

THEME 2b: A BEAUTIFUL AND HISTORIC CITY – GREEN INFRASTRUCTURE



Vision

4.69 4.68 Durham City's natural green spaces and networks of greenery will be protected and enhanced for the leisure, health, economic and environmental benefits they provide for residents, visitors and people working in the City.

Objectives

4.70 4.69 The objectives of this theme are:

1. To protect and enhance the green infrastructure in Our Neighbourhood;
2. To protect and enhance the green assets of the World Heritage Site, and its inner setting, and of the character areas of the Durham City Conservation Area;
3. To address deficiencies of green infrastructure within Our Neighbourhood.

Context

Definition of green assets

4.71 4.70 Green infrastructure is the network of green assets (multi-functional green spaces and natural resources) within the City (PPG 'Natural environment' Glossary). Green assets cover a range of spatial scales and types of use. They include:

- the River and riverbanks, streams, ponds (i.e. blue infrastructure);
- open spaces (see Table 1 below);
- wildlife sites and wildlife habitats;
- woodland;
- parks and botanic gardens;
- public, community and private gardens;
- green landscaped areas;
- the grounds of the University, colleges, schools, hospitals, businesses and business parks;
- highway verges and railway embankments;
- footpaths and cycle paths;
- green corridors (a narrow strip of land containing enough habitat to support wildlife and connecting wildlife populations and habitats separated by human activities or structures (such as buildings or roads). They include riverbanks, cycle paths and footpaths, road verges);
- dark corridors (unlit strips of land (e.g. footpaths, verges and riverbanks) that provide wildlife with protection from artificial lighting and routeways between larger, unlit areas of habitat);
- cemeteries and churchyards;
- allotments and community gardens;
- sports and playing fields;
- amenity green spaces;
- designated Local Green Spaces;
- the Green Belt;
- trees, hedgerows, grass, vegetation;
- built structures such as green roofs, green walls, natural or artificial water features, bird and bat boxes and roosting sites.

4.72 4.71 The above list includes open spaces. An open space is defined as any open piece of land that is undeveloped (i.e. has no buildings or other built structures on it): it can be both public or private (with or without public access allowed). Open spaces can be green or hard, or a bit of both. A typology of open spaces (Department for Communities and Local Government, nd no date, Annexe) is given in Table 1 below:

Table 1: Topology of open spaces

Green Open Spaces	Mixed Spaces (including both green and hard areas)	Hard Open Spaces
Natural / semi- natural spaces (such as wildlife sites, woodland)	Civic spaces with soft landscaping (e.g. grass, trees, flowerbeds, water features)	Civic spaces (hard) (such as town squares, public seating areas)
Green corridors (including riverbanks, cycle paths and footpaths, road verges)		Play spaces (for children and young people)
Waterways (including rivers, streams)	Outdoor sports facilities (with grass surfaces)	Outdoor sports facilities (including playing fields, open air courts) (with hard surfaces)
Parks and gardens	Roundabouts (with soft landscaping)	Roundabouts (with hard surfaces)
Churchyards, cemeteries and burial grounds (open or closed to burials)	Amenity green spaces (most commonly, but not exclusively in housing areas - including informal recreation spaces, green spaces in and around housing, domestic gardens and village greens)	
Allotments and community gardens	Road verges	
	Vacant lot (with vegetation)	Vacant lot (with hard surfaces)

4.73 4.72 The City’s attractiveness and character is enhanced by the natural open spaces and networks of greenery which are valued throughout the year by residents, visitors and those working in the City. This green infrastructure serves a variety of purposes: the character setting of the World Heritage Site and Conservation Areas, attractive open spaces and footpaths for recreation and connections between communities, beneficial effects on people’s health, an attractive setting which encourages new businesses and new residents to move to the City, visitor and tourist attractions, beneficial habitats for biodiversity, and mitigating the effects of climate change, e.g. green assets providing carbon storage. (PPG 'Natural environment' para. 006)

4.74 4.73 Table D1 in Appendix D lists landscape and natural environment assets and open spaces in Our Neighbourhood, describing the context as known at the time of writing compiling the data (September 2019). This identifies many resources, however it cannot be used as a comprehensive list.

Justification

4.75 4.74 This justification refers to the Green Infrastructure theme as a whole. Additional, specific justification for an individual policy is given with the policy itself.

4.76 4.75 The Forum's priority survey (Durham City Neighbourhood Planning Forum, 2015) identified that local people valued highly the green infrastructure of the City. One of the highest rated aspects was the riverbank setting and riverside walks. In addition they rated the woodland 'wedges' which bring green space into City, pedestrianised areas, Council flower displays and tree plantings, parks and nature areas. One of their priorities is to protect green spaces/green belt and the environment. In the Forum's study of the views of young people (Durham City Neighbourhood Planning Forum, 2016a), one of their priorities included the River Wear. The young people all enjoyed the river and the river walks, and felt that even more could be made of the riverbanks to improve access and leisure opportunities.

4.77 4.76 An environmental objective is one of the three objectives in achieving sustainable development (NPPF para. 8). The NPPF covers green infrastructure in a number of chapters:

- Chapter 15. Conserving and enhancing the natural environment. "Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" (NPPF para. 170);
- Chapter 8. Promoting healthy and safe communities, e.g. "through the use of ... high quality public space ... [and] the provision of safe and accessible green infrastructure, sports facilities ... allotments and layouts that encourage walking and cycling" (NPPF para. 91)
- Chapter 13. Protecting Green Belt land
- Chapter 14. Meeting the challenge of climate change, flooding and coastal change, e.g. managing risks "through suitable adaptation measures, including through the planning of green infrastructure" (NPPF para. 150)

4.78 4.77 'The Natural Choice' (the natural environment white paper: UK Government, 2011) emphasises that a healthy, properly functioning natural environment is the foundation of sustained economic growth, prospering communities and personal well-being. The biodiversity strategy (Department for Environment, Food and Rural Affairs, 2011) builds on the natural environment white paper. Its mission is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

4.79 4.78 The Natural Capital Committee (2018) was set up to provide the UK Government with independent advice on protecting and improving natural capital, i.e.

green assets, land, minerals and water It is currently working on developing a 25 year Environment Plan to implement the 'Natural choice' White Paper (UK Government, 2011). The goals they recommend include providing everyone with access to local green space, restoring and enhancing wild species populations and habitats, and managing developments so that there is an overall net increase in natural habitat.

4.80 4.79 The 'Green Infrastructure Guidance' (Natural England, 2009) provides a comprehensive overview of the concept of green infrastructure, signposts to other relevant information, and maps out wider policy priorities and drivers for green infrastructure. Its aim is to drive forward green infrastructure planning and delivery.

4.81 4.80 More than 70 organisations from across multiple sectors have joined forces to create a 'Charter for Trees, Woods and People' with the aim of guiding UK policy and practice. It sets out ten principles "for a society in which people and trees can stand stronger together".



4.82 4.81 Durham County Council (2018c b [M48]) has produced a 'Durham Strategic Green Infrastructure Framework'. One of their delivery priorities is: "Enabling local communities to engage in the enhancement and creation of GI in their area within their Neighbourhood Plans". The strategic principles include:

- "Ensure that there is a functional and well-connected strategic green infrastructure across the County. Gaps or missing links should be addressed;
- Maximise opportunities to improve both strategic GI and more local GI whenever change is being considered ..."

4.83 4.82 The framework provides basic design principles to help achieve GI benefits, e.g.

- "Recognise, protect and manage Durham's natural green (and blue) infrastructure assets ..."
- "Ensure decisions affecting land result in a net gain for biodiversity"
- "Expand, enhance and link Durham's wildlife habitats where opportunities arise"
- "Enhance the structure of the landscape through protecting and regenerating primary hedgerow boundaries"
- "Support communities in the identification of locally valued green spaces in their area for potential designation as Local Green Space, and inclusion in Neighbourhood Plans where appropriate"
- "Ensure that adequate space is allocated for allotments (where there is a deficit) and protect existing allotment gardens/city farms"
- "Ensure that green links/corridors are maintained or created through housing developments, linking to the surrounding landscape"
- "Protect and create (where appropriate) public rights of way and other sustainable transport routes to encourage people to utilise more sustainable travel modes"
- "Incorporate green roofs and living walls into new developments"
- "Ensure that adequate GI, of a suitable quality, is incorporated into the 'Masterplanning' of settlements/new housing estates/new industrial estates etc."

