

SOUTH WILTSHIRE CORE STRATEGY

EXAMINATION IN PUBLIC

**Statement of Common Ground as
agreed between
Wiltshire Council and Natural England**

19 FEBRUARY 2010

Plan reference: Paragraph 5.54

Representation Number: 10257

Issues Raised

Natural England comments: Paragraph states: "...and the major strategic actions necessary are in summary:"

We note that there is no reference to the provision of Green infrastructure (as a major strategic action). This diminishes the importance of this activity for protecting and enhancing south Wiltshire's high quality environments. We therefore recommend adding a further bullet point: "Protection and enhancement of south Wiltshire's high quality environments through the provision of green infrastructure.

Wiltshire Council Ecologist: This section identifies the two specific plans which will deal with impacts to Porton Down SPA/SAC and the River Avon SAC. However it does not recognise that Salisbury Plain and the New Forest European sites also need to be protected. In addition, there is no reference to the latest policy context for biodiversity in Wiltshire, the Biodiversity Action Plan.

I suggest adding two bullet points. Firstly a bullet point for the Green Infrastructure Plan. This should refer to its significance for dealing with impacts relating to the above two European sites. A second bullet point should refer to the revised 2008 BAP indicating its significance for the core strategy. Reference could be made specifically to two BAP targets which are relevant to developments across the board. These are as follows Target GAPT2 "no planning permission is granted where it is likely that there will be a net loss of biodiversity" and GAPT3 "New developments deliver biodiversity gain through the provision of new features". Reference to the BAP is particularly important given that the saved policies in Appendix C do not refer fully to

Wiltshire Council Response

These omissions are acknowledged.

Agreed position

Also taking into account the Ecologist's comments, suggest the following:

Add to 5.54

- Protection and enhancement of South Wiltshire's high quality environments, particularly its N2K sites, including Salisbury Plain and the New Forest, through the provision of Green Infrastructure.
- Ensuring development does not compromise the aims of the Wiltshire Biodiversity Action Plan (BAP)

Add to para 4.6 under desired outcomes:

- Ensure development does not compromise the aims of the Wiltshire Biodiversity Action Plan (BAP)

Add to Integrated Delivery plan under Strategic Objective 5, Core Policy 23

- Target: BAP target GAPT2 – no planning permission is granted where it is likely that there will be a net loss of biodiversity
- Delivery mechanism: development control process
- Lead Delivery Agency: Wiltshire Council
- Timescale: Throughout plan period

Add to Integrated Delivery plan under Strategic Objective 5, Core Policy 23

- Target: BAP target GAPT3 – new developments delivery biodiversity gain through the provision of new features.
- Delivery mechanism: development control process
- Lead Delivery Agency: Wiltshire Council
- Timescale: Throughout plan period

Plan reference: 5.55

Representation Number: 10258

Issues Raised

Green infrastructure also delivers “healthy, safe and enriching places” as much as it delivers high quality environments. Its omission here similarly diminishes the importance of this activity for delivering healthy, safe and enriching places. We therefore recommend adding a further bullet point: “Deliver healthy, safe and enriching places through the provision of green infrastructure.”

As we mentioned in our response to the Preferred options consultation, there is no strategic objective associated with health. However, section 5.55 is headed “Delivering healthy, safe, and enriching places to live work and visit”, and goes on to say “This Strategy will make a positive contribution to deliver the outcomes sought in Strategic Objective 4”. We would thus welcome the inclusion of health as an element of Strategic Objective 4.

Wiltshire Council Response

Agree that GI is also relevant to this paragraph, add relevant bullet to para 5.55.

Agreed position

Add bullet to 5.55:

Deliver healthy, safe and enriching places through the provision of green infrastructure

Plan reference: Core Policy 7

Representation Number: 10294

Issues Raised

We welcome the proposals for a new park and enhancements to the edges of the Avon. We note however, that this policy does not recognise the river Avon as an opportunity to deliver, in the context of the redevelopment:

- Economic benefit through an enhanced retail environment.
- Community benefit through an enhanced sense of place.
- Health benefits through greater exposure to a more natural environment.

We suggest these benefits are worth noting in the supporting text, and that the Core policy is amended to include the statement "... which integrates into the city centre, and makes the most of the river Avon..." This would, we feel better set the tone for this development.

