) offer residents means of accessing the wider countryside for recreational opportunities. Cheltenham contains a fragmented network of PRoW within the centre of the town which becomes better connected around the outskirts. As shown in **Figure 4.1**, the PRoW network in and around Cheltenham provides an important means of access to the surrounding countryside for Cheltenham residents.
- 4.1.10 The Cheltenham Circular Footpath is a long-distance footpath around Cheltenham with views of the Cotswold escarpment and Severn Vale. It covers a distance of approximately 25 miles offering walking and cycling routes around the town as well as linking with other aspects of the PRoW network promoting access to the wider countryside³⁴.

³² Cheltenham Borough Council. Honeybourne Line. Available at: https://www.cheltenham.gov.uk/info/33/parks_and_open_spaces/547/honeybourne_line [Date accessed: 14/04/25]

³³ Cheltenham Borough Council. Honeybourne Line. Available at: https://www.cheltenham.gov.uk/info/33/parks_and_open_spaces/547/honeybourne_line [Date accessed: 14/04/25]

³⁴ Long Distance Walking Association. Cheltenham Circular Footpath. Available at: https://ldwa.org.uk/ldp/members/show_path.php?path_name=Cheltenham+Circular+Footpath [Date accessed: 14/04/25]

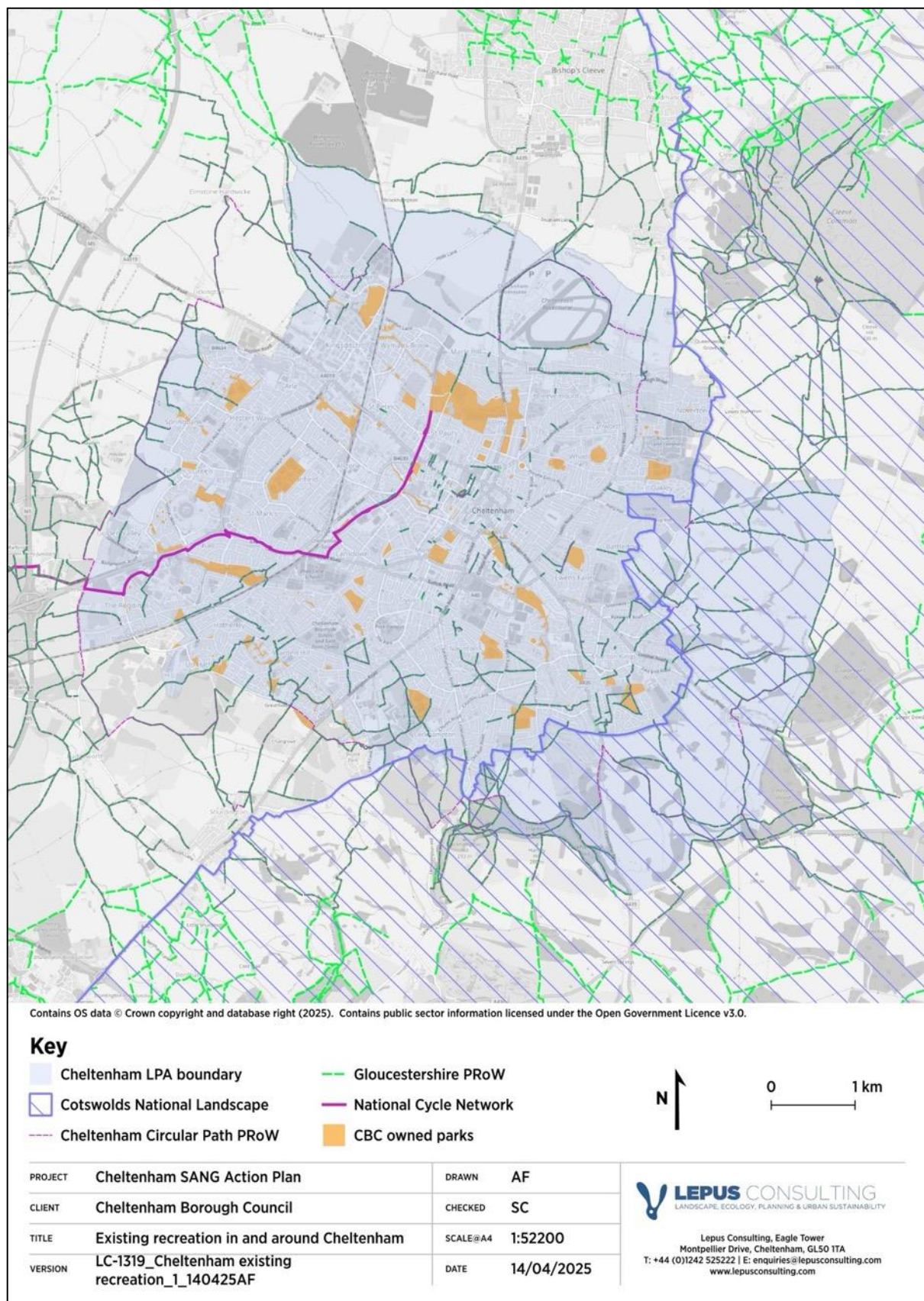


Figure 4.1: Existing recreation provision in and around Cheltenham

- 4.1.11 Strava provides a global heatmap which shows the “heat” made by aggregated public activities. This data provides a snapshot of historical data and is not updated in real-time but input on a monthly basis³⁵. Routes can be filtered by user groups and provides an illustration as to how certain areas are used.
- 4.1.12 **Figure 4.2 to Figure 4.4** depict the heatmaps for walking, running and cycling related recreational activities, all of which are common recreational activities taking place at the Cotswold Beechwoods SAC³⁶. The locations used and pathways taken by the different user groups vary with the brightest white lines demonstrating areas of most frequent use. The different routes taken by users varies depending on the type of recreational activity with walking and running user groups frequently using parks, such as Pittville Park, Naunton Park and the PRow network, whereas the cycling user group frequently use the road and cycle path network.
- 4.1.13 Using the Strava heatmap it is possible to identify hot spots in and around Cheltenham for walking, running and cycling recreational user groups. There were several areas of open/green space which were frequently used for walking, running and cycling related recreational activities:
- Pittville Park
 - Cheltenham Racecourse
 - The Honeybourne Line
 - Cox’s Meadow
 - Naunton Park
 - Cleeve Hill
 - Leckhampton Hill
 - Crickley Hill

³⁵ Strava heatmaps. <https://www.strava.com/heatmap#7.00/-120.90000/38.36000/hot/all> [Date Accessed: 28/02/25]

³⁶ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]



Figure 4.2: Strava Heatmaps - walking user group activity in Cheltenham



Figure 4.3: Strava Heatmaps - running user group activity in Cheltenham



Figure 4.4: Strava Heatmaps- all cycle sports user activity in Cheltenham

4.2 Greenspace typologies with access in Cheltenham

4.2.1 The CBC Open Space Study Standards Paper³⁷ identifies 242 green space sites in Cheltenham of varying sizes. The green space sites are categorised into eight typologies including:

- Allotments
- Amenity greenspace
- Churchyards and cemeteries
- Civic spaces
- Green corridors
- Natural and semi-natural greenspace
- Parks and gardens
- Provision for children and young people

³⁷ Knight, Kavanagh and Page (2016) Cheltenham Borough Council Open Space Study Standards Paper. Available at: https://www.cheltenham.gov.uk/downloads/file/6480/open_space_standards_paper [Date accessed: 19/02/25]

- 4.2.2 There are certain typologies which have a greater capacity for recreation. Whilst amenity greenspaces, civic spaces, green corridors, natural and semi-natural greenspace, parks and gardens and the provision for young people are all likely to provide recreational opportunities for residents, allotments and churchyards and cemeteries are not. Allotments are not typically publicly accessible and do not provide adequate provision for recreational activity. Churchyards and cemeteries are often attractive open spaces containing through routes, however it would be deemed inappropriate should these spaces be used for overt recreational activity, such as exercising a dog off the lead. As such, this Focused Implementation Plan does not consider open spaces of these typologies as options for SANG / Infrastructure Projects.
- 4.2.3 The Open Space Standards Paper provides an evidence base to support the future provision of open spaces in the Cheltenham area. For Parks and Gardens, no significant gaps in catchment mapping, based on a 10-minute walk time, were identified. There were some minor gaps identified around the periphery of Cheltenham; however, these gaps were served by other forms of open space such as amenity greenspace. In terms of natural and semi-natural greenspace the study concludes that the whole of Cheltenham is served by natural and semi natural greenspace provision based on a 30-minute drive time but that the majority of sites score below the threshold for quality. For amenity greenspace, catchment mapping indicates that with a five minute walk time applied, there is a reasonably good distribution of amenity green space provision across Cheltenham, serving most areas of higher population density. Some small catchment gaps are noted in the centre of Cheltenham, however these are served by parks and gardens provision. The study concludes that green corridors are of a high quality. The study sets out a number of recommendations which aim to identify gaps in catchment mapping and protect and enhance open space in these areas and where possible enhance low quality sites.
- 4.2.4 Natural England's GI Framework is a commitment in the Government's 25 Year Environment Plan. It aims to support the greening of towns, cities and connections with the surrounding landscape as part of the Nature Recovery Network. It acknowledges that, at present, access to green and blue spaces varies considerably across the country, and there are opportunities for these important assets to be better managed for the environment and to deliver a wider range of multifunctional benefits. The Framework recommends that Local Authorities provide three hectares of publicly accessible green space per 1,000 population, taking into consideration local accessible greenspace baseline, and considering local needs, opportunities, and constraints³⁸. The Green Infrastructure (GI) Framework however recognises that a higher standard than the Accessible Greenspace Standards is often set and that the effectiveness of SANG as mitigation will also depend upon its location and importantly its design.

³⁸ Natural England. 2023. Green Infrastructure Planning Framework. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date Accessed: 31/04/25]

4.2.5 Natural England's GI Framework also sets various standards for access to greenspace (AGst)³⁹ which identify appropriate distances for various GI typologies including doorstep, local, neighbourhood, wider neighbourhood, district and sub-regional. The distances give an indication of the kinds of green space residents should have access to from their homes. Cheltenham has a strong supply of accessible natural green spaces with areas where the need is not being met is generally low. SANG /Infrastructure Projects should take opportunity to support access where there are gaps in provision, such as through the creation of new parks, although this is not always possible in an urban setting due to a lack of available land.

4.3 Green Infrastructure in Cheltenham

4.3.1 As part of the JCS, a GI Strategy for Cheltenham, Gloucester and Tewkesbury⁴⁰ was produced in 2014 to ensure that green spaces and other environmental features are designed and managed as a multifunctional resource capable of delivering ecologic services and quality of life benefits required by the communities they serve.

4.3.2 The GI strategy aimed to support development associated with the JCS and respective local plans for Cheltenham, Gloucester and Tewkesbury through setting a vision, priorities and opportunities for development to contribute to the enhancement of this network. The GI Strategy identifies areas of focus specific to Cheltenham, Gloucester and Tewkesbury, the focus for GI delivery in Cheltenham is detailed as follows:

- Further improvements to Leckhampton Hill to increase its attractiveness to people and wildlife.
- Improve pinch points (which refer to where development has truncated GI corridors, preventing access and the movement of species).
- Increased connectivity and habitat improvements along the Honeybourne railway line and links to the open countryside.
- Further develop GI asset of the old Kingham line, in particular links to the open countryside.
- Better management of GI asset within public ownership, in particular habitat improvements along brook corridors.
- Make the most of development opportunities on the periphery of the settlement to increase GI asset and facilitate connectivity with wider countryside, in particular towards the Cotswolds and washlands of the River Severn.
- Promote sustainable drainage system (SUDS)⁴¹ guidance that supports GI through an adopted design guide.

³⁹ Natural England. 2023. Green Infrastructure Planning Framework. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date Accessed: 31/04/25]

⁴⁰ Joint Core Strategy Gloucester, Cheltenham and Tewkesbury (2014) Green Infrastructure Strategy. Available at: https://www.gloucester.gov.uk/media/2omb2su5/jcs_green_infrastructure_strategy_june_2014.pdf [Date accessed: 19/02/25]

⁴¹ Approaches to manage surface water that take account of water quantity (flooding), water quality (pollution) biodiversity (wildlife and plants) and amenity are collectively referred to as Sustainable Drainage Systems (SuDS). SuDS mimic nature and typically manage rainfall close to where it falls. SuDS can be designed to transport (convey) surface water, slow runoff down (attenuate) before it enters watercourses, they provide areas to store water in natural contours and can be used to allow water to soak (infiltrate) into the ground or evaporated from surface water and lost or transpired from vegetation (known as evapotranspiration).

- 4.3.3 The JCS GI Strategy aims to ensure every resident can within 300m (five minute walk time) access a green infrastructure corridor/ asset, which will be multifunctional and link to the wider GI asset and ultimately to the strategic GI of the Cotswold NL or the Severn and its washlands. For Cheltenham, the Strategy places particular emphasis on the importance of the Honeybourne Line, Leckhampton Hill, Cox's Meadow, the culverted River Chelt, which has resulted in flooding, and pinch points where development has truncated corridors, limiting access for both people and wildlife. Areas for potential improvement of and access to GI in Cheltenham and the wider countryside beyond are shown in **Figure 4.5**.