4.84 4.83 The Sustainable Communities Strategy for County Durham 2014-2030 (County Durham Partnership, 2014) has a section 'Altogether greener' with the aim of maximising the value and benefits of Durham's natural environment. The Countryside and Rights of Way Act 2000 placed an obligation on local authorities to produce and maintain a Rights of Way Improvement Plan (ROWIP). In the Rights of Way Improvement Plan for County Durham 2015–2018 (Durham County Council, 2015d) the 'opportunities' (essentially the policies) identified in the plan include an aim that paths are provided and improved as part of developments, and that gateway sites to public green spaces are improved.

4.85 4.84 Durham City falls within The Wear Lowlands character area of the County Durham Landscape Character Assessment and Landscape Strategy (Durham County Council, 2008a,b). The strategy for the Wear Lowlands is: "To conserve the character of the valley landscapes of the Wear while enhancing those areas which have been most affected by development" (Durham County Council, 2008b, p.104). These documents contain detailed contextual information and numerous objectives. Baseline information on biodiversity and geodiversity is available in the Council's Technical Paper No. 12 (Durham County Council, 2009).

4.86 4.85 A number of the saved policies from the City of Durham Local Plan cover green assets (E1,2,2A,5,5a,10,14 to 20,25,26; R1 to 3,5,11 to 13; T21; Q5,6).

4.87 4.86 The Durham City Regeneration Masterplan (Durham County Council, 2014) and its update (Durham County Council, 2016c) has a number of implementation projects and actions relevant to the green infrastructure of Our Neighbourhood (a subset of the Durham

City area covered by the Masterplan), i.e. 'Keeping Durham Green' by e.g. care of the River Wear banks, adding to existing green spaces.

4.88 4.87 Local strategies and initiatives emphasise the importance of the green infrastructure within the City, in particular the Durham City Conservation Area Appraisal (Durham County Council, 2016b) and the Durham Castle and Cathedral World Heritage Site Management Plan (Durham World Heritage Site, 2017). The Durham City Conservation Area comprises “the pre-1900 expansion of the city and the majority of the natural ‘bowl’ (the upper slopes of which present a largely rural backdrop to views of the Cathedral), the important green wedges of open countryside and other significant green areas which contribute to and enhance the setting of the historic buildings and the city as a whole” (Durham County Council, 2016b, Executive Summary, p.2). Management proposals for each character area are available, which include management, conservation and enhancement of green assets. Most of Our Neighbourhood falls within the area covered by the World Heritage Site and by its inner setting (see Maps 1 and 2). The immediate context of the river and the tree lined river banks is a key component of the World Heritage Site's Outstanding Universal Value. The inner setting of the World Heritage Site, and protection of views to and from the World Heritage Site, is another key component.

4.89 4.88 Durham County Council (on behalf of a Steering Group of the main landowners of the Durham riverbanks) commissioned Blue Sail Consulting Ltd (2017) to produce a development and management strategy for the Durham riverbanks, focussing on the Peninsula riverbanks. It recommends a number of projects to revitalise this area. These riverbanks projects intersect with the Emerald Network Policy G3. (See also relevant initiatives in the companion document 'Looking Forwards: Durham as a Creative and Sustainable City').



Planning Policies and Proposals for Land Use

4.90 4.89 The policies related to this theme are:

- Policy G1: Protecting and Enhancing Green and Blue Infrastructure [M10]
- Policy G2: Designation of Local Green Spaces
- Policy G3: Creation of the Emerald Network
- Policy G4: Enhancing the Beneficial Use of the Green Belt

Policy G1: Protecting and Enhancing Green and Blue Infrastructure

[M10]

Green assets are defined in para. 4.65 and 4.66, and Table 1.

Protecting and enhancing green assets

Protecting green and blue assets

Development proposals must not result in the loss of existing green assets unless:

- a) the affected asset does not have a significant recreational, heritage, cultural, ecological, landscape or townscape value; or
- b) the affected asset can be demonstrated to be surplus to local requirements and there are alternatives which are capable of serving the needs of the occupants of the development and of the environment; and
- c) retention of the existing green asset within the site is not viable or practicable.

If the loss of green assets is unavoidable, a compensatory amount of green assets should be provided within the site in the first instance. Where opportunities within the site are constrained then consideration will be given to provision off site which is capable of serving the needs of the occupants of the development and of the environment. In all instances opportunities to incorporate innovative solutions on site should be exhausted.

Development proposals which avoid the loss of existing green or blue assets (as defined in paragraphs 4.71, 4.72 [OM10] and Table 1) with significant recreational, heritage, cultural, ecological, landscape or townscape value will be supported.

Where the loss of green or blue assets of significant value is unavoidable then alternative equivalent provision should be provided on-site or off-site where this is not viable or practicable.

Enhancing green and blue assets

Where viable, development proposals are encouraged and will be supported to provide additional good quality green assets on site with regard to deficiencies of green assets within Our Neighbourhood.

Development proposals which provide additional green or blue assets, particularly those that address deficiencies within Our Neighbourhood, will be supported.

Any new green assets provided should be native species, Any new or replacement green or blue assets should be appropriate to the context, having regard to the landscape, townscape and ecology of the locality and where appropriate the setting of heritage assets.

Additional Requirements

Protecting and enhancing footpaths and the footpath network public rights of way and other footpaths

The local distinctiveness, characteristics, quality and biodiversity of existing footpaths shall be a primary consideration in their protection.

Development proposals should maximise opportunities to connect to the network of footpaths, public rights of way and bridle paths in Our Neighbourhood.

Proposals for the purpose of improving existing footpaths, or providing new footpaths, or providing access for people with disabilities, and for people with push chairs, will be supported where this would not cause damage to heritage assets and to green assets.

Development proposals should have regard to the local distinctiveness, character, quality and biodiversity of public rights of way and other footpaths. Proposals which connect to, improve or extend the network of public rights of way and improve its accessibility will be supported.

Protecting and enhancing green corridors

Development proposals must not cause significant harm to ecological connectivity.

Development proposals that are adjacent to, or encroaching upon, green corridors must maintain or enhance their functionality and connectivity.

Development proposals must contribute to the network of green corridors that connect built up areas with nearby destinations and the open countryside by:

- d) creating green corridors within the development site that connect to green routes corridors outside but abutting the site; or where such adjacent green corridors do not exist
- e) contributing to improvements in existing green corridors outside the development site but within, or adjacent to, or nearby Our Neighbourhood.

Development proposals that impact on green corridors should maintain or enhance their functionality and connectivity and avoid significant harm to ecological connectivity.

Development proposals that improve existing green corridors or create green corridors on-site that connect to or improve existing green corridors shall be supported.

Enhancing biodiversity

In order to enhance the nature conservation value of Our Neighbourhood and provide

net gains for biodiversity, proposals that:

- f) restore damaged habitats; or
- g) re-create lost habitats; or
- h) create new wildlife habitats, particularly habitats supporting local protected and priority species

will be encouraged and supported.

Development proposals that provide net gains for biodiversity by restoring, recreating or creating wildlife habitats, particularly for locally protected and priority species, will be encouraged and supported.

Protecting geological features

Development proposals **must should** avoid significant harm to features of geological value.

Protecting and enhancing the banks of the River Wear

Development proposals which restrict, or result in a loss of, existing access to the banks of the River Wear will be refused. Existing footpath routes, cycle paths, green corridors and dark corridors must be retained.

Development proposals that avoid loss of or restrictions to access to the banks of the River Wear and retain public rights of way, other footpaths, green corridors or dark corridors will be supported.

Other opportunities to provide additional pedestrian access points to the banks of the River Wear should be investigated, where practicable and desirable in relation to public safety, ecology and heritage impacts, and will be supported.

New developments, or redevelopments, next to the banks of the River Wear in Our Neighbourhood should incorporate where viable a safe pedestrian path along the riverbank. Opportunities should be maximised to create a footpath, green corridor and cycle access, in that order of priority. Such provision must not adversely impact on existing heritage assets and green assets.