We note that the Sustainability Appraisal recommends the level of parking should be the minimum required, and states that this policy includes this recommendation. However, the policy does not include this.

We welcome the reference to Core 20, but feel that particular reference should be made to the issue of potentially polluting runoff from the development reaching the Avon. We do not feel that including reference to core policy 19 adds anything to this policy, in that while the development may adjoin the River Avon SAC, the immediate proximity to the river does not make this policy any more pertinent. We therefore recommend that this bullet point is replaced with "Meet the requirements of Policy 20 (Pollution and Phosphate levels in the water environment), in particular ensuring there is no potential for polluted runoff to enter the river during both the construction and operational phases of the development".

Wiltshire Council Response

No objection to the addition of text as suggested but it is not felt that it would add any significant value to the policy.

It is felt that 'adequate' rather than 'minimal' car parking is required as when full masterplanning for the site occurs it is necessary that adequate parking is provided to compliment to the retail and leisure function of the proposal.

Due to the sensitive location of the Maltings / Central car park, with several tributaries of the River Avon flowing through the site it is felt appropriate to delete reference to Core Policy 19 to emphasise further the importance of the River habitat.

The issue of run-off during the construction should be dealt with through a construction management plan the addition of this wording therefore does not add to this.

Polluted run-off from the site during the operational phases will be achieved through construction methods such as SUDS which are Core Policy 21 and therefore reference run-off during operations phases is not felt necessary. However reference could be added to the relevant development template if necessary.

Agreed position

Add to paragraph 2 line 8 of Core Policy 7 after 'centre':

, and makes the most of the River Avon

Re-phrase para 4 of core Policy 7, bullet 7 to:

Meet the requirements of Policy Policies 19 (water efficiency) and 20 (phosphate levels) of this Core Strategy

Plan reference: Core Policy 15

Representation Number: 10303

Issues Raised

This section 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 (Green Infrastructure) recognises these risks and the need for measures to mitigate any effect. There should be, in the supporting text to this policy, recognition of the Natura 2000 sites, the issue of recreation and a cross reference to Paragraph 12.5 and Core Policy 23.

Wiltshire Council Response

It is acknowledged that the section would be more complete if a reference to the further GI that may be necessary in the future is made.

Agreed position

Add new paragraph after 9.17.

It may also be the case that development in some areas of south Wiltshire may have an impact on the New Forest SPA an SAC that may need to be mitigated against through increased Green Infrastructure provision. This is further discussed in paragraph 12.5 of this Core Strategy.

Plan reference: Wilton and Southern community Areas

Representation Number: 10317 and 10310

Issues Raised

We note that 4 of the 5 community areas have at least some of their land within the Cranborne Chase and West Wiltshire Downs AONB. The statement in 10.14/11.13 should be made applicable to Wilton and Southern Community Areas as well for consistency.

Wiltshire Council Response

Agree that a paragraph should be added to Chapters 7 (Applying the Spatial Strategy to the Wilton Community Area) and 9 (Applying the Spatial Strategy to the Southern Wiltshire Community Area) to correct this factual omission.

Agreed position

Add new paragraph after 7.14

7.15 Protecting and enhancing high quality environments

Part of this Community Area is located within the Cranborne Chase and West Wiltshire Downs AONB. Within the AONB particular attention will be placed on the preservation of the character and scenic quality of the environment. Where proposals come forward emphasis will be placed on their scale, location, siting, design, materials and landscaping. Where possible, proposals should aid the delivery of the AONB Management Plan. Applications for development within and adjoining the AONB should have regard to the AONB Landscape Character and Historic Landscape Character Assessments.

Add new paragraph after Core Policy 15

9.18 In addition part of this Community Area is also located within the Cranborne Chase and West Wiltshire Downs AONB. Within the AONB particular attention will be placed on the preservation of the character and scenic quality of the environment. Where proposals come forward emphasis will be placed on their scale, location, siting, design, materials and landscaping. Where possible, proposals should aid the delivery of the AONB Management Plan. Applications for development within and adjoining the AONB should have regard to the AONB Landscape Character and Historic Landscape Character Assessments.