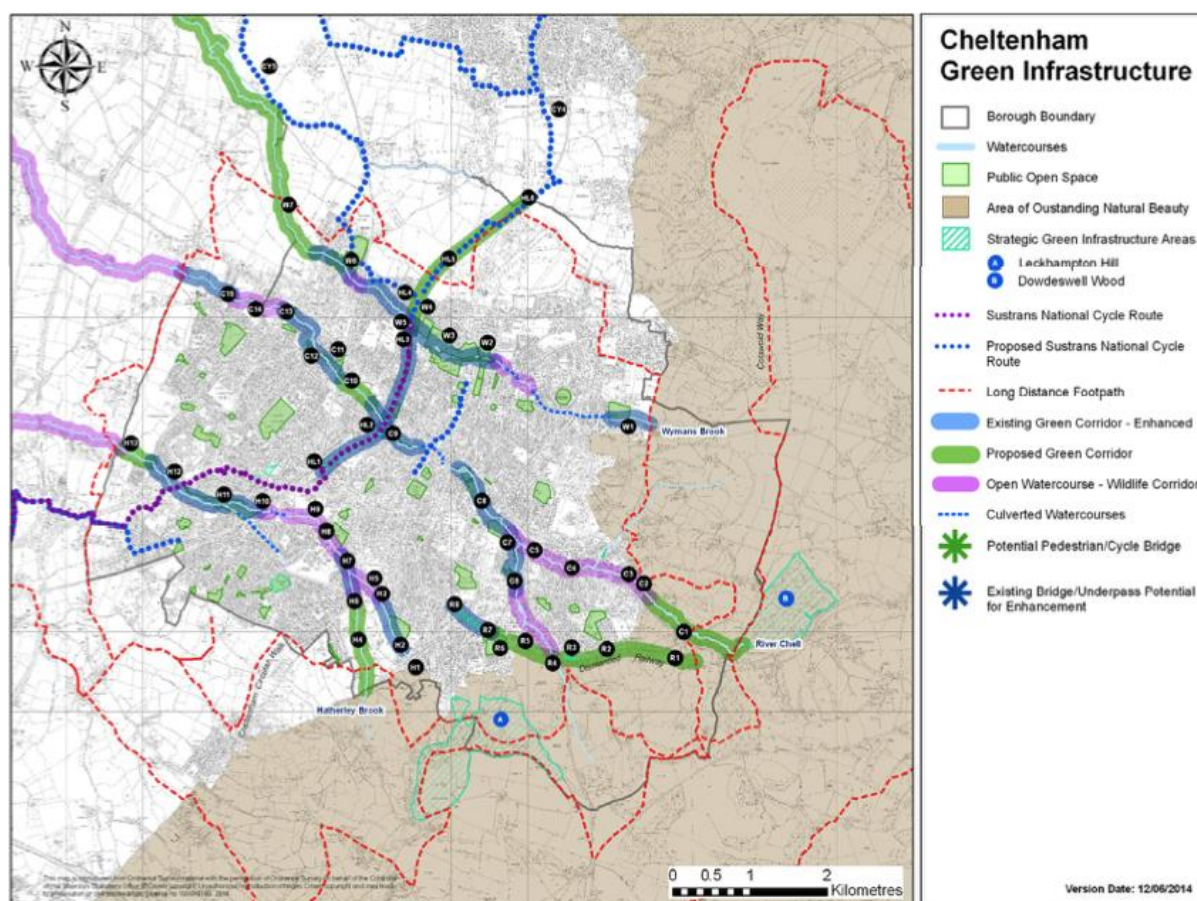


Figure 4.5 GI and GI opportunities in Cheltenham (Source: JCS GI Strategy⁴²)

⁴² Joint Core Strategy Gloucester, Cheltenham and Tewkesbury (2014) Green Infrastructure Strategy. Available at: https://www.gloucester.gov.uk/media/2omb2su5/jcs_green_infrastructure_strategy_june_2014.pdf [Date accessed: 19/02/25]

5 Designing green space for recreational mitigation

5.1 Design principles

- 5.1.1 This section of the Focused Implementation Plan provides information on design requirements for SANG / Infrastructure Projects.
- 5.1.2 The design of SANG often draws on approaches pioneered by Natural England which were first established at the Thames Basin Heaths (TBH) Special Protection Area (SPA) and for the Dorset Heaths which is designated as an SPA, Special Area of Conservation (SAC) and Ramsar⁴³. New SANG can be created, or existing greenspaces enhanced to create a SANG, in order to absorb the level of additional recreational pressure associated with new development. Design of SANG often requires delivery of 'must have' elements alongside a number of 'should have' and 'desirable' elements in terms of the scale of SANG, its visitor catchment and on-site infrastructure, character and design.
- 5.1.3 Whilst the provision of traditional SANG remains a key tool in the delivery of alternative recreational space in many strategic mitigation solutions across the county, it is not always straightforward to provide SANG at 8ha/1000 people due to constraints associated with land availability. The 8ha/1000 people standard was developed for a specific heathland designated site, and while it has been applicable in other situations, these have all been outside of built-up environments. There is a need to acknowledge that greenspace usage and provision is different in a more urban environment. Natural England therefore recognise that in certain situations there is scope for mitigation provision to be better suited to the environment in which it is coming forward. To this end, a number of LPAs have taken alternative approaches to the provision of alternative recreational space for mitigation. This has often involved the delivery of Infrastructure Projects designed to avoid pressures at designated sites. Examples of this approach include LPAs close to Epping Forest, the New Forest and the Dorset Heathlands European sites. It is noted that each strategic mitigation solution has been designed to effectively mitigate bespoke adverse effects and each differs in terms of precise operation and administration.

5.2 Epping Forest SAC

- 5.2.1 Epping Forest SAC comprises a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The SAC is increasingly vulnerable to impacts associated with recreational disturbance⁴⁴. As such, the appropriate provision of alternative greenspace is needed to ensure the recreational impacts are mitigated.

⁴³ Wetlands of international importance.

⁴⁴ Natural England (2016) Site Improvement Plan: Epping Forest (SIP076). Available at: <https://publications.naturalengland.org.uk/publication/6663446854631424> [Date accessed: 28/03/25]

- 5.2.2 Both the London Borough of Enfield and the London Borough of Waltham have adopted a 'toolbox' style approach to the delivery of alternative recreational space. This approach was advocated by Natural England who recognised that given the urban nature of these London boroughs, and the availability of green space, the provision of traditional SANG meeting the 8ha/1000 people was a constraint to mitigation delivery.
- 5.2.3 The London Borough of Enfield's Recreation Mitigation Strategy⁴⁵ drew on various factors in determining a selection criterion for delivery of alternative recreational space which comprised the following:
- SANG must provide an attractive, realistic alternative green space for people who would otherwise have visited the SAC and therefore avoid impacts.
 - SANG should complement the Enfield Blue and Green Strategy.
 - SANG projects should enhance links to Enfield Chase which will provide a significant recreational opportunity for residents in Enfield.
 - SANG projects should take into consideration deficits in access to green space across the borough.
 - SANG projects should aim to ensure residents can access blue and green space within 15 minutes.
- 5.2.4 This resulted in the selection of Infrastructure Projects which varied in function, type, size and location comprising a series of open space enhancements and green links to provide alternative recreational space for new housing developments.
- 5.2.5 The London Borough of Waltham Forest adopted a similar approach and produced a Green Spaces and Places Supplementary Planning Document (SPD)⁴⁶ which sets out a series of Infrastructure Projects to mitigate recreational impacts at Epping Forest SAC. The proposed interventions for each project aimed to enhance existing green spaces to make them an attractive alternative to Epping Forest SAC.

5.3 New Forest

- 5.3.1 An SPD⁴⁷ was adopted in 2021 by New Forest District Council to provide a framework for the delivery of mitigation for recreational mitigation at the New Forest European sites. The SPD sets out requirements for the delivery of traditional SANG style mitigation for developments over 50 homes at a scale of 8ha/1000 people. The SPD however recognises that in some circumstances (in particular for developments of less than 50 homes) traditional on site SANG may not be possible. It therefore requires a financial contribution from each development towards a rolling programme of projects designed to enhance existing green spaces and recreational walking routes, including provisions for their long-term maintenance and management. This rolling programme of projects is reviewed on a 3 – 5 yearly basis. The list of projects must be deliverable to an agreed timeframe and reflect the timescales and locations of the current trajectory of predicted housing delivery.

⁴⁵ Lepus Consulting (2023) Enfield Epping Forest Recreation Mitigation Strategy.

⁴⁶ London Borough of Waltham Forest (2022) Waltham Forest Green Spaces and Places SPD. Part 1: Suitable Alternative Natural Greenspace (SANGs). Available at: <https://www.walthamforest.gov.uk/sites/default/files/2022-12/LPE33%20SANG%20strategy%20updated%20November%202022.pdf> [Date accessed: 27/03/25]

⁴⁷ New Forest District Council (2021). Mitigation for Recreational Impacts on New Forest European Sites SPD. Available at: <https://www.newforest.gov.uk/media/2237/Adopted-Mitigation->

- 5.3.2 Some examples of these rolling projects which were delivered in 2023/2024 include Oaklands Way/ Challenger Way in Hythe which sought to promote and improve walking routes through woodland and residential areas with interpretation boards and signage to promote the route. Woodside Park in Lymington underwent access and open space enhancement works which improved access and walking routes and landscaping areas for a community orchard and an enclosed area for dog agility and off-lead training⁴⁸.

5.4 Dorset Heathlands

- 5.4.1 The Dorset heathlands is an extensive area of lowland heathland in southern England. Formerly a single tract divided only by river valleys it is now fragmented. The heathlands comprise a wide range of different habitat types related to variation in soils, hydrology, water chemistry and land use history⁴⁹. The area is covered by a number of European designations. Given its fragmented nature and the proximity of housing, the heathland is vulnerable to recreational impacts.
- 5.4.2 The Dorset Heathlands Planning Framework 2020-2025 Supplementary Planning Document (SPD)⁵⁰ sets out a guidance for the development of mitigation which reduce impacts at the Dorset Heathlands. The SPD recognises dog walkers and BMX users as some of the predominant user groups across the Dorset Heaths SAC.
- 5.4.3 The approach taken to avoiding recreational disturbance at the designated heathland habitat involves the delivery of Heathland Infrastructure Projects (HIPs). HIPs include the delivery of traditional SANG and also bespoke greenspace/recreation projects designed to avoid recreational impacts by targeting key user groups.
- 5.4.4 The SPD sets out a range of possible types of HIPs that would be appropriate to address different impacts. These include, but are not limited to:
- Provision of strategic SANGs, e.g. country parks.
 - Provision of developer-led SANGs alongside new development.
 - Improvements to accessible routes, provision of seating and viewpoints.
 - Improvements to links between SANGs or other green infrastructure.
 - Improvements to non-designated sites.
 - Provision of BMX facilities.
 - Provision of new dog-friendly areas/parks.
 - On-site projects including improved signage, managing inappropriate car parking and use of BBQs.

[Strategy/pdf/Mitigation for Recreational Impacts SPD May 2021 ADOPTED.pdf?m=1621259387820](#) [Date accessed: 23/04/25]

⁴⁸ New Forest District Council. Mitigation Programme 2023/24. Available at: <https://www.newforest.gov.uk/article/3369/Mitigation-Programme-2023-24> [Date accessed: 23/04/25]

⁴⁹ Natural England (2010) Site Improvement Plan: Dorset Heaths (SIP062). Available at: <https://publications.naturalengland.org.uk/publication/5181909839642624> [Date accessed: 31/03/25]

⁵⁰ Dorset Council and BCP Council (2020) The Dorset Heathlands Planning Framework (2020-2025) Supplementary planning Document. Available at: <https://www.dorsetcouncil.gov.uk/documents/35024/309543/Dorset+Heathlands+2020-2025+SPD+Adopted.pdf/bda03d74-cbc9-57c9-b3be-6253ba2825fb> [Date accessed: 31/03/25]

- 5.4.5 Some examples of HIPs include Upton Country Park SANG which contains a 1,000 sq. m. dog recall and training area providing people in the local area with a designated area for dog walking and related dog recreation to reduce the numbers of dog walkers at the designated heathlands.
- 5.4.6 Infrastructure has also been improved along the River Stour at the Stour Valley water meadows. This project includes a designated car park, providing easy access for visitors. The site also contains seating and a network of circular walking routes to ensure residents have access to a range of recreational opportunities. The site is well positioned connecting to an existing network of footpaths and cycle paths providing longer routes along the River Stour⁵¹.

5.5 SANG / Infrastructure project design criteria

- 5.5.1 The Cotswold Beechwoods Recreation Mitigation Strategy, at its Appendix 3, sets out criteria for the delivery of traditional SANG. This set of criteria is reproduced below in **Box 5.1** and applies to bespoke developer-led SANG. These criteria follow the original SANG guidelines which were provided for the TBH (**paragraph 5.1.2**)^{52,53}:

Box 5.1: SANG guidelines from the Cotswold Beechwoods Recreation Mitigation Strategy⁵⁴

Cotswold Beechwood Recreation Mitigation Strategy: SANG Guidelines

- SANG should be provided at a rate of 8ha per 1000 new residents; this per ha standard is equivalent to 0.0192ha per dwelling (assuming an occupancy rate of 2.4 people per dwelling).
- Sites with sports grounds, playing fields or children's play areas are unlikely to meet the criteria for SANG or if such features are present, they should not be counted towards the per ha standard.
- Where sites have existing visitor use, this existing use will need to be taken into account when applying the per ha standard. This will require visitor survey data to be available. Sites are likely to have additional capacity where average visitor use is less than 1 person per ha per hour⁵⁵. Where existing sites are already well used, there will be a need to demonstrate that the measures will be effective, and this may require some delivery upfront.
- The focus for the SANGs should be large sites of at least 40ha (which will accommodate suitably long routes), however smaller sites (15ha and above) may work, depending on the location and quality. For smaller sites, connectivity to the Public Rights of Way network will be essential to allow longer routes.

⁵¹ BCP Council (2024) Stour Valley water meadows along the River Stour. Available at: <https://bcpprojects.net/stour-valley-water-meadows/> [Date accessed: 31/03/25]

⁵² Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

⁵³ Natural England (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG)

⁵⁴ Footprint Ecology (2022) Cotswold Beechwoods SAC Recreation Mitigation Strategy. Appendix 3 Available at: <https://www.cotswold.gov.uk/media/0m5bwtv2/cotswold-beechwoods-mitigation-strategy-110522.pdf> [Date accessed: 18/02/25]

⁵⁵ This provides a guide or approximate benchmark, typically busier than the relevant European sites, but less than an urban park. Sites will need to be considered on a case-by-case basis.

