



Working towards a core strategy for Wiltshire

# Wiltshire Core Strategy Habitats Regulations Assessments

28 February 2014

# **Update to the Wiltshire Core Strategy Habitats Regulations Assessment**

**February 2014  
(EXAM/89)**

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### APPENDIX 1 – HRA of Proposed Modifications

### APPENDIX 2 – In Combination Assessment

## **Executive Summary**

The findings of the previous Wiltshire Core Strategy Habitats Regulations Assessment (HRA) have been reviewed in light of all modifications proposed since that assessment was carried out (March 2013). An in combination assessment has also identified any plans or projects which have been subject to HRA since March 2013.

Likely Significant Effects (LSE) of the proposed modifications include:

- 1 Water abstraction – increased abstraction required to supply the additional proposed housing would increase LSE upon the River Avon SAC and Kennet and Lambourne Floodplain SAC. It cannot currently be concluded that the WCS modifications would not have any adverse effect upon these sites until the water companies confirm that this supply could be met within licensed headroom.
- 2 Water pollution (Phosphate) – the increased housing numbers will result in an increased requirement for wastewater discharge, which could have LSE upon the River Avon SAC through increased phosphate levels. It cannot currently be concluded that the WCS modifications would not have any adverse effect upon these sites until Wessex Water confirms that this wastewater treatment could be met within licensed headroom.
- 3 Recreation – the proposed modifications would increase recreational pressure at Salisbury Plain SPA and New Forest SPA. For both of these sites it is anticipated that the increases are relatively modest and the existing mitigation strategies remain valid and effective and it can be concluded that the modified WCS (alone) would not affect the integrity of these sites.
- 4 Habitat Loss and modification – increased housing at Bradford on Avon, Corsham and Westbury could result in habitat loss / modification which would impact upon the Bath and Bradford Bats SAC, however it is concluded that this would be effectively addressed through the Council's guidance document and would not affect the integrity of the SAC. Increased housing at Trowbridge could have LSE upon the Bechstein's populations at Biss / Green Lane Woods, however this will be dependent upon the future distribution of housing, to be determined through a subsequent DPD, and the effects of that housing is most appropriately Assess through the HRA accompanying that DPD.
- 5 Nitrogen deposition – there is potential for the additional housing to result in increased atmospheric pollution from traffic, however it is concluded that this would not have an adverse effect upon any Natura 2000 sites.

Confirmation from the water companies in relation to issues 1 and 2 is expected in the coming weeks.

The in combination assessment identified several in combination LSE from recent Local Plan documents, however none of these in combination LSE were considered to result in an adverse effect upon the integrity of a Natura 2000 site.

The army rebasing masterplan is likely to have in combination LSEs with the WCS in respect of water abstraction, phosphate on the River Avon SAC and recreational disturbance on Salisbury Plain SPA; further work is required before these effects can be fully assessed.

## 1. Introduction

As a 'competent authority', Wiltshire Council is legally required to carry out a Habitats Regulations Assessment (HRA) of any plan or project it adopts / consents. Such assessments require the competent authority to firstly identify any likely significant effects of the plan or project upon a network of European designated sites known as Natura 2000. Where such potential effects are identified, the competent authority must the carry out an 'appropriate assessment' of those effects and satisfy itself that the plan or project would not adversely affect the integrity of any of the Natura 2000 sites, otherwise further strict tests would need to be met and authorisation from the Secretary of State and European Commission required before any such plan or project could be formally adopted / consented. The competent authority must have regard to the advice of the relevant statutory advisor on HRA; in England this is Natural England (NE).

With specific regard to land use planning, the Council is required to undertake a HRA of particular land use plans under [Regulation 102](#) of the Habitats Regulations; this requirement applies to the Wiltshire Core Strategy (WCS). HRA is an iterative process and the Council has carried out HRA at several stages of the development of the WCS, with the last full HRA being carried out in March 2013<sup>1</sup>, based on the pre-submission draft of the WCS<sup>2</sup> and the schedule of proposed modifications<sup>3</sup> submitted to the Examination in Public (EiP) at that time. The conclusions of that assessment were endorsed by Natural England prior to the EiP hearings in summer 2013.

Following the hearings, that assessment was subject to a review in light of the post- hearing modifications to the plan proposed by the Council as a result of the discussions and evidence provided at the hearings; that review<sup>4</sup> did not find that the proposed post-hearing modifications<sup>5</sup> would result in any additional significant effects which had not already been dealt with in the March 2013 HRA, and concluded that the findings of the original assessment remained valid. Indeed several of the changes to the plan were included in order to provide greater certainty and clarity of how any potential effects upon Natura 2000 would be dealt with. The review also re-examined any changes to other relevant plans or projects which had progressed or changed since March 2013; it did not identify any additional significant in-combination effects at that time.

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<sup>1</sup> Wiltshire Core Strategy Assessment under the Habitat Regulations (March 2013) – [SUS/36](#)

<sup>2</sup> Wiltshire Core Strategy Pre-submission Document (February 2012) – [WCS/01](#)

<sup>3</sup> Wiltshire Core Strategy Pre-submission Document – Schedule of Changes (Sept 2012) – [EXAM/04](#)

<sup>4</sup> Habitats Regulations Assessment (HRA) Report Addendum (August 2013) - [EXAM/58](#)

<sup>5</sup> Schedule of Proposed Modifications in Plan Order (August 2013) – [EXAM/56](#)

## **2. Scope of this Assessment**

The Council is now proposing further modifications to the WCS in response to the Inspector's 10<sup>th</sup> Procedural Letter<sup>6</sup>, as set out in EXAM/90. It is therefore considered timely for the Council to review the HRA of the WCS in order to ensure any such proposed modifications are HRA compliant. Given the increasingly complex series of documents, changes and associated assessments, it is considered prudent to clarify the scope of this assessment:

- The starting point is the March 2013 HRA and the pre-submission documents which that assessment was based upon.
- It will focus on relevant changes, rather than repeat the findings of the March 2013 HRA where there are no significant changes.
- This assessment incorporates the finding of the August 2013 HRA review.
- It will assess the effects of all proposed modifications to the plan made since the March 2013 assessment, including both the post-hearing modifications and those currently presented in EXAM/90.
- It will update the in-combination assessment based on knowledge of any relevant plans or projects at the current time.

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<sup>6</sup> Letter from Andrew Seaman to Alistair Cunningham dated 2<sup>nd</sup> December – [EXAM/75](#)

### **3. Methodology**

This assessment assesses the effects of the proposed modifications including both the post-hearing modification (EXAM/56) and the current proposed modifications (EXAM/90). Each policy has first been rescreened for Likely Significant Effects (LSE) in light of the proposed modifications, as shown in Appendix 1. Where those modifications are likely to contribute towards an identified LSE upon a Natura 2000 site the conclusions of the HRA with respect to that LSE have been reviewed. Given that several of the policies will contribute to the same LSE, an appropriate assessment of the plan, including all relevant policies, has been carried out as shown in Section 4 below. In particular, the effectiveness of any mitigation measures has been reviewed to ensure that they would continue to address relevant LSE and ensure no residual adverse effects upon the integrity of a Natura 2000 site.

The in combination assessment has been carried out by identifying and reviewing all changes to relevant Local Plans (taken to be those Local Planning Authorities bordering Wiltshire), and associated updates to the relevant HRAs, as shown in Appendix 2. Where there has been no update to the HRA since the last iteration of the WCS HRA (March 2013), it is assumed that any in combination effects have already been considered in that assessment. Where a Local Plan HRA has been updated this has been reviewed to identify any LSE which might potentially be caused by both that plan and the WCS, and therefore potentially act in combination to affect the integrity of the Natura 2000 network. The effects of the WCS have then been considered in combination with all relevant plans and policies in Section 5 below.