Plan reference: Core Policy 19

Representation Number: 10319

Issues Raised

We feel that the policy is vague with respect to non-residential development. Firstly there is the typo, including “energy” in the text. Secondly we are concerned that developers could comply by implementing trivial measures. We believe the following text to be more appropriate: “Non-residential development will be required to incorporate a high level of water efficiency measures. Developers will be expected to submit details of how a high level of water efficiency has been taken into account during the design of proposals.”

Wiltshire Council Response

This policy was discussed at length during the ‘water summit’ meetings held in the spring of 2009 where parties agreed wording. At these meetings commercial water efficiency measures were discussed at some length where it was agreed that commercial efficiencies are achieved through market forces and therefore such demands on commercial providers were not necessary.

No objection to removal of word ‘energy’ from Policy text, this is in effect a ‘typo’.

Agreed position

Remove from second para, line one of policy word ‘energy’.

Plan reference: Core Policy 20

Representation Number: 10321

Issues Raised

Phosphate pollution on the Hampshire Avon SAC is arguably the most complex Habitats Regulations Assessment issue for the Core Strategy to address. We support Core policy 20. There are, however, still some areas within the document which are in need of clarification or expansion. Our position is as follows:

Human activities produce sources of phosphorus (P) which can threaten the integrity of freshwater ecosystems, including rivers, through a range of inter-related biological processes (e.g. excessive algal growth and associated changes in the composition of plant and animal communities). To protect SAC rivers, Natural England uses a family of P targets, jointly developed with the Environment Agency, for the purposes of site management and condition assessment. Currently, P concentrations exceed the appropriate targets over the majority of the Hampshire Avon system, threatening the integrity of the SAC.

Whilst significant improvements have recently been made to a number of Sewage Treatment Works (STWs) driven by the EA's Regulation 50 Review of Consents (RoC) and AMP4, these improvements, according to EA predictive modelling, will not be sufficient to reduce P concentrations to below the aforementioned targets, across the majority of the SAC. Therefore, these STW discharges when combined with other sources of P (eg. agricultural sources, septic tanks) are still contributing to a significant threat to site integrity. To be able to ascertain that these discharges are no longer threatening the integrity of the SAC at the end of the RoC process, it is necessary for the Environment Agency to invoke the provisions of 51(3) of the Habitats Regulations. In this context the establishment of a supplementary phosphorus management plan (PMP) is required, which has provisions that are effective and implemented expeditiously. Further to this, Article 6.1 of the Habitats Directive requires Member States to establish measures which will ensure that sites are contributing to Favourable Conservation Status.

Currently, such a PMP does not exist for the Hampshire Avon SAC, though significant efforts are being made by Natural England to take this forward, with the resources and data available. Natural England (South West) are currently commissioning research work to better understand the relative importance of other sources of phosphate on the Hampshire Avon system, to target the most effective measures. Complementary work is ongoing nationally through a joined up Natural England – Environment Agency Project which seeks to secure appropriate measures to rehabilitate all affected freshwater Sites of Special Scientific Interest (SSSIs) by the end of 2010.

We therefore think the statement in paragraph 12.2(b): “A specific issue raised by the HRA of this Core Strategy (and that of the RSS) concluded that, subject to programmed investment being carried out to reduce the phosphate load from major sewage treatment works in the River Avon system, there would be no adverse effect on the integrity of the SAC from proposed development.” needs to be clarified. We recommend replacing the first two paragraphs of 12.2(b) with our position as set out above. This would make the rationale for this policy clearer and accurate.

Key to the delivery of this policy is the development and delivery of the PMP. This is briefly described in Para 5.31 (b): “A strategy for mitigating phosphate levels in the watercourses to be implemented in accordance with the 'Phosphate Management Strategy'. This process will be managed and part funded by Natural England and Environment Agency with additional funding being secured from developer contributions.” It would be helpful if more detail was provided within the Core Strategy to clarify how the PMP will be taken forward and how developer contributions will be managed. Our view of how this should happen is as follows, and suggest that the above wording is replaced with the following text:

'The Environment Agency should lead the development of the phosphate management strategy with the support of Natural England, the Local Authority and water companies. It is envisaged that the Local Authority would hold the contributions to be spent on delivery projects agreed by this group. The contributions sought from developers should be proportionate, effectively offsetting the additional

sources of phosphate arising from development.

In order to facilitate development prior to a fully costed phosphate management strategy, the Local Authority, in consultation with the Environment Agency and Natural England, will determine a contribution applicable to all residential development using Sewage Treatment Works (STWs) within the catchment.