Development proposals which provide additional pedestrian access points to the banks of the River Wear that are desirable in relation to public safety, ecology and heritage will be supported. Where appropriate, development proposals next to the banks of the River Wear should incorporate a public route along the riverbank which creates a footpath, green corridor and cycle route in that order of priority and avoids any significant impact on existing heritage or green or blue assets.

Protecting dark corridors

New lighting proposals must be ecologically friendly in siting, design and intensity and

extent of emissions and not cause significant harm to existing dark corridors.

Development proposals incorporating new lighting should be designed to minimise any ecological impact and avoid significant harm to existing dark corridors.

4.91 4.90 Small sites (i.e. sites for housing of 0.4 hectares or 10 housing units, or under, or other types of development sites of 0.4 hectares, or under where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more) [M45, M47] face practical constraints on both the retention of green assets when designing the development and in the provision of compensatory (or additional) green assets. Trees or hedgerows around the perimeter of a site might be practicable to retain for example, whereas a tree or group of trees in the centre of a site could prevent the development unless they were removed. As well as compensatory (or additional) green assets in the form of small trees and small landscaped garden areas or flowerbeds, other alternatives could be used, e.g. green roofs, green walls, water features, bat or bird boxes and roosting sites.

4.92 Information on public rights of way in Our Neighbourhood are available in Durham County Council's Definitive Public Rights of Way map <https://www.durham.gov.uk/definitivemap>. [OM11] 'Other footpaths' are defined as the footpaths in Our Neighbourhood which are used by the public but which are not public rights of way. These include both paths with permissive access negotiated with the landowner and paths used less formally. [OM12]

4.93 There are many green corridors and dark corridors in Our Neighbourhood as the definition used in para. 4.71 demonstrates, i.e.

- green corridors (a narrow strip of land containing enough habitat to support wildlife and connecting wildlife populations and habitats separated by human activities or structures (such as buildings or roads). They include riverbanks, cycle paths and footpaths, road verges);
- dark corridors (unlit strips of land (e.g. footpaths, verges and riverbanks) that provide wildlife with protection from artificial lighting and routeways between larger, unlit areas of habitat).

4.94 An assessment of open spaces in Our Neighbourhood has been undertaken for this Neighbourhood Plan (Durham City Neighbourhood Planning Forum, 2018, <http://npf.durhamcity.org.uk/wp-content/uploads/2020/09/Open-Spaces-Assessment-Final.pdf>) which includes sites that form the larger green corridors. Smaller green corridors such as strips of trees and hedgerows alongside roads, cycle paths, pavements and footpaths have not been listed in this document. Major areas of darkness are also listed in this document. The location of street lights is given in Durham County Council's Street Lights map. [OM11]

4.95 One of the aims of Initiative 5 in the companion document 'Looking Forwards: Durham as a Creative and Sustainable City' is the mapping of green corridors and dark corridors. This will form part of the evidence base for a future revision of the Plan. [OM11]

4.96 The 'banks of the River Wear' are defined as the area from the waterline up to and including the footpath / pavement running alongside the river (except for the Peninsular riverbanks). In the peninsular areas the riverbanks are well defined within the World Heritage Site (see Map 1) and go up to the first boundary wall.) [OM13]

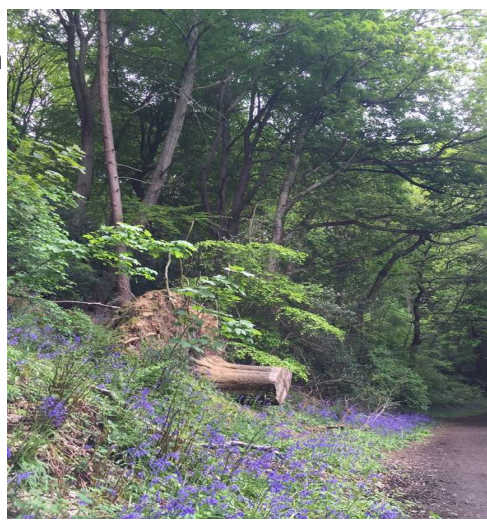
4.97 4.91 Darkness is important to wildlife and to the special setting of the World Heritage Site and the Durham City Conservation area, and provides health benefits to people of relaxation, tranquillity and appreciation of the night sky. Though an urban area, this Neighbourhood Plan considers that parts of Our Neighbourhood should be treated as Zone E1 or E2 for the provision of lighting (Durham County Council, Neighbourhood Services, 2014; Durham County Council, Regeneration and Local Services, 2016), e.g. the World Heritage Site, along the riverbanks and along the traditional footpaths criss-crossing Our Neighbourhood. This would entail either restricting lighting, or providing minimal intensity lighting with a full horizontal cut off. Darkness contributes to the Outstanding Universal Value of the World Heritage Site (Durham World Heritage Site, 2017, p.62)

Justification for Policy G1

4.98 4.92 Public authorities have a duty to have regard for conserving biodiversity and part of the way to achieve this is through the planning system (NPPF para. 8, PPG 'Natural environment' para. 009, 019, 023). The NPPF states the importance of access to high quality open spaces for the benefits to health and well-being (NPPF para. 96 to 98). Saved policies of the City of Durham Local Plan are also relevant (E5, Q8, R1).

4.99 4.93 A key document is the Open Space Needs Assessment 2018 (Durham County Council, 2018d c). [M48] This document assesses open space, sport and recreation facilities in County Durham by: identifying local needs; auditing local provision and assessing this against quality, quantity and access standards. It identified an under supply in all types of open space in the Durham City Assessment Area (which includes Our Neighbourhood but covers a wider area).

4.100 4.94 The complementary 'Playing Pitch Strategy' (Durham County Council, 2011a, 2012a) contains an audit of provision and aims to ensure that the quantity and quality of playing pitches and accessibility of playing pitches meets the needs of the local population now and in the future. It includes policy recommendations for the Durham City Area Action Partnership (which is wider than Our Neighbourhood) covering safeguarding and enhancing of provision.



4.101 4.95 Public open spaces are used by a range of different people for different purposes. A well-designed open space should be located near to the community it serves, have connectivity, be accessible, flexible in meeting different needs, adaptable to meet future needs, welcoming, safe and secure, clean and well maintained. (CABE Space, 2007) CABE, The Commission for Architecture and the Built Environment, was the government's advisor on architecture, urban design and public space from 1999 to 2011.

Policy G2: Designation of Local Green Spaces

[M12]

Green spaces within Our Neighbourhood that are of significant environmental, landscape or historical value are designated as Local Green Spaces. These areas, as shown on Proposals Map 2, comprise:

The following areas (shown on Proposals Map 2) are designated as Local Green Space where inappropriate development should not be approved except in very special circumstances:

1. The River Wear corridor within Our Neighbourhood, comprising that in the areas of the Peninsular Woodlands, the Racecourse and the Sands; and
2. Observatory Hill, Bow Cemetery and two fields on the south side of Potters Bank, and Clay Lane and land South West of Clay Lane; and
3. Bow Cemetery
4. Clay Lane
5. 3. Flass Vale Local Wildlife Site and Local Nature Reserve and North End allotments and leisure gardens; and
6. 4. St Margaret's Cemetery plus St Margaret's and allotments; and
7. 5. Durham Light Infantry (DLI) grounds; and
8. 6. Woodland on the south side of the City, comprising Maiden Castle Wood, Great High Wood, Hollinside Wood, and Blaid's Wood; and
9. 7. Battle of Neville's Cross Battlefield: the undeveloped area of the registered battlefield site within Our Neighbourhood.

Development proposals that cause significant harm or loss to the characteristics that make these sites important and special to local people will be refused, unless very special circumstances can be demonstrated where the loss or harm is necessary to achieve substantial public benefits that outweigh the loss or harm. If this loss or harm cannot be avoided, then appropriate mitigation measures must be included in the proposal.

Proposals for the purpose of improving footpaths, or providing new footpaths, or providing access for people with disabilities, will be supported. Such provision must not

cause significant harm to the characteristics of the site.

