

CHIPP301

Response to Chippenham Consultation

The UK is one of the most nature depleted countries in the world and despite nature struggling against all odds to survive, more than one in seven native species face extinction and more than half are in decline.

Due to the complexity of the ecosystem of farm animals churning the land to feed the birds (who spread the seeds) with insects which spread the pollen and feed the small mammals which feed the birds of prey, by thinking you can just put bridges and tunnels in for the animals and it will all be fine goes against scientific research. The noise and air pollution from the traffic will also have an effect on any animals, insects and birds not killed by the large machinery building works and loss of habitat.

Please put these photos owls, egrets, herons, woodpeckers, Water Rails, rabbits, slow worms, stonechats, birds of prey, butterflies, Kingfishers and other birds and information into the consultation replies.

Wiltshire Council declared a Climate emergency in 2019 and the farmland plays an important part in providing local food and reducing food miles and carbon from imported food. Soils play a key role in the carbon cycle by soaking up carbon from dead plant matter. Plants absorb CO₂ from the atmosphere through photosynthesis and this is passed to the ground when dead roots and leaves decompose, as soon as you start the building work you release this carbon into the atmosphere accelerating the rise in temperature which leads to droughts, floods and extreme weather as we are already starting to see. The excessive building we are seeing in Chippenham and Wiltshire, 5,000 houses over government figures just to build a road because a grant was available is unacceptable, Chippenham is already providing over 4,510 houses which should be its allocation for the period, suggesting 20% of the allocation for the whole of Wiltshire is built in Chippenham alone is unsustainable for a historic market town with a centre going back to the 9th century. Births have fallen by 15.3% over the last 8 years and deaths are up 14.9% compared to the last 5 years, we still have not seen the final outcome of the pandemic deaths and indirect deaths from delays in cancer and heart treatment, to rush into this project without knowing the effects of the pandemic, Brexit and the highest Government borrowing since the second world war, destroying our countryside which we value and makes Chippenham the community it is for something that may not be needed is unacceptable.

We have seen from the cycle route put in on the A420 and then taken out a few months later because the consultation was completed after not before the project went ahead and there was a cycle path already running parallel to the additional one shows Wiltshire Council need to listen to the residents of Chippenham who know their areas best.

We use this area for leisure and recreation leading to healthy lives from exercising outside in fresh air, putting houses right up to the cycle path and removing the landscape will cause residents like myself to get in our cars as we will no longer be able to walk to the countryside and go to other areas of the County clogging up the roads.

We have a 7 mile cycle path that is used by families from all over Chippenham to get to Calne, due to the safety and landscape of this area, these children then go onto be cyclists for the future, the development will ruin this.

Isn't it better to wait a year and make the right decision than rush into something which will destroy our town's ethos forever?

Thank you

CHIPP301a

















































CHIPP309

Please add the attached photos and statement into the responses for Chippenham Local Plan under scale of growth

20% of the houses for Wiltshire in Chippenham is not acceptable, adding 5000 houses onto Government figures is not acceptable, if you take the 5,000 houses off the Chippenham allocation we have provided our share for the period, the figures were out of date in 2019 so more houses have been built all over the County since then as developers are building on top of the Local Plan numbers in areas where business needs require them.

The Old College building photo attached has been derelict for 6 years plus the time the new college was being planned and built, we need affordable homes on this site and the Bridge Centre as they are ideal with links to train and bus stations and amenities and will revitalise the town centre, at the moment all the building is for retirement homes in the town centre, for a vibrant town we need all ages.

We also have many derelict and vacant houses for years, see 2 examples attached which are on the main routes into the town and have been that way for many years, the Old College and Bridge Centre sites are also on the main rail and road views into the town centre, this is not giving a good impression for prospective Businesses needed for the 37 vacant business premises of various sizes available in Chippenham and is not even considered in the main part of the local plan.

Because Wiltshire Council want to get rid of the County Farms and Farmland owned by Wiltshire Council for housing and the developers are honest and say they make more money out of greenfield sites the footprint of Chippenham is growing without the investment in existing sites, we have built over 40% above the housing targets CPRE figures so far in this local plan period. Please don't destroy the farmland needed for local food in the declared climate emergency policies and use these sites and take a break from excessive building, we have already got ongoing large building sites all around the town and need to regenerate after the Pandemic, Brexit and the Climate Emergency being declared.

Thank you

CHIPP309a





By Julie Armstrong



CHIPP311

6.3.2 Surface water (fluvial) flooding

Climate change is predicted to increase rainfall intensity in the future by a range of between 20% and 40% (the recommended national precautionary sensitive range for 2085 to 2115). This will increase the likelihood and frequency of surface water flooding across the entire County. However, it is likely to particularly affect impermeable urban areas that are already susceptible such as Salisbury, Trowbridge and Chippenham.

Unfortunately the mapping showing the impact of climate change on surface water flood risk in the 1 in 100 year plus 40% event shown in Appendix F could not be accessed.

Although the SA considers the use of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces it goes on to state that as Site 1 is in Source Protection Zone 2c the extent to which SUDs can be used may be affected. We note that Site 2 is not covered by a Source Protection Zone and so SUDs will not be adversely affected. And yet Sites 1 and 2 are rated the same “minor adverse effect”. This seems to be an example of the subjective application of the SA criteria to the identified sites.

Biodiversity of the Marden Valley. The River Marden has been identified as a priority habitat (Running Water) in the Wiltshire and Swindon Biodiversity Action Plan. Protection is therefore supported by Core Policy 50 Biodiversity and Geodiversity in the Wilshire Core Strategy. Paragraph 6.72 in the supporting text says “the valuable natural environment includes not only identified sites, but also features of natural conservation value including priority species and habitats (including those listed in the national and Wiltshire Biodiversity Action Plan).

Wiltshire Council have not yet carried out a proper biodiversity assessment for Site 1, relying it appears on a scant PEOAR report in the Future Chippenham consultation (not even included as part of this consultation). A biodiversity assessment is required to assess the actual impact the development proposals would have on these and other species. This assessment needs to be taken into account in the weightings given to each site.

Traffic Levels Development to the east of Chippenham is likely to increase rat run traffic on the roads in the parish. These are country lanes and already unsuitable for the volume of traffic that currently uses them to avoid congestion on the A350 from M4 Junction 17 to the Morrison’s roundabout by coming through Langley Burrell and onwards through the parish. Also the comments on modelling the eastern road note significant congestion problems on the A4 to the east. With such congestion more drivers will come through the parish in even larger numbers than they do now. There has been no traffic modelling on the impact of this on the parish and this needs to be done.

Road Building

The development at Site 1 is predicated on the building of the Eastern distributor road. This is not new. The very same point was noted by the Planning Inspector when reviewing the CSAP

“Over allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR”

As the housing allocation has not been approved the requirement for this road has not been established. The Local Plan argues that such a road will relieve the traffic congestion in Chippenham

Town Centre. Currently this congestion centres on the Bridge Centre and Rowden Hill due to vehicles passing on an east/west axis. This would not be resolved by a relief road winding through housing development to the east of Chippenham. What would solve this is a road from A4 at Pewsham to Lackham giving quick access to the PRN A350. Traffic modelling on just a southern distributor road needs to be done to compare with the one done for an eastern distributor road to show which is best for relieving congestion in the centre of Chippenham. Further a road to the south would give quick access to the employment land at Bumpers Farm and retail outlets off the A350 and make development west of the A350 more sustainable than developing Site 1.

A road to the east will adversely impact on the air quality and increase noise pollution in the west of the parish. The increase in noise will be particularly acute where the proposed road goes over the River Avon at a distance of just over 1km from Tytherton Lucas.

The changed travel patterns arising from Covid and Climate Change awareness need to be factored into the traffic modelling to assess the need for proposed additional road infrastructure to the east and south of Chippenham. The carbon footprint of building the road infrastructure needs to be included in the SA.

The sense is that the sites are not treated equitably in terms of road infrastructure. To the south of Chippenham it is noted that there is “an opportunity for a new southern link road if required”. There is no “if required” comment on road building to the east.

It is our view that these Site 1 constraints have not been properly assessed in the work so far and all sites identified need to remain in the draft plan until the housing numbers are reviewed and the SA amended in the light of comments from this consultation.

CP4 – 10

As we do not agree with development on Site 1 for reasons cited in our response to the Emerging Spatial Strategy and the site allocation for Chippenham these questions are premature.

CP11 Do you agree with the proposal for some housing to be located north of the North Rivers cycletrack?

There should be no development north of the North Rivers cycletrack. Further there should be no development to the south either. The Bremhill Neighbourhood Plan Policy 3 states “Development should not be permitted in the open countryside north of the North Rivers Cycle”

Development within this area “has the potential to reduce separation between Tytherton Lucas and Chippenham which would reduce its remote and tranquil character. In addition development would be visually prominent from surrounding high ground and could make the edge of Chippenham considerably more noticeable”.

The Wiltshire Council Chippenham Landscape Setting Assessment December 2014 states: Landscape Quality “The landscape has a predominantly rural character particularly...to the north of the North Wiltshire Rivers Route cycleway”. Qualities to be safeguarded within this strategic area include: “Remote rural character of the land to the north of the North Wiltshire Rivers Route characterised by large arable fields bound by tree lined watercourses and onward views over the

expansive river floodplain flanked by the wooded limestone ridge to the east”.

In addition it states the context of the “Remote character of Tytherton Lucas with the edge of Chippenham appearing generally distant and wooded”.

CP12

Hardens Farm and Newleaze Farm should be retained as working farms to support food production and contribute to making UK more self-sufficient in the post COVID/Brexit world. This would also assist with water retention, CO2 retention and maintain habitat for wildlife as well as providing opportunities for young people without capital assets to become farmers.

CP13 Are there important factors you think we've missed that need to be considered in planning for Chippenham?

There should be no changes to the boundary between Bremhill Parish and Chippenham during the period of this Local Plan.

Detailed Comments on Supporting Documents

Level 1 Strategic Flood Risk Assessment

Background

The world is facing a major crisis of Climate Change, the planet is heating up and there appears to be little willingness to stop, or even reverse this trend.

The consequences for the continued asset stripping of the environment will be increased temperatures, rising to over 40 degrees in summer months by 2040, and increased storm damage through severe weather systems bringing intense rain and wind.

Lord Krebs, Chair of the Adaptation sub-committee of the Climate Change Committee [1] stated: “the six immediate priority areas are related to the risks of flooding and coastal change, the impact of high temperatures on health and wellbeing, risks of future water shortages, impacts on the global food system, and risks arising from new and emerging pests and diseases (COVID)”

The Scott Wilson report 2011 on the Bristol River Avon states:

“Within the county of Wiltshire, the river is predominately underlain by the Kellaways formation and in the west Great Oolite Group. The low permeability of this area results in rapid response to rainfall.”

“Communities that have experienced flooding from this river system include Malmesbury, Chippenham, Melksham and Bradford Upon Avon.”

At Para 3.3 “The areas that are identified as being the most susceptible to ground water flooding are located close to the Upper Bristol Avon and the River Marden.” (All land to the East of Chippenham)

This is not the first-time developers and Wiltshire Council have proposed development to the East of Chippenham. In 2015 an Examination in Public was held to consider the building of 1600 homes:

On 14th September 2015 the Planning Inspector leading the EIP in his initial appraisal stated:

"The plan acknowledges the landscape impact for this area is a significant concern as is the need for considerable work to avoid the flood risks to the town and elsewhere"

The former point is recognized in the Landscape setting report (docceps06) Para 6.25.

"The open character and strong association with the rivers and floodplain are important characteristics to safeguard. The generally remote character to the north of the North Wilts River Route and the eastern end of Stanley Lane is important to conserve."

The matter of concern here is that the plan is over-allocating in both housing and employment land requirements specifically in the area, which the evidence base suggests is environmentally sensitive and least attractive in terms of flood risk.

Soundness Issues:

Mr Patrick Whitehead, the EIP's Planning Inspector, went on to state at Paragraph 19 of his report:

"Over-allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR [2].

