
Wiltshire Gypsies and Travellers Development Plan Document

Sustainability Appraisal Scoping
Report Appendix C - Consultation
responses on SA scoping Report
consultation version
March 2021

Pre-Submission Draft (Regulation 19)

August 2024

Historic England

From: [REDACTED]

To: [REDACTED]

Subject: RE: Wiltshire Gypsies and Travellers Plan - Consultation on Draft Sustainability Appraisal Scoping Report ending 22nd April 2021

Date: 22 April 2021 14:23:52

Dear [REDACTED], thank you for consulting Historic England on the scope of your proposed SA. Apologies for the delay in my response.

As you know we have previously advised on Wiltshire Council's Sustainability Appraisals, most recently in relation to the Wiltshire LP Review; so to avoid undue repetition could I please refer you to those comments, and in particular to our guidance on how best an SA might consider and respond to the historic environment. <https://historicengland.org.uk/images-books/publications/sustainabilityappraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmentalassessment>

I note the proposed SA for this document contrasts with the form and scope of the aforementioned LP SA, and this G&T Plan SA could benefit from considering the SA drafted for the LP to ensure good practice is employed. For example, this SA appears not to include reference to relevant historic environment plans, programmes and policies nor to the related issues and challenges facing Wiltshire's heritage e.g. the pressure from encroachment on its sensitive historic landscapes. Likewise, the heritage objective and decision-making questions would benefit from being consistent with the LP SA.

Sincere regards

[REDACTED]

Partnerships Team Leader South West.
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[REDACTED]

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Natural England

Date: 09 April 2021
Our ref: 347096

BY EMAIL ONLY
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Dear [REDACTED],

Planning consultation: Wiltshire Local Plan - Wiltshire Gypsies and Travellers Plan - Consultation on Draft Sustainability Appraisal Scoping Report

Thank you for your consultation on the above dated 18 March 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

TASK A1 - IDENTIFYING OTHER PLANS, POLICIES AND SUSTAINABILITY OBJECTIVES

Natural England is broadly satisfied with the Review of Plans, Programmes, Policies and Sustainability Objectives identified in Appendix A. However, we note there is no reference to New Forest National Park Recreation Management Strategy. Additionally, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- River basin management plans
- AONB and National Park management plans.
- Relevant landscape plans and strategies.

TASK A2: COLLECTION OF BASELINE INFORMATION

No comment

TASK A3 - KEY SUSTAINABILITY AND ENVIRONMENTAL ISSUES AND PROBLEMS

We note that there is no reference to the restoration or enhancement of biodiversity, with the issues referring only to avoiding damage. We recommend that the restoration or enhancement of biodiversity is included in line with the National Planning Policy Framework.

We note that there is no specific reference to the loss of Best and Most Versatile agricultural land.

We note that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue.

In direct relation to the aforementioned improving access to nature we also note that there is no reference to the New Forest.

TASK A4 - SUSTAINABILITY APPRAISAL FRAMEWORK

As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape:

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

We acknowledge that our interests in the natural environment have been covered by this section however in **Table 11: Sustainability topics and SA objectives** we note that biodiversity net gain has not been included under Biodiversity. Natural England would like to emphasise the importance of the net gain approach with the following advice:

Biodiversity Net Gain

Government policy is progressing to reverse the trend of biodiversity decline, which has continued to occur despite planning policy aimed towards no residual loss in biodiversity.

This includes the revised NPPF which sees a strengthening of provision for net gain through development. Defra have also consulted on updating planning requirements to make it mandatory. This is following the publishing of Defra's 25 Year Environmental Plan, in which net gain through development is the first key objective.

Natural England therefore recommend plans and policies seek to achieve biodiversity net gain, over and above residual losses which should be accounted for and addressed.

You may wish to consider the use of the Defra Biodiversity Metric 2, which is a clear and methodical calculation for net gain in biodiversity for individual planning proposals. The metric has been updated to include a wider range of habitat types and incorporate wider benefits of Green Infrastructure. The final version of the metric is due to be published in December 2020.

Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede Biodiversity Metric 2.0. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be measurable.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me directly. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely [REDACTED]
Conservation and Planning Lead
Wessex Team

Wiltshire Council



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