In addition to new and revised Local Plan documents, the in combination assessment also pays particular attention to the Salisbury Plain Army Rebasing plans, which are now significantly advanced. This will approximately involve the relocation of approximately 4,000 troops to Salisbury Plain by 2020 and will require significant growth in training facilities and Single Living Accommodation (SLA) at the garrisons of Tidworth, Larkhill, Bulford and Perham Down, while there will also be a need for approximately 1,600 dwelling for Service Family Accommodation (SFA) dwellings outside the wire at the settlements of Ludgershall, Tidworth, Bulford and Amesbury. The MoD will publish a masterplan in May and will be undertaking a HRA of that plan. The masterplan will also be endorsed by the Council as a material planning consideration in determining the applications for the planning applications for that development. The first applications are anticipated in September 2014, with work due to commence in 2015 and be completed by 2020. There is therefore a very close relationship between the plans in terms of timescales and geography.

## 4. Appropriate Assessment of the Proposed Modifications

Each of the policy changes has been considered in detail in Appendix 1. This section provides a discussion of the relevant LSE identified through that process.

### 4.1 Water Abstraction

#### River Avon SAC

This issue is addressed in Section 3 of the March 2013 HRA (p18-20). Proposed modifications to the following policies which could potentially contribute to this LSE are:

- CP2 – Delivery Strategy
- CP4 – Amesbury
- CP17 – Mere
- CP24 – Southern Wiltshire
- CP26 – Tidworth and Ludgershall
- CP31 – Warminster

Collectively, the proposed modifications to these policies would result in approximately 775 additional dwellings in the River Avon SAC catchment which will increase the demand for water and contribute towards additional abstraction across the catchment. Abstraction is known to have the potential to damage notified features of the SAC through reduced flows, however such impacts are localised with some stretches being more sensitive than others. The impact of these policies is therefore dependent not only upon the housing numbers but also upon the environmental capacity at each of the relevant abstraction points.

The water resources required to supply the housing proposed under these policies will be supplied by utility companies, which will abstract the necessary resources under the terms of an abstraction licence. All of the abstractions in the River Avon SAC catchment have recently been reviewed by the relevant competent authority, the Environment Agency (EA)<sup>7</sup>. As a result of that 'Review of Consents' (RoC) several of the licences were modified to include reduced abstraction limits and targeted augmentation, allowing the EA to conclude that all abstractions would not have an adverse effect upon the River Avon SAC either alone or in combination. Wiltshire Council is confident in the conclusions of the EA's RoC and is therefore satisfied that provided the water resources required to supply the proposed WCS housing figures can be delivered within the licensed headroom for relevant abstraction licenses then it can be concluded that the WCS would not have an adverse effect upon the integrity of the River Avon SAC through water abstraction.

The majority of public water supplies within the River Avon SAC catchment are provided by Wessex Water with the exception of Tidworth, where public water is supplied by Veolia. The Council is currently awaiting confirmation from both water companies that the additional housing proposed under the modified housing figures could be supplied within the headroom of the relevant abstraction licenses. It therefore cannot be concluded that the additional water demand from the

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<sup>7</sup> Environment Agency (2010) River Avon SAC Stage 4 Review of Consents and Site Action Plan

proposed WCS housing figures (including the additional 775 dwellings) would not have an adverse effect upon the integrity of the River Avon SAC until the water companies have confirmed that these dwelling could be supplied within existing licensed headroom. It is expected that this confirmation will be received in the next couple of weeks.

#### Kennet and Lambourne Floodplain SAC

Proposed modifications to the Marlborough CA policy (CP14) could have LSE upon the Kennet and Lambourne Floodplain SAC through increased water abstraction. The proposed modifications would result in approximately 70 additional dwellings at Marlborough which will increase the demand for water and contribute towards additional abstraction across the catchment. As with the River Avon SAC, there is potential for the Kennet and Lambourne Floodplain SAC to be adversely affected low flows, which could be exacerbated by over abstraction. Abstraction licenses in the River Kennet have been subject to the same RoC process as those within the River Avon SAC catchment and all such licences are now understood to have been found Habitats Regulations compliant by the EA.

The Council is currently awaiting confirmation from Thames Water that the additional 70 dwellings could be supplied within the headroom of the relevant abstraction licenses. It therefore cannot be concluded that the additional water demand from the proposed WCS housing figures (including the additional 70 dwellings) would not have an adverse effect upon the integrity of the Kennet and Lambourne Floodplain SAC until the Thames Water has confirmed that these dwellings could be supplied within existing licensed headroom. It is expected that this confirmation will be received in the next couple of weeks.

#### **4.2 Phosphate – River Avon SAC**

This issue is addressed in Section 3 of the March 2013 HRA (p17-18). Proposed modifications to the following policies which could potentially contribute to this LSE are:

- CP2 – Delivery Strategy
- CP4 – Amesbury
- CP17 – Mere
- CP24 – Southern Wiltshire
- CP26 – Tidworth and Ludgershall
- CP31 – Warminster

Collectively, the proposed modifications to these policies would result in approximately 775 additional dwellings in the River Avon SAC catchment which will increase the discharge of waste water into the river system. Discharges from sewage treatment works (STWs) are known to contribute to phosphate (P) levels in the River Avon SAC system, which are understood to be exceeding their current conservation targets in some stretches. Elevated P levels have the potential to damage notified features of the SAC through eutrophication and reduced dissolved oxygen levels, however such impacts are localised with some stretches being more sensitive than others. The impact of these policies is therefore dependent upon not only upon the housing numbers but also the environmental capacity at each of the relevant STW discharge points.

STW discharges are licensed by the EA and as described for abstraction licenses above all these licences in the River Avon SAC catchment have recently been subject to a RoC by the EA. That RoC

paid particular attention to the potential effects of STW discharges upon P levels in the River Avon SAC and concluded that the majority of licences would not affect the integrity of the River Avon SAC, subject to the installation of P stripping technology (which has now understood to have been implemented). The only exception was at Warminster where further measures were to be secured through a Nutrient Management Plan, implemented by the EA<sup>8</sup>. There is an agreed position between the Council, NE and the EA that development which can be delivered within headroom of a licensed discharge consent which was subject to the RoC is not likely to have an adverse effect upon the integrity of the River Avon SAC through increased P loading<sup>9</sup> and this conclusion is further supported by CP69 of the WCS which confirms that development in excess of licensed headroom will require a bespoke assessment and may require additional mitigation measures.

The Council is currently awaiting confirmation from Wessex Water that the additional 775 dwellings could be supplied within the headroom of the relevant discharge licenses. It therefore cannot be concluded that the additional wastewater demand from the proposed WCS housing figures (including the additional 775 dwellings) would not have an adverse effect upon the integrity of the River Avon SAC until Wessex Water has confirmed that these dwellings could be supplied within existing licensed headroom. It is expected that this confirmation will be received in the next couple of weeks.

### **4.3 Recreation**

#### Salisbury Plain SPA

This issue is addressed in Section 3 of the March 2013 HRA (p15-17). Proposed modifications to the following policies which could potentially contribute to this LSE are:

- CP2 – Delivery Strategy
- CP4 – Amesbury
- CP14 – Marlborough
- CP26 – Tidworth and Ludgershall
- CP31 – Warminster
- CP32 - Westbury

Research has shown that stone curlew populations such as those on the Salisbury Plain SPA are sensitive to recreational disturbance, particularly from dog walkers. Research has also shown that increased housing close to Salisbury Plain SPA will increase the proportion of visits to the plains over time. Based established research, it has been estimated that the original WCS housing figures would increase visitor pressure to the plains by 30.5 visits per day. This clearly represents a relatively small increase to the overall visitor pressure across the vast area of the plains which would increase slowly over the entire plan period, nonetheless it is difficult to accurately predict the effects of recreational disturbance upon bird populations therefore a precautionary approach is required. With this in mind the Council produced the Salisbury Plain Mitigation Strategy<sup>10</sup> in order to address this issue with respect to the original WCS housing numbers, and CP50 of the WCS includes a commitment to

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<sup>8</sup> This issue is explained in greater detail in our 'Note to the Inspector regarding Phosphate and the River Avon SAC' ([EXAM/42](#))

<sup>9</sup> Nutrient Management in the Hampshire Avon Catchment - Letter of Intent by Environment Agency and Natural England ([STA/01](#))

<sup>10</sup> Draft HRA and Mitigation Strategy for Salisbury Plain SPA ([CPP/118](#))

implement this strategy. The approach of the mitigation strategy is to monitor both visitor pressure and stone curlew populations throughout the plan period and adapt management of the plains in response to any identified trends by working in collaboration with both NE and the Defence Infrastructure Organisation which is responsible for management of the plains. NE did agree that that strategy would provide effective mitigation for any increased recreational disturbance to stone curlew populations as a result of the proposed WCS housing<sup>11</sup>, and the strategy has been implemented now for over a year.