This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest that inclusion of housing allocation to the north of the North Wilts Rivers Route and the larger of the two employment sites intended for development beyond the plan period are unsound."

Wiltshire Council is again putting forward an over-allocation of housing in order to benefit from the £75m being offered by the Government for road infrastructure. The over-allocation this time is far greater than that proposed in 2015.

From the notes of the progress meeting following the suspension of the EIP on 18th January 2016, Mr Patrick Whitehead stated "The Flood risk report (CEPS10-EP6) on balance Area C (Land to the East of Chippenham) appears least attractive for development in the terms of flood risk, surface water management compared to others because of the degree to which flooding is an issue to tackle and the extent of flood risk land"

It was recorded that it was noted that the consequences of management measures being miscalculated or failing would be potentially far more serious than other areas, and that the links across the river could disrupt the natural flows. For these, and a number of other questions including changes in perception nationally resulting from recent flood events, it was necessary to re-visit the issue of flood risk associated with strategic Area C (Land to the East of Chippenham).

Steve Scothern Senior Drainage Engineer for Wiltshire Council stated in the planning application for the Riverside Development to the East of Chippenham on 15th January 2016.

"It is clear from casual observations in the area of the Radial Gate weir and the river Avon immediately upstream of the Chippenham Town Bridge that the running tolerances in terms of "freeboard" already leave little room to manoeuvre since the purpose of the radial gate is to

maintain an elevated flow level in the river. Following severe storm events, this “freeboard” almost disappears, and the radial gate has been overtopped. The amount of rainfall falling on large developments on each bank of the River Avon will influence the expected peak flows.”

As Climate Change takes hold and more severe rainfall is expected over the lifetime of this proposed development of 9,000 plus houses the flood risk to Chippenham Town and its residents will increase.

Local Plan Assessment - JBA Consulting Level 1 Flood Risk Assessment report (May 2019)

This Flood assessment for the Chippenham Site Selection process for land to the East of Chippenham is not appropriate for a level 1 assessment as the area has been subject to numerous flooding incidents, which are increasing year on year. The underlying geology is The Kellaways formation and Oxford Clay making the soil construction impermeable leading to flooding. Further comments are:

2.3.1 Bristol Avon. The data was collected in 2011 and is out of date. It is no longer relevant today due to Climate Change. The number of homes at risk from flooding is out of date and should be significantly increased, as will the risk.

Table 2-2 How is Wiltshire Council managing the flood risk for Chippenham? Building at Rawlings Green and on Site 1, both sites upstream from the town, will bring an increased risk of flooding the town itself. The flood risk can be mitigated by building fewer houses.

2.7 Wiltshire Local Flood Risk Management Strategy. Wiltshire LFRMS is out of date and due for renewal. Will Wiltshire Council proceed to the EIP with this and with the concerns of flooding land to the East of Chippenham which were raised by the last Planning Inspector in 2016.

2.8.1 NPPF. Sequential testing must be undertaken for the planning, as this area is high risk to flooding. (See above)

2.8.2 Wiltshire Council must take into account the cumulative impact on flood risk including:

- Developing Rawlings Green
- Proposed development to the south and east of 7500 houses
- Proposed river crossings at Rawlings Green and to the south of Chippenham
- Impact of Climate Change - increase in river levels and flow of the river Avon.

It must also take into account the impact of Climate Change. Climate Change is expected to increase flood risk and lead to development to become unsustainable, opportunities should be taken to relocate developments away from downstream flood risk areas.

2.10 Surface Water Management Plan (SWMPs). Chippenham is ranked 2nd in the Wiltshire properties at risk from flooding at 1,192 properties. However, this report was published in 2011 and is now over 10 years old and out of date. It should not be used in this report. An up-to-date report is required.

2.15 Sewers for Adoption. The risk to the river Marden and river Avon of foul water escaping into the rivers cannot be overemphasized. The waters of the river Marden are pristine, and there is an

abundance of fish, otters, kingfishers and other threatened species. Protection of this watercourse is imperative.

6.3.2 Surface water (pluvial) flooding. Climate change is predicted to increase rainfall intensity in the future by a range of between 20% and 40% (the recommended national precautionary sensitive range for 2085 to 2115). This will increase the likelihood and frequency of surface water flooding across the entire county. However, it is likely to particularly affect impermeable urban areas that are already susceptible such as Salisbury, Trowbridge and Chippenham.

The Chippenham radial gate is already at risk of overtopping. Wiltshire Council should not be considering building 7500 houses adjacent to the river Avon, to the south and east of Chippenham?

9.3 Cumulative Impact of Development. Building at least 7500 in multiple developments in Chippenham area will increase the flood risk.

Other questions and observations:

Various appendixes were NOT provided.

Appendix J: Recorded Flood History in Wiltshire is missing?

Appendix O: Action 993 What are the options for renewing the radial gate at Chippenham?

Appendix Q: Record of flood history. Why are there no records after 2014? The last 7 years are very relevant to this report.

Conclusion:

The Flood assessment submitted for the 2021 Chippenham Local Plan Review completed by JBA Consultants did not address the serious threats to the River Avon & Marden Vales from fluvial flooding.

The last five years has seen ever increasing incidents of flooding in the Chippenham Avon Vale. This flooding has been a threat to the river Avon and the lands in the Vale for many years if not centuries.

In the 15th century Maud Heath made a bequest to the people of Bremhill, and that money was used to create Maud Heath Causeway the oldest private footpath in the world. It is still in community ownership, and the fund maintains the Causeway which connects the parish of Bremhill to Langley Burrell and eventually Chippenham. The Causeway allowed farmers from Bremhill to take their goods to market when the river Avon Flooded. Today the causeway floods several times a year and cars are frequently abandoned after ingesting water into the engine.

The intensity of the rainfall is increasing and it is raining for longer, allowing surface water to run quickly into the watercourses creating flooding.

The JBA report does address the specific history or soil make up of Site 1.

Wiltshire Council has always stated that drainage of the land in Site 1 could be managed by Urban Surface Drainage Units (SUDS). This engineering solution is not suitable for this land as it is impermeable, and the SUDS will over spill and create a considerable flooding risk to properties. With

large quantities of surface water much of it will enter the sewer systems contaminating properties and the valued river tributaries threatening fish, and wildlife.

Attenuation ponds could be considered. With 5,000 homes, roads, parking spaces, employment areas all concreted over the run off will be many million tons of water into attenuation ponds with the likelihood that they will be overtapped. This water will again drain towards the valued watercourses.

The size and depth of ponds required to manage the run off from 5,000 houses, driveways, and roads has not been calculated.

The risk to Chippenham from flooding from an estate of 3,000 houses on one side of the River Avon, and a further 650 houses on the other side at Rawlings Green must be substantial as Mr. Steve Scothern Wiltshire Council Drainage Engineer stated in his response to the planning application in 2015 to build 1600 houses on this very site this flood risk assessment is considering.

On a final note, there should be no house building north of the Chippenham to Calne cycle track as recommended by the Planning Inspector Ann Skippers in 2018 when the Bremhill Neighbourhood Plan was made. Any house building at this location would mean that any runoff from construction would run downhill to the river Marden, and any development this side of the cycle track would threaten the river Marden Vale with flooding.

Summary

The Flood risk to Site 1 will continue to increase as Climate Change increases the intensity of rainfall over a shorter period of time. River levels, especially the River Avon, will continue to rise, and the flows increase. Building 7,500 houses within a few hundred metres of two rivers, on ground that is the Kellaways Formation and Oxford Clay will mean that the run off from the roads, driveways, and houses may over-top any surface urban drainage system, and create incidents of flooding which may threaten life and damage to property. The proximity of zones 2 & 3 so close to such a large development to the East of Chippenham will create a major flood risk.

Local Transport Review

Transport - extracts from the Atkins Report with Bremhill Parish comments.

The Wiltshire strategic model was reviewed to confirm the model's capability and robustness throughout the process. This review focussed on ensuring that the transport networks in the settlements subject to detailed assessment (Chippenham, Salisbury and Trowbridge) accurately reflect actual base 2018 condition, but now three years out of date!

This Local Plan Consultation is so important WC should start again - car number growth over three years; up to 15,000 more vehicles within the plan period; car journey changes - housing development 2018 - 2036; construction traffic for 10 years minimum; High-level sense checks were also undertaken for Wiltshire's market towns; these reviewed the level of network coding detail and zoning structures for each town (what does this actually mean?)

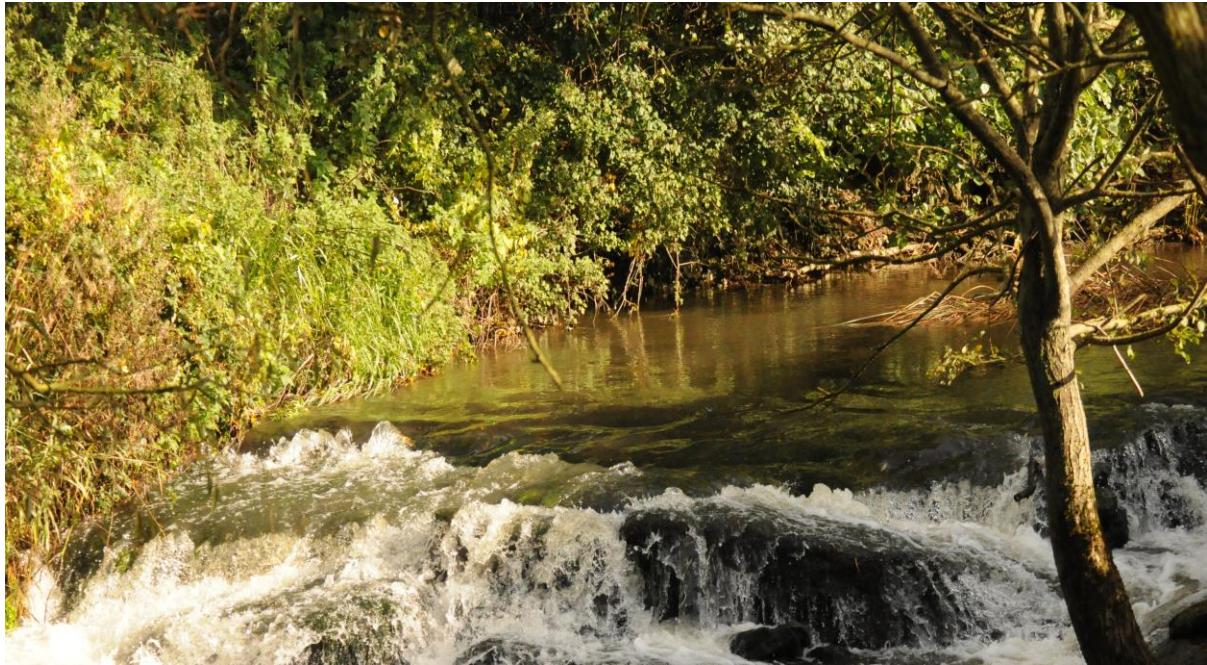
The Wiltshire strategic model is based on a 2018 base year. Forecasts of future travel demand were developed based on standard DfT modelling assumptions, together with specific forecasts of housing

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Ecology update on the Marden /Avon Valley