Work is ongoing to identify the necessary mix of measures required at different locations within the Hampshire Avon SAC to reduce phosphate concentrations appropriately. Whilst it is not possible to prescribe the relative balance of specific measures at specific locations currently, it seems likely that the following measures will be required: further source apportionment studies; additional modelling exercises; additional actions to better manage agricultural pollution; better understanding of the risks posed by septic tanks and the provision of advice on how they can be better managed; better management of urban run-off.'

Wiltshire Council Response

Understand the desire for further explanation but the suggested amendment is too detailed for inclusion in a Core Strategy. Appendix E sets a target (under Strategic Objective 5) for adoption and delivery of the PMP and the level of detail suggested should be included within the management plan itself. .

Agreed position

Suggested revised text for 12.2b

The River Avon SAC and ground water sources are particularly vulnerable from the effects of pollution from surface water drainage, non-physical and biological disturbance.

Groundwater in South Wiltshire is the source of much of the river flow within the River Avon. Pollution of groundwater therefore has the potential to impact on water quality in the river.

Source Protection Zones (SPZs) mapped by the Environment Agency (EA) are used to protect abstractions used for water supply and other forms of distribution to the public. These zones show the areas of groundwater within which there is particular sensitivity to pollution risks, due to the proximity of a drinking water source and the way the groundwater flows. Generally, the closer the activity or release is to a groundwater source the greater the risk.

Protecting water quality both in and outside of SPZs is necessary to comply with the requirements of the Water Framework Directive.

Human activities produce sources of phosphorus (P) which can threaten the integrity of freshwater ecosystems, including rivers, through a range of inter-related biological processes (e.g. excessive algal growth and associated changes in the composition of plant and animal communities). To protect SAC rivers, Natural England uses a family of P targets, jointly developed with the EA, for the purposes of site management and condition assessment. Currently, P concentrations exceed the appropriate targets over the majority of the Hampshire Avon system, threatening the integrity of the SAC.

Whilst significant improvements have recently been made to a number of Sewage Treatment Works (STWs), these improvements, according to EA predictive modelling, will not be sufficient to reduce P concentrations to below the aforementioned targets, across the majority of the SAC. Therefore, these STW discharges when combined with other sources of P (eg. agricultural sources, septic tanks) are still contributing to a significant threat to site integrity. To be able to ascertain that these discharges are no longer threatening the integrity of the SAC, development in the SAC catchment should support this wider agenda to protect the river, and developers of the strategic sites identified in Core Policy 2 will be required to contribute to an overall mitigation strategy through Section 106 agreements. This mitigation strategy will identify and implement measures to reduce the phosphate levels in the SAC.

~~A specific issues raised by the HRA of this Core Strategy (and that of the RSS) concluded that, subject to programmed investment being carried out to reduce the phosphate load from major sewage treatment works in the River Avon System, there would be no adverse effect on the integrity of the SAC from proposed development. However, there are other phosphate inputs besides those attributable to sewage works, and initiatives area underway to better understand this issue and implement measures that will lead to a long-term reduction in phosphate concentration in the river.~~

~~Currently, phosphorus concentrations exceed the appropriate targets over the majority of the Hampshire Avon system, threatening the integrity of the SAC.~~

~~Whilst significant improvements have recently been made to a number of Sewage Treatment Works these improvements, when combined with other sources of phosphorus (e.g. agricultural sources, septic tanks) will not be sufficient to reduce phosphorus concentrations to below the targets, across the majority of the SAC.~~

~~new development must contribute, through Section 106 agreements, to a phosphorus management plan, effectively offsetting the additional phosphate which will inevitably be discharged as a result of development.~~

Plan reference: Core Policy 21

Representation Number: 10457

Issues Raised

We feel that the policy is vague with respect to sustainable drainage. Developers could comply by implementing trivial reduction measures. We believe the following text to be more appropriate: "All new development will include measures to minimise the rate of rainwater run-off and..."

Wiltshire Council Response

We have asked the Environment Agency they are happy for this amendment to be made. .

Agreed position

Amend second paragraph of Core Policy 21 to read:

'All new development will include measures to ~~reduce~~ minimise the rate of rainwater run-off and.....'