Cotswold Beechwood Recreation Mitigation Strategy: SANG Guidelines

- SANGs should provide parking that is free or significantly cheaper than parking at the European sites (noting that parking at all the Cotswold Beechwoods car-parks is free). A guide to parking provision should be in the region of 1.5 spaces per ha of SANG⁵⁶.
- They should be quiet countryside locations, away from traffic noise, industrial sites etc. They should have a sense of space, openness and viable alternatives to the Cotswold Beechwoods.
- They should contain a variety of habitats and be scenic, ideally with views.
- They should provide attractive, informal areas for dog walking: a range of walk lengths on relatively dry terrain, including some of at least 3km where dogs can be safely off the lead during the whole walk.
- They should provide routes that attract walkers, potentially including families. Walks are likely to need to be circuits with some interest (such as viewpoints, heritage features etc.).
- The site(s) should provide access all year round, without areas becoming waterlogged or inaccessible for significant periods of the year due to wet or muddy terrain.
- They could provide routes that work for cycling, potentially accommodating family cycling groups and mountain bikes as a low-key destination.
- Access points to the SANG(s) should be primarily within a 5km radius or 10-minute drive and easily accessible by road from the development. Ideally, they would provide direct foot access and good access routes for cyclists. Direct access on foot would mean some SANG-equivalent mitigation capacity within around 500m radius of proposed housing locations.
- New SANGs should be recognisable as a 'destination' such that sporadic visitors are drawn from a wide area (i.e. not just residents in the new development). As such they will need to be positively promoted and welcoming.
- On-site infrastructure should be relatively low key, and could include the following as appropriate:
 - Small scale visitor centre/ shelter (not necessarily staffed);
 - Interpretation (providing information about the area)
 - Way finding infrastructure to direct people around the site
 - Some surfaced paths/ boardwalks
 - Wildlife viewing facilities (such as screens)
 - Range of paths (some waymarked) that provide a range of different routes and circuits, potentially including some longer routes for cycling (perhaps family groups and relatively low-key mountain bike circuits) but not such that access (e.g. appeal to dog walkers) is compromised
 - Access to water for dogs to drink, bathe and splash in
 - Benches/ informal seating
 - Viewpoints
- SANGs will need to be promoted through a range of different ways, including signage, so that they are easy to find and local residents (both new and existing) are well aware of the site.
- SANGs will need to provide access in perpetuity and therefore require some legal mechanism to ensure this.

⁵⁶ This figure will depend on how close the SANG is to housing and the proportion of visitors that might arrive on foot or by bicycle. A busy SANG site might be expected to have up to 1 person visiting per ha per hour.

Cotswold Beechwood Recreation Mitigation Strategy: SANG Guidelines

- Sites with significant nature conservation interest (SSSI) or particularly vulnerable species present are unlikely to be suitable as SANG.

5.6 Infrastructure Projects for the Cotswold Beechwoods SAC

- 5.6.1 The Cotswold Beechwoods Recreation Mitigation Strategy, at its Appendix 3, also sets out high level guidance for the delivery of Infrastructure Projects. The Guidance provided in the Mitigation Strategy for Infrastructure Projects as alternative recreation spaces recognises the character of Cheltenham which is urban in nature with limited green space for new SANG. As an alternative the guidance notes that developer contributions should be made towards Infrastructure Projects in suitable locations. The guidance requires that Infrastructure Projects focus on improvements to existing open spaces which are already accessible, but which could be managed or improved to make them more attractive to visitors who might otherwise visit the Cotswold Beechwoods SAC. In particular, the Mitigation Strategy notes that gains could be made where there is currently a low level of use at recreational resources.
- 5.6.2 Where large areas of land for purchase are likely to be expensive and reliant on opportunity, the Mitigation Strategy notes that Infrastructure Projects provide smaller and more frequent opportunities for mitigation. The Mitigation Strategy notes that projects may initially focus on 'quick' wins, such as existing parks, greenspace sites and the public rights of way network. It also notes that projects may also include permitted routes for mountain bikers, changes to parking, signposts, promotion of existing greenspace sites etc. Ultimately the guidance set out in the Mitigation Strategy requires Infrastructure Projects to provide a suite of opportunities for residents to recreate which will be delivered in line with the pace of housing growth and at locations where development will bring new residents.
- 5.6.3 Infrastructure Projects identified in this Focused Implementation Plan are intended to provide attractive alternative recreational opportunities through the enhancement of existing green spaces and recreational routes. Projects may include smaller SANG-type spaces, improvements to Public Rights of Way and other recreational connections, and measures targeted towards the principal recreational user groups of the Cotswold Beechwoods SAC, including walkers, dog walkers and cyclists.
- 5.6.4 Enhancement of existing parks and greenspaces should focus on improvements to their accessibility and recreational functionality to allow them to divert residents from the Cotswold Beechwoods SAC. Such improvements would focus on the key user groups of the SAC, such as walkers and dog walkers (**paragraph 2.2.7**). As set out in **Section 4.1**, there is an extensive walking and cycling network across Cheltenham which connects to the wider area. Connections to and along this could be enhanced by improving the condition and signage of routes. This would increase the frequency with which this network is used and provide an alternative for walkers and dog walkers to visit the SAC. Measures could include:
- Path surfacing
 - Way-marking
 - Installation of interpretation boards
 - Links to dog exercise areas

- Links to biking facilities
- Provision of seating
- Clearance of vegetation and enhancement of planting / biodiversity
- Installation of lighting
- Promotion

5.6.5 Finally, the Cotswold Beechwoods SAC Mitigation Strategy recognises that where SANG / Infrastructure Project funds accumulate and there is a lack of opportunity for the money to be spent effectively, then the funding should be used to increase the level of SAMM, for example through further wardening. It is however noted that any such decisions would need to be made by a governance group dedicated to implementation of SAMM measures.

5.7 Methods used to calculate mitigation requirements

5.7.1 As noted in **Section 5.2**, the Cotswold Beechwoods SAC Mitigation Strategy requires all new residential development within the ZOI to contribute towards SAMM and in addition either provide bespoke SANG (e.g. as part of a large development) or contribute towards SANG/Infrastructure Projects (in compliance with guidance set out in **Section 5.2**).

5.7.2 There is an established methodology in place for the calculation of mitigation capacity at traditional SANG. Where projects set out in this Focused Implementation Plan align closely with traditional SANG, an 8ha of SANG per 1000 population calculation has been used (**Section 5.4**).

5.7.3 Following identification of the preferred SANG / Infrastructure Projects, visitor count surveys were undertaken at each of the preferred sites to establish existing baseline levels of recreational use. The survey results were used to apply discounting to the estimated visitor uplift for each project, ensuring that only the additional recreational capacity generated through the proposed enhancements contributes towards mitigation. This approach provides a more robust and evidence-based estimate of mitigation capacity than reliance on professional judgement alone.

5.8 Methodology to calculate traditional SANG requirements

5.8.1 The standard established across the country, and as set out in the Cotswold Beechwoods SAC Recreation Mitigation Strategy, for bespoke developer led SANG is a calculation of 8ha per 1000 population.

5.8.2 As noted in **Section 3.1**, the number of dwellings to be accounted for in this strategy is 1,127 dwellings⁵⁷. This number does not include development which has provided its own bespoke SANG but does include all dwellings which have already made a financial contribution towards the mitigation strategy. This equates to 2,705 residents for whom alternative recreational space needs to be delivered.

⁵⁷ Based on the CP allocations information provided by CBC on the 14/04/26. This number is inclusive of windfall dwellings which have been indicated by CBC (total 260 windfall) in SAC payments yearly projection excel received on 14/04/26.

- 5.8.3 This means that based on a traditional approach there would be a total requirement of **22ha (rounded from 21.6ha)** of SANG to meet the need in Cheltenham. Whilst ideally this SANG would need to be designed to the standards set out in **Box 5.1**, it is noted in the Mitigation Strategy that SANG networks, either not meeting the standard, or all of the traditional guidelines (**Box 5.1**), but which does provide a semi natural experience of a size greater than 2ha for the local populous, could be considered for delivery by the Council.
- 5.8.4 SANG can either be created or existing green spaces can be enhanced to provide SANG with the specific purpose of absorbing recreational pressure on the SAC. Where existing open spaces are used, the scale of mitigation potential and the number of additional visitors that can be accommodated will vary according to existing visitor use, site characteristics, accessibility and the nature of the proposed enhancements. Existing visitor levels have therefore been established through visitor count surveys, allowing discounting to be applied so that only the additional recreational capacity generated by the proposed enhancements contributes towards mitigation.
- 5.8.5 The catchment for bespoke developer-led SANG is dependent on the particular characteristics and location of a SANG, and also its location within the wider green infrastructure network. As a guide these catchments are as follows:
- SANG of 2-12ha will have a catchment of 2km
 - SANG of 12-20ha will have a catchment of 4km
 - SANG of 20ha+ will have a catchment of 5km⁵⁸
- 5.8.6 The evidence suggested that smaller sites (of 2ha) would have a smaller visitor draw, attracting people who may visit on foot, whilst medium (12-20ha) and larger sized sites (20ha–40ha) with a range of facilities would act as ‘interceptor sites’ for people coming by car within a 4km-5km of new development.
- 5.8.7 Cheltenham Borough spans approximately 8 km from west to east and 7 km from north to south. Of this area, as outlined in **Section 4.2**, the easternmost part of the Borough includes the Cotswold escarpment, which forms part of the NL.
- 5.8.8 The borough primarily comprises Cheltenham town and its surrounding suburbs, characterised by a well-established urban form with relatively high density and a largely continuous built fabric. While areas of green space are limited in extent, they are of generally high quality and well maintained. The borough is well connected by public and active transport networks, providing good accessibility to these green spaces. Consequently, a traditional catchment-based approach to SANG allocation will not be applied in this Implementation Plan. Instead, the selected projects have been identified using a borough-wide approach that reflects Cheltenham's urban form, existing green infrastructure network and accessibility. The mitigation capacity of each project has been informed by the theoretical residual capacity following discounting, alongside consideration of site characteristics, proposed enhancements, accessibility and suitability for relevant user groups. The selected projects will aim to deliver a semi-natural experience and incorporate characteristics similar to traditional SANG.

⁵⁸ The TBH SANG catchments (paragraph 5.3.4) were established by considering the user groups visiting the TBH SPA and the distance travelled by these user groups. The user groups were predominantly walkers and dog walkers. The SANG catchments were compared to visitor survey data obtained for other heathland sites, in particular the Dorset Heaths designation [CLARKE, R., LILEY, D., UNDERHILL-DAY, J. and ROSE, R. (2005) Visitor access patterns on the Dorset heathlands. English Nature Research Reports, No. 683.]

5.8.9 The following methodology has been used to inform the mitigation capacity of the preferred Infrastructure Projects. It combines visitor count data and a discounting exercise to establish the theoretical residual recreational capacity of each site after accounting for existing use. This residual capacity is considered alongside professional judgement regarding site characteristics, the proposed enhancements and the suitability of each site for relevant user groups, including walkers, dog walkers and cyclists, to determine the mitigation capacity of each project.

5.9 Method for calculating mitigation capacity of preferred infrastructure projects

5.9.1 High-level visitor count surveys have been undertaken at each of the preferred SANG / Infrastructure Project locations by the Council to provide an initial understanding of existing levels of recreational use. The surveys comprised counts of people observed using each location during defined survey periods, providing a snapshot of existing visitor use from which an indicative annual level of recreational use could be estimated.

5.9.2 More detailed visitor surveys are recommended to establish site-specific patterns of recreational use and to refine the high-level visitor count data used in this Focused Implementation Plan. The following survey methodology, based on approaches adopted for similar strategic mitigation solutions⁵⁹, could be used for this purpose:

- A tally count is required for at least two weekdays and one weekend day for each candidate SANG / Infrastructure Project with existing public access.
- Days do not need to be consecutive, however all tally counts should normally be undertaken in close proximity to one another (within 2-3 weeks).
- The hours of surveying should respond to the season and the amount of daylight available, taking account of other factors such as wooded areas which can generally be darker. A total of 8 hours of surveying per day is expected in summer months between 7am and 7pm. This reduces to 6 hours in winter months.
- Weather should be reasonably good for the time of year that the survey is being undertaken.
- Surveys should capture visitor access points that are generally well used.

5.9.3 The calculation set out in **Table 5.1** has been used to estimate the recreational capacity of each preferred SANG / Infrastructure Project, taking account of existing levels of recreational use.

Table 5.1: How recreational capacity and headroom are calculated

Step	What is being measured	Unit	Calculation	What the calculation is doing
A	Baseline level of visitor use at the proposed SANG / Infrastructure Project	Visits per year	$\text{Average daily visitor count} \times 365$	Estimates how many visits are currently made to the proposed SANG / Infrastructure Project over a year.

⁵⁹ Dacorum Borough Council. Chilterns Beechwoods Special Area of Conservation Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest To support the Habitats Regulations Assessment for Dacorum Borough Council; Buckinghamshire Council; Central Bedfordshire Council; St. Albans City and District Council.

Step	What is being measured	Unit	Calculation	What the calculation is doing
B	Estimated number of people making those visits	People	$A \div 57$	Converts visits into people. The calculation assumes that one person makes 57 visits per year. The figure of 57 comes from the Cotswold Beechwoods SAC visitor survey and represents the average number of visits made to the SAC by a visitor each year.
C	Area of the proposed SANG / Infrastructure Project	Hectares (ha)	Measured area	Establishes how much green space is available.
D	Estimated maximum recreational capacity at the proposed SANG / Infrastructure Project	People	$C \div 8 \times 1,000$	Converts the area into a population capacity using the SANG standard of 8 ha per 1,000 people.
E	Estimated recreational headroom at the proposed SANG / Infrastructure Project	People	$D - B$	Subtracts the estimated number of existing users from the estimated number of people the location could accommodate.
F	Area represented by the recreational headroom	Hectares (ha)	$E \div 1,000 \times 8$	Converts the remaining capacity in people back into hectares using the 8 ha per 1,000 people standard.
G	Estimated housing capacity represented by the recreational headroom	Dwellings	$E \div 2.4$	Converts the remaining capacity in people into dwellings, assuming 2.4 people per dwelling.