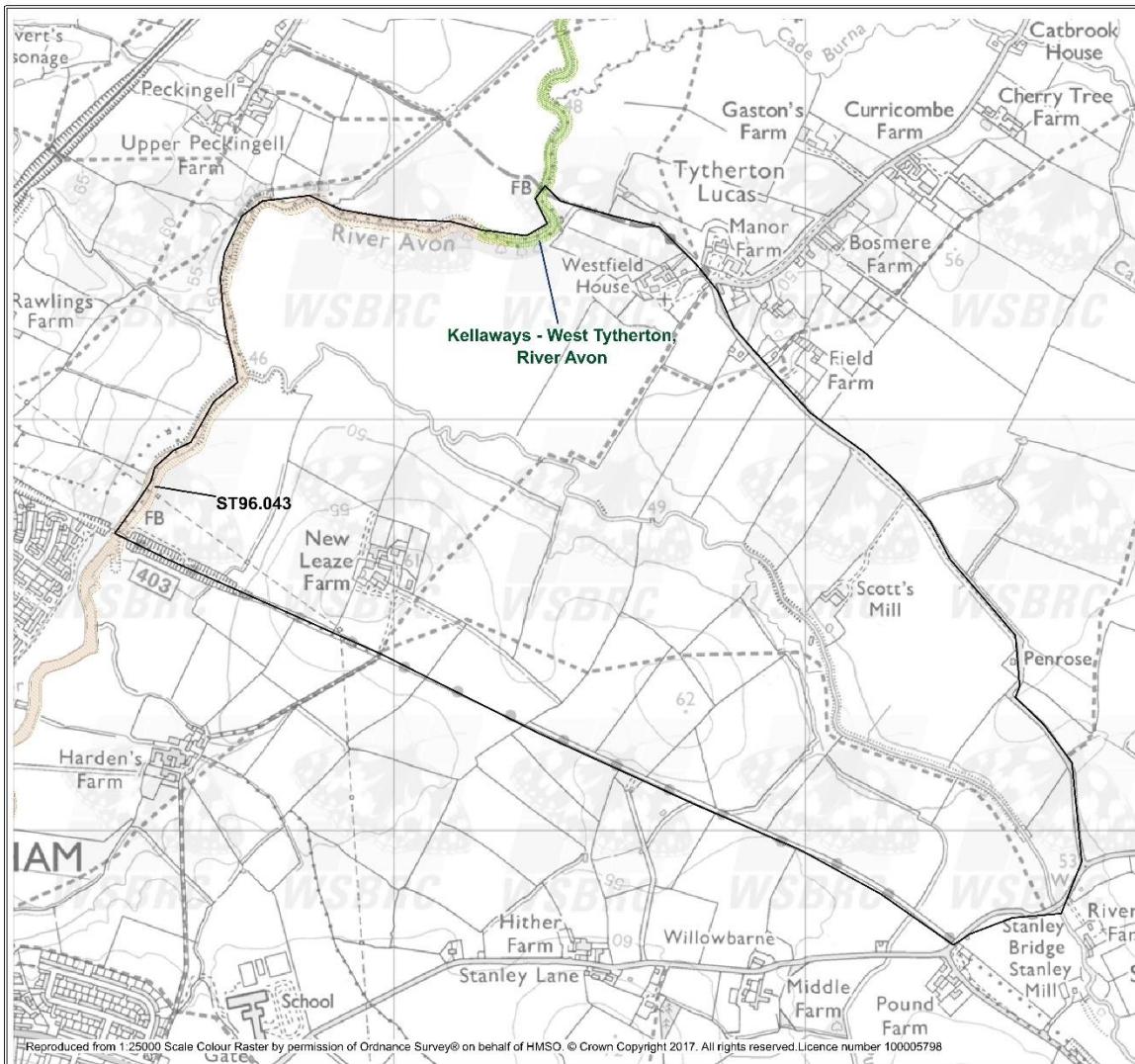
The potential impact of the proposed Chippenham Link Road

Draft 1 -28/9/2020



Background

In 2017 the Bremhill Parish Neighbourhood Plan was recorded by Wiltshire Council as 'made' which means it was passed by a Government Inspector appointed by W.C. and a referendum to adopt the plan for Bremhill Parish going forward. In a series of consultations with parishioners as part of the development of the plan a detailed survey saw 88% of the public want to retain green space between the countryside and towns adjacent to the Parish. One of those green spaces was outstandingly valued due to its natural environment for the wellbeing of wildlife. The River Marden valley is part of the exceptional landscape to the east of Chippenham. This special area of interest is identified in the following map.



Source: Wiltshire & Swindon Biological Records Centre

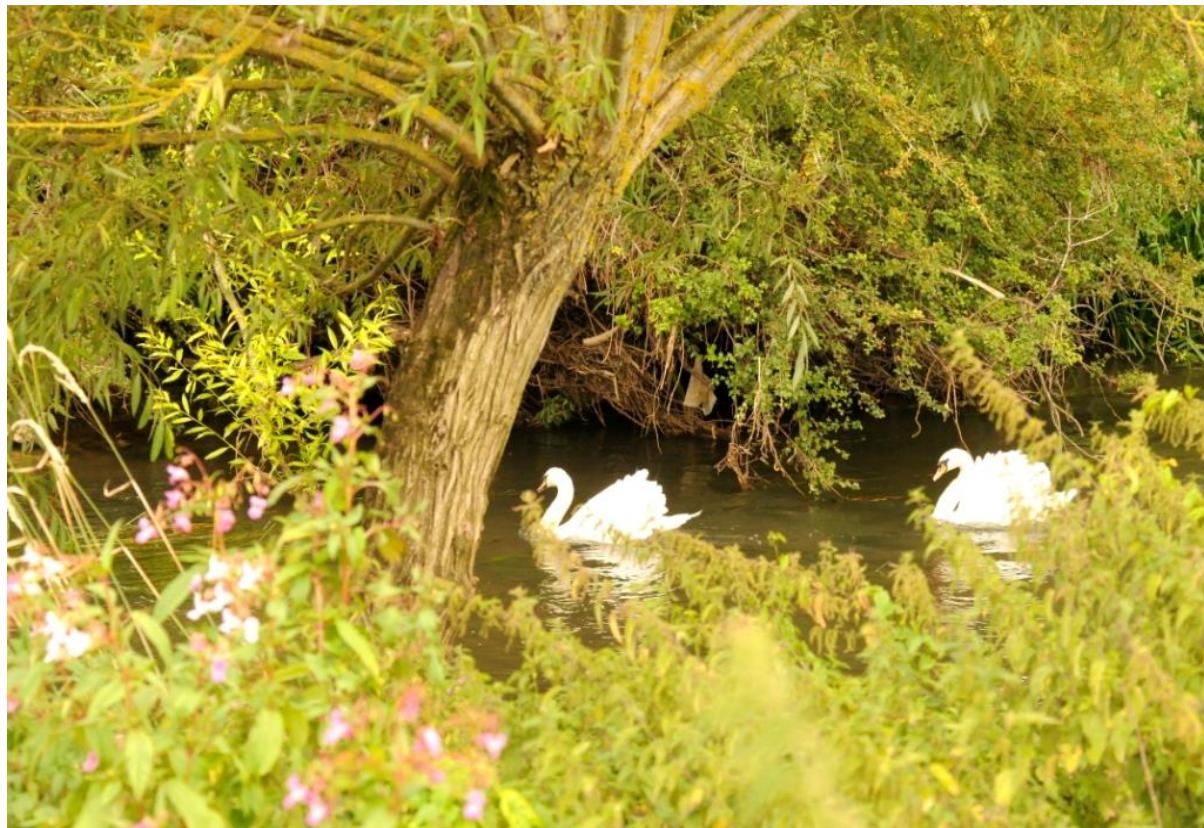
The river valley can only be accessed from a public footpath and is an undisturbed site for a number of important species of mammals, birds, insects, aquatic life, flora and fauna. Accordingly the River Marden has been identified as a Priority Habitat (Running Water) in the Wiltshire and Swindon Biodiversity Action Plan. Protection is also supported by Core Policy 50 Biodiversity and Geodiversity in the Wiltshire Core Strategy. Paragraph 6.72 in the supporting text says 'The valuable natural environment includes not only identified sites, but also features of natural conservation value including....priority species and habitats (including those listed in the national and Wiltshire Biodiversity Action Plan)'.

An abundance of wildlife

Importantly, otters have been sighted in and by the River Marden and watercourses nearby. Their presence has been officially recorded since 2017. (See Appendix A) As recently as September 2020 breeding otters have been reported near the confluence of the Marden and Avon rivers in surveys conducted by Avellana Ecology, an ecological consultancy based in Bristol. The presence of otters has also been reported by members of the Chippenham Sailing Club and anglers from both Calne and Chippenham Angling Clubs. Otters are protected by the Habitats Regulations 1994 and are classed as “European Protected Species” and therefore given the highest level of species protection. This course of action is because they are still threatened by human intervention, including noise, pollution, and consequences of landscape development.

Birds

The bird life which uses the rivers as habitat include numerous kingfishers who use holes and crevices along the high banks near the confluence of the Marden and Avon to nest and rear their young. Little egrets have been recorded along the river margins in the last three years and herons utilise shallower areas to wade and catch their prey. Swans and species of ducks, moorhens and coots choose the tranquil waters to nest and rear their off spring. During the winter months migrating waders use the protection of the river banks to feed including both common and jack snipe, sandpiper and other species including woodcock. Moving away from the water margins into the fields many birds such as hawks, buzzard, owls and more recently red kites have been seen. The hedgerows, grassland and productive farmland which abuts the river along with the woodland edges provides habitat for a prolific number of other birds, mammals and insects.



Swans enjoy the undisturbed habitat of the River Marden

Historically, the Marden Valley has always been an important natural area for wildlife conservation and survival. The Wiltshire and Swindon Biological Records Centre has recorded many hundreds of sightings of species in the target area for a number of years dating as far back as 1984. This includes species that are on the endangered list. Details of all the sightings are in Appendix 1 with a designation key in Appendix 2.

Recorded sightings in mapped area- for full information see Appendix 1 and associated abbreviations			
	SPECIES	FIRST RECORDED-ONWARDS	NUMBER OF RECORDINGS
17	BIRDS		
18	Little Egret	2017	2
19	Grey Partridge	2002	2
20	Osprey	2006	2
21	Lapwing	2013	1
22	Curlew	2006	2
23	Kingfisher	1995	14
24	Skylark	1995	21
25	Grey Wagtail	1997	2
26	Song Thrush	2005	5
27	Starling	2005	6
28	House Sparrow	2005	9
29	Linnet	2005	3
30	Yellowhammer	2005	4
31			
32	Mammal		
33	Otter	2013	3
34	Badger	1996	45
35	Watervole	1995	8
36	Brown Hare	1996	22
37			

Source: Wiltshire & Swindon Biological Records Centre. NB .The figures show the number of recordings, not the count number of the species.

[REDACTED] a volunteer for RSPB surveys. He has lived in the village for over 30 years and from 2007 to 2011 took part in a survey organised by the British Trust for Ornithology. He reported "The survey covered the whole of the UK and Ireland and the information provided by fieldworkers was used to produce the Bird Atlas, which was published in 2017. Part of the area that he surveyed was by the Rivers Avon and Marden between Tytherton Lucas and Chippenham. (Area shown by the previous map.)

STATEMENT [REDACTED];

"I recorded what a valuable resource the rivers and their banks and adjacent fields were for birdlife. The banks are often tree lined and there are frequent reed beds where reed warblers nest. There are one or two attractive small waterfalls where I have seen dippers and the banks of the river are often steep which is perfect for the many kingfishers that frequent the rivers. Other birds that use the rivers and their banks are swans and mallard, coots, moorhens, little grebe, herons and recently a pair of little egret. Swifts and swallows are attracted to the rivers to feed, as are common

sandpipers in the spring and last August two young cuckoos were by the Avon for a while before heading off to Africa. In the winter, flocks of redstart and fieldfare arrive to feed in the fields alongside the river. This is just a sample of the many birds that survive alongside the river because of its isolation from urban development".

Bats

Bats require quality habitats to feed such as river corridors and wetlands and their 'sonar' commuting routes along hedgerows to reach them. The ancient buildings, agricultural barns in the River Marden Valley, along with older trees that are susceptible to holes and cracks in their bark, provide habitat that hosts significant numbers and types of bats. Others navigate their way from important roosting sites such as –an ancient woodland, a field's width away from the river, and Nocketts Hill south of the A4, on their quest for food along hedgerows and by watercourses.