Plan reference: Core Policy 23

Representation Number: 10474

Issues Raised

We welcome this Policy on GI. However, we have a number of concerns with respect to this policy.

1. Scope.

The description of Green Infrastructure only describes one function of Green Infrastructure namely biodiversity. There are a number of other functions which are not described. Consequently developments may be permitted which are policy compliant, but which none the less degrade other functions of green infrastructure (e.g. degrade the function of a public right of way).

2. Strength.

The final paragraph 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'. In our view any development coming forward before or after the implementation of the Wiltshire Green Infrastructure Plan must accord with the first sentence of the 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'.

3. Clarity.

We feel it would be helpful if the policy elements relating to Natura 2000 sites (and supporting text) were more clearly distinguished from the general GI requirements for all developments. Perhaps by combining the second bullet point, and the sentence beginning "Other measures that...", and adding "This is to ensure there is no negative impact on Salisbury Plain or New Forest N2K sites".

4. Robustness.

There is no mention of a require developers to pay for monitoring of the effectiveness of the measures to avoid impacts on N2K sites. See comment under WC response below.

5. Detail.

We have recently commented on Swindon's Proposed submission document, and regard their policy DMP8: Green infrastructure Principles to be largely in accord with our thinking as to the level of detail such a policy should contain. It addresses points 1 and 2 above. It also gives much greater detail on the expectations on developers. Clearly, it would need to include the policy elements relating to the N2K sites mentioned on 3 and 4 above.

Wiltshire Council Response

Scope – The definition use is based more on PPS12. However appreciate that Natural England have developed a fuller definition. There proposed to add footnote to Green Infrastructure at para 12.4 to read 'For a full definition of GI see Natural England' s 'Green Infrastructure Guidance' page 7.

Strength - However, no objection to removal of wording as recommended for the avoidance of doubt.

Clarity - However, no objection to rewording as recommended for the avoidance of verbosity.
Suggest:

Remove paragraph starting: "Other measures that..."

Reword second bullet point to read: Provide for any suitable alternative natural greenspace provision, access or quality improvements, improved linkages between greenspaces, site habitat management measures and visitor access management measures to ensure there is no negative impact on the Salisbury Plain or New Forest N2K sites”.

Robustness -

Disagree that comments point to unsoundness.

Policy requires developers to ‘contribute towards the implementation...’ of the GI Plan. There is no reason why this should not include a financial contribution towards monitoring of mitigation measures: this detail must however be assessed on a site-specific basis and subject to a legal agreement rather than set out in a high level Core Strategy policy.

We need to separate out N2K matters and other issues. Suggest adding to bullet 2 in brackets at the end “(including monitoring of effectiveness as required)”

Do not feel that the wording ‘including monitoring of effectiveness as required’ will add anything to the plan unless there is a ‘back up’ plan in the instance that an impact has occurred. The HRA to the Site specific DPD and planning applications will need to be certain that any impact can be mitigated against, otherwise the development should not go ahead.

Detail - It is accepted that the Swindon policy contains more detail than CP 23, but this level of detail could, and perhaps should, be included in a subservient DPD rather than a Core Strategy.

A Public Open Space Study, undertaken on behalf of Council in 2007, identified areas where South Wiltshire is deficient in the provision of a range of open space, and recommended standards aimed at addressing this shortfall.

However, although the methodology of the study followed PPG 17 guidance, the reasoning for setting standards in some cases raised questions as to whether needs had been properly quantified in a spatially distinctive manner.

Current Local Plan standards for recreational open space have worked well (although limited in the type of open space that can be achieved) and there was not considered to be an urgent need to revise these standards.

It was therefore considered that the Open Space Study should be thoroughly reviewed and new standards set in a future Planning Obligations DPD rather than through a Core Strategy policy.

It was however recognised that a specific GI Policy was necessary. Policy 23 introduces criteria for development once the GI Plan is published, whilst also protecting the GI network in the meantime.

Agreed position

Add footnote to ‘Green Infrastructure’ at para 12.4 to read ‘For a full definition of GI see Natural England’ s ‘Green Infrastructure Guidance’ page 7 available from www.naturalengland.org.uk.