The proposed modifications would increase housing numbers within the visitor catchment of the Salisbury Plain by approximately 905 dwellings, leading to an estimated additional 3 visits per day; this represents an approximately 10% increase on the previously predicted visitor pressure which the approved mitigation strategy sought to address. Given that this additional 10% would be experienced over the remaining plan period (12 years), the Council considers that the proposed housing still is still likely to have only a modest and gradual increase the recreational pressure on the plains. The Council therefore considers that the approach of CP50 and the approved mitigation strategy continues to provide an effective mechanism to mitigate effects of recreational disturbance upon stone curlew populations, and as such the Council concludes that the additional housing proposed through the modifications would not have an adverse effect upon the integrity of the Salisbury Plain SPA.

#### New Forest SPA

Recreational pressure is also known to have a negative effect upon the bird species which the New Forest SPA has been designated, particularly Dartford warbler, nightjar, woodlark and woodcock. While only 1% of the New Forest SPA lies within Wiltshire's administrative boundaries, the vast majority of visits to the national park are known to originate within 8km of the park, which includes a significant proportion of the Southern Wiltshire CA. To date, the WCS has only proposed 555 houses in the Southern Wiltshire CA, which represents a small proportion of proposed housing within 8km of the New Forest once the relevant Core Strategies are taken into account<sup>12</sup>. The March 2013 HRA identified that proposed housing within the Southern Wiltshire CA could make a small contribution towards recreational pressure within the New Forest in combination with those other Core Strategies over the plan period, and CP50 therefore proposes to address this by contributing towards the Recreational Management Strategy for the park which aims to direct visitors to less sensitive areas.

The proposed modifications would increase housing numbers in the Southern Wiltshire CA from 555 to 615 over the plan period. Taken in the context of all proposed development within 8km of the New Forest SPA, the Council still considers that this still represents a very modest and gradual potential increase in recreational pressure. It is therefore concluded that the approach of CP50 and the Recreational Management Strategy still represents an effective mechanism to mitigate the effects of recreational disturbance upon the New Forest SPA, and that the WCS would not have any adverse effect upon the integrity of the site.

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<sup>11</sup> Statement of Common Ground as agreed between Wiltshire Council and Natural England ([SOCG/05](#)), Para.6

<sup>12</sup> New Forest National Park, New Forest District, Southampton, Bournemouth, Test Valley, East Dorset and Christchurch

#### **4.4 Habitat Loss / Modification – Bath and Bradford Bats SAC**

This issue is addressed in Section 3 of the March 2013 HRA (p24-26). Proposed modifications to the following policies which could potentially contribute to this LSE are:

- CP7 – Bradford on Avon
- CP11 – Corsham
- CP29 – Trowbridge
- CP32 – Westbury

The Bath and Bradford Bats SAC comprises a series of underground mines in the west of the county which are used by internationally important populations of bats. The landscape surrounding those mines vital to the maintenance of those populations, particularly the network of other roost sites in buildings, trees and underground, semi-natural habitats which provide foraging areas and linear features which provide commuting routes through the landscape. The March 2013 HRA identified that additional housing in this landscape has the potential to result in the loss of important roosts / foraging areas / commuting routes for bats, however the effects are very difficult to predict at a strategic level, as they will be dependent upon the specific location and design of individual developments; the only exception to this is the strategic allocations at Bradford on Avon and Trowbridge, where the HRA goes into a more detailed assessment of those allocations. CP50 of the WCS therefore proposes to address this issue through the application of a guidance document which aims to highlight particularly sensitive areas and types of development to planners and developers, ensuring that developments in this landscape are sensitively located and designed at the application stage<sup>13</sup>.

The proposed modifications would potentially increase proposed housing figures in the relevant area by up to 1,225 houses. The modifications do not allocate this additional housing to any particular location so it is still very difficult to accurately predict its effects upon the designated bat populations, nonetheless the Council is confident that the total quantum of housing could be delivered in this area without having an adverse effects on the integrity of the Bath and Bradford Bats SAC, provided it is sensitively located and designed. The effects of this additional housing across Bradford on Avon, Corsham and Westbury would continue to be effectively mitigated through the implementation of the Wiltshire Bats SAC Planning Guidance document.

CP29 would direct the vast majority of this housing (950) to Trowbridge, although it does not allocate land for this development, with the location to be determined through a subsequent Site Allocations DPD. Land to the south east of the town is known to be potentially sensitive with respect to the Bath and Bradford Bats SAC as a maternity colony of Bechstein's bats are known to breed in a cluster of ancient woodlands in this area, and forage and commute in the surrounding landscape; this colony is understood to form part of the population designated as the Bath and Bradford Bats SAC. The WCS currently allocates an area of land in this area for 2,600 dwellings and 15ha of employment land (Ashton Park), and it has been agreed through negotiations with NE that in principle this general quantum of development at this location could be delivered without having an adverse effect upon the Bechstein's populations, subject to sensitive design and incorporation of mitigation measures; the Council has been working closely with NE and the developers on the

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<sup>13</sup> Wiltshire Bats SAC Planning Guidance ([STU/208](#))

masterplan for this site to ensure that the proposals will not have an adverse effect on those populations. While it is considered that that allocation can be delivered without adverse effects upon the Bechstein's colony, any further development in this area is likely to impact upon the Bechstein's populations through increased recreational pressure in the ancient woodlands they roost in and the loss of foraging and commuting habitats in the surrounding landscape. The proposed modifications for CP29 would remove the figure of 2,600 dwellings to be delivered at Ashton Park which would bring greater uncertainty over the potential impact of this allocation in this relatively sensitive location.

At the current time it is not possible to accurately assess the effects of the additional 950 houses at Trowbridge upon the Bechstein's populations, as this will be dependent upon the distribution of development across the town. Nonetheless, the general quantum of proposed development at Trowbridge does have the potential to adversely affect the Bechstein's population, particularly if this is delivered to the south east of the town. Nonetheless, it is considered that the additional housing could feasibly be delivered without the need to develop any further to the south east by resolving transport issues to the north east, releasing Greenbelt land to the west of the town or adopting a dispersed option involving multiple smaller sites around the town. It is also worth noting that the housing figures for each community area have now been relaxed from 'at least' to 'approximately', therefore if the 950 houses cannot be sustainably delivered at the town there is the option to deliver some of this requirement in surrounding community areas within the HMA. Nonetheless it is important that potential effects upon the Bechstein's populations are given due regard and attention throughout the site selection process. While CP29 only sets a strategic target for housing at Trowbridge rather than a specific location, it also now includes a clearly requirement for the protection of bats and their habitats to be a key determinant in the allocation of sites through the DPD.

It is not possible for an assessment at this strategic level to go into any further detail in assessing the effects of the additional 950 houses and indeed CP29 requires that the location of this additional housing be determined through a Site Allocations DPD which will itself be subject to a HRA. The higher the level of a plan in the hierarchy the more general and strategic will be its provisions and therefore the more uncertain its effects will be. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. This approach is in accordance with best practice in HRA, provided the following three tests can be met:

- a) The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas
- b) The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g it is not constrained by location specific policies in a higher tier plan); and

c) The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy<sup>14</sup>

In response to these tests the Council considers that;

- a) The WCS HRA cannot reasonably assess the effects of CP29 as it will be dependent upon the location of the development which is as yet unspecified
- b) The Site Allocations DPD will dictate the scale and location of any development, and it will be possible to avoid adverse effects on the integrity of the Bath and Bradford Bats SAC through that plan
- c) The Site allocations DPD will legally require a HRA under Regulation 102 of the Habitats Regulations

It is therefore concluded that the effects of the additional 950 houses are best assessed under the Site Allocations DPD.