The WSBRC have recorded several species of Bats since 1984 in the target area-

1	Recorded sightings in mapped area- for full information see Appendix 1 and associated abbreviations			
2				
3	SPECIES	FIRST RECORDED-ONWARDS	NUMBER OF RECORDINGS	
4	<hr/>			
5				
6	BATS			
7	Chiroptera	1999	14	
8	Greater/ Lesser Horseshoe	2007	4	
9	Barbastelle	2014	14	
10	Serotine	1998	12	
11	Daubenton's	1999	7	
12	Noctule	1984	4	
13	Pipistrelle	1982	18	
14	Soprano Pipistrelle	1999	3	
15	Brown Eared	2014	6	
16				

Source: Wiltshire & Swindon Biological Records Centre. NB .The figures show the number of recordings, not the count number of the species.

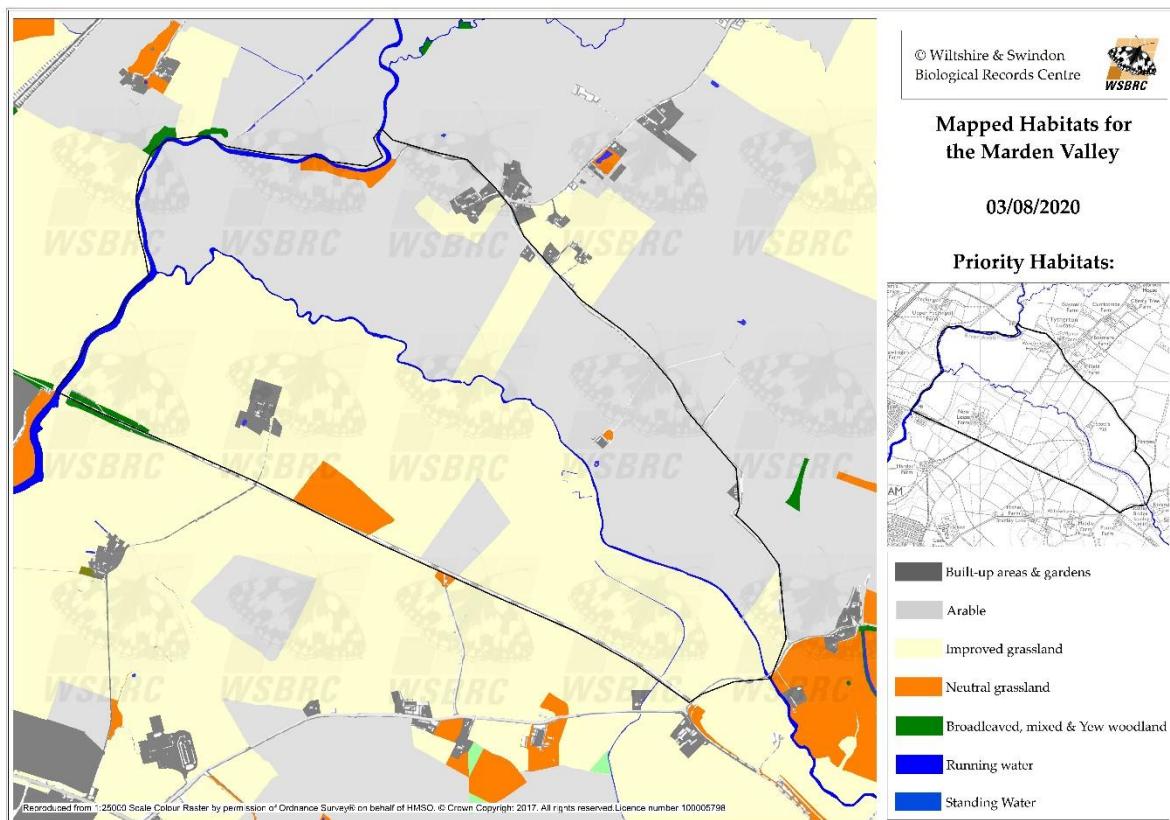
Further evidence of wildlife abundance is supported by the Calne and Chippenham Angling Clubs who fish along this river valley, this recreation has taken place for many years, and their understanding of the river and conservation helps to preserve the character and nature of this open space. The anglers report mink and otters in the river and bats and owls using the river for feeding and drinking. Barn owls quarter the fields surrounding the river. They report that an indigenous deer herd plus badger setts and grass snakes have been sighted along the river margins.

An unspoilt area for social amenity

A footpath connects the conservation village of Tytherton Lucas to New Leaze Farm over a footbridge dedicated to Councillor Anscombe. The footpath continues across farmland to the North Wiltshire Rivers NCN 403 cycle route, which is used by walkers, cyclists and dog walkers to connect between Calne and Chippenham. This route has historical value in that it is the old railway line between the two towns passing through the countryside. Threatened with closure in 2019 a petition signed by over 5,000 people sent a message to Wiltshire Council that the pathway was a well-used and a vital social amenity for relaxation and well-being which resulted in it being kept open.

Geological conservation site

A site of Special Scientific Interest SSSI River Avon grid ref: ST945 750 is situated at the River Avon and River Marden confluence at the northern border of the Green Space. The site name Kellaways – West Tytherton (Tytherton Lucas) River Avon is notified under Section 28 Wildlife and Countryside Act 1981. This is a designated geological conservation site. The Kellaways - Tytherton Lucas exposures are of great international importance and historical significance and constitute the most important Callovian locality in Great Britain. The area along the riverbank has many important invertebrate species, especially ammonites. The site requires protection from pollution and erosion, and should not be put to any unacceptable risk.



The need for habitat improvement

The Calne community area designated by Wiltshire Council includes most of the Parish of Bremhill. In a report (JSA for Wiltshire 2014) it describes valuable wildlife habitats which include: Calcareous grassland, broadleaved woodland and neutral grassland (wildflower hay meadows). Calcareous grassland and unimproved grassland is an important habitat for butterflies, bees, birds, wildflowers and other wildlife. The report states that there is a great need to protect these areas from the impacts of further development, to encourage wildlife-friendly farming practices and to improve the connections between wildlife sites, so that wildlife can move and adapt freely.

Further assessment of potential unimproved grassland is ongoing throughout the Marden valley and tree planting and habitat improvement is being undertaken by the Charity "Avon needs more trees." The aim is to create a wildlife corridor with natural habitat along both sides of the River Marden and to help flood prevention.

What has changed in the last few years

Overall, whilst areas like the River Marden Valley stand as a beacon for wildlife the general picture is far from positive and it is not through lack of awareness. In 2010 the Department for Environment, Food & Rural Affairs published, under the 2010 to 2015 Conservative and Liberal Democrat coalition government, the Natural Environment White Paper 2010. The aim of the White Paper was to set out a clear framework for protecting and enhancing the things that nature gives us for free. Over 15,000 people and organisations sent responses to a call for ideas on the Natural Environment White Paper, a record number for a Defra consultation, proving that people want to see a real positive change in the future of our natural environment which underpins our economic prosperity, health and wellbeing. Things which are too often taken for granted.

Stephanie Hilborne OBE, chief executive of The Wildlife Trusts said at the time-

"This overwhelming response provides a clear message to the Government that people care passionately about the natural environment and want to see bold and ambitious action to support its recovery. The Wildlife Trusts actively encouraged people to play their part for nature by responding to the consultation and encouraging their friends and family to do the same. Thousands chose to take action and show how much they value wildlife. We know millions of people have a passion for wildlife and the natural world. It inspires us every day and provides essential services including food and flood protection. This White Paper is an opportunity to make a real difference."

Whilst it built some foundations, frankly it didn't make a real difference and some species declined further and some to extinction.

A serious wake - up call

In 2019 , another major report, the 'State of Nature' showed that wildlife continued to decline across England, with 35% of species having seen their numbers decline since 1970 and as many as one in seven now faced extinction. The report was produced by experts from more than 70 wildlife organisations across the UK, working for the first time with government agencies to present the clearest picture of the status of species across land and sea. Butterflies were hit particularly hard with overall numbers down by 23% and those of species that require more specialised habitats were down by more than 75%. England's mammals were also under increasing threat, with more than 27% of species at risk of disappearing altogether. In response to the national picture Wiltshire Wildlife Trust Chief Executive Dr Gary Mantle MBE said:

"The shocking conclusions of this report mirror what we see here in Wiltshire on a daily basis. Our wonderful county is blessed with an incredible range of habitats and animal and plant species, but behind the scenes these are becoming more endangered by the day. The iconic curlew is a case in point: numbers have decreased by as much as 85% over recent decades, with just 10 breeding pairs now left in Wiltshire".

"Today's report on the State of Nature is a serious wake-up call and shows the scale of effort needed to save nature in Wiltshire and across the UK. As the loss of wildlife is a continuous and continuing trend, it can be easy to overlook the sheer scale of loss; but this doesn't reduce the seriousness of the situation."

"We urgently need government to legislate to create a Nature Recovery Network that would map the places where wildlife needs to be protected, highlight the spaces where more habitat could be created, and reveal the areas where biodiversity should be restored.

The latest response to Biodiversity decline

In response to the situation ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ has been published Ref: PB13583. This new, ambitious biodiversity strategy for England is informed by the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. It lists a number of headline indicators for each category goal with monitoring and reporting requirements. Once the Bill becomes law, the government will be required to prepare an Environmental Improvement Plan, which sets out the steps it intends to take to improve the natural environment.

The 25 Year Environment Plan will be the first such Environmental Improvement Plan. This Plan will have to be reviewed at least every five years. The government will have to report annually on what it has done to implement the Environmental Improvement Plan and on whether the natural environment (or particular aspects of it) has improved. The new environmental watchdog, the Office for Environmental Protection, will also have to report annually on the progress that has been made in improving the natural environment in accordance with the Environmental Improvement Plan. That report may also include recommendations to government about how it can improve progress.

Insect declines have profound consequences

Meanwhile, the Wildlife Trusts have published a new report ‘Reversing the Decline of Insects’ which shows how people, in every part of society, wherever they live, can take action to arrest insect decline. Everyone, everywhere, is being asked to become an insect champion.

The report cites examples of farmers, communities, councils and charities that are boosting insect populations and proving that it can be done. It comes at a critical time for insects as the publication follows their previous report ‘Insect declines and why they matter’, launched last year. This examined mounting evidence that insect populations are close to collapse and concluded that “the consequences are clear; if insect declines are not halted, terrestrial and freshwater ecosystems will collapse, with profound consequences for human wellbeing.

The chief executive of The Wildlife Trusts Craig Bennett says, ”Recent evidence suggests that abundance of insects may have fallen by 50% or more since 1970. This is troubling, because insects are vitally important, as food, pollinators and recyclers amongst other things. Perhaps more frightening, most of us have not noticed that anything has changed. Insects are food for numerous larger animals including birds, bats, reptiles, amphibians and fish, and they perform vital roles such as pollination of crops and wildflowers, pest control and nutrient recycling.

The causes of insect declines are much debated, but almost certainly include habitat loss, chronic exposure to mixtures of pesticides, and climate change. The good news is that it is not too late; few insects have gone extinct so far, and populations can rapidly recover.

We urgently need to stop all routine and unnecessary use of pesticides and start to build a nature recovery network by creating more and better connected, insect friendly habitat in our gardens, towns, cities and countryside.

Only by working together can we address the causes of insect decline, halt and reverse them, and secure a sustainable future for insect life and for ourselves.”

Conclusions

This appraisal of the Marden valley started off demonstrating that the vast majority of Bremhill Parish residents voted to keep the green space outlined on the target map for sound ecological reasons whilst appreciating the value of unspoilt countryside by getting closer to nature as a social amenity. This came through time and time again in the three public meetings at the time of the neighbourhood plan consultations. There is also undeniable evidence that wildlife is generally in decline. Every day there are fewer places that wildlife can call home, habitat loss is the biggest cause of wildlife depletion. When it is gone there is no mitigation... it is simply gone. If we relate that to the potential damage that the Chippenham link road encroachment into the Marden /Avon valley will have on the ecology of the area and the loss of social amenity it beggars belief that it is even being considered as part of the plan to build more housing.