Para 12.4 sentence 2 amend ‘open’ to ‘green’ – It is a functionally linked network of ~~open~~ green spaces

Amend policy to read:

Core Policy 23 - Green infrastructure and Habitat networks

Proposals for development shall make provision for the retention and enhancement of existing Green Infrastructure. Where development is permitted the Local Planning Authority will require developers to:

- Contribute towards the implementation of the Wiltshire Green Infrastructure Plan.
- Provide for any suitable alternative natural greenspace provision, access or quality

~~improvements, improved as well as proving linkages between greenspaces, site habitat management measures, and visitor access management measures to ensure there is no negative impact on in order to deter increased public use of the New Forest and Salisbury Plain N2K sites, where appropriate.~~

- Put measures in place to ensure appropriate future management of Green Infrastructure.
- Retain and enhance existing on site Green Infrastructure and create new or replacement Green Infrastructure equal to or above the current **ecological** value of the existing if damage or loss is unavoidable.
- Maintain the integrity of the existing Green Infrastructure network and prevent habitat fragmentation

~~Other measure that could also be considered include site habitat management measures and visitor access management measures at or around N2K sites, especially the New Forest and Salisbury Plain~~

~~Until such time as the Green Infrastructure Plan is produced a development that would adversely affect the integrity and value of the existing Green Infrastructure network, or prejudice the implementation of the Wiltshire Green Infrastructure Plan will not be permitted~~

Plan reference: Appendix A Core Policy 2

Representation Number: 10474

Issues Raised

Natural England are concerned that the development templates will be used by developers to justify delivering the essential infrastructure requirements and no more. This could be resolved by making two changes. Firstly, the Green Infrastructure statements should be qualified by saying "...Other GI requirements will be determined at or prior to master planning. Specific requirements for BAP habitats and species will also be determined at or prior to master planning". Secondly, the delivery mechanism part of the template should provide greater clarity over how partners will be involved in the master planning process, and indeed which partners.

We do not think it appropriate to comment on the site specific content of these templates, given the detailed work is required to inform this.

Preamble to letter states: We have three primary concerns, the addressing of which would improve the soundness of the document. These are around...Appendix A - Development Templates for strategic growth sites...

Wiltshire Council Response

It is acknowledged that, if it were possible, it would be beneficial if the Templates could be used to help deliver infrastructure over and above that required in mitigation of any impact caused by the proposed development. However, in order to be sound and legally compliant the Templates can in fact only ask for what is essential for the delivery of the development.

For the avoidance of doubt, there is no objection to qualifying the Templates by adding a proviso acknowledging that further GI requirements might arise, but it is imperative these requirements are limited to what is essential, rather than what might simply be desirable

Delivery Mechanisms and clarification of how partners will be involved in master planning process is also ongoing. Again considerable progress has been achieved since the publication date and the aim is that this will be completed before EIP. Natural England have not suggested any particular changes to the document on this point and it is not felt that any is required.

Agreed position

Add to each development template under 'Essential Infrastructure Requirements (Green Infrastructure)':

'Other essential GI and BAP habitat and species requirements will be determined at or prior to master planning'.

Plan reference: Appendix C

Representation Number: 10483

Issues Raised

We note that Policy TR10 - Brunel Link is a saved policy. We do not support the retention of this policy. We regard the redevelopment of Churchfields as obviating the need for such a road, and such a development is liable to damage the designated and non-designated features of the river.

Wiltshire Council Response

It is acknowledged that the redevelopment of Churchfields might remove the need for a Brunel Link road. However, the Churchfields site has not yet been allocated and it would therefore be premature to remove Policy TR10 on this basis.

Furthermore, although it is unlikely that any funding will be made available in the foreseeable future, our understanding is that the scheme remains 'live' through the Local Transport Plans and the Policy should be retained until such time as this is no longer the case.

In the event of any detailed proposals being formulated, impact on biodiversity would obviously be a key issue in determining their acceptability.

Agreed position

No amendments.

Plan reference: Appendix E

Representation Number: 10485

Issues Raised

With regard to Strategic Objective 5, we have concerns with respect to the choice of targets and indicators.

Firstly, they do not reflect the targets set out in the associated policies. For example, Core Policy 23 (green infrastructure) has a target around the achievement of BAP targets, while appendix E makes no reference to this.

Secondly, the indicators are not closely causally related to the efficacy of the core strategy (e.g. many are principally delivered through mechanisms other than spatial planning, such as NI197 and E2).