4.102 4.96 An assessment of open spaces in Our Neighbourhood has been undertaken for this Neighbourhood Plan (Durham City Neighbourhood Planning Forum, 2018) As a result of that assessment, the areas in the policy above (see Proposals Map 2) have been designated as Local Green Spaces for the following reasons: **[M12]**

- **G2.1: The River Wear Corridor in the areas of the Peninsular Woodlands, the Racecourse and the Sands:**

The river and river corridor of the River Wear as it meanders through the City's floodplain and cuts through the rocky gorge of the peninsular is the most significant landscape feature of the City. Its important contribution to the setting of the World Heritage Site and the City cannot be overestimated. The river and riverbanks are an important component of the Durham City Conservation Area in all five character areas. Respondents to the Forum's priority survey listed the riverbank setting and riverside walks as the second highest attribute of what is good about Durham City. The river paths are well used for walking and leisure activities, and provide an important wildlife corridor linking the character areas of the City Conservation Area to each other and to the wider countryside within Our Neighbourhood. Protection of the river corridor was included in the City of Durham Local Plan saved policy E5 on protecting open spaces within Durham City, and a River Wear Walkway was proposed in policy R13. A draft development and management strategy for the riverbanks has been drawn up for Durham County Council with the aim of revitalising the riverbanks. The current report (Blue Sails Consulting Ltd, 2017) focuses on the Peninsular Riverbanks. Later work will look at the wider riverbanks. The particular sections of the riverbanks within the City centre comprising this Local Green Space are in the areas of: (i) the Peninsular riverbanks, (ii) the Racecourse, and (iii) the Sands. The Peninsular riverbanks are a key part of the green setting of the World Heritage Site, providing iconic views to and from the Cathedral and Castle. They are of historic value, with historic riverbank gardens and walks, forming part of an 18th century designed landscape. They have high community value as a walking area and a location for events, e.g. Lumiere. They are a key tourist attraction, accessible by public rights of way. The riverbanks in the Racecourse vicinity provide a popular walking route. They provide iconic views to World Heritage Site, as well as views of the river and surrounding areas of the City, and of events held on the Racecourse and the river. The Racecourse has high community value as a site for a range of sporting venues. It is a site for events, particularly the historic and iconic Durham Miners Gala and the Durham Regatta. The riverbanks also provide access beside, and into, Pelaw Woods. The riverbanks in the vicinity of the Sands provide a popular walking route, with views of the surrounding areas of the City and of the Green Belt in the Frankland Lane area. They provide access to the Sands. The Sands have historic value as one of the few areas of common land left in Our Neighbourhood. It is a grassed area with recreational value and providing a venue

for events, e.g. the annual Easter Fair. The rest of the riverbanks in Our Neighbourhood are protected by Policy G1 which seeks to retain existing, and support new, footpaths, green corridors, dark corridors and cycle paths along the river where the physical space allows.

- **G2.2: Observatory Hill and Bow Cemetery and two fields on the south side of Potters Bank.:**

G2.2A. Observatory Hill Local Green Space : Area A. The Observatory Hill Local Green Space comprises Observatory Hill and two fields on the other side of Potters Bank.

Observatory Hill, adjoining Potters Bank and near to Durham School, is within both the inner bowl of the World Heritage Site and the Durham City Conservation Area. Its elevated site makes it very visible from the centre, and it contributes to the green and rural landscape setting for the World Heritage site and the City Centre. It is well used by local people, and has been for countless years, for access for walking, dog walking, exercise, sitting, picnics, sledging in winter, photography, etc - all the types of purposes for which open green space is used. There are footpaths criss-crossing the area (though not all are PROW). Most of Observatory Hill is used for agricultural purposes, as rough grassland. Land around the Observatory contained orchids and other rare plants. However, these have been lost since Durham University's tenant has ploughed the land to claim the agricultural subsidy. However, it would be possible to recreate the plant community if the land were managed with conservation in mind. At the east side of Observatory Hill the Cathedral has a playing field, with a small section of this at the entrance used for parking. This playing field is screened by mature trees and hedgerows. Observatory Hill provides important views towards and from the World Heritage Site, and if developed would blight the views in that direction from the World Heritage Site as the Hill is so high, and mitigation by masking by trees would not be effective or feasible. Observatory Hill has City-wide esteem, with iconic status for a thousand years and more. It was included in the City of Durham Local Plan saved policy E5 on protecting open spaces within Durham City.

G2.2B. Observatory Hill Local Green Space: Area B. Bow Cemetery and the Two adjacent fields (one at the bottom of Potters Bank North West of St Mary's College, which is partly within the Durham City Conservation Area, and one falling down from Elvet Hill / St Aidan's College South of Potters Bank) provide one of the key 'green fingers/wedges' that are an important characteristic of Durham City, leading towards the World Heritage Site. In the Forum's priority survey respondents had high regard for the 'woodland' wedges bringing green space into the City. Bow Cemetery provides a beautiful wildlife feature adjacent to Bow Cottage, a Grade II listed building which was the old Cemetery lodge. Bow Cemetery is still occasionally used for burials. The remains of Scottish soldiers, who were imprisoned and died in Durham following the Battle of Dunbar in 1650, were laid to rest here in 2018. The two fields provide rough grassland and are used for agricultural purposes. The field falling down from St Aidan's College provides an iconic view of the World Heritage Site, and development in its upper levels would damage views to and from the World Heritage Site. The two fields form part of the

Mount Oswald-Elvet Hill Parkland Landscape Area designated in saved policy E5.2 of the City of Durham Local Plan.

G2.2C. Observatory Hill Local Green Space: Area C. This area comprises the majority of Clay Lane (a PROW) and land within Durham School, and most of it lies within the Durham City Conservation Area. Clay Lane has been an important pedestrian route into Durham since the medieval period and continues to serve as a major pedestrian artery into the City centre. It is an attractive green area of biodiversity, providing a significant habitat for wildlife that includes badgers, foxes, bats and the occasional weasel. It forms one of the green corridors linking the river banks with countryside outside the City. It is unlit and therefore provides an important dark corridor. The land within Durham School comprises playing fields, wooded areas with mature trees providing an important habitat, and open grassland with iconic views to and from the World Heritage Site. This land is private with no public access and is used for operational purposes by Durham School. However, it provides both biodiversity benefits and an attractive green and historic setting in that Sub-Character Area of the Durham City Conservation Area.

Priority: If the whole of this area is considered to be too large to designate as a Local Green Space, then the City of Durham Parish Council would seek a Local Green Space comprising Areas A and B; in any case Area A should be a Local Green Space.

- **G2.3: Bow Cemetery:**

Bow Cemetery provides a beautiful wildlife feature adjacent to Bow Cottage, a Grade II listed building which was the old Cemetery lodge. Bow Cemetery is still occasionally used for burials. The remains of Scottish soldiers, who were imprisoned and died in Durham following the Battle of Dunbar in 1650, were laid to rest here in 2018.

- **G2.4: Clay Lane:**

Clay Lane (a PROW - FP15) has been an important pedestrian route into Durham since the medieval period and continues to serve as a major pedestrian artery into the City Centre. It is an attractive green area of biodiversity, providing a significant habitat for wildlife that includes badgers, foxes, bats and the occasional weasel. It forms one of the green corridors linking the river banks with countryside outside the City. It is unlit and therefore provides an important dark corridor.

- **G2.35:: Flass Vale Local Wildlife Site and Local Nature Reserve and North End allotments and leisure gardens.:**

Flass Vale is an historic area of woodland lying within the Green belt and the Crossgate Character Area of the Durham City Conservation Area. Its wildlife value has been recognised by designation as a Local Wildlife Site; part of the site is registered as Common Land and part is designated as a Local Nature Reserve. Maiden's Bower, a Bronze Age round cairn and scheduled ancient monument, is located in Flass Vale. Local legend says Maiden's Bower was the site of a vigil held during the Battle of Neville's Cross. The North End allotments and leisure gardens that lie to the North East of the site are an integral part of this Local Green

space. Such a central site is always under threat of development, and new permitted developments have 'nibbled away' at the edges of this site. The local importance of this site is demonstrated by the active group the 'Friends of Flass Vale' who manage and care for the site.