Of course, for the Wiltshire Local Plan Review, Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life. So, perhaps one can understand why it is an easy proposition to build over a few farm fields with loss of wild life habitat and amenity. After all, it is a small percentage in the overall scheme of things, BUT, the same attitude to development is happening all over the UK, pushed by a government that promises to '...become the first generation to leave the environment in a better state than we found it' on one hand and then destroying green fields by concreting them over with the other. The collective result across the country is a big loss of irreplaceable habitat for wildlife. As a result wildlife still declines and the whole cycle of pledges and plans for the future starts again.

What is required is not lip-service to the problem but a more balanced approach to numbers of homes built versus preservation of the natural world. It doesn't make sense for the Government to spin out a message of the importance of wildlife protection and preservation whilst overruling made Neighbourhood Plans over two years old. Thus, allowing local councils to build on green field sites where they are behind on delivering new housing on their 5 year plan. This is an undemocratic knee-jerk reaction with long term damage to the natural world which we depend on.

The ecological value of the Marden/Avon Valley should be celebrated, protected and enhanced for this generation and the next, not used as a short term bail -out for Government housing targets that have failed to have been met by Wiltshire Council.

[REDACTED]

Bremhill Parish Councillor

APPENDIX 1



Wiltshire and Swindon Biological Records Centre (WSBRC) is one of a national network of Local Environmental Records Centres (LERCs) across the UK which sits under the umbrella of a national body, the Association of Local Environmental Records Centres (ALERC). Housed at the Trust's headquarters, it has been the custodian of Wiltshire's wildlife records since 1975.

The objective of the team of staff and volunteers is to collect, collate, manage, interpret and disseminate biological and geological information for the area. To achieve this the team supports and encourages high-quality biological recording and monitoring by volunteers, community groups and organisations. Around two million species records are held (for fungi, plants and animals) plus detailed information on habitats and sites of importance across Wiltshire and Swindon.



WILTSHIRE & SWINDON BIOLOGICAL RECORDS CENTRE



Data Search for the Marden Valley with a 1 km buffer for bat records only

The information provided in the following report is confidential and must at all times be treated in accordance with the WSBRC Terms and Conditions of Data Use

These are available on our website at www.wsbrc.org.uk > Request a Data Search.

Data held by WSBRC is validated as fully as possible to ensure such factors as geographical and temporal accuracy of each record as well as formatting or inputting errors. Validation is done by manual checking as well as by automated routines within our database system. In addition, WSBRC staff and County Recorders, in particular, undertake verification of records ensuring that notable species or new records for an area are correctly identified. However, errors cannot be completely eliminated.

Local Wildlife Sites

File code	Grid Ref.	Site name	Area (Ha)	Site Description	Selection criteria	Source	Main Habitat	Latest Recorded Habitats
ST96.043	ST905643	Bristol Avon River	150.35	One of the main river systems draining north-west Wiltshire.	XG.2 (150.35ha)	WWF (10km); WSP(1) 2015	River	[Phase 1 Habitat Classification - November 1996] G23 Open water: running, oligotrophic

Local Geological Sites

None found in search area.

Protected Road Verges

None found in search area.

Statutory Sites

Site Type	Grid Ref.	Site name	Area (Ha)	Designation status	Main Habitat
SSSI	ST944748	Kellaways - West Tyther頓, River Avon	3.91594	Notified	Kellaways-West Tyther頓 is a river bank section along the River Avon in Wiltshire situated 1 km south east of Langley Burrell. The locality includes a number of highly-fossiliferous exposures of the famous 'Kellaways Rock'.

SPECIES

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2012-30/06/2012 roost	Bat site: Not roost	Sighting	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2013-30/06/2013 roost	Bat site: Not roost	Sighting	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2014-30/06/2014 roost	Bat site: Not roost	Sighting	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2004-30/06/2004 roost	Bat site: Not roost	Sighting	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		10/08/1999 roost	Bat site: Not roost	[GR imprecisely recorded]	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2016-30/06/2016 roost	Bat site: Not roost		County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2015-30/06/2015	Bat site: Not roost		County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2013-30/06/2013	Bat site: Not roost		County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2012-30/06/2012	Bat site: Not roost		County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2014-30/06/2014	Bat site: Not roost		County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/04/2004-30/06/2004	Bat site: Not roost		County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/01/2018-31/12/2018	Bat site: Not roost	PTE Living with Mammals records [Unverified Record]	County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST934725		01/01/2017-31/12/2017		[Unverified Record]	County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lt(NT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	Chiroptera	Bats	ST9334725		2019		Living with Mammals survey [Unverified Record]	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(INT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Chiroptera	Bats	ST9474	Location withheld	10/07/1993	Bat site: Roost	Access in vertical gap between bricks; one course from top to roost site in cavity wall. No bats seen on visit. No droppings found. [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2P, HSD4, RLGB.CR, RLGB.DD, RLGB.EN, RLGB.Lr(INT), RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Rhinolophus ferrumequinum	Greater Horseshoe Bat	ST93374	Location withheld	23/04/2018	1 Count; Bat site: Roost	[GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Rhinolophus ferrumequinum	Greater Horseshoe Bat	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count; Bat site: Not roost		County, HabRegs2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Rhinolophus hipposideros	Lesser Horseshoe Bat	ST93375	Location withheld	25/09/2007	8 Count; Bat site: Roost	Bats counted as emerging from roof. [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Rhinolophus hipposideros	Lesser Horseshoe Bat	ST93375	Location withheld	11/09/2007	12 Count; Bat site: Roost	Bats counted in roof space, along with 4 dead specimens. Significant droppings throughout the loft both old and fresh. [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Barbastella barbastellus	Western Barbastelle	ST93361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count; Bat site: Not roost		County, HabRegs2, HSD2P, HSD4, RLGB.VU, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Eptesicus serotinus	Serotine	ST9338752	Langley Green, Langley Burrell	25/09/2007	+ Count; Bat site: Not roost	Bats heard during survey.	County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	Eptesicus serotinus	Serotine	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count; Bat site: Not roost		County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	Eptesicus serotinus	Serotine	ST9674	Location withheld	25/05/2004	Bat site: Roost	BCT NBMP Colony Count (restricted to 1 km) [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	Eptesicus serotinus	Serotine	ST9674	Location withheld	17/06/2001	Bat site: Roost	BCT NBMP Colony Count (restricted to 1 km) [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4c

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	10/06/1998	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	20/06/2003	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	09/06/2001	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	26/07/2001	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	22/06/2002	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	06/06/2003	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	25/06/2003	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Eptesicus serotinus</i>	Serotine	ST9674	Location withheld	15/06/2003	Bat site: Roost	BCT NBMP Colony Count (restricted to 1km) [GR reduced due to sensitivity (R6)]	County, HabRegz2, HSD4, RLGB.VU, WCA5/9.4c
terrestrial mammal	<i>Myotis</i>	Unidentified Bat	ST9360174198	River Avon corridor, east of Rawlings Farm, Chippenham	29/07/2015	1+ Count ; Bat site: Not roost	Foraging along river corridor. Originally recorded as Whiskered/Brandt's bats.	County, HabRegz2, HSD2p, HSD4, RLGB.CR, RLGB.DD, Sct.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Myotis</i>	Unidentified Bat	ST938752	Langley Green, Langley Burrow	25/09/2007	* Count ; Bat site: Not roost	Bats heard during survey.	County, HabRegz2, HSD2p, HSD4, RLGB.CR, RLGB.DD, Sct.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Myotis</i>	Unidentified Bat	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count ; Bat site: Not roost		County, HabRegz2, HSD2p, HSD4, RLGB.CR, RLGB.DD, Sct.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9360174198	River Avon corridor, east of Rawlings Farm, Chippenham	29/07/2015	1+ Count ; Bat site: Not roost	Foraging along river corridor	County, HabRegz2, HSD4, WCA5/9.4c

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474		10/08/1999	Bat site: Not roost	[GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474		25/08/1999	Bat site: Not roost	[GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474		13/08/2004	Bat site: Not roost	[GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474		27/08/2004	Bat site: Not roost	[GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474		07/07/1985	Bat site: Not roost	Flying over R.Avon. [GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST9474	West Tytherington	07/07/1985	Bat site: Not roost	Flying over R.Avon. [GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis daubentonii</i>	Daubenton's Bat	ST926730	River Avon, Chippenham	26/08/2016	1+ Count; Bat site: not roost	guided walk	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	<i>Myotis mystacinus</i>	Whiskered Bat	ST9273	Chippenham, Monkton Park	23/05/1985	Bat site: Undetermined	Female injured, died later [GR imprecisely recorded]	County, HabRegs2, HSD4, RLGB, DD, WCA5/9.4c
terrestrial mammal	<i>Nyctalus noctula</i>	Noctule Bat	ST9301574256	Farm development site, Rawlings Farm, Upper Cocklebury Lane, Chippenham.	29/07/2015	1+ Count; Bat site: Not roost	Commuting across site. Grid reference is centre point of site.	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Nyctalus noctula</i>	Noctule Bat	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count; Bat site: Not roost		County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Nyctalus noctula</i>	Noctule Bat	ST932726	Chippenham, Hardens Mead	19/09/1984	Bat site: Not roost	1 at 2220 hrs	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Nyctalus noctula</i>	Noctule Bat	ST9574	West Tytherington	07/07/1985	Bat site: Not roost	1 flying high above garden [GR imprecisely recorded]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Pipistrellus species</i>	Pipistrelle Bat	ST9273	Location withheld	01/09/1992	Bat site: Roost	Access point under soffit and roost in roof apex. Bats present on visit. Droppings found in area of roost. [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB, Lr(NT), Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Pipistrellus species</i>	Pipistrelle Bat	ST9273	Location withheld	30/06/1992	Bat site: Roost	Access behind guttering and roost under eaves. Few fresh droppings on window sill. Summer roost (?) for many years. [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB, Lr(NT), Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Pipistrellus species</i>	Pipistrelle Bat	ST9473	Location withheld	01/08/2014-31/08/2014	1+ Count; Bat site: Roost	2 droppings found [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB, Lr(NT), Sect.41, UKBAP, WCA5/9.4c

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	Pipistrellus species	Pipistrelle Bat	ST9373	Location withheld	01/08/2014- 31/08/2014	1+ Count ; Bat site: Roost	3 droppings found [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB,Lr(NI), Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Pipistrellus species	Pipistrelle Bat	ST9473	Location withheld	27/07/1984	bat Count ; Bat site: Roost	ID: Signs (drops/roost) [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, RLGB,Lr(NI), Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Pipistrellus species	Pipistrelle Bat	ST938752	Langley Green, Langley Burrell	25/09/2007	* Count ; Bat site: Not roost	Bats heard during survey.	County, HabRegs2, HSD4, RLGB,Lr(NI), Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST935725	Hardens Mead, Chippenham	27/05/2011	2 Count of Adult ; Bat site: Not roost	Flying around at dusk	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST935725	Hardens Mead, Chippenham	13/10/2011	1 Count of Adult ; Bat site: Not roost	Flying around. Last sighting of the year at dusk 6.50pm.	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST9273	Location withheld	30/06/1982	bat Count ; Bat site: Roost	c.30 seen leaving roof [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST9273	Location withheld	30/06/1982	bat Count ; Bat site: Roost	c.40 seen next door [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST9474	Location withheld	01/08/1984	bat Count ; Bat site: Maternity roost	c.70 inc. juvs. in attic [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST9273	Chippenham, Esmead	07/08/1982	Bat site: Not roost	1 observed flying 21.00. Colony has left house	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST952744	Tytherton Lucas, Cogswell	07/07/1985	Bat site: Not roost	Flying over house	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Pipistrelle	ST9474	River Avon, Tytherton Lucas, Cogswell	07/07/1985	Bat site: Not roost	R. Avon [GR imprecisely recorded]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Common Pipistrelle	ST926730	River Avon, Chippenham	26/08/2016	1+ Count ; Bat site: not roost	guided walk	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Common Pipistrelle	ST9360174198	River Avon corridor, east of Rawlings Farm, Chippenham	29/07/2015	1+ Count ; Bat site: Not roost	Foraging along river corridor	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pipistrellus	Common Pipistrelle	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014- 31/08/2014	1+ Count ; Bat site: Not roost	County, HabRegs2, HSD4, WCA5/9.4c	