#### **4.5 Nitrogen Deposition**

The WCS identified potential LSE upon a range of Natura 2000 sites through increased traffic which would in turn increase atmospheric pollution and nitrogen deposition on sites within 200m of a main road, albeit such effects are considered to be very small and difficult to predict at a strategic level. The increased housing numbers through the proposed modifications would further increase traffic levels and therefore atmospheric pollution, however it is considered that the existing approach to mitigation as set out in CP55 remains valid and effects. It is therefore concluded that the WCS as amended through the proposed modifications would not have an adverse effect upon the Natura 2000 network through nitrogen deposition.

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<sup>14</sup> David Tyldesley Associates (2009) Habitats Regulations Assessment of Local Development Documents (Revised Draft Guidance)

## 5. In Combination Assessment

The review of neighbouring Local Plan documents is presented in detail in Appendix 2 below, however this section provides a discussion of the in combination LSE identified through that process.

### 5.1 Water Abstraction

As set out above, the WCS HRA has identified LSE of water abstraction upon the River Avon SAC / SPA, while two other local plans have also identified similar LSE upon that designation. The Christchurch and East Dorset Core Strategy confirmed that the Wessex Water Resource Management Plan (WWRMP) had already assessed water resource requirements for the area on the basis of the proposed numbers and found that it could be delivered within licensed headroom. The HRA accompanying the WWRMP confirmed that there would be no adverse effect upon the SAC / SPA as a result, therefore it could also be confirmed that there would be adverse effects through the Core Strategy through water abstraction. The New Forest District Local Plan (Part 2) confirmed that any additional water demands would be met through close consultation with NE and EA, and it understood that NE are satisfied with this approach and it was therefore concluded that the plan would not have any adverse effects upon the integrity River Avon SAC / SPA through abstraction.

The army rebasing plans are understood to require an approximately 20% increase in abstraction at the garrisons on Salisbury Plain due to proposed SLA, which represents a significant increase in abstraction from the River Avon SAC. To date these abstractions have not being licensed or monitored by the EA as they are subject to crown exemption (which is due to end shortly), therefore further work is currently ongoing to model the effects of existing and proposed abstraction at these boreholes in order for the masterplan HRA to assess the effects of the rebasing proposals upon the River Avon SAC; it is understood that that modelling work will be complete by the end of March. Outside the wire, the additional SFA will also require a significant increase in water abstraction from the public water sources which are licensed by EA and managed by Wessex Water and Veolia, both of which are yet to confirm that they have capacity to supply these additional dwellings within their licensed headroom.

The army rebasing proposals and WCS will have in combination LSE upon the River Avon SAC through water abstraction, particularly Core Policy 2 (Delivery Strategy), Core Policy 4 (Amesbury) and Core Policy 26 (Tidworth and Ludgershall). Until the abstraction modelling work is complete and the water companies have confirmed that SFA can be delivered within licensed headroom it is not possible to conclude that the WCS would not have an adverse effect upon the River Avon SAC in combination with other plans or projects. It is understood that this work will be complete by the end of May 2014.

### 5.2 Water Pollution (Phosphate)

The WCS HRA has identified LSE of phosphate loading upon the River Avon SAC / SPA, while two other local plans have also identified similar LSE upon that designation. The appropriate assessment of the Christchurch and East Dorset Core Strategy confirmed that only a single STW in the plan area discharges to the River Avon and the plan did not propose any growth at that settlement. The New Forest District Local Plan (Part 2) confirmed that any additional requirement for waste water

discharge would be met through close consultation with NE and EA, and it understood that NE are satisfied with this approach and that the plan would not have any adverse effects upon the River Avon SAC / SPA through abstraction.

Army rebasing proposals will require an increased capacity for waste water treatment at the garrisons due to SLA and at public STWs outside the wire due to SFA requirements, with the potential for this to increase P levels in the River Avon SAC system. All wastewater discharges are understood to be licensed by the EA and have been subject to the RoC. However, the water companies and MoD have yet to confirm that the increased wastewater discharge as a result of the rebasing proposals could be delivered within the licensed headroom.

The army rebasing proposals and WCS will have in combination LSE with the WCS through increased waste water discharges to the River Avon SAC, particularly Core Policy 2 (Delivery Strategy) and Core Policies relating communities area policies within the catchment (4, 17, 18, 20, 24, 26, 27, 31 and 33). Provided both the army rebasing and WCS housing numbers can be delivered within licensed headroom it is considered that the RoC can be relied upon to conclude that both plans would not affect the River Avon SAC in combination. However, until the MoD and the water companies have confirmed that both WCS housing and the army rebasing proposals can be delivered within licensed headroom it is not possible to conclude that the WCS would not have an adverse effect upon the River Avon SAC in combination with other plans or projects. It is anticipated that this situation should be confirmed by the end of March 2014.

### **5.3 Recreation**

The Local Plan document review identified potential LSE of increased recreational pressure upon the New Forest SPA / SAC associated with two plans, while the WCS HRA also identified similar LSE as a result of housing development proposals in the Southern Wiltshire community area (CP24) which could act in combination. Both the Test Valley Revised Local Plan and the New Forest District Local Plan (Part 2) proposes to address the issue through the implementation of a series of Suitable Alternative Natural Green Spaces (SANGS) outside the SPA / SAC, which will attract the additional visitors to those less sensitive sites. Wiltshire Council has agreed to provide mitigation through support for the New Forest Recreation Management Strategy, as required under CP50. It is therefore considered that these three plans will not adversely affect the integrity of the New Forest SPA / SAC in combination.

The review of Local Plan documents did not identify any LSE in combination with the WCS upon Salisbury Plain SPA. However, the army rebasing proposals are likely to increase recreational pressure upon the SPA through the increased SLA and SFA housing. Based on the methodology used in the WCS HRA it is estimated that the SFA will result in an additional 4.6 visits per day to the plains. It is less clear how much SLA would contribute to visitor pressures on the plains however it is expected that the occupants of those units would be less likely to use the plains for recreation and it is understood that military personnel are not typically allowed to keep dogs in the garrison, therefore the effects of dog walking upon stone curlews from the SLA is expected to be minimal. The additional 3 visits from the proposed WCS modifications and the additional 4.6 visits per day from the rebasing proposals would amount to an approximately 27% increase in visitor pressure upon Salisbury Plain SPA / SAC above that originally predicted by the WCS HRA. It is also worth noting that this additional visitor pressure would also increase relatively rapidly in the first half of

the plan period as the rebasing proposals are expected to be complete by 2020. Initial discussions with DIO and NE indicate that it will be necessary to revisit the current Salisbury Plain Mitigation Strategy and ensure that it represents an appropriate mechanism to address increased visitor pressure of the quantum and over the timescales now predicted under the revised WCS housing figures and rebasing proposals. Discussions to date indicate that it may be necessary to identify and secure more specific mitigation measures in that strategy which can be implemented in a shorter timescale, allowing the strategy to be more responsive to any negative effects identified through future monitoring. It is not possible to conclude that the WCS will not have any adverse effects upon the Salisbury Plain SPA / SAC through increased visitor pressure in combination with the army rebasing proposals until the Salisbury Plain Mitigation Strategy has been revised and approved by NE. It is anticipated that this work will be complete by the end of May 2014.

The Local Plan document review identified potential LSE of increased recreational pressure upon the North Meadows and Clattinger Farm SAC associated with Local Plan documents. The Swindon Borough Local Plan addresses this issue through its biodiversity and green infrastructure policy. The Cotswold District Local Plan HRA suggests that further information is required to assess the potential effects of recreational disturbance at this site, however the WCS HRA found that management at the site will address increased recreational pressures and it is considered that that mechanism will also address the Cotswold District's development. It is therefore considered that these three plans would not have any adverse effects upon the integrity of the North Meadows and Clattinger Farm SAC through increased recreational pressures.