- **G2.46 : St Margaret's Cemetery plus St Margaret's and allotments:**
These lie between Crossgate and South St and provide an important green space in the cCentre of the City, and within the Crossgate Character Area of the Durham City Conservation Area. The Cemetery provides a wildlife refuge, a place for walking and quiet contemplation as well as being of historic value (St Margaret's Church is one of the earliest churches in the City, dating from the 12 century). The Cemetery abuts onto the allotments. The allotments provide for gardening and leisure, as well as a wildlife resource, and are of historic value (the site has been cultivated since the middle ages, and was once the Cathedral's vegetable garden and fish ponds; it is thought that the old quarry in the allotments was the source of the stone used to build the Cathedral). This area was included in the City of Durham Local Plan saved policy E5 on protecting open spaces within Durham City.
- **G2.57 : Durham Light Infantry (DLI) grounds:**
The DLI grounds are within the Green Belt. They have wildlife and recreational value, with areas of the site providing views of the City cCentre. The significance of these grounds as a resting place for the ashes of members of the DLI Regiment makes this a site of huge importance and value to local people. Part of these grounds could be made into a Memorial Garden. The DLI grounds could function in association with the refurbished Wharton Park by providing a safe and secure picnic area, particularly for parents and children: the current DLI car park providing necessary car parking for people using these grounds and facilities.
- **G2.68 : Woodland. Maiden Castle Wood, Great High Wood, Hollinside Wood and Blaid's Wood:**
These woods have been in existence since at least the 19th Century, though replanting has occurred in the 20th Century. Parts of these woods show the remnants of old railway embankments, and interpretation boards in Great High Wood give visitors information about the railway and mining historical background. Maiden Castle is an Iron Age promontory fort and is listed as a Scheduled Ancient Monument. Hollinside Wood, Great High Wood and Blaid's Wood are designated as Areas of High Landscape Value, Ancient Semi-Natural Woodland, Sites of Nature Conservation Importance and Sites of Ecological Value. They lie within the Green Belt. All these woods provide a near continuous block of woodland with public access. They are used by the public for walking, cycling and leisure activities. The woods are renowned for their display of English bluebells in the Spring. As Durham University says: "The number of designations covering the woodlands reflect their importance in terms of landscape, amenity, and conservation." (Durham University. Biodiversity Policy)

- **G2.79 : Neville's Cross Battlefield**

This Local Green Space comprises the undeveloped area of the registered battlefield site within Our Neighbourhood, including land lying on both sides of the registered public footpaths forming part of a boundary walk around the edge of the Battlefield site to the immediate west of Crossgate Moor. This area lies within the Green Belt. The battlefield is of national significance. The Battle of Neville's Cross, between Scottish and English forces, took place on 17th October 1346, on moorland just to the west of Durham. This was a significant battle as the Scots were comprehensively defeated, and this loss led to English occupation of parts of Scotland south of the Forth and Clyde rivers. It was over a century before the Scots could recover this land. The battlefield where the armies assembled before the battle is largely undeveloped. The remains of a Cross commemorating the battle is sited in the built-up area of Neville's Cross and is a scheduled ancient monument. The battlefield is registered in the Register of Historic Battlefields (UK Battlefields Resource Centre, **nd no date**). A copy of the map is available to view at <http://www.battlefieldstrust.com/media/401%2Epdf> (accessed September 2019).

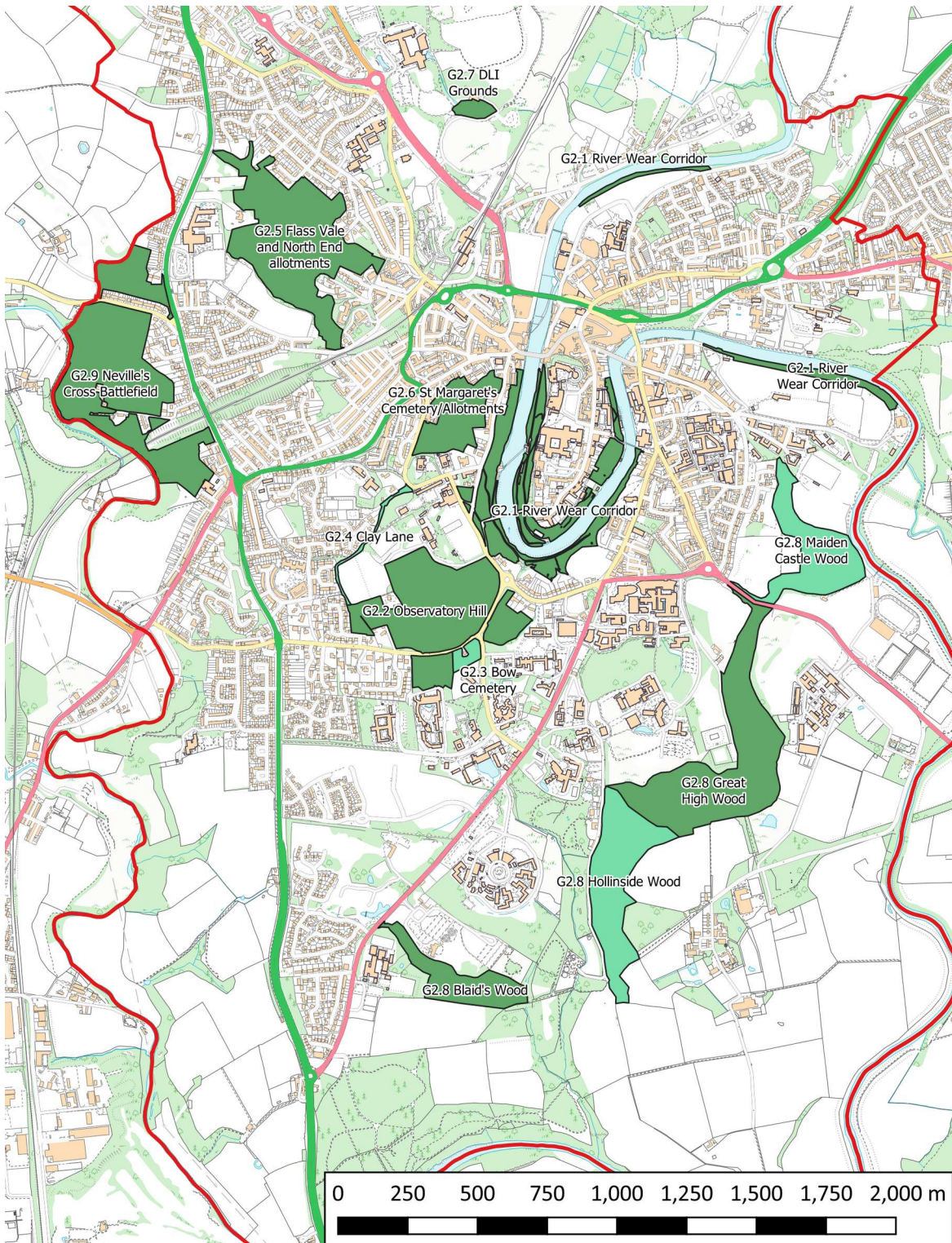
4.103 4.97 It should be noted that the Neighbourhood Plan can only cover areas that are within its boundary. One of the Local Green Spaces - Neville's Cross Battlefield - also crosses over into the neighbouring parish of Bearpark. Future co-operation with the neighbourhood plan in this parish could hopefully result in the whole of this important area becoming a Local Green Space.

4.104 4.98 The NPPF (para. 99 to 101) provides for neighbourhood plans to designate Local Green Spaces allowing "communities to identify and protect green areas of particular importance to them" (PPG para. 'Open space, sports and recreation facilities, public rights of way and local green space' 005 to 021). "Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis." (para. 013) "However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty). Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected." (para. 017) "Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners." (para.020). Therefore the existing public access status and operational use of the designated Local Green Spaces can continue as usual.

4.105 4.99 Policies for managing development in a Local Green Space should be consistent with those for Green Belts (NPPF para. 101) Therefore, inappropriate development, harmful to the characteristics that make the Local Green Space special, would not be approved except in very special circumstances (NPPF para. 143). However, there are exceptions for some types of new building (NPPF para. 145) e.g. "buildings for agriculture ... the provision of appropriate facilities ... for outdoor sport, outdoor recreation,

cemeteries ... and allotments, ; as long as the facilities preserve the openness of the Green Belt [Local Green Space] and do not conflict with the purposes of including land within it; the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; ... the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces". Additionally, some forms of development are also not inappropriate (NPPF para. 146) "provided they preserve its openness and do not conflict with the purposes of including land within it" e.g. "local transport infrastructure which can demonstrate a requirement for a Green Belt [Local Green Space] location; the re-use of buildings provided that the buildings are of permanent and substantial construction; e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)".