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	Pipistrellus pipistrellus	Common Pipistrelle	ST9674	Location withheld	18/06/1999	Bat site: Roost	BCT NBMP Colony Count [restricted to 1km] [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, WCA5/9.4c
terrestrial mammal	Pipistrellus pygmaeus	Soprano Pipistrelle	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count ; Bat site; Not roost	Commuting across site. Grid reference is centre point of site.	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Pipistrellus pygmaeus	Soprano Pipistrelle	ST9301574256	Farm development site, Rawlings Farm, Upper Cocklebury Lane, Chippenham.	29/07/2015	1+ Count ; Bat site; Not roost	Commute across site. Grid reference is centre point of site.	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Pipistrellus pygmaeus	Soprano Pipistrelle	ST926730	River Avon, Chippenham	26/08/2016	1+ Count ; Bat site; not roost	guided walk	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat	ST9274	Chippenham	27/09/1982	Bat site: Undetermined	Live at Westinghouse Company [GR imprecisely recorded]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat	ST9473	Location withheld	01/08/2014-31/08/2014	1+ Count ; Bat site; 50-100 droppings found [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c	
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat	ST9301574256	Farm development site, Rawlings Farm, Upper Cocklebury Lane, Chippenham.	29/07/2015	1+ Count ; Bat site; Not roost	Commuting across site. Grid reference is centre point of site.	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat	ST9361373456	New Leaze and Harden's Farms, east Chippenham	01/08/2014-31/08/2014	1+ Count ; Bat site; Not roost	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c	
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat	ST9374	Location withheld	31/08/2014	1+ Count ; Bat site; Roost	2 droppings found [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	Plecotus auritus	Brown Long-eared Bat		Location withheld	21/01/2016	1+ Count ; Bat site; Roost	Occasional night roost [Unverified Record] [GR reduced due to sensitivity (R6)]	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4c

Protected & Notable Species

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
flowering plant	<i>Juncus subnodulosus</i>	Blunt-flowered Rush	ST950735	Scott's Mill	1888		near Scott's Mill, Chippenham - Listed in Preston (1888) Flora of Wilts, p311.. Recorded in region 2 as taxon 696, <i>Juncus obtusiflorus</i> Ehrh.	County
flowering plant	<i>Polygala serpylifolia</i>	Heath Milkwort	ST9374	ST97H	1984 - 1991		[GR imprecisely recorded]	County
flowering plant	<i>Spergula arvensis</i>	Corn Spurrey	ST9374	ST97H	1984 - 1991		[GR imprecisely recorded]	RGB.VU
flowering plant	<i>Euphorbia exigua</i>	Dwarf Spurge	ST9374	ST97H	1984 - 1991		[GR imprecisely recorded]	RGB.Lf(NT)
crustacean	<i>Austropotamobius pallipes</i>	White-clawed Freshwater Crayfish	ST941739	Marden, New Leaze Farm	1997		Source Crayfish1	HSD2P, HSD5, RLGB.EN, Sect.41, UKBAP, WCA5/9.1t
crustacean	<i>Austropotamobius pallipes</i>	White-clawed Freshwater Crayfish	ST942739	River Marden	June 1997		At base of waterfall in rocky bed	HSD2P, HSD5, RLGB.EN, Sect.41, UKBAP, WCA5/9.1t
crustacean	<i>Austropotamobius pallipes</i>	White-clawed Freshwater Crayfish	ST942739	Marden	27/07/1996		Farmer seen. Data missing for aquatic zone	HSD2P, HSD5, RLGB.EN, Sect.41, UKBAP, WCA5/9.1t
crustacean	<i>Austropotamobius pallipes</i>	White-clawed Freshwater Crayfish	ST942739	Marden, BAMAD23	10/06/1997	1 Count	Stretch from ST943739 to ST940739	HSD2P, HSD5, RLGB.EN, Sect.41, UKBAP, WCA5/9.1t
insect - butterfly	<i>Lasiommata megera</i>	Wall	ST9474	Kelways, near to Wall	- 2006		[GR imprecisely recorded]	RGB.Lf(NT), Sect.41, UKBAP
insect - butterfly	<i>Coenonympha pamphilus</i>	Small Heath	ST9474	Kelways, near to Wall	- 2006		[GR imprecisely recorded]	RGB.Lf(NT), Sect.41, UKBAP
bony fish	<i>Anguilla anguilla</i> (<i>Actinopterygii</i>)	European Eel	ST942739	Marden	12/03/1995		2lb. Fisherman says bream, chub and occasional trout have been caught in the area in the past.	RGB.CR, Sect.41, UKBAP
bony fish	<i>Barbus barbus</i> (<i>Actinopterygii</i>)	Barbel	ST942739	Marden	12/03/1995		Fisherman reported previous day - 8lb 12oz. Fisherman says bream, chub and occasional trout have been caught in the area in the past.	HabRegs4, HSD5
bony fish	<i>Barbus barbus</i> (<i>Actinopterygii</i>)	Barbel	ST942739	Marden	26/08/1996		Data missing for aquatic zone	HabRegs4, HSD5
bony fish	<i>Barbus barbus</i> (<i>Actinopterygii</i>)	Barbel	ST955730	Marden, BAMAD19	09/06/1997	1 Count	Stretch from ST956728 to ST953731; west bank only surveyed	HabRegs4, HSD5

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
bony fish (Actinopterygii)	<i>Barbus barbus</i>	Barbel	ST945737	Marden, BAMAD22	10/06/1997	1 Count	Stretch from ST947737 to ST943739	HabReps4, HSD5
bony fish (Actinopterygii)	<i>Salmo trutta</i>	Brown/Sea Trout	ST942739	Marden	12/03/1995		Occasional trout have been caught in the area in the past	Sect.41, UKBAP
bony fish (Actinopterygii)	<i>Cottus gobio</i>	Bullhead	ST942739	Marden	15/06/1997		During invert survey on 21/6/97. Fields either side of old bridge contain rape in flower. Some of the willow saplings at the monitoring pt appear to hav	HSD2p
bony fish (Actinopterygii)	<i>Cottus gobio</i>	Bullhead	ST945737	Marden, BAMAD22	10/06/1997	1 Count	Stretch from ST947737 to ST943739	HSD2p
bony fish (Actinopterygii)	<i>Cottus gobio</i>	Bullhead	ST947737	New Leaze Farm	18/08/2007		5 caught during invert survey, between 1 inch and 2.5 inches long	HSD2p
bony fish (Actinopterygii)	<i>Cottus gobio</i>	Bullhead	ST942739	River Marden, NE of New Leaze Farm, Chippenham	04/05/2011	1 Count of Juvenile	Live in net when conducting River Monitoring Invertebrate Survey	HSD2p
bony fish (Actinopterygii)	<i>Cottus gobio</i>	Bullhead	ST942739	River Marden	13/05/2013	1 Count	about 600m upstream from River Avon, Chippenham. Found in net during River Monitoring for Wiltshire Wildlife Trust	HSD2p
amphibian	<i>Bufo bufo</i>	Common Toad	ST9474	West Tytherton, garden pond	1980		[GR imprecisely recorded]	Sect.41, UKBAP
amphibian	<i>Rana temporaria</i>	Common Frog	ST9474	West Tytherton, garden pond	1980		[GR imprecisely recorded]	HSD5
reptile	<i>Natrix helvetica</i>	Grass Snake	ST9374	Peckingell, river	July 1979		Swimming [GR imprecisely recorded]	Sect.41, UKBAP, WCA5/9.1k/l
bird	<i>Egretta garzetta</i>	Little Egret	ST9474	Tytherton Lucas	30/04/2017	1 Count	[GR imprecisely recorded]	BD1
bird	<i>Egretta garzetta</i>	Little Egret	ST9474	Tytherton Lucas	30/04/2017	1 Count	WOS Website [GR imprecisely recorded]	BD1
bird	<i>Perdix perdix</i>	Grey Partridge	ST942739	Marden	27/01/2002		2 birds. Data missing for aquatic zone	Bred, Sect.41, UKBAP
bird	<i>Pandion haliaetus</i>	Osprey	ST9474	Tytherton Lucas	25/08/2006	1 Count	Between: 24:00-24:00. [GR imprecisely recorded]	BD1, WCA1i
bird	<i>Pandion haliaetus</i>	Osprey	ST9474	Tytherton Lucas	25/08/2006	1 Count	Heading south along river at 11am which was then seen off by 2 buzzards who didn't like the osprey being there. [GR imprecisely recorded]	BD1, WCA1i
bird	<i>Vanellus vanellus</i>	Lapwing	ST936735		18/01/2013	150 Count		BRed, Sect.41, UKBAP

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
bird	<i>Numenius arquata</i>	Curlew	ST9572	Stanley Chippingham	11/04/2006	1 Count	Calling while circling to land nearby at 09:30hrs. Believed to have nested in the area in the past. [GR imprecisely recorded]	BRed, Sect.41, UKBAP
bird	<i>Larus argentatus</i>	Herring Gull	ST9373	Blackbridge	18/01/2005	2 Count	Between: 10:30-11:49. [GR imprecisely recorded]	BRed
bird	<i>Larus argentatus</i>	Herring Gull	ST9373	Blackbridge	31/01/2005	30 Count	Between: 11:00-12:30. [GR imprecisely recorded]	BRed
bird	<i>Larus argentatus</i>	Herring Gull	ST9373	Blackbridge	15/02/2005	7 Count	Between: 09:30-10:30. [GR imprecisely recorded]	BRed
bird	<i>Cuculus canorus</i>	Cuckoo	ST942739	Marden	27/05/1996		New bridge still blocked off	BRed, Sect.41, UKBAP
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	22/07/1995			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	15/06/1997		Seen on 21/6/97. Fields either side of old bridge contain rape in flower. Some of the willow saplings at the monitoring pt appear to have	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	14/10/1995		Flying along river	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST97L	Location withheld	27/07/1996		Farmer said kingfisher nested in bank under old bridge. Data missing for aquatic zone [GR reduced due to sensitivity (BS)] Flying downstream. Data missing for aquatic zone	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	09/12/1995			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	22/05/1999			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	20/06/1999			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	17/10/1999			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	16/09/2000		Flying over rapid. Data missing for aquatic zone	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	Marden	27/12/2000			BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST942739	New Leaze Farm	19/09/2009	1	1 flew over water near observer.	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST9373	Blackbridge	09/03/2005	1 Count	Between: 10:40-12:10. [GR imprecisely recorded]	BD1, WCA1i
bird	<i>Alcedo atthis</i>	Kingfisher	ST9373	Blackbridge	14/04/2005	1 Count	Between: 10:30-12:00. [GR imprecisely recorded]	BD1, WCA1i