#### **5.4 Habitat Loss / Modification**

The Bath and North East Somerset (BNES) Draft Core Strategy HRA identifies potential LSE upon the Bath and Bradford Bats SAC through habitat loss and modification due to allocated development sites close to the component sites; the WCS HRA has identified similar LSE associated with development in the landscapes surrounding the SAC sites, particularly under CP2 (Delivery Strategy), CP7 (Bradford on Avon), CP11 (Corsham), CP29 (Trowbridge) and CP32 (Westbury). The BNES HRA has assessed the likely effects of specific land allocations in this landscape and concluded that they would not affect site integrity. Although it did not identify any LSE associated with unallocated development (possible because it is entirely within the Avon Greenbelt), it is understood that BNES Council is also planning to develop a guidance document similar to that produced by Wiltshire Council (STU/208). It is therefore concluded that the BNES Core Strategy and WCS would not have in combination effects upon the Bath and Bradford Bats SAC.

#### **5.5 Nitrogen Deposition**

Local Plan HRAs identified potential LSEs associated with nitrogen deposition upon numerous sites including Cotswold Beechwoods SAC, North Meadows and Clattinger Farm SAC, River Avon SAC / SPA and the Solent and Southampton Water SPA; the WCS HRA also identified similar LSE associated with these sites. These effects are to be addressed through a series of transport strategies and policies within the plans themselves, taking a similar approach to the WCS. It is considered that these plans would not have an in combination effect on any one of these sites Natura 2000 sites through nitrogen deposition.



## Appendix 1

Policy Screened	Initial HRA Screening Assessment dated March 2013 (SUS/36)	Post-Hearing Proposed Modification (EXAM/56)	Current Proposed Modification (EXAM/90)	Post Modification Screening Assessment	Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)
Strategic Objective 1: delivering a thriving economy which provides a range of job opportunities and enhance the vitality and viability of town centres	A5	No changes proposed.	Minor. None relevant to Natura 2000.	Remain as category A5.	N/A
Strategic Objective 2: addressing climate change	A5	No changes proposed.	None.	Remain as category A5	N/A
Strategic Objective 3: providing everyone with access to a decent affordable home	A5	No changes proposed.	Minor. None relevant to Natura 2000.	Remain as category A5	N/A
Strategic Objective 4: helping to build resilient communities	A5	No changes proposed.	None	Remain as category A5.	N/A
Strategic Objective 5: protecting and enhancing the	A5	Amendments to policy and supporting text are felt to be providing	None	Remain as Category A5	N/A

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natural, historic and built environment		clarification.			
Strategic Objective 6: Ensuring that adequate infrastructure is in place to support out communities	A5	No changes proposed.	None	Remain as Category A5	N/A
Core Policy 1 Settlement Strategy	Category D.	Amendments to policy are felt to be providing clarification.	Minor amendment to supporting text to reflect changes to LDS.	Policy is judged to remain as Category D.	Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant and as a result it can be concluded that there will be no residual adverse effect on site integrity.
Core Policy 2 Delivery Strategy	Category A1	Amendments to policy are felt to be providing clarification.	Increase to overall housing requirement figure by 5,000. Policy now disaggregates the housing requirement and directs housing to individual towns and Community Areas (Table 1); this figure was previously disaggregated in more detailed subsequent CA policies only. Housing numbers are to be 'indicative' rather than 'at least'.	Disaggregation of housing numbers now sets a clear framework and requirement for the CA policies. Category C.	River Avon SAC – Increase in abstraction, increase in discharge  Salisbury Plain SPA – increase in recreational pressures  New Forest SPA – increase in recreational pressures  Bath and Bradford Bats – habitat loss / modification  Nitrogen deposition – various N2K sites

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Core Policy 3: Infrastructure requirements	Category A1	Amendments to supporting text are felt to be providing clarification with respect to ensuring suitable foul sewage options are available.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 4: Spatial Strategy: Amesbury Community Area	Category B	Amendments to supporting text provides greater clarification with respect to the relevant Natura 2000 sties.	Additional approximately 395 houses to be delivered within the Amesbury CA (not at the town)	Policy is judged to remain as Category D.	<p>Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details.</p> <p>Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.3 above.</p>
Core Policy 5: Porton Down	Category B	Amendments to policy are felt to be providing clarification. B.	None	Policy is judged to remain as Category B	N/A
Core Policy 6: Stonehenge	Category B	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category B.	N/A
Core Policy 7: Spatial Strategy: Bradford on Avon Community Area	Category D	No changes proposed.	Additional approximately 110 houses to be delivered within the	Policy is judged to remain as Category D.	Additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed

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			Bradford upon Avon CA, of which approximately 85 will be delivered at the town and approximately 25 will be delivered in the remainder of the CA.		location and design of the development. CP50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.4 above.
Core Policy 8: Spatial Strategy: Calne Community Area	Category D	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.	Additional approximately 225 houses to be delivered within the Calne CA, of which approximately 200 will be delivered at the town and approximately 25 will be delivered in the remainder of the CA.	Policy is judged to remain as Category D.	The additional housing is unlikely to contribute towards any LSE. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column). As a result it can be concluded that there will be no residual adverse effect on site integrity.
Core Policy 9: Spatial Strategy Chippenham Central Area of Opportunity	Category D	No changes proposed.	None.	Policy is judged to remain as Category D.	N/A
Core Policy 10: Chippenham Community Area	Category D	Amendments to provide clarification and certainty. Land South West of Abbeyfield School moved from supporting text to policy text. Requirement for	Additional approximately 600 houses to be delivered within the Chippenham CA, of which approximately 500 will be delivered at the town and approximately 100	Policy is judged to remain as Category D.	The additional housing is unlikely to contribute towards any LSE. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column) and as a result it can be concluded that there will be no residual adverse effect on site integrity.

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		more detailed Strategic Flood Risk assessment to be undertaken.	will be delivered in the remainder of the CA. Strategic allocations removed, to be replaced by a DPD.		
Core Policy 11: Spatial Strategy Corsham Community Area	Category D	No amendments to policy itself. Amendments to supporting text are felt to be providing clarification.	Additional approximately 175 houses to be delivered within the Corsham CA, of which approximately 150 will be delivered at the town and approximately 25 will be delivered in the remainder of the CA.	Policy is judged to remain as Category D.	Additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed location and design of the development. CP50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.4 above.
Core Policy 12: Spatial Strategy Devizes Community Area	Category D	Small change to settlement hierarchy. Great Cheverell moves from a Large village to a Small Village and Etchilampton becomes subject to countryside policies of the Core Strategy.	Additional approximately 350 houses to be delivered within the Devizes CA, of which approximately 280 will be delivered at the town and approximately 70 will be delivered in the remainder of the CA.	Policy is judged to remain as Category D.	The additional housing is unlikely to contribute towards any LSE. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column) and as a result it can be concluded that there will be no residual adverse effect on site integrity.
Core Policy 13: Spatial Strategy Malmesbury Community Area	Category D	No proposed changes to Core Policy 13 or supporting text.	Additional approximately 195 houses to be delivered within the Malmesbury CA, of	Policy is judged to Remain as Category D.	The additional housing is unlikely to contribute towards any LSE. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column) and as a result it can be

Policy Screened	Initial HRA Screening Assessment dated March 2013 (SUS/36)	Post-Hearing Proposed Modification (EXAM/56)	Current Proposed Modification (EXAM/90)	Post Modification Screening Assessment	Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)
			which approximately 125 will be delivered at the town and approximately 70 will be delivered in the remainder of the CA.		concluded that there will be no residual adverse effect on site integrity.
Core Policy 14: Spatial Strategy Marlborough Community Area	Category C	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.	Additional approximately 70 houses to be delivered within the Marlborough CA, of which approximately 70 will be delivered at the town, with no additional housing proposed in the remainder of the CA.	Policy is judged to remain as Category D.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the Kennet and Lambourn Floodplain SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.3 above.
Core Policy 15: Spatial Strategy: Melksham Community Area	Category B	Amendments to policy and supporting text are felt to be providing clarification. Policy is judged to remain as Category B.	Additional approximately 330 houses to be delivered within the Melksham CA, of which approximately 310 will be delivered at the town and approximately 20 will be delivered in the remainder of the CA.	Policy is judged to remain as Category B.	The additional housing is unlikely to contribute towards any LSE.
Core Policy 16: Melksham Link	Category B	No changes proposed.	None	Policy is judged to remain as	N/A