5.10 Assumptions and limitations

- 5.10.1 This Focused Implementation Plan sets out a means of facilitating the delivery of SANG and Infrastructure Projects as part of the mitigation programme for the Cotswold Beechwoods SAC. It is anticipated that the Plan will be reviewed and refined in response to future housing delivery identified through the emerging SLP.
- 5.10.2 The approach to calculating SANG provision draws on established SANG standards developed for strategic recreational mitigation elsewhere, including the Thames Basin Heaths. These standards have been incorporated into the Cotswold Beechwoods SAC Recreation Mitigation Strategy and therefore provide the basis for calculating SANG provision in this Focused Implementation Plan. They provide a consistent basis for calculating provision but are arguably not tailored to the particular recreational characteristics of the Cotswold Beechwoods SAC or green spaces within Cheltenham.
- 5.10.3 The visitor counts undertaken at the preferred SANG / Infrastructure Projects provide a high-level indication of existing recreational use. More detailed visitor surveys and monitoring would allow the recreational capacity calculations to be refined through future reviews of this Focused Implementation Plan.

5.11 Selection of projects for recreational mitigation

- 5.11.1 The primary purpose of this Implementation Plan is to provide alternative attractive and realistic recreational opportunities for people who would otherwise have visited the Cotswold Beechwoods SAC and therefore avoid adverse recreational impacts from new development in CBC.
- 5.11.2 The approach taken to the selection of SANG / Infrastructure Projects complements and enhances the aims and objectives of Cheltenham's GI Strategy⁶⁰, Open Space Assessment Report⁶¹, and Open Space Standards Paper⁶², set out in **Chapter 4**. This Focused Implementation Plan also aims to contribute to deficiencies in access to green spaces across the Borough by ensuring a network of bespoke developer led SANG (as set out in **Table 3.1**) and SANG / Infrastructure Projects are easily accessed from proposed future dwellings set out in the CP and JCS.

6 Identifying potential infrastructure projects

6.1 Sequential approach to site review

- 6.1.1 A long list of potential SANG / Infrastructure Projects was identified through a review and analysis of possible future blue and green projects across Cheltenham in consultation with the Council's Green Spaces Team. These sites are situated across Cheltenham and range in size and type and have the potential to be enhanced to absorb recreational pressure that would otherwise occur at the SAC. The sites typically consist of existing open green spaces such as parks and recreation grounds, but also include parts of the PRow network to be reinstated and/ or reconnected and connection with disused railway lines. The long list of sites can be seen in **Figure 6.1** and is listed in the **Appendix A**⁶³.
- 6.1.2 The typology for each site is described in **Section 4.2**. In **Appendix A**, the final column provides a GI corridor reference based on the Joint Core Strategy (JCS) GI Strategy⁶⁴. These references identify priority GI opportunities in Cheltenham, focusing on enhancing river and brook corridors to create pedestrian and cycle links between existing and planned open spaces. The corridor codes are as follows:
- C – River Chelt
 - H – Hatherley Brook

⁶⁰ Joint Core Strategy Gloucester, Cheltenham and Tewkesbury (2014) Green Infrastructure Strategy. Available at: https://www.gloucester.gov.uk/media/2omb2su5/jcs_green_infrastructure_strategy_june_2014.pdf [Date accessed: 19/02/25]

⁶¹ Knight, Kavanagh and Page (2016) Cheltenham and Tewkesbury Open Space Assessment Report. Available at: https://www.cheltenham.gov.uk/downloads/file/6477/open_space_assessment_report [Date accessed: 19/02/25]

⁶² Knight, Kavanagh and Page (2016) Cheltenham Borough Council Open Space Study Standards Paper. Available at: https://www.cheltenham.gov.uk/downloads/file/6480/open_space_standards_paper [Date accessed: 19/02/25]

⁶³ Appendix A provides the long list of sites. References were allocated to each site for the purposes of filtering and have not been carried over into the main section of this report.

⁶⁴ Joint Core Strategy Gloucester, Cheltenham and Tewkesbury (2014) Green Infrastructure Strategy. Available at: https://www.gloucester.gov.uk/media/2omb2su5/jcs_green_infrastructure_strategy_june_2014.pdf [Date accessed: 19/02/25]

- W – Wyman's Brook

6.1.3 Generally, the larger sites included in the long list are found towards the periphery of the urban settlement of Cheltenham, with smaller sites typically found in the more central areas. The linear routes, including aspects of the PRow network which could be enhanced, are located at the urban fringe, connecting to the wider countryside beyond. There is also a concentration of sites associated with the Honeybourne Line which runs centrally through the Borough.

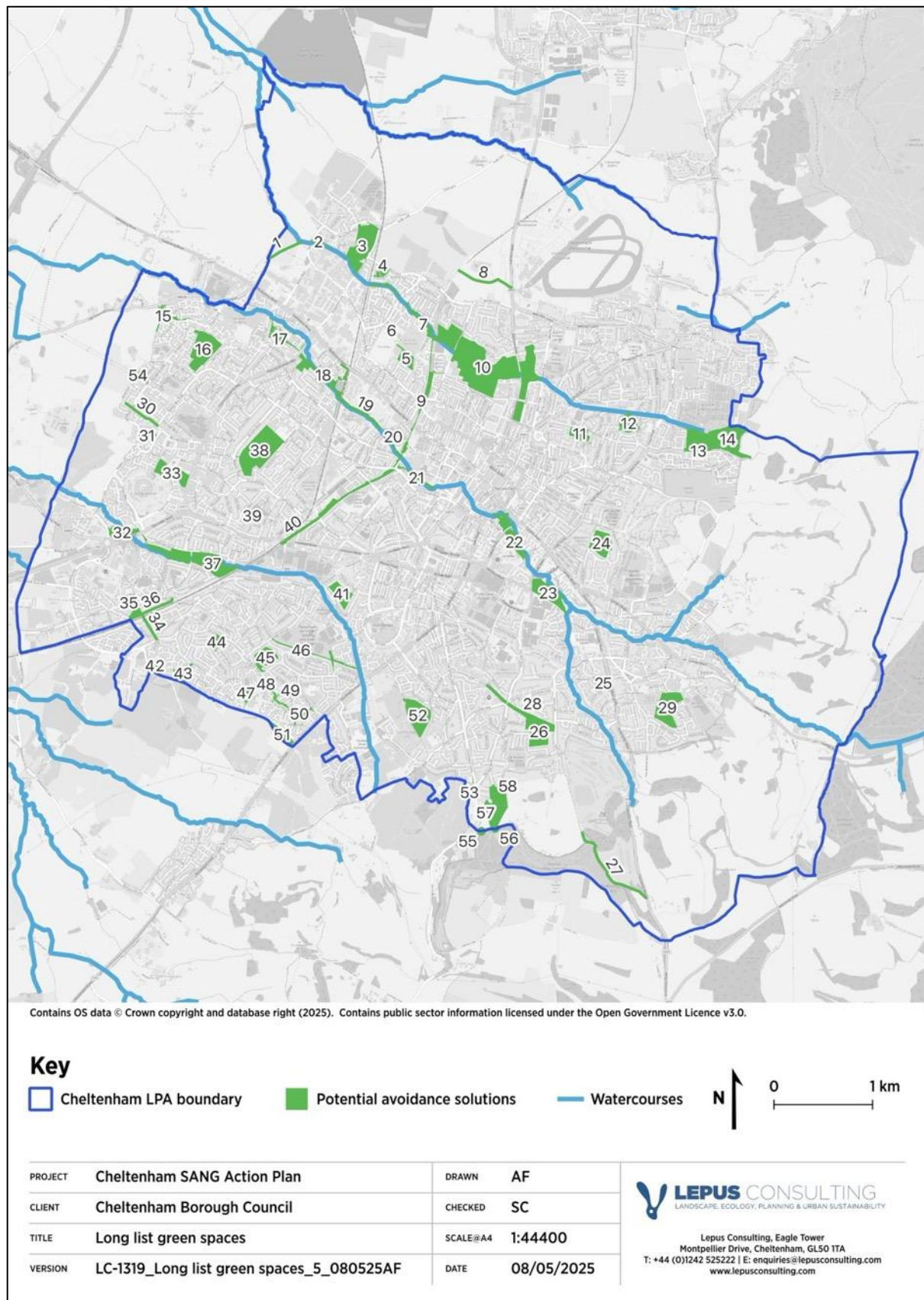


Figure 6.1: Long list of potential SANG / Infrastructure Projects provided by CBC

- 6.1.4 This long list of sites underwent an initial sifting process to remove sites containing playing fields, as these are unlikely to meet the criteria for alternative recreation space as they are also contributing to the playing pitch provision in Cheltenham and where enhancements around the site periphery are unlikely to be feasibly incorporated. Sites which are already well established with good visitor infrastructure were also discounted as they have an existing high visitor use, with little opportunity for further enhancement / intervention to increase visitor uplift. Finally, sites which were fragmented in nature and not connected to key green space assets, or near to forthcoming development in Cheltenham, were also removed.
- 6.1.5 This sifting process was done in conjunction with CBC to ensure no appropriate site was missed. The sites removed through the initial sifting process are as follows:
- PRow adjacent to access road to Gallagher Retail Park
 - Swindon Village Playing Fields
 - Prince of Wales Stadium PRow
 - Whaddon Recreation
 - Clyde Crescent
 - Priors Farm Playing Fields
 - Springfield Park
 - Sandford Park
 - Cox's Meadow
 - Sandy Lane Playing Field
 - Sandy Lane to Leckhampton Hill
 - Hester's Way Park
 - Hatherley Park
 - Caenarvon Park
 - Brizen Recreation
 - Burrows Playing Field to Leckhampton Hill
 - Tramway
 - Henley Road
- 6.1.6 The long list of potential SANG / Infrastructure Projects was then filtered against a set of bespoke selection criteria which is detailed in **Box 6.1**. These criteria were devised to ensure integration with GI aims and aspirations in Cheltenham (**Section 4.6**). This set of criteria was informed by consultation at a stakeholder workshop which was held on 30th April 2025.

Box 6.1: Criteria for SANG / Infrastructure Projects to mitigate recreational impacts at the Cotswold Beechwoods SAC

Criteria for SANG / Infrastructure Projects to mitigate recreational impacts at the Cotswold Beechwoods SAC

1. Solutions must provide attractive, realistic alternative green space for people who would have otherwise visited the SAC.
2. Solutions to deliver Council led traditional SANG should be sought in the first instance – these will be projects over 15ha in size which are able to meet the criteria set out in Appendix 3 of the Cotswold Beechwoods SAC Recreational Mitigation Strategy. Where smaller sites meet the criteria for traditional SANG, consideration should be given to a network of linked SANG.
3. Where traditional Council led SANG are not possible the following criteria apply to the design and selection of Infrastructure Projects:
 - a. Infrastructure Projects should enhance connectivity between the Council's existing GI assets and network of green spaces, focusing on areas where there may be a deficit in such resources.
 - b. Infrastructure Projects should complement and enhance the aims of the JCS GI Strategy. This will include improved connectivity to the surrounding landscape and wider countryside, enhancement of disused railway corridors and the promotion of active travel opportunities.
 - c. Infrastructure Projects should seek to maximise opportunities for BNG uplift and integration with the Gloucestershire LNRS.
 - d. Infrastructure Projects should aim to ensure that residents can access a GI corridor/ asset within a 15 minute walk (1200m) and link to the wider PRow network to allow for longer walking routes.
 - e. Infrastructure Projects should target walkers, dog walkers and mountain bikers which form the main user groups visiting the Cotswold Beechwoods SAC.
 - f. Sites with significant nature conservation interest (e.g. SSSIs) or particularly vulnerable species present should be avoided.
 - g. Infrastructure Projects should be located outside areas of flood risk.

- 6.1.7 This filtering process identified a short list of SANG / Infrastructure Projects which were likely to be most fitting and appropriate as recreational avoidance solutions in Cheltenham for further consideration. Through this filtering process unsuitable sites were eliminated and a short list of sites compiled. This filtering process included a consideration of the timeframes associated with the delivery of projects.

7 Preferred SANG and recreation infrastructure projects

7.1 Introduction

- 7.1.1 Site walkover surveys were undertaken on the 4th, 7th and 9th of April 2025 to each short-listed Council-led SANG / Infrastructure Project. During the walkovers each site was tested against the selection criteria. Photos were taken at each site, as well as information noting how busy each site was, the user groups present and potential areas for improvement.
- 7.1.2 A meeting with CBC and Natural England took place on 9th September to inform the proposed SANG / Infrastructure Projects which would be taken forward to the Implementation Plan.
- 7.1.3 The short-listed sites have been categorised by delivery timeframe. Short-term projects form the focus of this Implementation Plan and include those intended to support residential growth already identified in the adopted CP and JCS (refer to in **Chapter 3**), particularly for developments unable to provide bespoke, on-site developer-led SANG. In such cases, developers are required to make financial contributions to the Council, which will be used to deliver Council-led SANG or Infrastructure Projects.
- 7.1.4 The short-term projects are illustrated in **Figure 7.1** and include the following:
- Benhall Open Space
 - Priors Farm
 - Pittville Park – Western Component
- 7.1.5 There are currently no single, council-owned green spaces of sufficient size to meet Natural England's standard SANG requirements (typically a minimum of 15 hectares, with a preference for sites closer to 40 hectares as set out in **Box 5.1**). To address this constraint, the Council has adopted a hybrid approach, comprising delivery of smaller, non-traditional SANG and complementary Infrastructure Projects that enhance connectivity and access across the green network and existing recreational provision in Cheltenham and have the potential to be enhanced to absorb recreational pressure that would otherwise occur at the SAC.
- 7.1.6 The Council-led recreation infrastructure projects will not meet all of the traditional guidelines for SANG (**Box 5.1**) but will provide a semi natural experience for new residents through the delivery of sites greater than 2ha. Where possible features typical of traditional SANG will be incorporated into these projects.
- 7.1.7 Complementary Infrastructure Projects focus on enhancements for users of the Cotswold Beechwoods SAC arising from new housing growth, such as walkers and cyclists, alongside improvements in the connectivity of underused greenspaces and recreational linkages across Cheltenham.
- 7.1.8 The recreational capacity of the preferred SANG and recreational infrastructure projects has been calculated using the methodologies set out in **Sections 5.8 and 5.9**.