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
bird	<i>Alauda arvensis</i>	Skylark	ST941733	Field beside Chippenham to Calne cycle path, SW of New Leaze Farm	18/06/2006	1 Count	Lark was ascending almost vertically from pasture, warbling constantly as it rose.	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST9373	Blackbridge	27/04/2005	1 Count	Between: 10:30-12:00. [GR imprecisely recorded]	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST9373	Blackbridge	03/06/2005	2 Count	Between: 10:20-11:30. [GR imprecisely recorded]	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST9373	Blackbridge	13/06/2005	1 Count	Between: 10:10-11:40. [GR imprecisely recorded]	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	25/03/2000	Overhead. Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	23/04/2000	Above field. Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	27/05/2000	Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	06/06/1998	Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	09/05/1998	Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	15/03/1998	Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	05/04/1998	Heard. Data missing for aquatic zone	Heard. Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	06/01/1996			BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	15/06/1997	Heard above. Fields either side of old bridge contain rape in flower. Some of the willow saplings at the monitoring pt appear to have	Heard above. Fields either side of old bridge contain rape in flower. Some of the willow saplings at the monitoring pt appear to have	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	05/05/1995			BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	10/06/1995	Hassed by inquisitive cows!	Hassed by inquisitive cows!	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	12/03/1995	Fisherman says bream, chub and occasional trout have been caught in the area in the past.	Fisherman says bream, chub and occasional trout have been caught in the area in the past.	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	22/06/1996	Data missing for aquatic zone	Data missing for aquatic zone	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	27/05/1996	New bridge still blocked off	New bridge still blocked off	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST942739	Marden	19/07/1997	Farmer on S side said WWT had done a vole survey upstream & found voles. He had shown them native crayfish at "rapids".	Farmer on S side said WWT had done a vole survey upstream & found voles. He had shown them native crayfish at "rapids".	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST9373	Blackbridge	23/03/2005	1 Count	Between: 10:10-11:29. [GR imprecisely recorded]	BRed, Sect.41
bird	<i>Alauda arvensis</i>	Skylark	ST9373	Blackbridge	18/03/2005	1 Count	Between: 10:00-11:19. [GR imprecisely recorded]	BRed, Sect.41

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
bird	<i>Motacilla cinerea</i>	Grey Wagtail	ST942739	Marden	28/09/1997		At last! We found the native crayfish under the stones below the "rapids." Four. Largest brown carapace, smallest pinkish.	Bred
bird	<i>Motacilla cinerea</i>	Grey Wagtail	ST942739	Marden	21/11/1999		Data missing for aquatic zone	Bred
bird	<i>Turdus philomelos</i>	Fieldfare	ST942739	Marden	16/02/1997		Flying across adjacent field. New gate built on S side entrance to new bridge.	Bred, WCA1i
bird	<i>Turdus philomelos</i>	Fieldfare	ST9373	Blackbridge	18/01/2005	2 Count	Between: 10:30-11:49. [GR] imprecisely recorded]	Bred, WCA1i
bird	<i>Turdus philomelos</i>	Fieldfare	ST9373	Blackbridge	31/01/2005	1 Count	Between: 11:00-12:30. [GR] imprecisely recorded]	Bred, WCA1i
bird	<i>Turdus philomelos</i>	Fieldfare	ST9373	Blackbridge	15/02/2005	45 Count	Between: 09:30-10:30. Fieldfare seen gathered in tree tops beside pasture [GR imprecisely recorded]	BRed, WCA1i
bird	<i>Turdus philomelos</i>	Song Thrush	ST9373	Blackbridge	14/04/2005	1 Count	Between: 10:30-12:00. [GR] imprecisely recorded]	BRed
bird	<i>Turdus philomelos</i>	Song Thrush	ST9373	Blackbridge	03/06/2005	1 Count	Between: 10:20-11:30. [GR] imprecisely recorded]	BRed
bird	<i>Turdus philomelos</i>	Song Thrush	ST9373	Blackbridge	18/03/2005	1 Count	Between: 10:00-11:19. [GR] imprecisely recorded]	Bred
bird	<i>Turdus philomelos</i>	Song Thrush	ST9373	Blackbridge	23/03/2005	1 Count	Between: 10:10-11:29. [GR] imprecisely recorded]	BRed
bird	<i>Turdus philomelos</i>	Song Thrush	ST9373	Blackbridge	31/01/2005	1 Count	Between: 11:00-12:30. [GR] imprecisely recorded]	BRed
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	18/01/2005	1 Count	Between: 10:30-11:49. [GR] imprecisely recorded]	BRed
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	23/02/2005	30 Count	Between: 10:10-11:20. [GR] imprecisely recorded]	BRed
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	09/03/2005	4 Count	Between: 10:40-12:10. [GR] imprecisely recorded]	Bred
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	27/04/2005	1 Count	Between: 10:30-12:00. [GR] imprecisely recorded]	BRed
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	03/06/2005	6 Count	Between: 10:20-11:30. [GR] imprecisely recorded]	Bred
bird	<i>Sturnus vulgaris</i>	Starling	ST9373	Blackbridge	13/06/2005	4 Count	Between: 10:10-11:40. [GR] imprecisely recorded]	BRed
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	31/01/2005	12 Count	Between: 11:00-12:30. [GR] imprecisely recorded]	BRed, Sect.41, UKBAP

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	15/02/2005	4 Count	Between: 09:30-10:30. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	23/02/2005	10 Count	Between: 10:10-11:20. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	09/03/2005	10 Count	Between: 10:40-12:10. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	18/03/2005	4 Count	Between: 10:00-11:19. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	23/03/2005	12 Count	Between: 10:10-11:29. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	14/04/2005	6 Count	Between: 10:30-12:00. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	27/04/2005	8 Count	Between: 10:30-12:00. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	03/06/2005		Between: 10:20-11:30. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Passer domesticus</i>	House Sparrow	ST9373	Blackbridge	13/06/2005		Between: 10:10-11:40. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Linaria cannabina</i>	Linnet	ST9373	Blackbridge	14/04/2005	2 Count	Between: 10:30-12:00. [GR imprecisely recorded]	Bred
bird	<i>Linaria cannabina</i>	Linnet	ST9373	Blackbridge	23/03/2005	4 Count	Between: 10:10-11:29. [GR imprecisely recorded]	Bred
bird	<i>Linaria cannabina</i>	Linnet	ST9373	Blackbridge	18/01/2005	8 Count	Between: 10:30-11:49. [GR imprecisely recorded]	Bred
bird	<i>Emberiza citrinella</i>	Yellowhammer	ST9373	Blackbridge	18/03/2005	1 Count	Between: 10:00-11:19. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Emberiza citrinella</i>	Yellowhammer	ST9373	Blackbridge	23/03/2005	1 Count	Between: 10:10-11:29. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Emberiza citrinella</i>	Yellowhammer	ST9373	Blackbridge	03/06/2005	1 Count	Between: 10:20-11:30. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
bird	<i>Emberiza citrinella</i>	Yellowhammer	ST9373	Blackbridge	13/06/2005	1 Count	Between: 10:10-11:40. [GR imprecisely recorded]	Bred, Sect. 41, UKBAP
terrestrial mammal	<i>Erinaceus europaeus</i>	West European Hedgehog	ST9573	West Tytherton, Scotts Mill Farm	01/08/1984		DOR Lane [GR imprecisely recorded]	RIGB,VU, Sect. 41, UKBAP
terrestrial mammal	<i>Erinaceus europaeus</i>	West European Hedgehog	ST9573	West Tytherton, Scotts Mill Farm	01/08/1984		DOR Lane [GR imprecisely recorded]	RIGB,VU, Sect. 41, UKBAP
terrestrial mammal	<i>Neomys fodiens</i>	Eurasian Water Shrew	ST9377/11	Marden, BAMAD24	10/06/1997	1 Count	Stretch from ST939741 to ST936741	County

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Lutra lutra</i>	European Otter	ST9343973881	Eastern bank of River Avon, north of dismantled railway	02/10/2014	1+ Count; Otter: Spraint	HabRegS2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9Ac	
terrestrial mammal	<i>Lutra lutra</i>	European Otter	ST9343973881	Eastern bank of River Avon, north of dismantled railway	02/10/2014	1+ Count; Otter: Spraint	HabRegS2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9Ac	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Junction of River Marden/River Avon, Chippenham	24/01/2013- 31/01/2013	1. Count	HabRegS2, HSD2P, HSD4, Sect.41, UKBAP, WCA5/9Ac	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9373	Location withheld	13/05/2013	Badger: Sett	PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9373	Location withheld	01/05/2014- 31/05/2014	1+ Count; Badger: Sett	Likely subsidiary sett [GR reduced due to sensitivity (R6)] PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	01/05/2014- 31/05/2014	1+ Count; Badger: Sett	Likely annex sett [GR reduced due to sensitivity (R6)] PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST946744	Tytherton Lucas	28/09/2015	Badger: latrine	PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	01/05/2014- 31/05/2014	1+ Count; Badger: Sett	Likely main sett [GR reduced due to sensitivity (R6)] PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9573	Location withheld	05/02/2017	1. Count of Badger: Sett	Standing in broad daylight then bolting down nearby sett hole [GR reduced due to sensitivity (R6)] PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden - Monitoring Stretch	19/10/1996	Badger: Run	Signs of badgers near old bridge PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden - Monitoring Stretch	21/09/1996	Badger: Run	Signs of badgers PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	31/08/1998	Badger: Run	Badger damage to maize in field. PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden - Monitoring	26/08/1996		Evidence of badgers near south bank PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST939744	Kellaways, near to	10/12/1981		PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST940735	Kellaways, near to	17/10/1983		PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST947737		20/01/2001	Badger: Run	Excavations & footprints in field PBA	
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST947737		24/01/1998	Badger: latrine	Scrapings and latrines PBA	

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739		25/03/2000			PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	27/01/2002	Badger: Sett	Activity signs/fresh bedding/paths [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	24/02/2002	Badger: Sett	Activity signs/fresh bedding at set [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9373	Location withheld	12/04/1992	Badger: Sett	Ev of use: Footprints, dung pits, walkways and scratching tree. See notes [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9373	Hardens Farm nr	04/08/1982		reared and released [GR imprecisely recorded]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9474	West Tytherton	29/05/1980		orphan cub found, female [GR imprecisely recorded]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	10/02/2001		More badger activity. Data missing for aquatic zone	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	23/12/2001	Badger: Latrine	Recent badger activity, fresh earth and latrines, bedding.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	27/01/2002	Badger: Sett	Fresh activity at sett; bedding and print. Data missing for aquatic zone [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	24/01/1998	Badger: Latrine	Scrappings and latrines of badgers near/on old bridge.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	19/10/1996	Badger: Dung	Signs of badgers near old bridge. New bridge still blocked off	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	26/08/1996		Evidence near south bank at edge of maize field. Data missing for aquatic zone	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	12/04/1997	Badger: Latrine	Fresh latrines on N side of old bridge Paths visible.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	15/06/1997	Badger: Latrine	Badger latrines & paths near old bridge, freshly used.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	19/07/1997	Badger: Latrine	Latrine near old bridge.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	28/09/1997	Badger: Feeding signs	Badgers have eaten some corn cobs.	PBA

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	31/08/1998		Signs around old bridge. Data missing for aquatic zone.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	20/03/1999	Badger: Latrine	Scrapes and latrines.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	05/12/1998	Badger: Sett	Badger scrapes, burrows. [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	07/02/1999	Badger: Latrine	Scrapes and latrines.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	17/04/1999	Badger: Latrine	Scrapes and latrines.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	22/05/1999	Badger: Latrine	Scrapes and latrines.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	20/06/1999	Badger: Latrine	Badger activity.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	28/08/1999	Badger: Latrine	Badger activity.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	26/09/1999	Badger: Latrine	Badger activity.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	17/10/1999	Badger: Latrine	Signs of badger.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	21/11/1999		Large hole excavated near water at bend on S side by badgers. Data missing for aquatic zone.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	16/01/2000	Badger: Run	Badger scrappings.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	13/08/2000	Badger: Run	Badger tracks.	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Location withheld	23/04/2000	Badger: Sett	Badger's: one hole blocked by fallen earth, others open. [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	27/05/2000	Badger: Sett	Evidence of badger activity around sett. Data missing for aquatic zone. [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST9473	Location withheld	20/01/2001	Badger: Sett	Excavations at sett. Data missing for aquatic zone. [GR reduced due to sensitivity (R6)]	PBA
terrestrial mammal	<i>Meles meles</i>	Eurasian Badger	ST942739	Marden	24/02/2002		Badger activity, scraping and fresh earth and bedding.	PBA