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Project				Category B.	
Core Policy 17: Spatial Strategy: Mere Community Area	Category B	No changes proposed. Policy is judged to remain as Category B.	Additional approximately 35 houses to be delivered within the Mere CA, of which approximately 35 will be delivered at the town, with no additional housing proposed in the remainder of the CA.	Policy is judged to remain as Category B.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details
Core Policy 18: Spatial Strategy Pewsey community Area	Category D	Clarification and more detail with respect to Natura 2000 sites. Addition to incorporate the saved local plan employment allocation of Land at Marlborough Road. This site was screened in the HRA SUS/36 concluding on p127 that 'any development at this location would need to comply with Core Policies 18 and 50. These are judged to provide sufficient protection'; screened under category B. The amendment of	Change 'at least' to 'approximately', but no change to proposed housing numbers.	Policy is judged to remain as Category D.	Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column), Proposed changes provide further clarification with respect to Natura 2000 sites. As a result it can be concluded that there will be no residual adverse effect on site integrity.

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		incorporating the site into WCS policy purely provides clarification.			
Core Policy 19: Spatial Strategy: Royal Wootton Bassett and Cricklade Community Area	Category D	Amendments to provide clarification. The policy now saves employment land at Purton Brickworks. This was not subject to HRA as the draft WCS did not save this site. However the conclusion drawn to the remaining saved employment land allocations by the HRA (SUS/36) equally applies to this site (page 138 to 139). This concludes that the allocations have been screened as having no significant effects alone or in combination because CP 50, CP41, CP55 and CP69 provide sufficient mitigation.	Additional approximately 205 houses to be delivered within the Royal Wootton Bassett and Cricklade CA, of which approximately 150 will be delivered at Royal Wootton Bassett and approximately 55 will be delivered in the remainder of the CA.	Policy is judged to remain as Category D.	The additional housing is unlikely to contribute towards any LSE. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column) and as a result it can be concluded that there will be no residual adverse effect on site integrity.
Core Policy 20: Spatial Strategy Salisbury	Category B	No amendments to policy itself are proposed. However	None	Policy is judged to remain as Category B.	N/A

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Community Area		amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites. .			
Core Policy 21: Maltings / Central Care Park	Category B	Small amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category B.	N/A
Core Policy 22: Salisbury Skyline	Category A3	No changes proposed.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 23: Old Sarum Airfield	Category A1.	No changes proposed.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 24: Spatial Strategy Southern Wiltshire Community Area	Category B.	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.	Additional approximately 60 houses to be delivered within the Southern Wiltshire CA. No additional housing at Downton.	Category D.	Additional housing will further increase recreational pressure upon New Forest SPA in combination with new housing proposed outside of Wiltshire, but in and around the New Forest. CP50 and the New Forest Recreation Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.4 above. Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details
Core Policy 25: New Forest National Park Authority	Category A2	No amendments to policy itself are proposed. However amendments to	None	Policy is judged to remain as Category A2.	N/A

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		supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.			
Core Policy 26: Spatial Strategy: Tidworth and Ludgershall Community Area	Category D	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites. Changes also require the consideration of appropriate disposal of foul and surface water. Policy is judged to remain as Category D.	Additional approximately 20 houses to be delivered within the Tidworth and Ludgershall CA. No additional housing at either town.	Policy is judged to remain as Category D.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details.  Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.3 above.
Core Policy 27: Spatial Strategy: Tisbury Community Area	Category B	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.	Additional approximately 20 houses to be delivered within the CA. No additional housing at Tisbury town.	Policy is judged to remain as Category B.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details
Core Policy 28: Trowbridge Central Area of	Category A1	No changes proposed.	None	Policy is judged to remain as category A1.	N/A

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Opportunity					
Core Policy 29: Spatial Strategy: Trowbridge Community Area	Category D	Amendments to policy supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites. Changes also require a more detailed Strategic Flood Risk assessment to be undertaken.	Additional approximately 1000 houses to be delivered within the Trowbridge CA, of which approximately 990 will be delivered at Trowbridge and approximately 10 will be delivered in the remainder of the CA. Housing at Additional housing for Trowbridge directed towards Green Lane / Biss Woods. No limit on Ashton Park extension.	Policy is judged to remain as Category D.	This significant uplift in housing numbers for Trowbridge appears to direct them towards Green Lane / Biss Woods. Likely to increase pressures on Bechstein's maternity roosts in this area through habitat loss / fragmentation from housing and infrastructure and recreational pressures on the woods. See Section 4.4 above.
Core Policy 30: Trowbridge Low-Carbon/ Renewable Energy Networks	Category A1	No changes proposed.	None	Policy is judged to remain as category A1.	
Core Policy 31: Spatial Strategy: Warminster Community Area	Category D	Amendments to supporting text ensure correct name of Cranborne Chase and West Wiltshire Downs AONB are felt to be providing clarification. Changes also require	Additional approximately 265 houses to be delivered within the Warminster CA. An additional 270 housing will be provided at the town, while approximately	Policy is judged to remain as Category D.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain Management Strategy would continue

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		a more detailed Strategic Flood Risk assessment to be undertaken.	5 less dwellings would be delivered in the remainder of the CA.		ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.3 above.
Core Policy 32: Spatial Strategy: Westbury Community Area	Category D	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites. Policy is judged to remain as Category D.	Additional approximately 225 houses to be delivered within the Westbury CA. An additional approximately 210 houses will be provided at the town, while an additional approximately 15 houses would be delivered in the remainder of the CA.	Policy is judged to remain as Category D.	Additional housing in this area could potentially put additional pressure upon the Bath and Bradford on Avon Bats SAC through habitat and roost loss, although this would be dependent upon the detailed location and design of the development. CP50 and the Wiltshire Bats SAC guidance would continue to provide an effective mechanism to ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.4 above. Additional housing will further increase recreational pressure upon Salisbury Plain SPA in combination with other CA policies in the plan. CP50 and the Salisbury Plain Management Strategy would continue ensure that this additional housing would have no adverse effect upon site integrity. See Section 4.3 above.
Core Policy 33: Spatial Strategy: Wilton Community Area	Category B	No amendments to policy itself are proposed. However amendments to supporting text are felt to be providing clarification and more detail with respect to Natura 2000 sites.	Additional approximately 35 houses to be delivered within the Wilton CA.	Policy is judged to remain as Category B.	Additional housing will further increase pressures of water abstraction and phosphate loading (wastewater) upon the River Avon SAC in combination with other CA policies in the catchment. See Section 4.1 and 4.2 above for details
Core Policy 34: Additional Employment Land	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A

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Core Policy 35: Existing Employment Sites	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 36: Economic Regeneration	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 37: Military Establishments	Category A1	No amendments to Core Policy 37 itself. Amendments to supporting text clarifies military's future plans to develop a single masterplan for Army Rebasing.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 38: retail and Leisure	Category A1	Amendments to policy are felt to be providing clarification.	Changes to supporting text confirming timescales for further retail work.	Policy is judged to remain as Category A1	N/A
Core Policy 39: Tourist Development	Category A1 / A2	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 40: Hotels, Bed and Breakfasts, Guest Houses and Conference Facilities	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 41:	Category A1	Amendments to	None	Policy is judged to	N/A

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Sustainable Construction and low-Carbon Energy		policy are felt to be providing clarification.		remain as Category A1	
Core Policy 42: Standalone Renewable Energy Installations	Category A1/A2	No changes proposed.	None	Policy is judged to remain as Category A1/A2.	N/A
Core Policy 43: Providing Affordable Housing	Category A1	Amendments to policy are felt to be providing clarification.	Changes to split Wiltshire into two affordable housing zones based on additional viability work. No contributions required for developments under four dwellings.	Policy is judged to remain as Category A1.	N/A
Core Policy 44: Rural Exceptions sites	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 45: Meeting Wiltshire's Housing need	Category A1	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 46: Meeting the needs of Wiltshire's vulnerable and older people	Category A1	Amendments to policy are felt to be providing clarification.	Removal of reference to Lifetime Homes	Policy is judged to remain as Category A1.	N/A