- 7.1.9 In addition to the short-term programme of projects, consideration has been given to a pipeline of medium and long-term projects. These longer-term projects are intended to accommodate future housing growth and plan-led development, as will be identified in the SLP and any subsequent review of the CP. These projects can be brought forward in future plan periods as necessary to support the delivery of sustainable development in Cheltenham and avoid recreational pressure upon the SAC. The identified medium and long-term projects are set out in **Figure B.1, Appendix B**.

7.2 Priors Farm

- 7.2.1 Priors Farm is located on the north-eastern edge of Cheltenham, adjacent to Cheltenham Cemetery and Crematorium, and at the bottom of the Cotswold NL and the Cotswold Escarpment. Previously the site was a tenanted farm and therefore has a natural feel with habitats comprising a mix of grassland, scrub, woodland, a small orchard, and a wetland area associated with a flood alleviation scheme for the neighbouring housing development to the south. Wyman's Brook runs along the southern boundary of the site and contributes to its natural character.
- 7.2.2 Priors Farm is located next to Priors Farm Playing Fields, which includes a car park providing direct access for visitors. The predominantly enclosed nature of the site and its distance from roads make it particularly popular with dog walkers. Whilst there are no formal PRow across the site, a single promoted route runs along the site's southern boundary adjacent to a minor watercourse and a network of informal non permissive desire lines has developed across the site (see **Figure 7.2**). The Cheltenham Circular PRow runs along the eastern boundary of the site.
- 7.2.3 Due to its peripheral location within the Borough, Priors Farm is not well connected to Cheltenham's internal GI assets. However, its location enables strong connections to the wider countryside via the PRow network, including links to Cleeve Hill and Cleeve Common, which are significant recreational assets in the area (**Figure 7.3**).
- 7.2.4 High-level visitor count surveys were undertaken at Priors Farm to establish existing levels of recreational use. The survey results were used to account for existing recreational use when calculating the recreational capacity available for mitigation.

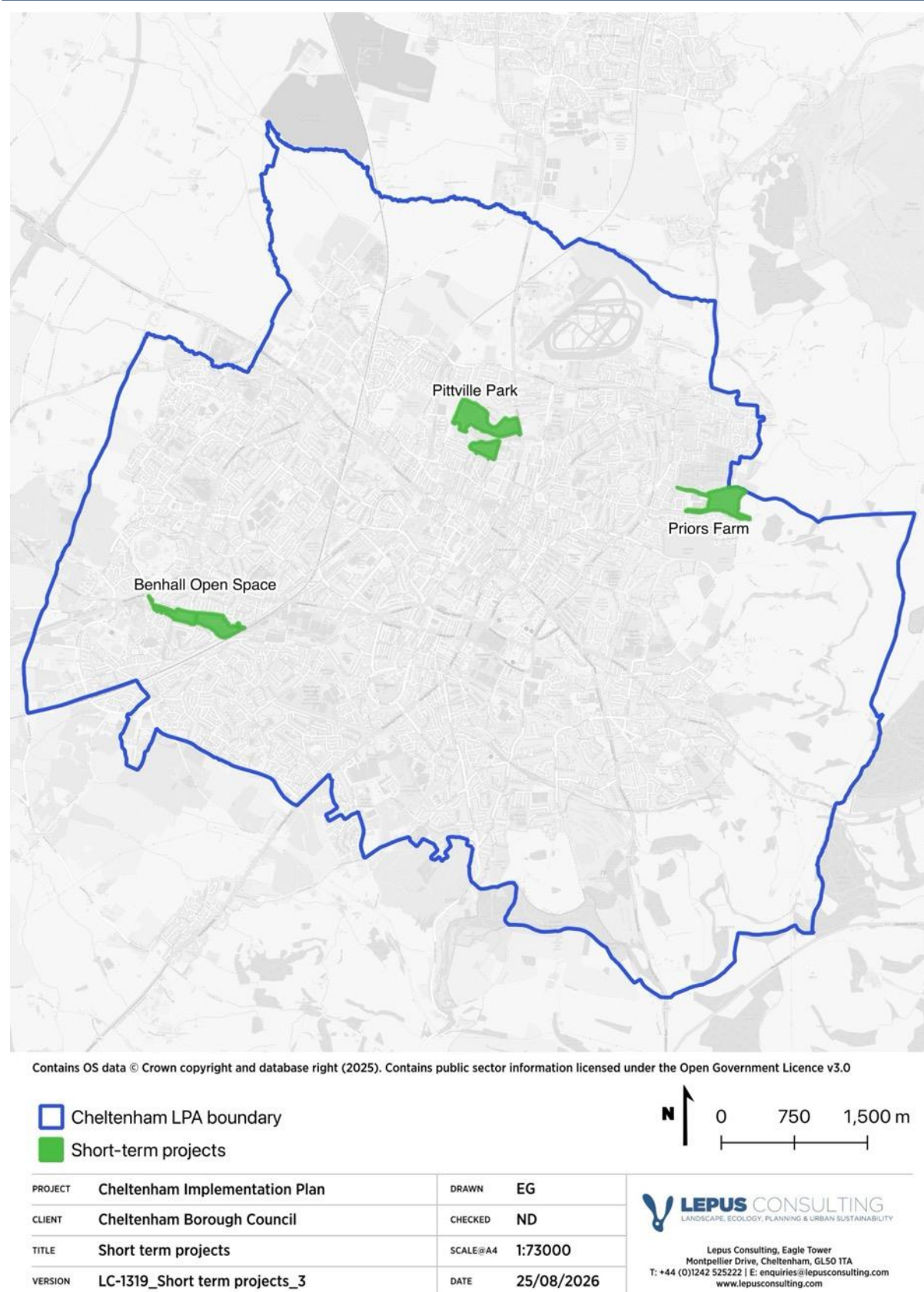


Figure 7.1: Map of short-term SANG / Infrastructure Projects



Photo of large wetland area at the site



Photo of informal footbridge over brook inhibiting accessibility

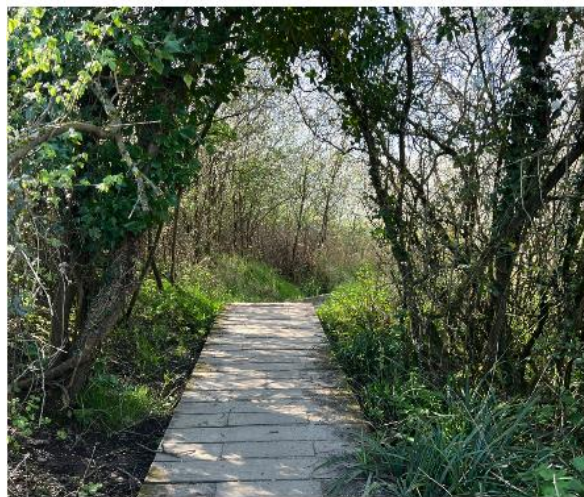


Photo of footbridge over Wyman's Brook in wooded area



Photo of planted orchard area

Figure 7.2: Photos taken during walkover surveys at Priors Farm

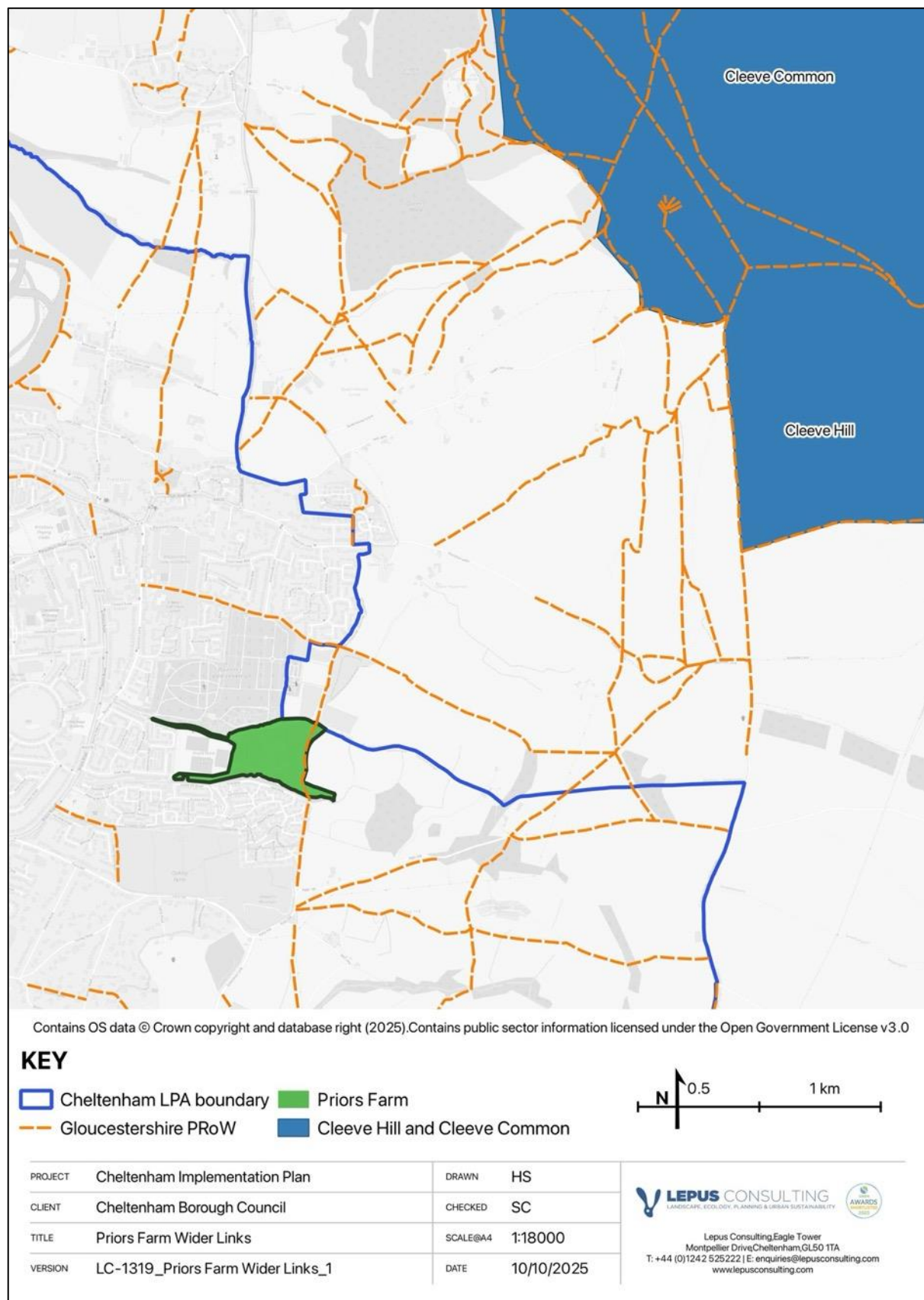


Figure 7.3: Map showing Priors Farm's links to wider countryside

- 7.2.5 Priors Farm is considered well-positioned to function as a SANG, offering an alternative destination for recreational users who might otherwise visit the Cotswold Beechwoods SAC. The site's natural character, mix of grassland, scrub, woodland and wetland habitats, existing informal route network, accessibility from Priors Farm Playing Fields and connections to the wider PRow network provide a strong basis for its use as an alternative recreational destination. The site lacks ecological designations and formal sports facilities, making it suitable for informal recreation. It is also well aligned with the Wyman's Brook Green Corridor and PRow connections to the wider countryside. The site is enclosed and allows off-lead access for dog walkers.
- 7.2.6 Proposed enhancements will increase the recreational appeal and capacity of Priors Farm. Formal pathways and circular walks of varying lengths will be provided around existing site features, including woodland, the escarpment and water bodies. These will include the Pond Walk, Farm Field Walk and Furrow Field Walk. Connections to the wider PRow network, including the Cheltenham Circular Footpath, will provide access to longer routes significantly greater than 3 km.
- 7.2.7 Information boards, signage and waymarking will promote the available routes, supported by benches and replacement bridges. A bike pump track will also be provided in the north-east of the site, targeting a recreational user group identified at the Cotswold Beechwoods SAC. The pump track will be similar to that provided at Burrows Playing Field, illustrated in **Figure 7.4**.
- 7.2.8 Existing bins will be replaced and parking at Priors Farm Playing Fields will be extended to facilitate increased recreational use. Existing parking off Imjin Road provides more than 1.5 spaces per hectare, consistent with the SANG guidelines set out in **Box 5.1**, and is linked to Priors Farm by an existing pedestrian access route. The proposed enhancements are illustrated in **Figure 7.5** and summarised in **Table 7.2**.

7.3 Estimated recreational capacity

- 7.3.1 High-level visitor count surveys were undertaken at Priors Farm to establish baseline levels of recreational use. The survey results were used to account for existing recreational use when calculating the site's recreational capacity. **Table 7.1** presents the resulting recreational capacity available for mitigation, expressed as SANG-equivalent area and the equivalent number of dwellings.

