

South Wiltshire Core Strategy Examination

Matter 12. Question 12.4. Core Policy 23. Green Infrastructure

What is the purpose of the Green Infrastructure Plan which the Council proposes to produce? What is the basis for requiring all developers to contribute towards the implementation of this plan?

1. The Green Infrastructure Plan needs to meet a number of needs, including transport, formal and informal recreation, biodiversity enhancement, as well as being effective at diverting recreational pressures away from disturbance-sensitive protected wildlife.
2. The Wiltshire Core Strategy needs to secure measures to ensure that recreational pressures arising from the increased population it plans for do not increase disturbance to the highly sensitive, rare and vulnerable wildlife of Salisbury Plain Special Protection Area (SPA) and Special Area of Conservation (SAC), Porton Down SPA and the New Forest SPA, SAC and Ramsar site (together referred to in this submission as *the Natura 2000 or N2K Sites*). The Green Infrastructure Plan could meet this need.
3. The HRA Report Appendix 11 states at para. 1.25 that *'To offset additional visitor pressure from local people and in particular regular dog walkers, avoidance and mitigation measures should be included within the Core Strategy, in line with the SW RSS.'* This is further discussed in the main HRA Report (Section 4.4.3), which lists necessary mitigation measures, differing versions of which are then listed at para 12.5 and Core Policy 23 itself of the Core Strategy. To conform with the Habitats Regulations¹, if Green Infrastructure related measures are needed to avoid harm to any of the Natura 2000 sites, the Core Strategy must give a high level of confidence that such measures are available, will be secured, implemented and appropriately managed, and that their effectiveness at avoiding harm is monitored.
4. We agree that Core Strategy allocations are likely to increase recreational use of Salisbury Plain. The HRA Appendix 11 dealing with Salisbury Plain estimates an additional approximate eight visits per day to Salisbury Plain (East). There is nothing in the Core Strategy stating what the current level of usage is. However, given the sensitivity of stone curlews to disturbance, we consider that this increase could be significant. Stone-curlews have been shown to be sensitive to disturbance, eg to dog walkers up to distances of 450m, and colour ringed pairs observed moving from apparently suitable nesting sites where the disturbance event rate exceeded 1.5 disturbance events per hour (Taylor E C 2006). We therefore agree that risks to the Salisbury Plain SPA arising from the Core Strategy policies will need to be mitigated. Without such mitigation, we have not seen evidence to suggest the Strategy would not have an adverse effect on the integrity of the Salisbury Plain SPA.
5. It is reassuring that the Core Strategy Submission Document, para. 12.5 refers to the need for the Site Specific Allocations DPD to require the list of mitigation measures, but we consider that it must not be left for these issues to be tied down in that DPD. The Core Strategy gives legitimacy to these allocations and those within Core Policies 1 & 2, and must in our view secure the necessary protection for these sites.

¹ The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).

6. There must be confidence that the mitigation measures will be secured and delivered. As drafted, in the RSPB's view Core Policy 23 fails to give that confidence. Specifically, it states: *'Provide for any suitable alternative natural greenspace provision, access of quality improvements as well as providing linkages between greenspaces in order to deter increased public use of the New Forest and Salisbury Plain N2K sites, where appropriate.'*
 - There is no detail in this bullet point on the extent and quality of Green Infrastructure (GI) necessary to attract people from using Salisbury Plain and New Forest. We know from work undertaken by Footprint Ecology, detailed in their report, *'Access Patterns in South-east Dorset: The Dorset Household Survey. Consequences for Future Housing and Greenspace Provision'* (Clarke et al. 2008) that to be effective, Suitable Alternative Natural Green Space (SANGS) must offer a large and attractive area in a readily available location.
 - There is no information on how SANGS will be secured, paid for, delivered and maintained.
 - The Policy in our view also needs to require monitoring of the effectiveness of the SANGS at diverting recreational pressures from Salisbury Plain, and to include measures to remedy any failings of the SANGS.

To overcome these problems we recommend that the Core Strategy commits to a study to audit sites that are available and have the necessary attributes to provide SANGS, and establishes the mechanism necessary to bring them forward and monitor their usage. Only following this can SANGS be cited with confidence as potential mitigation for harm. The third bullet point in Core Policy 23 referring to ensuring appropriate future management should set out these details.

7. The second paragraph of the Policy identifies that *'Other measures that could also be considered include site habitat management measures and visitor access management measures at or around N2K site, especially the New Forest and Salisbury Plain'*. There is a legal requirement to achieve favourable conservation status for the N2K sites, which exists independently of any need to offset increases in visitor recreational pressure. Unless it can be clearly demonstrated that the designated site has achieved favourable conservation status, site habitat management cannot be considered as a mitigation measure to avoid harm to the N2K sites. To ensure measures such as visitor access management are deliverable, clear details about how Ministry of Defence and/or the New Forest National Park Authority agree to implement and manage this commitment are required. We are not aware of any such measures and therefore question the extent to which this measure can be relied upon to avoid effects.
8. The final paragraph of the Policy states *'Until such time as the GI Plan is produced a development that would adversely affect the integrity and value of the existing GI network.....will not be permitted'*. We consider that any development coming forward before or after the implementation of the Wiltshire Green Infrastructure Plan must accord with the first sentence of this Policy: *'Proposals for development shall make provision for the retention and enhancement of the existing Green Infrastructure.'* We therefore recommend removal of the words *'Until such time as the Green Infrastructure Plan is produced'*.
9. Core Policy 23, amongst other things addresses the issues arising from Core Strategy policies on Salisbury Plain and New Forest. Both the New Forest National Park and

Porton Down are afforded dedicated Policies (Core Policies 12 and 15). Given the importance of Salisbury Plain and its major ecological sensitivities, and the issues arising from the Core Strategy that affect it, we believe there is substantial merit in drafting a dedicated Core Policy for it, to include the above recommendations.

10. The Core Strategy Submission Document fails to identify the risk of increased recreational use of the New Forest arising from the Core Strategy allocations on the Natura 2000 sites. Paragraph 12.5 and Core Policy 23 recognise these risks and the need for measures to mitigate any effect, but in our view they need to be recognised in Core Policy 15 on the New Forest National Park. Furthermore, we consider that the Plan should require the following:

- Recognise the risks to, and potential impacts on the 'special qualities' and 'special character' arising from additional recreational use generated by the Core Strategy allocations on the New Forest N2K sites.
- Give clarity to the measures that are necessary to mitigate those risks stating who is responsible for implementation of such measures, when and how measures are to be established, and how they will be funded, and how the continued management will be funded.
- Secure monitoring to gauge effects on the New Forest N2K Sites, identify the method and scope of monitoring to ensure that it adequately monitors for all potential impacts on the site. The Authority(ies) responsible for the implementation and continued management of monitoring systems should be clearly stated along with clear statement of when and how such systems are to be implemented including identification of the funding mechanisms.