Proposals Map 2: Local Green Spaces [M13 map amended]



An interactive version of this map is available at http://maps.durhamcity.org.uk/npf/Proposals_Map_2.php [M11, OM5, M1]

Justification

4.106 4.100 Durham County Council (2019a,b b,c) [M48] has identified Areas of Higher Landscape Value. The Areas of Higher Landscape Value within our Neighbourhood comprise: Aykley Heads and Frankland; Durham Riverbanks; Observatory Hill and Elvet Hill; Hollinside, Mountjoy and Whinney Hill; Durham Racecourse and Pelaw; Houghall and Maiden Castle; Houghall Farm; Burn Hall.

4.107 4.101 Some of the areas designated here as Local Green Spaces also possess other types of designation, e.g. being within the Green Belt or a conservation area or being a wildlife site or heritage asset. National Planning Practice Guidance states that land that is already protected can be designated as a Local Green Space if there is additional local benefit (PPG 'Open space, sports and recreation facilities, public rights of way and local green space' para. 010 and 011). Different types of designation achieve different purposes. The areas listed here are of particular importance to the local community as the reasons given above demonstrate. Additionally, these areas are not as secure as their existing protections would imply. The development pressure in a small constrained area such as Our Neighbourhood is high. There is recent history of planning approvals for large scale developments in the Green Belt with predicted future plans for much more development in the Green Belt. In the Forum's priority survey (Durham City Neighbourhood Planning Forum, 2015) respondents had high regard for the 'woodland' wedges bringing green space into the City, were concerned about loss of / lack of open and green spaces and threat to green belt, and wanted to protect green spaces/green belt and the environment.

4.108 4.102 New sites might become available in Our Neighbourhood that might merit designation as Local Green Spaces. This would require amendment of the Neighbourhood Plan. One such site is Mount Oswald. This formed part of an area of open space protected under saved Policy E5.2 of the City of Durham Local Plan. The Mount Oswald site, previously a golf course, was land that had not been built on since the Middle Ages when it was agricultural land. It therefore contains assets of wildlife value including mature trees and a pond containing protected species. The current housing development on this site needs to be placed within the context of a long battle by local residents to retain this green space. The Mount Oswald site is currently being developed to a level greater than provided for in the City of Durham Local Plan. Open spaces retained within that development, including a complex of interconnected parks and open spaces (which retains and adds to the existing green assets) are therefore of particular importance to the local community and likely to warrant designation as a Local Green Space. As areas of open space in this development are being defined through a series of reserved matters applications, it isn't possible to finalise boundaries at this time. Inclusion, and enhancement, of existing green assets within new developments is the aim of Policy G1. New residential areas might include green areas that were planned as part of the development. Such green areas might be designated as Local Green Space if they are demonstrably special and hold particular local significance. (PPG 'Open space, sports and recreation facilities, public rights of way and local green space' para. 012).

Policy G3: Creation of the Emerald Network

[M14]

An Emerald Network is **proposed identified**, as shown on Proposals Map 3, which comprises sites of wildlife interest within Our Neighbourhood linked by public rights of way or pavements. These sites are:

1. Observatory Hill; and
2. Flass Vale; and
3. Wharton Park; and
4. Aykley Heads; and
5. Hoppers Wood; and
6. The Sands riverbanks; and,
7. St Margaret's cemetery and allotments; and
8. Peninsular Woodlands; and
9. The Racecourse riverbanks; and
10. Pelaw Wood (the part that lies in Our Neighbourhood); and
11. Houghall; **and/**
12. Maiden Castle; and
13. **12.** Hollinside Wood, Great High Wood, Little High Wood, Blaid's Wood, dene connecting to Low Burnhall Wood; and
14. **13.** Durham University Botanic Gardens; and
15. **14.** Low Burnhall Wood; and
16. **15.** Farewellhall Wood (the part that lies in Our Neighbourhood); and
17. **16.** Baxter Wood (the part that lies in Our Neighbourhood).

Proposals for the purpose of improving the biodiversity of sites in the Emerald Network will be supported.

Proposals for the purpose of improving the amenity of sites in the Emerald Network, or for improving existing footpaths within or between these sites, or providing additional footpaths within or between these sites, particularly for improving accessibility for people with a disability, will be supported as long as they cause no **significant** harm to the biodiversity of these sites.

Development proposals that would cause significant harm to the biodiversity of a site or footpath in the Emerald Network, or the connectivity of sites in the Emerald Network, will be refused, unless this significant harm:

- a) **can be avoided by locating on an alternative site with less harmful impacts; or**
- b) **adequately mitigated; or**
- c) **as a last resort, compensated for.**

4.109 4.103 The Emerald Network comprises designated wildlife sites (such as Local Nature Reserves, Local Wildlife Sites, and Ancient Woodland Sites), key green sites (such as parks and gardens), and the River Wear and the riverbanks. The sites are connected by public rights of way or pavements. In some cases the existing PROW or pavement may skirt the site rather than provide access into the site. Other Local Wildlife sites in Our Neighbourhood have not been included in the Emerald Network as they are not accessible by public rights of way or pavements, e.g. Moorhouse Wood and Borehole Wood. The Emerald Network includes the only sites that meet the above criteria in Our Neighbourhood (see the assessment of open spaces in Our Neighbourhood undertaken for this Neighbourhood Plan - Durham City Neighbourhood Planning Forum, 2018). [M17] [OM11] This policy does not provide public access to these sites if such access is currently restricted by the site owners. Any provision of public access to a site is at the discretion of the owner. This policy does not confer extra designations on these sites and should be contrasted with Policy G2 which does convey an additional designation on a small number of very special sites. [M16] The Emerald Network is only part of the green infrastructure within Our Neighbourhood. The Emerald Network also links to a number of sites of wildlife interest that lie immediately adjacent to Our Neighbourhood. These comprise: part of Baxter Wood, part of Farewellhall Wood, Old Durham Gardens, part of Pelaw Wood, Frankland Wood and Kepier Wood.

4.110 4.104 The purpose of the Emerald Network is to encourage people (residents, visitors and tourists) to visit key wildlife sites in Our Neighbourhood for the leisure and health benefits they provide. The 'Looking Forwards' initiative 6 outlines how the Emerald Network could be set up