Table 7.1: Estimated recreational capacity at Priors Farm

A. Total visits per annum to Priors Farm	B. Equivalent no. of visitors p.a	C. Estimated Area (ha)	D. Capacity to mitigate	E. Residual mitigation capacity	F. Residual area of SANG capacity available	G. SANG capacity (equivalent no. of dwellings)
2993	52.51	9.12ha	1140	1087.49	8.70ha	453



Figure 7.4: Bike Track Burrows Field

Table 7.2: Summary of enhancements at Priors Farm

Project:	Priors Farm SANG
Summary of Enhancements	Mountain bike pump track Clearly labelled entrance points Formal paved pathways to create a network of routes which link to existing non-permissive / informal desire lines to provide circuits of different lengths around existing site features (including woodland components, water features and the escarpment) Formal and accessible bridges across streams Potential watercourse reprofiling Site interpretation boards with links to QR codes Waymarking posts Benches Fencing to allow dogs to exercise off the lead Access to water for dogs to drink/ cool down in Dog waste / litter bins Planting to provide a variety of habitat types Wildlife viewing facilities Project promotion Extension to existing parking Maintenance and inspection Monitoring
User groups	Walkers. Dog walkers. Mountain bikers.
Site size	9.12ha
Estimated SANG-equivalent mitigation capacity (see methodology in Section 5.4)	8.70ha



Figure 7.5: Map of Priors Farm enhancements

7.4 Benhall Open Space

7.4.1 Benhall Open Space is located to the west of Cheltenham and comprises an area of approximately 10.04ha. The site consists of two large areas of open grassland either side of Robert Burns Avenue as well as areas of woodland to the south and east of the site. Hatherley Brook is culverted through the site running along the southern boundary and then heading towards the north as shown in **Figure 7.6**. The site also contains a small play park area.

7.4.2 The site is accessible via Bibury Road, Robert Burns Avenue, and Willersey Road, and is used by walkers, runners, and dog walkers. On street parking is freely available on the roads which form the perimeter of the site. Several benches are located around the site. The western section of the open space includes a formal footpath following the course of the Hatherley Brook, though it currently terminates before connecting with the eastern component of the site. A formal path crosses the eastern section of the site toward Bibury Road which is supplemented by informal footpaths across the grassland connecting to the perimeter road. Informal bike features have been excavated within the woodland on site.

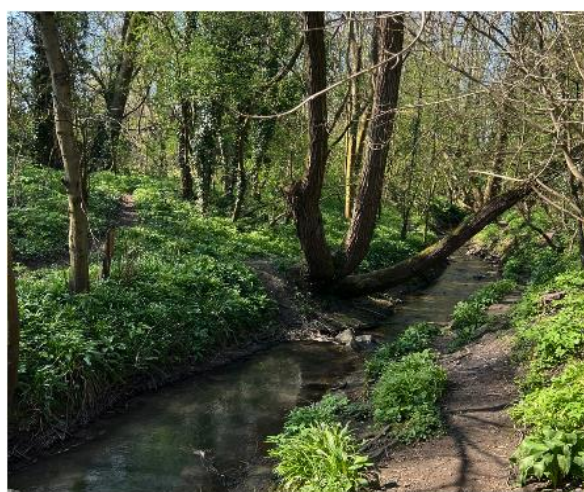


Photo of Hatherley Brook running through the site



Photo of wooded area where the culverted Hatherley Brook emerges



Photo of formal path trailing off in eastern part of site



Photo of formal path dissecting site next to play park area

Figure 7.6: Photos taken during walkover surveys at Benhall Open Space

7.4.3 Benhall Open Space is well-positioned to serve as an alternative recreational space for residents who might otherwise visit the Cotswold Beechwoods SAC. It lies close to areas of anticipated high housing growth in western Cheltenham. Whilst the site contains no designated ecological features or formal sports facilities, it has the potential to link into the wider GI network, particularly via connections to Cheltenham's river corridors.

7.4.4 There are opportunities to enhance Benhall Open Space to attract a higher volume and broader demographic of visitors. Proposed improvements include the development of a network of formal pathways and circular walks of varying lengths that traverse woodland areas and follow the course of Hatherley Brook, making use of the site's natural features. Paths will include the Meadow Walk and Woodland Walk. A number of these can be used informally for cycling. Additional information boards, signage, waymarking and maps are proposed to improve navigation, raise awareness, and enrich the visitor experience. Furthermore, strategic planting will introduce greater biodiversity and visual interest, enhancing the overall appeal of the site. **Table 7.4** provides a summary of the enhancements proposed at Benhall Open Space; these are also illustrated in **Figure 7.7**.

7.5 Estimated recreational capacity

7.5.1 High-level visitor count surveys were undertaken at Benhall Open Space to establish baseline levels of recreational use. The survey results were used to account for existing recreational use when calculating the site's recreational capacity. **Table 7.3** presents the resulting recreational capacity available for mitigation, expressed as SANG-equivalent area and the equivalent number of dwellings.

Table 7.3: Estimated recreational capacity at Benhall Open Space

A. Total visits per annum to Benhall Open Space	B. Equivalent no. of visitors p.a	C. Estimated Area (ha)	D. Capacity to mitigate	E. Residual mitigation capacity	F. Residual area of SANG capacity available	G. SANG capacity (equivalent no. of dwellings)
27145	476	10.04ha	1255	778.77	6.23ha	324

Table 7.4: *Summary of enhancements at Benhall Open Space*

Project:	Benhall Open Space
Summary of Enhancements	Clearly labelled entrance points marking routes around site. Formal paved pathways to create a network of routes which link to existing pathways and provide circuits of different lengths around existing site features (including woodland components and Hatherley Brook) Boundary treatment along Whittington Road/ Bibury Road to allow dogs to exercise off the lead Signage and site interpretation boards with QR code links Waymarking posts Benches New / replacement dog waste / litter bins Access to water for dogs to drink/ cool down in Woodland management and improvement of natural habitats Project promotion Maintenance and inspection – in perpetuity Monitoring
User groups	Walkers. Dog walkers. Cyclists.
Site size	10.04ha
Estimated SANG-equivalent mitigation capacity (see methodology in Section 5.4)	6.23ha



Figure 7.7: Map of Benhall Open Space enhancements

7.6 Pittville Park

- 7.6.1 Pittville Park is located to the north of Cheltenham and covers approximately 34.5 ha (see Figure 7.8). The proposed SANG / Infrastructure Project relates specifically to the **15.95 ha project area east of Tommy Taylor's Lane and west of Evesham Road**, which forms the area used in the recreational capacity calculations set out in **Table 7.5**. The project area provides opportunities to increase and diversify recreational use through targeted improvements to routes, accessibility, wayfinding and signage.
- 7.6.2 Pittville Park's lake areas are among Cheltenham's most frequently used recreational spaces, attracting walkers, dog walkers, cyclists, and runners. It also hosts a number of events including the weekly Parkrun and junior training hosted by the Cyclocross: Cheltenham and Country Cycling Club.
- 7.6.3 Pittville Park is well connected to Cheltenham's broader GI network and links to other priority GI sites, including the Honeybourne Line Open Space and Wyman's Brook Open Space as illustrated in **Figure 7.8**. The park also connects to the A435 Cheltenham to Bishop's Cleeve cycle route⁶⁵, providing links to the Cheltenham Racecourse and the surrounding PRow network.
- 7.6.4 The proposed enhancements have therefore been designed specifically to increase the recreational offer of the western component and encourage a broader range of users to make use of this area. Improvements to pathways and route connections will provide a greater choice of circular walks and improve connectivity across the western component, while signage, waymarking and interpretation will improve navigation and awareness of the available recreational opportunities. These measures are intended to increase the attractiveness and usability of the western component for walkers, dog walkers and cyclists, while reducing reliance on the more intensively used areas of Pittville Park. The western section of Pittville Park is free from ecological designations and formal sports grounds, and benefits from its links to disused railway corridors and the wider GI and PRow networks (**Figure 7.9**).

⁶⁵ <https://www.gloucestershire.gov.uk/highways/a435cycleway/>

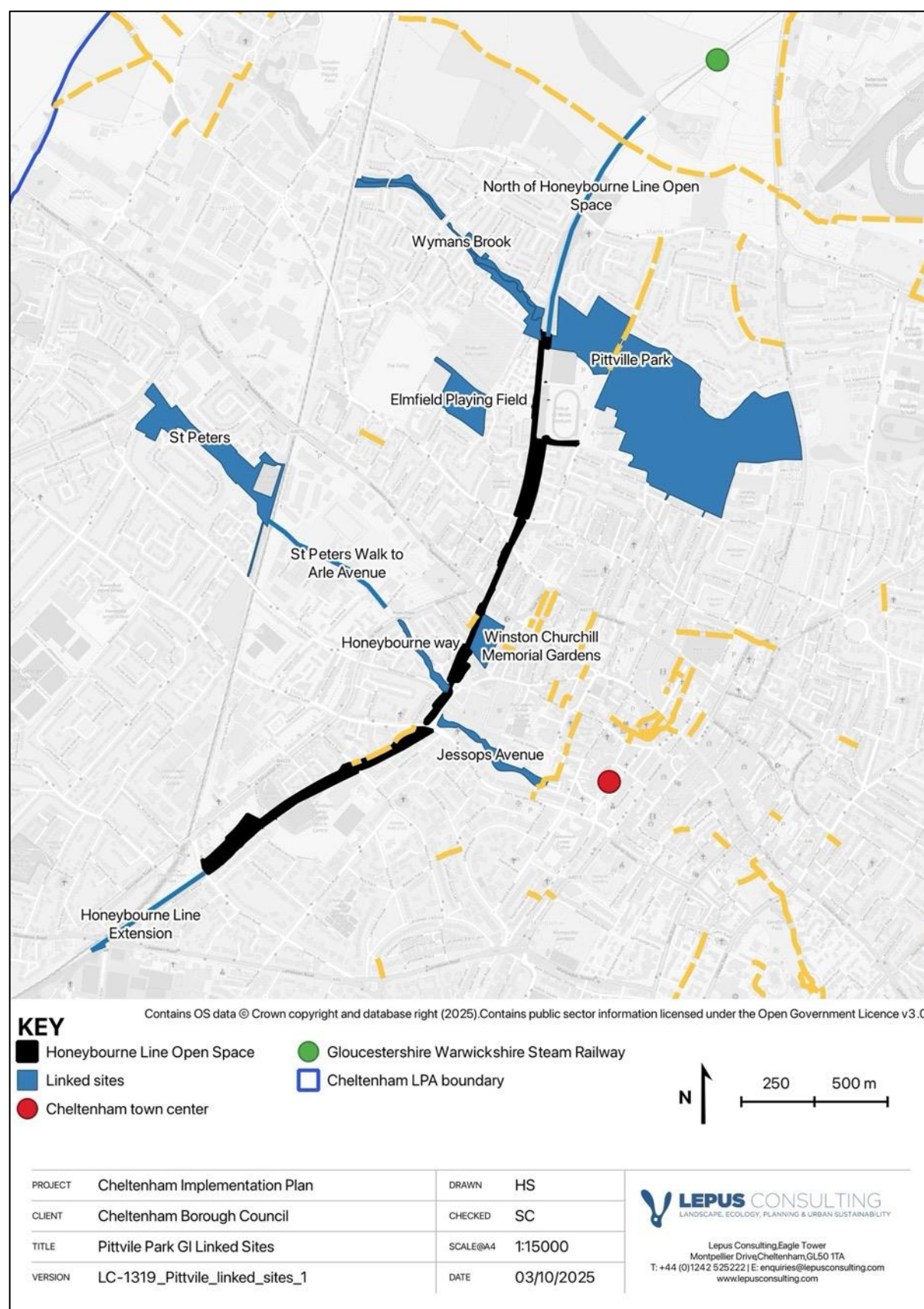


Figure 7.8: GI links to Pittville Park and the Honeybourne Line

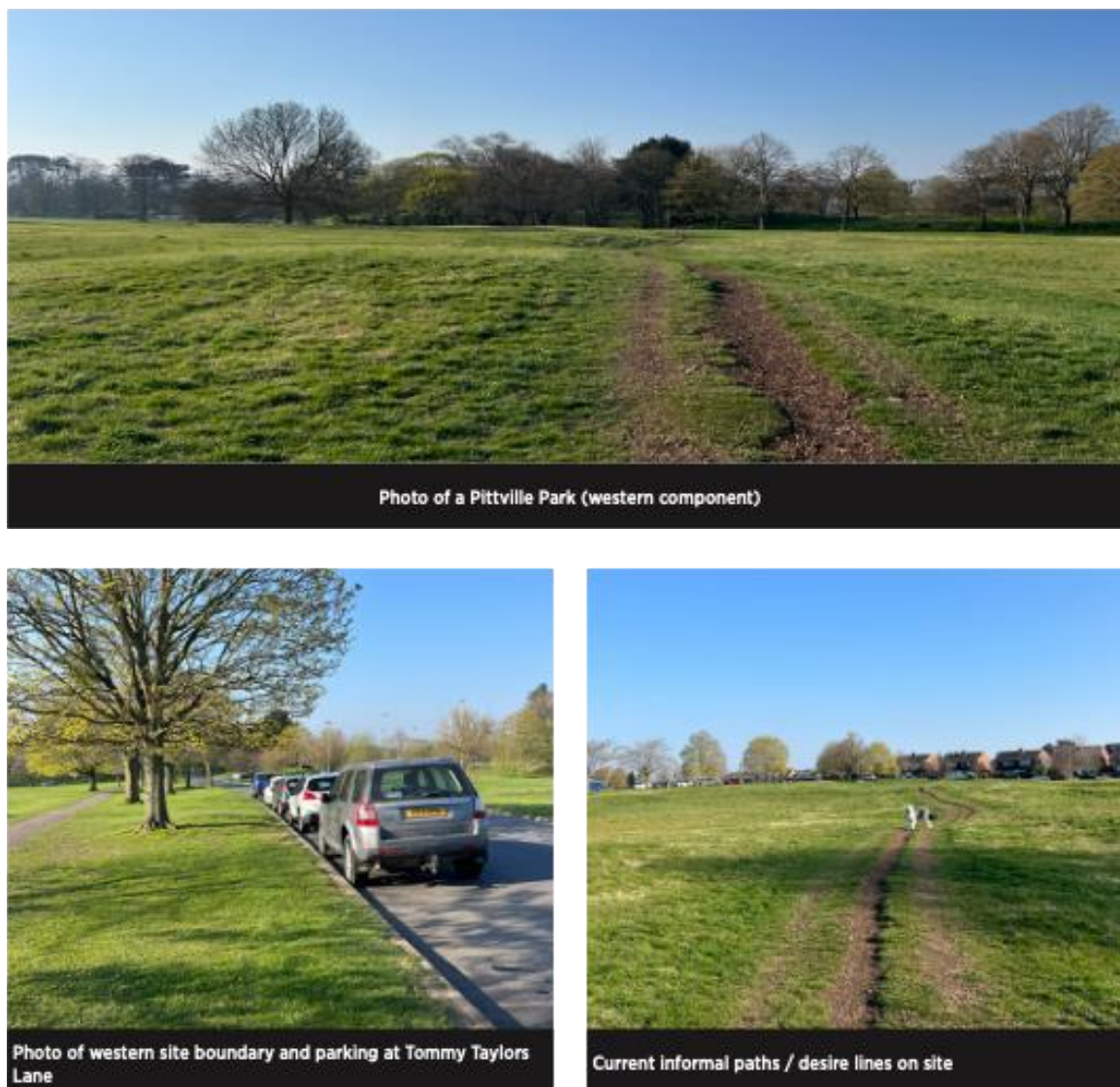


Figure 7.9: Photos taken during walkover surveys at Pittville Park (western component)

7.6.5 Enhancements proposed at Pittville Park (western component) are designed to attract both cyclists and walkers (with and without dogs) currently visiting the SAC. They also provide extensive opportunities to link to The Honeybourne Line and possible future extensions along this disused railway line northwards. Enhancements include:

- Upgrading and expanding the informal bike jumps to accommodate various skill levels.
- Installing formal footpaths and circular walks to improve connectivity with the main park, including a pedestrian crossing over Tommy Taylor's Lane to connect the western component of the park with the new park block to its west.
- Improving access to the Honeybourne Line, enabling safer links to other GI assets.
- Inclusion of a natural barrier along the parcel's eastern boundary to improve safety, allow off-lead dog walking, and make the area more welcoming for families.