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Core Policy 47: Meeting the needs of Gypsies and Travellers	Category A1	Amendments to policy are felt to be providing clarification.	Minor amendments to reflect changes of national policy. Makes provision for an additional 24 residential pitches and 25 transit pitches. Commitment to a further Gypsy and Traveller's DPD.	Policy is judged to remain as Category A1.	N/A
Core Policy 48: Supporting Rural Life	Category A1	Amendments to policy are felt to be providing clarification and to ensure that buildings are re-used as well as converted.	None	Policy is judged to remain as Category A1.	N/A
Core Policy 49: Protection of Services and community Facilities	Category A1	Amendments to policy are felt to be providing clarification. Policy is judged to remain as Category A1	None	Policy is judged to remain as Category A1.	N/A
Core Policy 50: Biodiversity and Geo-diversity	Category A3	Amendments to policy and supporting text are felt to be providing clarification.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 51: Landscape	Category A3	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 52: Green	Category A1	Amendments to policy and supporting	None	Policy is judged to remain as	N/A

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Infrastructure		text are felt to be providing clarification.		Category A1.	
Core Policy 53: Wilts and Berks and Thames and Severn Canals	Category A1/A2	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1/A2.	N/A
Core Policy 54: Cotswolds Water Park	Category A1/A2	No proposed changes.	None	Policy is judged to remain as Category A1/A2.	N/A
Core Policy 55: Air Quality	Category A1/A2	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A1/A2.	Policy 55 identifies the role of Low Emission Strategies (defra 2010) as a way of tackling transport related emissions and the need to consider the potential for air quality impacts on European sites, this is consistent with CP25 of the South Wiltshire Core Strategy. Core Policy 55 has been amended to state that assessment will be required for new industrial processes located within 10km of a European Site.
Core Policy 56: Contaminated Land	Category A2	No proposed changes to policy text.	None	Policy is judged to remain as Category A2.	N/A
Core Policy 57: Ensuring high quality design and place shaping	Category A1/A3	Amendments to policy are felt to be providing clarification to ensure Core Policies 66 Strategic Transport Network and Core Policy 61 Transport and new development are considered.	None	Policy is judged to remain as Category A1 / A3.	N/A
Core Policy 58:	Category A3	Amendments to	None	Policy is judged to	N/A

Policy Screened	Initial HRA Screening Assessment dated March 2013 (SUS/36)	Post-Hearing Proposed Modification (EXAM/56)	Current Proposed Modification (EXAM/90)	Post Modification Screening Assessment	Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)
Ensuring the conservation of the historic environment		policy and supporting text are felt to be providing clarification and to ensure reference to the Wiltshire Historic Landscape Assessment.		remain as Category A1/A3.	
Core Policy 59: The Stonehenge and Avebury and associated sites World Heritage Site and its setting	Category A3	Amendments to policy are felt to be providing clarification..	None	Policy is judged to remain as Category A3	N/A
Core Policy 60: sustainable Transport	Category A3	No changes proposed.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 61: Transport and Development	Category A3	Slight amendments to the title of the policy to provide clarification.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 62: Development Impacts on the Transport Network	Category A3	Amendments to policy and supporting text are felt to be providing clarification..	None	Policy is judged to remain as Category A3	N/A
Core Policy 63: Transport Strategies	Category D	Amendments to policy are felt to be providing clarification that transport strategies will be developed for other	None	Policy is judged to remain as Category D. Mitigation measures identified during	<b>Bath and Bradford-on-Avon Bats SAC</b> – Council has prepared a guidance document for prospective developers ‘Bat Special Areas of Conservation Planning Guidance for Wiltshire Issue 1.0 which identifies consultation zones around core roosts where developments may lead to impacts on the

Policy Screened	Initial HRA Screening Assessment dated March 2013 (SUS/36)	Post-Hearing Proposed Modification (EXAM/56)	Current Proposed Modification (EXAM/90)	Post Modification Screening Assessment	Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)
		<p>areas in the plan area (outside of Salisbury, Trowbridge and Chippenham). Additional of text after para 6.158 is to ensure that CP63 is compliant with the Habitat Regulations (reg 61 and 102). Further amendments to supporting text also provide further detail and clarification with respect to Natura 2000 sites.</p>		<p>Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column). Proposed changes provide further clarification with respect to Natura 2000 sites. As a result it can be concluded that there will be no residual adverse effect on site integrity.</p>	<p>SAC. Council is entering a Memorandum of Understanding with Natural England to review this document once a year and revise practice as necessary to ensure the SAC remains in favourable condition. The Core Strategy should explain this process by referring to it in CP50: Biodiversity and Geodiversity. Lower tier plans covering Corsham, Trowbridge and Bradford on-Avon will need to include measures to protect and secure habitats beyond the SAC and contribute to its favourable condition. The A350 improvements planning application will only be approved following assessment under the Habitats Regs (informed by a new survey) and this will ensure that all necessary mitigation measures are included to maintain favourable condition of the SAC. CP63 has also now been updated to confirm that emerging transport strategies will not take forward transport options which might adversely affect a Natura 2000 site.</p>
Core Policy 64: Demand Management	Category A3	Amendments to policy are felt to be providing clarification and ensure smarter choices will be promoted alongside other demand management measures.	None	Policy is judged to remain as Category A3.	N/A
Core Policy 65: Movement of Goods	Category A3	Amendments to policy are felt to be providing clarification.	None	Policy is judged to remain as Category A3.	N/A

Policy Screened	Initial HRA Screening Assessment dated March 2013 (SUS/36)	Post-Hearing Proposed Modification (EXAM/56)	Current Proposed Modification (EXAM/90)	Post Modification Screening Assessment	Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)
		Changes aim to direct and manage freight traffic to roads there a minimum of community and environmental impacts will occur.			
Core Policy 66: Strategic Transport Networks	Category D	Amendments to policy and supporting text are felt to be providing clarification. Additional of text after para 6.168 is to ensure that CP63 is compliant with the Habitat Regulations (reg 61 and 102). Amendments to policy additionally provide clarification and more detail with respect to Natura 2000 sites especially requiring detailed bat survey information on Annex II species. Policy is judged to remain as Category A3.	None	Policy is judged to remain as Category D. Mitigation measures identified during Appropriate Assessment dated March 2013 (SUS/36) Appendix D are still relevant (summary provided in next column). Proposed changes provide further clarification with respect to Natura 2000 sites. As a result it can be concluded that there will be no residual adverse effect on site integrity.	<b>Bath and Bradford-on-Avon Bats SAC</b> – Council has prepared a guidance document for prospective developers ‘Bat Special Areas of Conservation Planning Guidance for Wiltshire Issue 1.0 which identifies consultation zones around core roosts where developments may lead to impacts on the SAC. Council is entering a Memorandum of Understanding with Natural England to review this document once a year and revise practice as necessary to ensure the SAC remains in favourable condition. The Core Strategy should explain this process by referring to it in CP50: Biodiversity and Geodiversity. Lower tier plans covering Corsham, Trowbridge and Bradford on-Avon will need to include measures to protect and secure habitats beyond the SAC and contribute to its favourable condition. The A350 improvements planning application will only be approved following assessment under the Habitats Regs (informed by a new survey) and this will ensure that all necessary mitigation measures are included to maintain favourable condition of the SAC. CP66 has also now been updated to require upgrades to the A350 to incorporate appropriate mitigation measures to maintain flight routes for Annex II bat species.