Justification

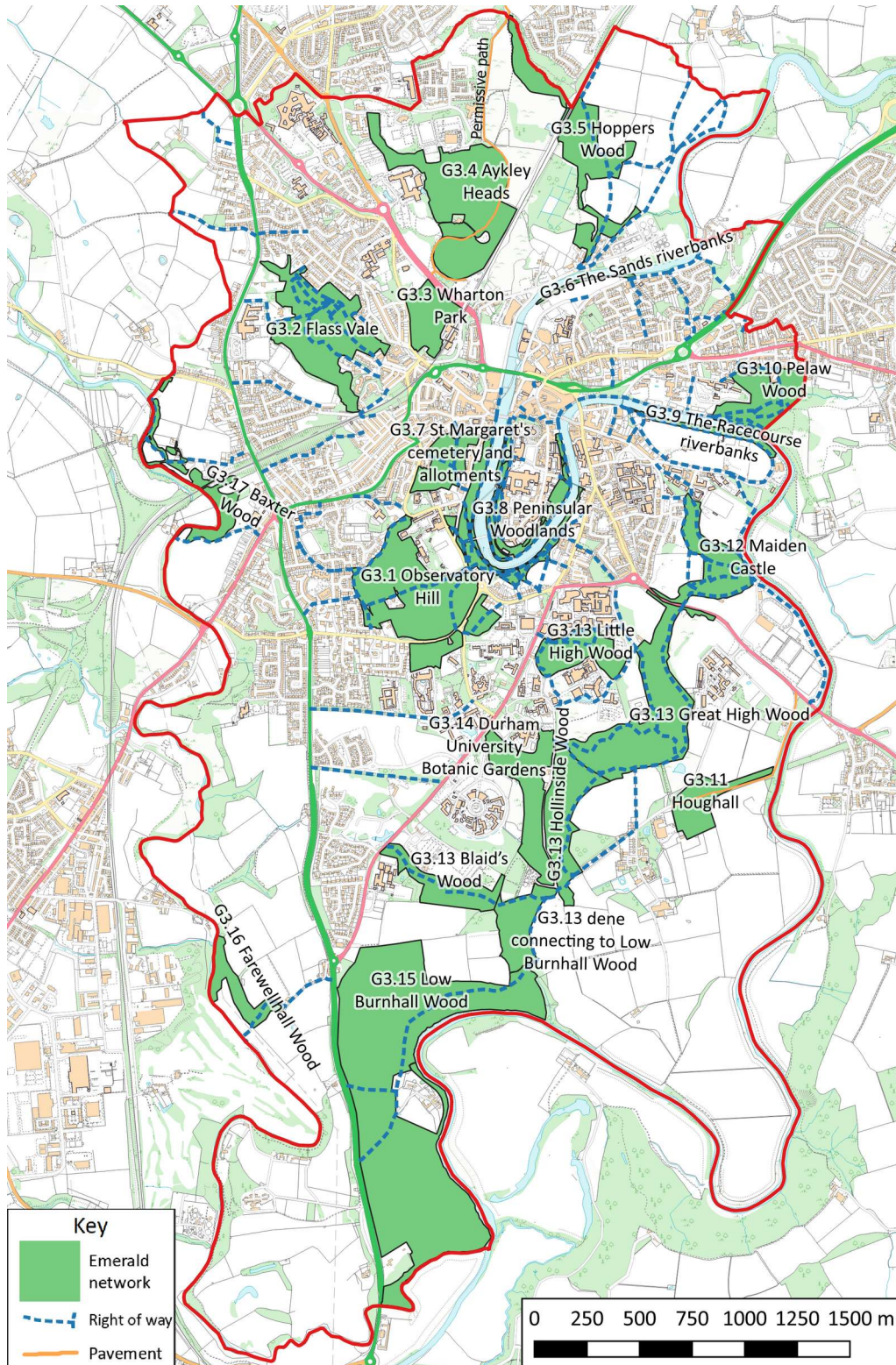
4.111 4.105 The idea for an Emerald Network developed from discussion between the Forum and the Friends of Flass Vale (comprising a membership of 250 people). It builds on policy R13 'River Wear Walkway' from the City of Durham Local Plan saved policies and incorporates policies E5, E26 and T21. Policy R13 was developed by the Council into the idea of a Necklace Park but this idea was never implemented.

4.112 4.106 The benefits of the Emerald Network include:

- improving the image of the City by proving an extra tourist attraction
- providing a leisure asset for local people, and thus improving their well being
- counteracting the fragmentation of wildlife habitat within the City: fragmentation has been shown to reduce plant and animal populations to levels where they risk becoming extinct
- promoting and improving access rights and the Public Rights of Way network through the City
- maintaining links with the wider countryside and seeking to improve wildlife corridors to designated sites such as the Deerness Valley, Bearpark and Croxdale Woods and Brasside/Low Newton wetlands.

4.113 4.107 The Emerald Network would complement other trails being set up by Durham County Council or other organisations.

Proposals Map 3: Emerald Network. [M15 map amended]



An interactive version of this map is available at http://maps.durhamcity.org.uk/npf/Proposals_Map_3.php [OM5, M1]

Policy G4: Enhancing the Beneficial Use of the Green Belt

[M18]

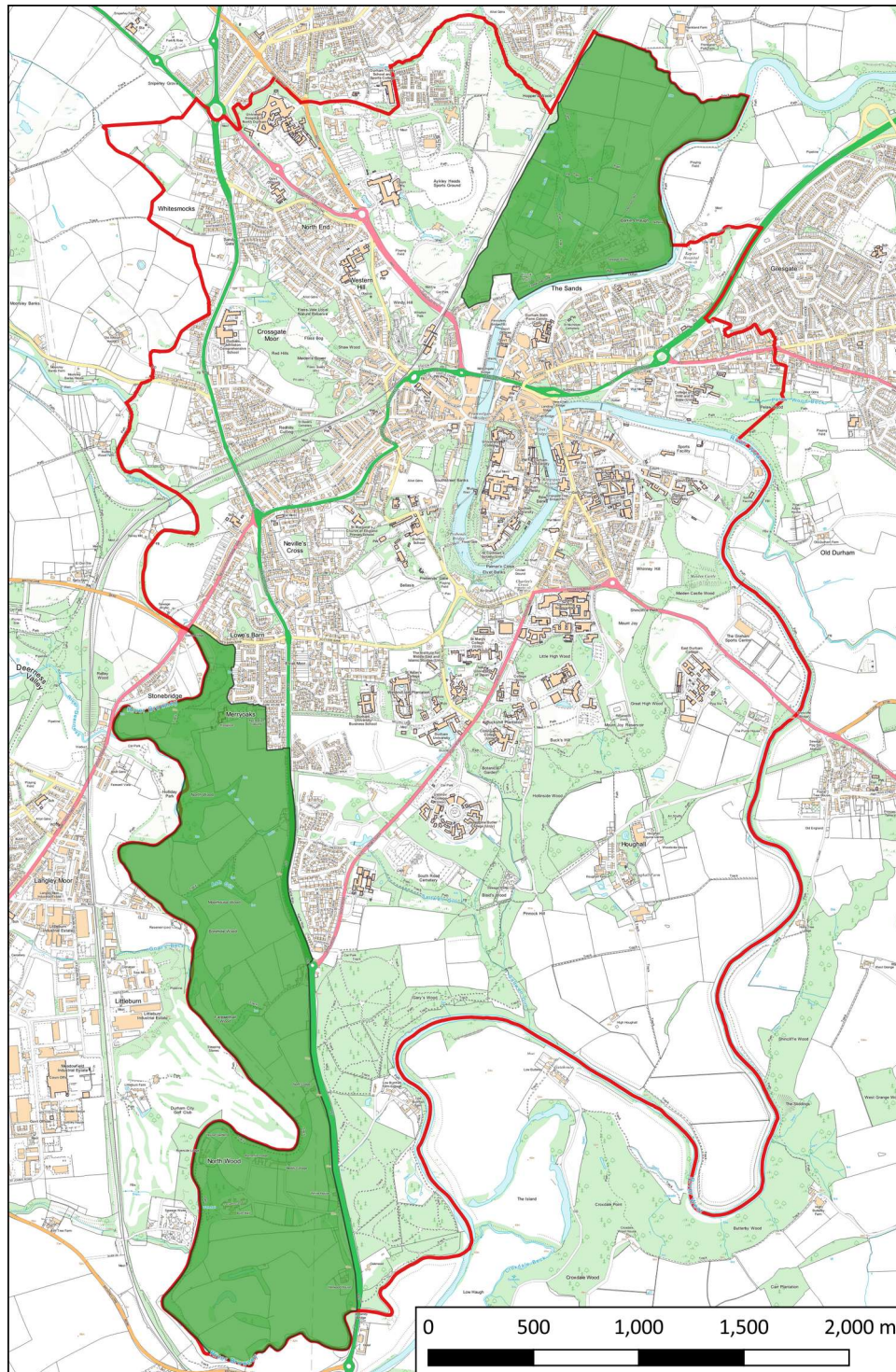
Proposals within the Green Belt land in the Sidegate and Frankland Lane area of Our Neighbourhood **as shown in Proposals Map 4** for the purpose of improving access (particularly for people with disabilities), green corridors, landscape, or biodiversity, or for enhancing visual amenity, will be encouraged and supported where such proposals:

- a) **sustain, conserve and** enhance the inner bowl setting of the World Heritage Site, and the Durham City Conservation Area, and:
- b) do not cause significant harm to the overall quality of the Green Belt environment, particularly its openness.