7.6.6 **Table 7.3** provides a summary of enhancements which will be provided at Pittville Park (western component), these are also illustrated in **Figure 7.10**.

7.7 Estimated recreational capacity

7.7.1 High-level visitor count surveys were undertaken within the Pittville Park project area to establish baseline levels of recreational use. The survey results were used to account for existing recreational use when calculating the site's recreational capacity. **Table 7.5** presents the resulting recreational capacity available for mitigation, expressed as SANG-equivalent area and the equivalent number of dwellings.

Table 7.5: Estimated recreational capacity at Pittville Park

A. Total visits per annum to Pitville Park	B. Equivalent no. of visitors p.a	C. Estimated Area (ha)	D. Capacity to mitigate	E. Residual mitigation capacity	F. Residual area of SANG capacity available	G. SANG capacity (equivalent no. of dwellings)
13695	240	15.95ha	1994	1753.74	14.03ha	731

Table 7.6: Summary of enhancements at Pittville Park

Project:	Pittville Park
Summary of Enhancements	Clearly labelled entrance points Formal paved pathways to create a network of routes which link to existing non-permissive / informal desire lines to provide circuits of different lengths around existing site features (including the lake and towards the Honeybourne Line) Upgrading and expanding the informal bike jumps to accommodate various skill levels Natural boundary bordering Tommy Taylors Lane Provision of new signalised crossing over Tommy Taylors Lane Site interpretation boards with links to QR codes Waymarking posts New and replacement dog waste / litter bins Creating, managing and enhancing a variety of habitat types Project promotion Maintenance and inspection Monitoring
User groups	Walkers. Dog walkers. Cyclists.
Site size	15.95ha
Estimated SANG-equivalent mitigation capacity (see methodology in Section 5.4)	14.03ha



Figure 7.10: Map of Pittville Park enhancement

7.8 Promotion and awareness

- 7.8.1 Promotion and public awareness activities have been costed into all short-term SANG / Infrastructure Projects outlined in **Sections 7.2 to 7.6**. These promotional measures will complement the delivery of SANG / Infrastructure Projects by increasing their public awareness and visibility.
- 7.8.2 The CBC website will serve as the primary platform for detailed information on SANG / Infrastructure Projects, with dedicated webpages. In addition to the website, social media will be used as a supplementary promotional channel. This media will target new younger residents allowing them to discover recreational spaces. This resource will also be used to actively promote specific sites and events. Interactive maps showing the interconnectivity of GI assets across Cheltenham will be included on digital platforms. These maps will allow users to plan routes that suit their needs, encouraging use of a wider range of open spaces and sustainable travel corridors. Together these media will help residents better understand and utilise the green infrastructure available in their local area.
- 7.8.3 Physical signage and interpretation boards will form an integral part of the awareness strategy. These measures will improve existing site signage to enhance the user experience and raise the profile of underutilised sites. It is also recommended that the condition of existing signage is improved. The walkover surveys identified several signs to be in a poor condition or vandalised, as seen in **Figure 7.11**. Improving this would immediately enhance the appeal of sites to users and support the Council's wider aims around green space accessibility and perception.



Figure 7.11: Photos taken during walkover surveys of damaged and vandalised information boards and signage

7.9 Summary of mitigation provision

7.9.1 Taking into consideration the proposed enhancements at the SANG / Infrastructure Projects set out in **Sections 7.2 to 7.7**, the estimated mitigation provision set out in **Table 7.7** can be achieved.

Table 7.7: Summary of mitigation provisions

SANG / Infrastructure Project Name	SANG / SANG equivalent provision (ha)	Equivalent number of dwellings capable of being mitigated
Priors Farm	8.70	453
Benhall Open Space	6.23	324
Pittville Park	14.03	731
Total	28.95 ha	1,508

7.9.2 As set out in Chapter 3, the total number of dwellings requiring mitigation through this Plan is **1,127 dwellings**, equivalent to approximately **2,705 people**. Applying the SANG standard set out in Chapter 5 results in a requirement for approximately **22 ha of SANG provision**.

7.9.3 The three SANG / recreation infrastructure projects provide an estimated SANG-equivalent mitigation capacity of 28.95 ha, equivalent to 1,508 dwellings. This provides additional capacity above the currently identified requirement of 1,127 dwellings.

7.9.4 The approach adopted reflects the precautionary basis of HRA and seeks to ensure that sufficient mitigation capacity is available to address the recreational effects associated with planned housing growth. The estimated SANG-equivalent provision exceeds the currently identified requirement, providing additional flexibility in the delivery of effective recreational mitigation in Cheltenham..

8 Costs

8.1 Understanding costs

- 8.1.1 **Table 8.1** provides a summary of costs associated with each SANG / Infrastructure Project. All costs are calculated on the basis of delivering, managing and maintaining each project. Costs include money for advertisement of each project and the monitoring and review of the success of enhancements. In addition, a sum for contingency has been included.
- 8.1.2 In order to satisfy the requirements of the Habitats Regulations, each SANG / Infrastructure Project should be secured and maintained for the full duration of the effect it is intended to address. For the purposes of this Implementation Plan, an 80-year period has been used as the practical in-perpetuity cost horizon. This provides a basis for estimating the long-term financial requirement for delivering, managing, maintaining and, where necessary, refreshing the mitigation.
- 8.1.3 Whilst developer contributions are collected and programmed on a 20-year basis, this does not represent the temporal extent of the identified impacts or the period for which mitigation will be required. The 20-year funding period should therefore be treated as a rolling funding and implementation period, rather than the end date for mitigation. The Council will be responsible for ensuring that the SANG / Infrastructure Projects remain funded, maintained and effective beyond the initial 20-year period.
- 8.1.4 To achieve this, the Council should maintain the SANG / Infrastructure Projects as an ongoing mitigation programme, with future funding requirements identified through regular reviews of project costs, maintenance requirements, visitor monitoring and development trajectories. The five-yearly review of this Implementation Plan will provide an opportunity to assess the effectiveness and condition of each project, confirm whether the mitigation remains sufficient, and identify any funding required to maintain, refresh, replace or enhance infrastructure over the subsequent funding period. Developer contributions collected through the Council's SANG mechanism should continue to be used to support the delivery and ongoing management of the mitigation programme, with future funding requirements incorporated into subsequent funding periods as necessary.
- 8.1.5 This approach is intended to ensure that mitigation remains available and effective for the full duration of the recreational effects identified through the HRA. The 80-year cost estimate presented in **Table 8.1** therefore provides an indication of the anticipated long-term financial requirement, while the five-yearly Implementation Plan reviews and ongoing monitoring provide the mechanism for checking that funding, management and mitigation remain adequate throughout this period.

Table 8.1: Summary of project costs

SANG / Infrastructure Project Name	Total costs (including minimal costs to cover ongoing maintenance over 20 years) ⁶⁶	Total cost (including full in-perpetuity costs over 80 years) ⁶⁷
Priors Farm	£409,269.00	£563,017.00
Benhall Open Space	£170,097.00	£298,889.00
Pittville Park	£199,806.00	£399,167.00
Contingency costs (10%) ⁶⁸	£60,579.00	£60,579.00
Total without contingency	£779,172	£1,261,073
Total including contingency costs	£839,751	£ 1,321,652

8.1.6 It is important to recognise that the costs are taken from a base year of 2025 (the date of calculation). Consequently, these costs will be updated on 1 April each year to take account of inflation.

⁶⁶ Costs include monitoring

⁶⁷ Ibid.

⁶⁸ 10% contingency on capital costs.

9 Delivery and governance

9.1 Delivery and governance

- 9.1.1 It is recommended that management plans should be developed to define the delivery requirements for the shortlisted SANG / Infrastructure Projects. Staff within the Council's Green Spaces Team can then receive appropriate training to ensure that each SANG / Infrastructure Project is maintained in accordance with its respective Management Plan.
- 9.1.2 Additionally, a designated officer within the Development Management Team could be trained to use the SANG / Infrastructure Project Capacity Monitoring Spreadsheet (refer to **Section 10**). This officer would then also be responsible for coordinating and overseeing relevant monitoring surveys, and for analysing visitor data to compare actual usage against projected visitor increases and available SANG / Infrastructure Project capacity for each project.
- 9.1.3 All associated training and monitoring costs have been incorporated into the individual cost breakdowns for each SANG / Infrastructure Project.

9.2 Developer contributions

- 9.2.1 Any development within the Cotswold Beechwoods SAC ZOI with a net increase of 1 dwelling or more will need to provide mitigation to ensure no adverse impacts on the site integrity of the SAC from recreational impacts. Where impacts are identified, they can be mitigated through a financial contribution to SANG and SAMM. SANG can either be delivered on site by individual developments or through a financial contribution of £480 / dwelling to fund projects set out in this Focused Implementation Plan.
- 9.2.2 Each SANG project has been allocated a forecast 'visitor uplift' / SANG equivalent mitigation capacity that the proposed enhancements can accommodate; visitor surveys are likely to be a useful tool in refining these forecasts, as set out in **Section 7.6**. The Council will allocate development on a case-by-case basis incrementally until there is no more capacity available. Capacity will be assigned to relevant allocated sites, pre-applications, applications and planning permissions. In instances where applications are refused or dismissed on appeal or where planning permission lapses, then the relevant allocated SANG / Infrastructure Project capacity is returned for another development to utilise.

9.3 Tariff Collection

- 9.3.1 The current estimate of SANG / Infrastructure Project charge per net additional unit is £480 per dwelling in 2026 and is to be paid at least by commencement via a Unilateral Undertaking S106.

10 Monitoring and review

10.1 Monitoring

- 10.1.1 Regular monitoring of each SANG / Infrastructure Project is essential to ensure that it is effective in achieving its aim to provide a realistic alternative recreational space to the Cotswold Beechwoods SAC for new residents. Monitoring will also provide transparency to the process and help inform future Implementation Plan reviews.
- 10.1.2 The Council will monitor the implementation of planning obligations. This will demonstrate how the spending of contributions on SANG / Infrastructure Project enhancements have been made for individual applications.
- 10.1.3 Of particular importance is the ability of each SANG / Infrastructure Project to achieve its forecast SANG equivalent mitigation capacity and associated visitor uplift, thereby attracting visitors who might otherwise visit the Cotswold Beechwoods SAC. Baseline visitor count surveys have been undertaken at the preferred SANG / Infrastructure Projects and informed the assessment of mitigation capacity through the application of discounting, as detailed in **Section 5.9**.

10.2 Repeat visitor surveys

- 10.2.1 Repeat visitor surveys should be undertaken one year after completion of enhancement works to assess changes in recreational use and determine whether the anticipated visitor uplift has been achieved. Thereafter, detailed visitor surveys should be undertaken at five-year intervals to inform ongoing monitoring and future reviews of this Focused Implementation Plan.
- 10.2.2 The high-level visitor surveys undertaken provide an appropriate baseline for informing this Plan. Future visitor surveys should build upon this baseline and provide more detailed evidence of recreational use, allowing the estimated visitor uplift and mitigation capacity to be tested and refined over time. Survey methodologies should ideally be agreed with Natural England.
- 10.2.3 The costs associated with visitor monitoring have been included within the individual SANG / Infrastructure Project costings. If the anticipated visitor uplift is not achieved, CBC should review the project, implement further enhancement or promotion where appropriate and, if necessary, revise the mitigation capacity assigned to it.
- 10.2.4 A programme of SANG / Infrastructure Project monitoring will be linked to monitoring of the CP. All monitoring information will be shared with Natural England and published in statutory Annual Monitoring Reports. A range of monitoring proposals are set in **Table 10.1**.

Table 10.1: Proposals for SANG / Infrastructure Project monitoring

Theme	Indicator	Scale and frequency	Target
Visitor Uplift for Infrastructure Projects	Visits per day	Prior to works. 1 year following completion. Every 5 years. Reporting after each stage.	Visitor uplift secured as expected
Funding	Incoming financial contributions for SANG (£). Total expenditure on SANG (breakdowns to be provided)	Ongoing with annual reporting	Income matches SANG expenditure set out within Implementation Plan
SANG Capacity	SANG capacity	Ongoing with annual reporting	Ensure sufficient SANG capacity for housing supply

10.3 Review

- 10.3.1 This Implementation Plan will be reviewed every five years. This will set out at a strategic level the progress made in delivering SANG / Infrastructure Project, the visitor uplifts / SANG equivalent mitigation capacity achieved, and any revisions required to projects to achieve further uplifts / capacity in the context of wider visitor monitoring at the SAC and changes in the trajectory of development in Cheltenham.