<b>Policy Screened</b>	<b>Initial HRA Screening Assessment dated March 2013 (SUS/36)</b>	<b>Post-Hearing Proposed Modification (EXAM/56)</b>	<b>Current Proposed Modification (EXAM/90)</b>	<b>Post Modification Screening Assessment</b>	<b>Implications for the Appropriate Assessment of the HRA dated March 2013 (SUS /36)</b>
Core Policy 67: Flood Risk	Category A3	Amendments to policy and supporting text are felt to be providing clarification to the monitoring framework.	None	Policy is judged to remain as Category A3	N/A
Core Policy 68: Water Resources	Category A2	Amendments to policy and groundwater quality are felt to be providing clarification and ensures groundwater quality is acknowledged as well as groundwater resources.	None	Policy is judged to remain as Category A2.	N/A
Core Policy 69: Protection of the River Avon SAC	Category A2	Amendments to policy and supporting text are felt to be providing clarification.	None	Policy is judged to remain as Category A2.	N/A

## **Appendix 2: Updated assessment neighbouring authorities plans and habitats regulations assessment**

<b>Plan / Habitats Regulations Assessment and its conclusions</b>	<b>Implications for Wiltshire Core Strategy Proposed Changes</b>
<p><a href="#"><u>Swindon Borough Local Plan 2026 Pre-submission Document</u></a></p> <p>The 2013 HRA identified LSEs in relation to water abstraction at North Meadow and Clattinger Farm SAC, Kennet and Lambourne Floodplain SAC and the River Lambourne SAC, although it concluded that these LSEs would not have an adverse effect on the integrity of these sites through increased water abstraction. Similar LSEs were also identified in the WCS HRA, therefore there is potential for in-combination effects, however the effects of abstraction in both the Wiltshire and Swindon administrative areas have already been assessed in combination through the EA's RoC.</p> <p>It also identified LSEs of atmospheric pollution upon both the North Meadow and Clattinger Farm SAC and the Kennet and Lambourne Floodplain SAC also identified in the WCS HRA, however the appropriate assessment concluded that these sites are not sensitive to atmospheric nitrogen deposition. There are therefore not considered to be any in-combination effects of the plans in relation to atmospheric pollution.</p> <p>LSEs of recreational disturbance upon the North Meadow and Clattinger Farm SAC were identified in both HRAs and could act to cause an in-combination effect.</p>	<p><b>Need to consider in-combination effects of recreational disturbance on North Meadow and Clattinger Farm SAC</b></p>
<p><a href="#"><u>Vale of the White Horse District Council Local Plan 2031 (February 2014)</u></a></p> <p>LSEs relating to Hackpen Hill SAC where identified in the HRAs of both the Vale of the White Horse (VWH) Local Plan and the WCS, although the appropriate assessments confirmed that neither plan would affect the integrity of the SAC. The VWH HRA identified LSEs in relation to recreational pressure and atmospheric pollution, while the WCS HRA only identified LSEs relating to water abstraction, therefore there are not considered to be any in-combination effects.</p>	<p>No in-combination effects identified</p>
<p><a href="#"><u>West Berkshire core Strategy DPD Adopted July 2012</u></a></p> <p>No changes to this plan since the March 2013 HRA was carried out.</p>	<p>NA</p>
<p><a href="#"><u>Draft West Oxfordshire Local Plan – October 2012</u></a></p> <p>No updates to this plan since the March 2013 HRA was carried out.</p>	<p>NA</p>
<p><a href="#"><u>Cotswold District Local Plan Consultation Paper: Preferred Development Strategy (May 2013)</u></a></p> <p>Both the Cotswolds and WCS HRAs have identified LSEs of recreational disturbance upon North Meadow and Clattinger Farm SAC, which could act together to cause in combination effects.</p> <p>Both HRAs have also identified LSE of nitrogen deposition upon the Cotswolds Beechwoods SAC and Rodborough Common SAC, and there is</p>	<p><b>Need to consider in-combination effects of: recreational disturbance on North Meadow and Clattinger Farm SAC; nitrogen</b></p>

<b>Plan / Habitats Regulations Assessment and its conclusions</b>	<b>Implications for Wiltshire Core Strategy Proposed Changes</b>
potential for these plans to act together to cause in-combination effects.	<b>deposition upon the Cotswolds Beechwoods SAC and Rodborough Common SAC</b>
<p><b><u>Draft North Dorset Local Plan (November 2013)</u></b></p> <p>The HRA for this plan did not identify any LSEs also identified in the WCS HRA, therefore there are no identified in-combination effects.</p>	No in-combination effects identified
<p><b><u>Christchurch and East Dorset Joint Core Strategy (December 2013)</u></b></p> <p>This HRA identified the potential for physical damage and loss of habitat on the River Avon SAC as a result of bypass proposal for Christchurch, improvements to the A35, new housing, gypsy and traveller sites and new cycling / walking routes. The WCS also identified LSE of habitat loss through development close to the River Avon SAC.</p> <p>The HRA identified potential LSE of recreational disturbance upon the River Avon SAC / SPA and the New Forest SAC / SPA from additional housing. The WCS HRA also identified similar LSE associated with additional housing.</p> <p>Both the Christchurch and East Dorset and WCS HRAs identified potential LSE of nitrogen deposition on the River Avon SAC / SPA.</p>	<b>Need to consider in-combination effects of: Water abstraction / discharge to the River Avon SAC / SPA; habitat damage / loss along the River Avon SAC / SPA; recreational pressure on the River Avon SAC / SPA and the New Forest SAC / SPA; nitrogen deposition on the River Avon SAC / SPA and the Solent and Southampton Water SPA</b>
<p><b><u>New Forest District Council Core Strategy (adopted October 2009)</u></b></p> <p>There are no updates on the Core Strategy adopted October 2009.</p>	No implications for Wiltshire Core Strategy proposed changes
<p><b><u>New Forest District Local Plan Part 2: Sites and Development Management</u></b></p> <p>Submitted for examination in July 2012, with hearings in early 2014 and January 2014. Currently awaiting Inspector's report, with adoption expected in April 2014.</p> <p>The HRA (September 2013) identified potential LSE of increased recreational pressures on the New Forest SAP / SAC, and water abstraction / pollution and habitat loss effects upon the River Avon SAC / SPA. Similar LSE were identified in the WCS HRA.</p>	<b>Need to consider in-combination effects of recreational pressure on New Forest SAC / SPA; water abstraction and pollution effects on the River Avon SAC / SPA</b>
<p><b><u>New Forest National Park Authority Core Strategy and Development Management DPD (adopted December 2010)</u></b></p> <p>There are no updates on the adopted DPD.</p>	No implications for Wiltshire Core Strategy proposed changes
<p><b><u>Test Valley District Council – Habitat Regulations Assessment for Revised Local Plan DPD (January 2013)</u></b></p>	<b>Need to consider in-combination</b>

<b>Plan / Habitats Regulations Assessment and its conclusions</b>	<b>Implications for Wiltshire Core Strategy Proposed Changes</b>
The HRA identified LSE of increased recreational pressure upon the New Forest SPA / SAC, also identified in the WCS HRA.	<b>effects of recreational pressure upon the New Forest SPA / SAC</b>
<p><a href="#"><u>South Gloucestershire Council Core Strategy</u></a>                      The Core Strategy was adopted by the council in December 2011, however there is not understood to have been any update to the associated HRA since the WCS HRA was last carried out in March 2013.</p>	No implications for Wiltshire Core Strategy proposed changes
<p><a href="#"><u>Bath and North East Somerset Draft Core Strategy</u></a>                      Changes to the Core Strategy were consulted upon in March and November 2013 and the HRA has been updated both times. The updated HRA continues to highlight potential LSE upon the Bath and Bradford Bats SAC through habitat loss and modification as a result of housing and infrastructure within the landscape surrounding the SAC sites. The WCS has identified similar LSE upon this SAC.</p>	<b>Need to consider in-combination effects of habitat loss / modification upon the Bath and Bradford Bats SAC.</b>
<p><a href="#"><u>Mendip Local Plan Part I: Strategy and Policies</u></a>                      The draft plan was submitted for examination in December 2013, however the HRA has not been updated since the November 2012 version.</p>	No implications for Wiltshire Core Strategy proposed changes
<p><a href="#"><u>South Somerset Proposed Submission Local Plan</u></a>                      The proposed submission plan was subject to HRA in June however there have been no updates to the plan or the HRA since then.</p>	No implications for Wiltshire Core Strategy proposed changes