As part of the aspirations for the GI strategy, we would like an access to natural greenspace standard (based on the Natural England access to natural greenspace standard) applied across Wiltshire. We also feel that it is crucial to monitor anticipated gains and losses to biodiversity from development. To these ends, we would like to see the following local indicators added:

Proportion of the population living in areas meeting Access to Natural Greenspace Standard (ANGSt) or similar local target.

Amount of net biodiversity gain delivered through the planning process.

Preamble to letter states: We have three primary concerns, the addressing of which would improve the soundness of the document. These are around...Appendix E –Integrated Delivery Plan.

Wiltshire Council Response

It is accepted that Core Policy 23 (Green Infrastructure) has a target regarding contributions to the achievement of Wiltshire BAP targets (GAPT2-5), and these should have been included in Appendix E.

The comments suggesting that many indicators are principally delivered through mechanisms other than spatial planning is noted. However, whilst the spatial planning system might not be principally responsible for achieving some of these targets, the allocation of sites for particular uses and the delivery of related infrastructure is imperative to this, and the inclusion of these indicators is therefore justified.

Regarding the addition of a standard for access to natural green space, Strategic Objective 7 includes relevant indicators. Whilst the GI Plan might aim to achieve targets for the proportion of the population living in areas meeting Access to Natural Greenspace Standard (ANGSt), it would be premature to include this in the Core Strategy in case it should in fact identify differing local targets. The Strategic Objective 7 indicator of 'Achievement of agreed GI Plan objectives' allows the necessary flexibility for this.

Furthermore, as stated above, the planning system is only one essential part of biodiversity protection and enhancement and, in terms of 'gain', it is again unclear how the weight given to allocation of land or delivery of infrastructure through legal agreements would be measured against subsequent implementation by other parties.

Agreed position

As detailed under para 5.54'

Add to Integrated Delivery plan under Strategic Objective 5, Core Policy 23

- Target: BAP target GAPT2 – no planning permission is granted where it is likely that there will be a net loss of biodiversity
- Delivery mechanism: development control process
- Lead Delivery Agency: Wiltshire Council
- Timescale: Throughout plan period

Add to Integrated Delivery plan under Strategic Objective 5, Core Policy 23

- Target: BAP target GAPT3 – new developments delivery biodiversity gain through the provision of new features.
- Delivery mechanism: development control process
- Lead Delivery Agency: Wiltshire Council
- Timescale: Throughout plan period

Plan reference: Sustainability Appraisal

Representation Number:

Issues Raised

Paragraph 4.60

This states that the green infrastructure policy will have very positive benefits for biodiversity, open spaces and health. As discussed above, the only explicit objective of this policy is biodiversity, and as such this assessment is somewhat glib.

The fact that the main appendix (IV) appraising the policies, does not appraise submission draft policies, but an earlier version, makes the Sustainability Appraisal difficult to follow, and to be certain that statements therein refer to the proposed submission draft as opposed to earlier versions.

Wiltshire Council Response

Appreciate that the SA may not be the easiest to follow due to the many iterations of the Proposed Submission Draft that existed. However through much of the 're-drafting' the policies themselves did not change, but more the overall structure of the proposed submission draft. Table 4.3 on page 20 of the SA report provides some clarity to this.

Agreed position

No amendments required.

Plan reference: Habitats Regulations Assessment

Representation Number:

Issues Raised

States that “This Habitats Regulations Assessment report has been fully updated to assess the latest available draft Core Strategy policies (included in Proposed Submission Draft Core Strategy version 12, July 2009). It is not clear:

How if at all the published Proposed Submission Draft Core Strategy differs from version 12.

To what degree the whole Proposed Submission Draft Core Strategy was assessed.

For example, Habitats Regulations Assessment para 5.6 states that under policy 12 a Wildlife Management Plan will be adopted as SPD. However, the Core Strategy make no commitment to creating these SPDs.

Wiltshire Council Response

The council were very careful not to amend any policy that was relevant to HRA after early iterations of the Core Strategy proposed submission draft.

Again through much of the ‘re-drafting’ the policies themselves did not change, but more the overall structure of the proposed submission draft. Paragraphs 3.2 to 3.4 details the policy number changes when it occurred.

This is a typographical error and the HRA report can be amended accordingly to ensure that the report reflects the final core policy numbering.

Agreed position

Slight amendments to the final HRA report.