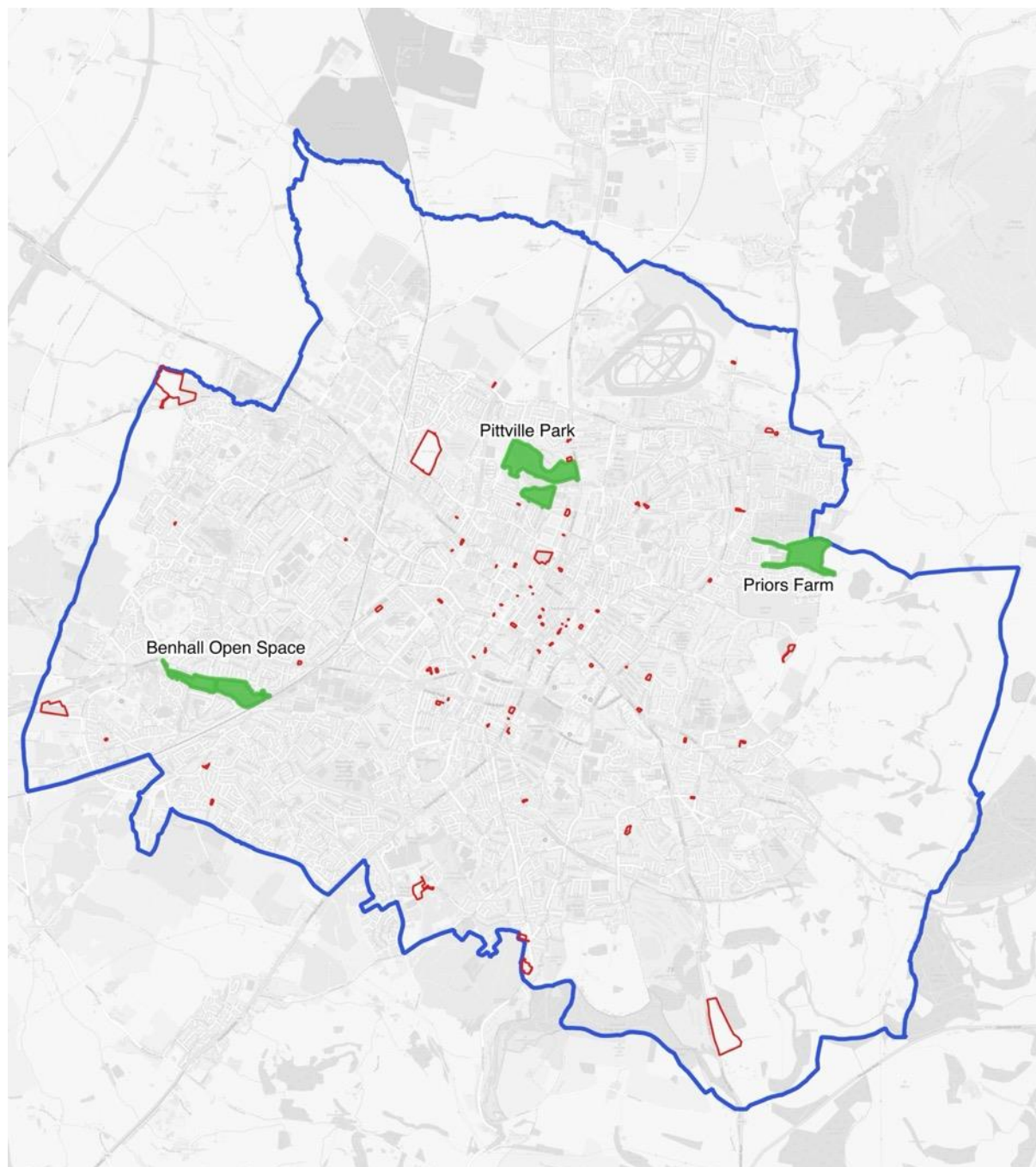
Appendix A: Long list of sites

Table A.1: Long list of potential Council-led SANG / Infrastructure Projects provided by CBC

Corresponding map number	Possible SANG/ infrastructure project	Typology	Ward (if applicable)	Area (ha) (if applicable)	GI corridor reference
1	PRoW adjacent to access road to Gallagher Retail Park	Linear	NA	NA	W
2	Manor Road Open Space	Amenity	Swindon Village	0.5147	W
3	Swindon Village Playing Fields	Amenity	Swindon Village	8.3492	W
4	Pendil Close Open Space	Amenity	Swindon Village	0.6915	W
5	Elmfield Playing field	Amenity	St Paul's	2.1502	W
6	Thomond Close Open Space	Amenity	St Paul's	0.2282	W
7	Wyman's Brook Open Space	Green corridor	Swindon Village	NA	W
8	Prince of Wales Stadium to PRoW	Linear	NA	NA	W
9	Honeybourne Line Open Space	Green corridor	Multiple	5.9362	W C H
10	Pittville Park	Park and garden	Pittville	34.5053	W
11	Whaddon Recreation	Amenity	Oakley	2.1417	W
12	Clyde Crescent	Amenity	NA	3.0643	W
13	Priors Farm Playing Field	Amenity	Oakley	5.3	W
14	Farmland at Priors excluding new cemetery area	Natural and semi-natural	Oakley	7.8	W
15	Somergate Road/ Pilgrive Way Open Space	Amenity/ provision for children and young people	Springbank	1.4398	C
16	Springfield Park	Amenity	Springbank	7.3998	C
17	George Readings Way	Amenity/ provision for children and young people	Springbank	1.7381	C
18	St Peter's Cheltenham Walk	Green corridor	St Peter's	4.6513	C
19	St Peter's Walk Open Space to Arle Avenue	Linear	St Peter's	NA	C
20	Honeybourne Way/ Cheltenham Walk	Linear/ amenity	St Peter's	0.5343	C
21	Jessop's Avenue Open Space	Linear/ amenity	Landsdown	1.0111	C

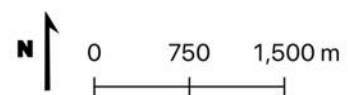
Corresponding map number	Possible SANG/ infrastructure project	Typology	Ward (if applicable)	Area (ha) (if applicable)	GI corridor reference
22	Sandford Park	Park and garden	College	4.5038	C
23	Cox's Meadow Open Space	Amenity	Charlton Park	5.1046	C
24	Queen Elizabeth II Playing Field	Amenity/ provision for children and young people	Battledown	4.3416	C
25	Cirencester Road Open Space	Amenity	Charlton Park	1.3311	C
26	Sandy Lane Playing Field	Amenity	Charlton Park	5.8799	C
27	Sandy Lane to Leckhampton Hill	Linear	Leckhampton with Warden Hill	NA	C
28	Pilley Bridge Nature Reserve	Natural and semi-natural	Charlton Park	2.2858	C
29	The Beeches Playing Field	Amenity	Charlton Kings	5.8485	C
30	Springbank Grove Alleyways	Linear	Springbank	NA	H
31	Elm Farm Open Space	Amenity/ provision for children and young people	Hester's Way	1.2208	H
32	Golden Valley Open Space	Amenity	Hester's Way	1.6633	H
33	Hester's Way Park	Amenity/ provision for children and young people	Hester's Way	4.0269	H
34	Hollis Road Alleyway	Linear	Benhall, The Reddings and Fiddler's Green	NA	H
35	Reddings Road Open Space	Amenity/ provision for children and young people	Reddings and Fiddler's Green	1.0584	H
36	Reddings Park Alleyway	Linear	Benhall, The Reddings and Fiddler's Green	NA	H
37	Benhall Open Space	Natural and semi-natural	Benhall and The Reddings	10.0424	H
38	King George V Playing Field	Amenity/ provision for children and young people	St Mark's	11.7567	H
39	Griffith Avenue Local Nature Reserve	Natural and semi-natural	St Mark's	0.9766	H
40	Honeybourne Line Extension	Linear	St Mark's	NA	H
41	Hatherley Park	Amenity/ provision for children and young people	Park	3.1524	H

Corresponding map number	Possible SANG/ infrastructure project	Typology	Ward (if applicable)	Area (ha) (if applicable)	GI corridor reference
42	Manor Farm Open Space, Up Hatherley Way	Amenity	Up Hatherley	0.4999	H
43	Chargrove Lane Open Space	Amenity	Up Hatherley	1.9346	H
44	Caernarvon Park	Amenity/ provision for children and young people	Up Hatherley	1.1641	H
45	Weaver's Field Open Space	Amenity	Warden Hill	3.4467	H
46	Kingham Line	Linear	Warden Hill	NA	H
47	Redthorne Way Open Space	Amenity	Up Hatherley	1.4247	H
48	Davillia Drive Open Space	Amenity	Warden Hill	0.293	H
49	Jasmin Way/ Justica Way Open Space	Linear/ amenity	Warden Hill	0.7095	H
50	Campion Park Open Space	Linear/ amenity	Warden Hill	0.9426	H
51	Brizen Recreation	Amenity/ provision for children and young people	Warden Hill	1.9184	H
52	Burrows Playing Field to Leckhampton Hill	Amenity/ provision for children and young people	Leckhampton with Warden Hill	6.1798	H
53	Tramway	Linear	Leckhampton with Warden Hill	0.469	H
54	Henley Road	Amenity	Springbank	0.8351	H
55	Leckhampton Hill Daisy Bank Car Park	NA	Charlton Park	NA	H
56	Leckhampton Hill Daisy Bank Car Park	NA	Charlton Park	NA	H
57	Leckhampton Hill Daisy Bank Field only (field north of Daisy Bank Road)	Natural and semi-natural	Charlton Park	4.0265	H
58	Daisy Bank Field	Natural and semi-natural	Charlton Park	2.6739	H
59	Hill Farm	Natural and semi-natural		8.76	NA



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- Cheltenham LPA boundary
 Application Sites
 Short-term projects



PROJECT	Cheltenham Implementation Plan	DRAWN	EG
CLIENT	Cheltenham Borough Council	CHECKED	ND
TITLE	Application Sites	SCALE@A4	1:73000
VERSION	LC-1319_Applications Sites_2	DATE	25/08/2026

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Figure A.1: Map of application sites

Appendix B: Medium- and long-term projects

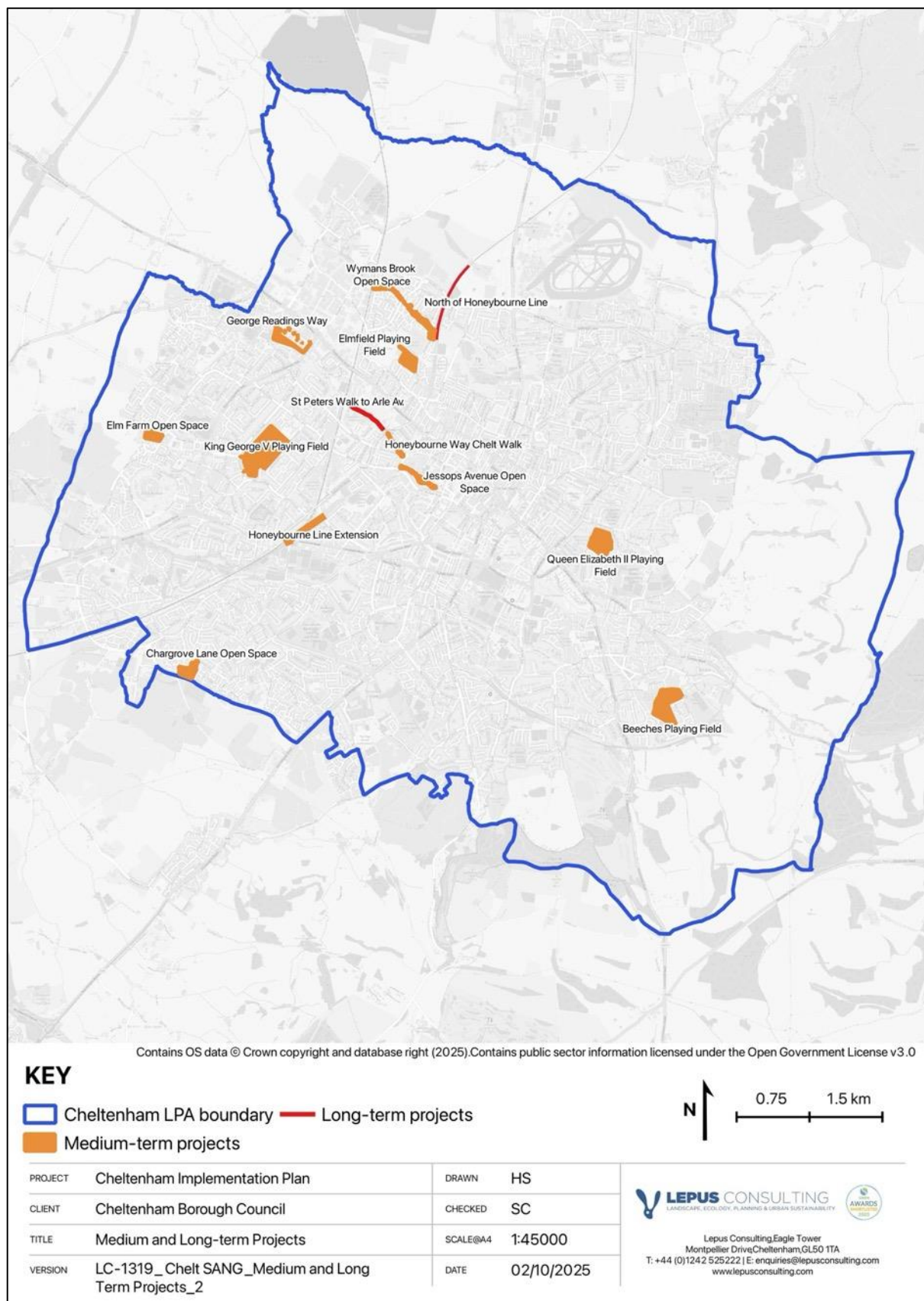


Figure B.1: Medium and long term SANG / Infrastructure projects

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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