Proposals within the Green Belt land in the area of Our Neighbourhood West of the A167 from Browney Bridge to Neville's Cross **as shown in Proposals Map 4** for the purpose of improving access (particularly for people with disabilities), green corridors, landscape, or biodiversity, or for enhancing visual amenity, will be encouraged and supported, where such proposals:

- c) **sustain, conserve and** enhance the outer bowl of the World Heritage Site, and:
- d) do not cause significant harm to the overall quality of the Green Belt environment, particularly its openness.

Proposals Map 4: Green Belt - areas for improvement [M19 map amended]



An interactive version of this map is available at http://maps.durhamcity.org.uk/npf/Proposals_Map_4.php [OM5, M1]

Justification

4.114 4.107 The NPPF (Chapter 13) attaches great importance to the Green Belt and to its protection from development. Local people, as shown by responses to the Forum's priority survey (Durham City Neighbourhood Planning Forum, 2015) and by the existence of community bodies such as 'The Friends of Durham Green Belt', place great value on the Green Belt within Our Neighbourhood. The Green Belt is particularly important to Our Neighbourhood because of one of its purposes "to preserve the setting and special character of historic towns" (NPPF para. 134). Saved policies of the City of Durham Local Plan are relevant to the Green Belt (E1).

4.115 4.108 There is the opportunity to enhance the Green Belt. The NPPF (para. 141) states that: "Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

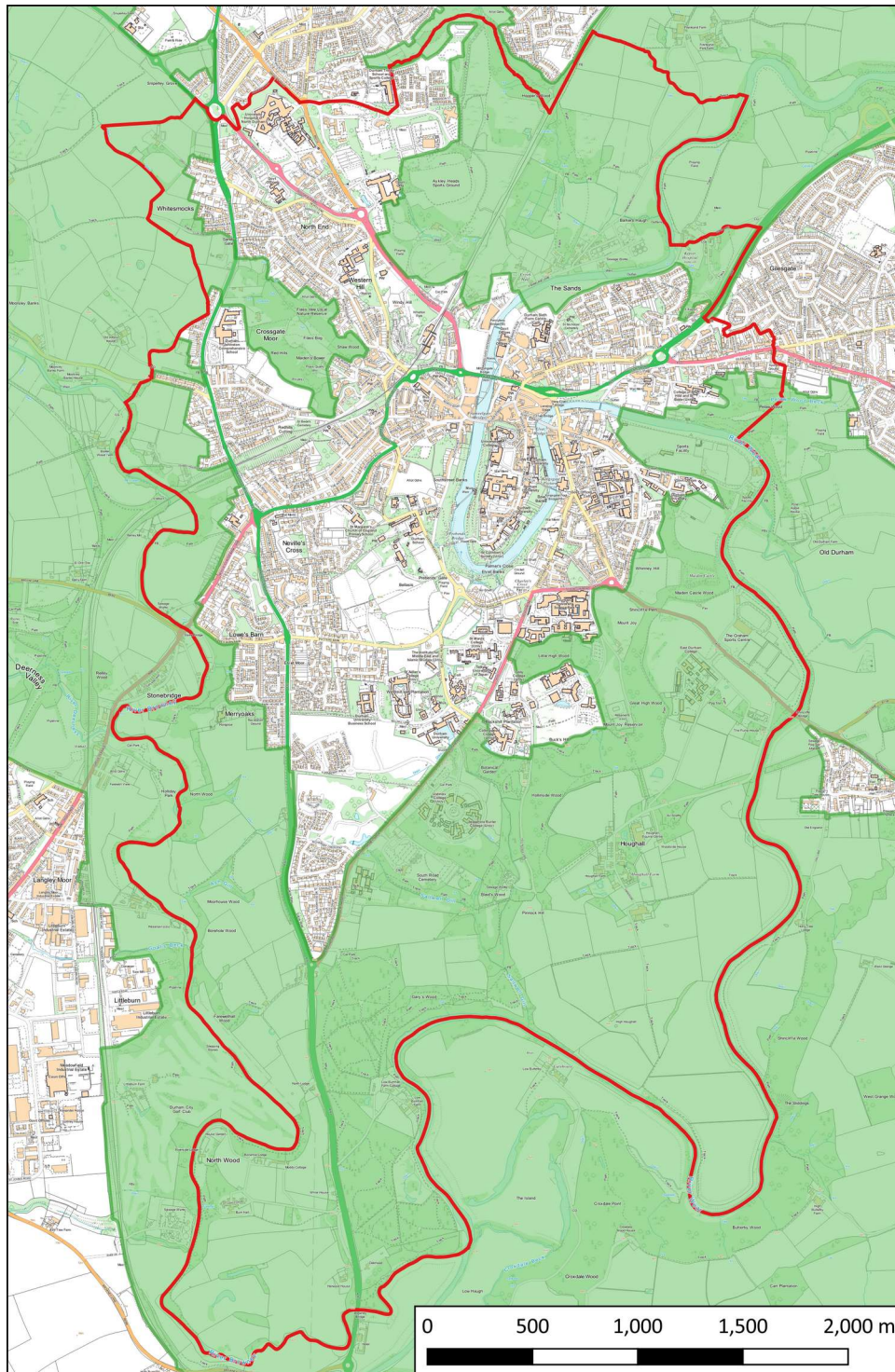
4.116 4.109 The areas of Green Belt within Our Neighbourhood are shown in Map 5. They comprise land at: Aykley Heads, Franklands, Sidegate, Kepier, The Sands, Pelaw Wood, Riverbanks, Racecourse, Whinney Hill, Maiden Castle, Mountjoy, Houghall, Great High Wood, Little High Wood, Hollinside Wood, Howlands, Blaid's Wood, Low Burnhall, West of the A167 to the River Browney (covering Burnhall, Merryoaks, Lowesbarn), West of the Neville's Cross Bank and West of the A167 (covering Neville's Cross, Quarry House Farm and Whitesmocks), Flass Vale.

4.117 4.110 Most of this land is covered by policies in this theme that aim to provide further protection and enhancement; generally by Policy G1, and specifically:

- As Local Green Spaces (Policy G2): the River Wear corridor comprising that in the areas of The Sands and the Racecourse; the DLI grounds area at Aykley Heads; woodland on the south side of the City comprising Maiden Castle, Great High Wood, Hollinside Wood, Blaid's Wood; West of the Neville's Cross Bank and West of the A167 (covering Neville's Cross, Quarry House Farm, Crossgate and Whitesmocks, i.e. the Neville's Cross Battlefield site).
- As sites within the Emerald Network (Policy G3): Flass Vale; Aykley Heads; Franklands, i.e. the accessible part of Hopper Wood; The Sands riverbanks; Racecourse riverbanks; Pelaw Wood; Maiden Castle; Houghall; Great High Wood, Little High Wood, Hollinside Wood, Blaid's Wood; Low Burnhall, i.e. Low Burnhall Wood; West of the A167 to the River Browney, i.e. Farewellhall Wood; West of the Neville's Cross Bank and West of the A167 (covering Neville's Cross, Quarry House Farm, Crossgate and Whitesmocks, i.e. Baxter Wood).

4.118 4.111 This leaves Green Belt land at Sidegate and Franklands Lane and West of the A167 from Browney Bridge to Neville's Cross not covered by additional policies in this Neighbourhood Plan.

Map 5: Green Belt in Our Neighbourhood [M19 map amended]



An interactive version of this map is available at http://maps.durhamcity.org.uk/npf/Map_5.php

4.119 4.112 Green Belt land at Sidegate and Franklands Lane lies in the Durham City Conservation Area and the inner bowl of the World Heritage Site. It is important that views within the inner bowl to and from the World Heritage Site are protected (Durham World Heritage Site, 2017, p.74). This is covered by Policy H1 in this Plan. Additionally this land would benefit from improved access, particularly for people with disabilities, and improvement to the wildlife value and visual amenity of the land and the green assets upon it.

4.120 4.113 The Green Belt land West of the A167 from Browney Bridge to Neville's Cross is mostly agricultural land. It lies within the outer bowl of the World Heritage Site. It is important that any developments in the outer bowl within Our Neighbourhood do not have a negative impact on the setting of the World Heritage Site (Durham World Heritage Site, 2017, p.19). This is covered by Policy H1 in this Plan. The wooded and wildlife value areas could have improved access as most are not accessible by public rights of way, as long as such improved access does not damage the biodiversity of the area.