Taxon Group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST942739	Marden	22/05/1999	Several.		RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST9373	Chippenham River Avon	July 1982	Water Vole: Sighting	Seen while fishing [GR imprecisely recorded]	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST944738	River Marden, Chippenham	21/06/1997		Piles of chopped grass	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST942739	Marden - Monitoring Stretch	14/10/1995		Vole-sized burrow in sloping bank	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST942739	Marden	14/10/1995		Vole-sized burrow in sloping bank.	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST940740	Marden, BAMAD2A	10/06/1997	1 Count of Tracks; Water Vole: Footprints	Stretch from ST940739 to ST939741	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST937741	Marden, BAMAD24	10/06/1997	1 Count ; Water Vole: Sighting	Stretch from ST939741 to ST936741	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Arvicola amphibius</i>	European Water Vole	ST937741	Marden, BAMAD24	10/06/1997	1 Count of Signs ; Water Vole: Feeding remains	Stretch from ST939741 to ST936741	RLGB.EN, Sect.41, UKBAP, WCA5/9.4c
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST945735	New Leaze Farm, Chippenham	25/03/2014	2 Count		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942733	By Cycle Track near Chippenham	06/08/2018	1 Count of Juvenile	Habitat: Farmland	Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST955732	Stanley near Chippenham	07/02/2017	1 Count of Adult	Moving along the side of a minor road	Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden - Monitoring Stretch	27/07/1996		Hares	Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	06/06/1998	Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden - Monitoring Stretch	22/06/1995		Hare	Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST948734	New Leaze Farm, Chippenham, nr	24/02/2002	1 seen [GR imprecisely recorded]		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST948734	Chippenham, Field nr	06/07/2002	3 seen in field		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST947733	Chippenham, Field nr	07/07/2002	1 seen in field		Sect.41, UKBAP

Taxon group	Species Name	Common Name	Grid Ref	Location	Date	Abundance	Comment	Status
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST9474	West Tytherton	16/10/1982	live 14:50-16:55 [GR imprecisely recorded]		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden - Monitoring	09/12/1995	Hares in adjacent fields		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Stretch	10/06/1995	Hare in adjacent field		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Stretch	16/09/1995	Hares, Screeching noises by bank		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden - Monitoring	05/04/1998	Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	23/11/1997	Disturbed in old sweetcorn field which ran away.		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	27/09/1998	Hares Fresh burrow diggings on bend S side of river. Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	24/08/1997			Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	24/02/2002	Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	10/06/1995	Hare in adjacent field - running away. Hassled by inquisitive cows!		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	16/09/1995	Hares Screeching noises by bank - young mink playing?		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	22/06/1996	Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	27/07/1996	Several. Data missing for aquatic zone		Sect.41, UKBAP
terrestrial mammal	<i>Lepus europaeus</i>	Brown Hare	ST942739	Marden	09/12/1995	Several. In adjacent fields. Data missing for aquatic zone		Sect.41, UKBAP

Appendix 2 Abbreviations used on the species recording



A	B	C	D	E	F
WSBRC Abbreviation	Kind	Long name	Description	Short name	
BD1	International	Birds Directive Annex 1	Birds which are the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution. As appropriate, Special Protection Areas to be established to assist conservation measures. Note that the contents of this annex have been updated in April 2003 following the Treaty of Accession.	BirdsDir-A1	
2	International	Berne Convention Appendix 1	Special protection ('appropriate and necessary legislative and administrative measures') for the plant taxa listed, including prohibition of deliberate picking, collecting, cutting, uprooting and, as appropriate, possession or sale.	Berne-A1	
3	International	Bonn Convention Appendix 1	Endangered migratory species in danger of extinction throughout all or a significant portion of their range, and for which Range States are obliged to prohibit taking and to take protective measures to conserve.	Bonn-A1	
4	Red Data List	Bird Population Status- red	Red list species are those that are Globally Threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown a substantial recent recovery.	Bird-Red	
5	Local	Wiltshire county notable	Taxa considered notable in Wiltshire	County Notable	
6	Nat Legislation	The Conservation (Natural Habitats, &c.) Regulations 1994 (Schedule 2)	Schedule 2: European protected species of animals.	ConsRegs-Sch2	
7	Nat Legislation	The Conservation (Natural Habitats, &c.) Regulations 1994 (Schedule 3)	Schedule 3: Animals which may not be taken or killed in certain ways.	ConsRegs-Sch3	
8	Nat Legislation	The Conservation (Natural Habitats, &c.) Regulations 1994 (Schedule 4)	Schedule 4: European protected species of plants.	ConsRegs-Sch4	
9	International	Habitats and species directive Annex 2 - priority species	Species which are endangered, the conservation of which the Community has a particular responsibility in view of the proportion of their natural range which falls within the territory of the Community. They require the designation of special areas of conservation.	HabDir-A2	
10	International	Habitats and species directive Annex 2 - non-priority species	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) whose conservation requires the designation of special areas of conservation. Note that the contents of this annex have been updated in April 2003 following the Treaty of Accession.	HabDir-A2*	
11	International	Habitats and species directive Annex 4	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat. Note that the contents of this annex have	HabDir-A4	

WSBRC Abbreviation ▾	Kind	Long name	Description	Short name	F	
HSD4	International	Habitats and species directive Annex 4	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat. Note that the contents of this annex have been updated in April 2003 following the Treaty of Accession.	HabDir-A4		
12	HSD5	International	Habitats and species directive Annex 5	Animal and plant species of Community interest whose taking in the wild and exploitation may be subject to management measures.	HabDir-A5	
13	N	Other rare/scarce	Nationally Notable	Species which are estimated to occur within the range of 16 to 100 10km squares. (subdivision into Notable A and Notable B is not always possible because there may be insufficient information available) Superseded by Nationally Scarce, and therefore no longer in use.	Notable	
14	Na	Other rare/scarce	Nationally Notable A	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in 30 or fewer 10km squares of the National Grid or, for less well-recorded groups, within seven or fewer vice-counties. Superseded by Nationally Scarce, and therefore no longer in use.	Notable-A	
15	Nb	Other rare/scarce	Nationally Notable B	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in between 31 and 100 10km squares of the National Grid or, for less-well recorded groups between eight and twenty vice-counties. Superseded by Nationally Scarce, and therefore no longer in use.	Notable-B	
16	NR(vp)	Other rare/scarce	Nationally rare	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.	Status-NR	
17	NS	Other rare/scarce	Nationally scarce	Occurring in 16-100 hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.	Status-NS	
18	NR(exRL)	Other rare/scarce	Nationally rare	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.	Status-NR (excl RedListed)	
19	NR(inRL)	Other rare/scarce	Nationally rare	Occurring in 15 or fewer hectads in Great Britain (includes all red listed species under IUCN criteria)	Status-NR (incl RedListed)	
20	RLGB.Bird1a	Red Data List	RDB Birds - 1a	Breeding in internationally significant numbers (>20% of the north-west Europe population).	NonIUCN_RedList	
21	RLGB.Bird1b	Red Data List	RDB Birds - 1b	Non-breeding in internationally significant numbers (>20% of the north-west Europe population).	NonIUCN_RedList	
22	RLGB.Bird2	Red Data List	RDB Birds - 2	Rate breeder (<300 pairs).	Birds1b	
23	RLGB.Bird3	Red Data List	RDB Birds - 3	Declining breeder (>50% sustained decline since 1960).	Birds2	
24	PBA	Nat Legislation	Protection of Badgers Act (1992)	The Protection of Badgers Act 1992 protects badgers from taking, injuring, killing, cruel treatment, selling, possessing, marking and having their setts interfered with, subject to exceptions.	NonIUCN_RedList	
25	RLGB.CR	Red Data List	IUCN (2001) -	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild	Protection of Badgers Act (1992)	
				RedList GB post		

A2	▼ : X ✓ f _{it}	BD1				
WSBRC Abbreviation ▾	Kind	Long name	Description	Short name ▾	F	
RLGB-DD	Red Data List	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.	RedList_GB_post 2001-DD		
28	RLGB-DD	Red Data List	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.	RedList_GB_post 2001-DD	
29	RLGB.EN	Red Data List	IUCN (2001) - Endangered	A taxon is Endangered when it is facing a very high risk of extinction in the wild in the near future.	RedList_GB_post 2001-EN	
30	RLGB.EN	Red Data List	IUCN (1994) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.	RedList_GB_post 94-EN	
31	RLGB.EW	Red Data List	IUCN (2001) - Extinct in the wild	A taxon is Extinct in the wild when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinct in the wild when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual) throughout its range have failed to record an individual. Surveys should be over a time frame appropriate to the taxon's life cycle and life form.	RedList_GB_post 2001-EW	
32	RLGB.EW	Red Data List	IUCN (1994) - Extinct in the wild	A taxon is Extinct in the wild when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinct in the wild when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual) throughout its range have failed to record an individual. Surveys should be over a time frame appropriate to the taxon's life cycle and life form.	RedList_GB_post 94-EW	
33	RLGB.EX	Red Data List	IUCN (1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.	RedList_GB_post 94-EX	
34	RLGB.EX	Red Data List	IUCN (2001) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.	RedList_GB_post 2001-EX	
35	RLGB.Lr(NT)	Red Data List	IUCN (2001) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.	RedList_GB_post 2001-NT	
36	RLGB.Lr(NT)	Red Data List	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer	RedList_GB_post 94-NT	

Sheet1

	WSBRC Abbreviation	Kind	Long name	Description	Short name	F
39	RLGB.VU	Red Data List	IUCN (2001) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.	RedList_GB_post 2001-VU	
40	RLGLB.VU	Red Data List	IUCN (1994) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.	RedList_GB_post 94-VU	
41	RLGLB.CR	Red Data List	IUCN (2001) - Critically Endangered	A taxon is Critically Endangered when the best available evidence indicates that it meets any of the criteria A to E for Critically Endangered (see Section V), and it is therefore considered to be facing an extremely high risk of extinction in the wild.	RedList_Global_p ost2001-CR	
42	RLGLB.EN	Red Data List	IUCN (1994) - Critically Endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.	RedList_Global_p ost94-CR	
43	RLGLB.EN	Red Data List	IUCN (2001) - Endangered	A taxon is Endangered when the best available evidence indicates that it meets any of the criteria A to E for Endangered (see Section V), and it is therefore considered to be facing a very high risk of extinction in the wild.	RedList_Global_p ost2001-EN	
44	RLGLB.LR(cd)	Red Data List	IUCN (1994) - Lower risk - conservation dependent	Taxa which are the focus of a continuing taxon-specific or habitat-specific conservation programme targeted towards the taxon in question, the cessation of which would result in the taxon qualifying for one of the threatened categories above within a period of five years.	RedList_Global_p ost94-LR(cd)	
45	RLGLB.Lr(NT)	Red Data List	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.	RedList_Global_p ost94-NT	
46	RLGLB.VU	Red Data List	IUCN (2001) - Vulnerable	A taxon is Vulnerable when the best available evidence indicates that it meets any of the criteria A to E for Vulnerable (see Section V), and it is therefore considered to be facing a high risk of extinction in the wild.	RedList_Global_p ost2001-VU	
47	RLGLB.VU	Red Data List	IUCN (1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.	RedList_Global_p ost94-VU	
48	Sect.41	Nat Legislation	Natural Environment & Rural Communities Act 2006 - Species of Principal Importance in England (s41)	Species of principal importance for the purpose of conserving biodiversity covered under section 41 (England) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity.	England NERC S.41	
49	UKBAP	UK BAP	UK Biodiversity Action Plan priority species	The UK List of Priority Species and Habitats contains 1150 species and 65 habitats that have been listed as priorities for conservation action under the UK Biodiversity Action Plan (UK BAP).	BAP-2007	
50	WCA1i	Nat Legislation	Wildlife and	Birds which are protected by special penalties at all times.	WACA-	

i8				lists that have not been reviewed since 1994.	
Sect.41	Nat Legislation	Natural Environment & Rural Communities Act 2006 - Species of Principal Importance in England (s41)	UKBAP	Species of principal importance for the purpose of conserving biodiversity covered under section 41 (England) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity.	England NERC S.41
i0	WCA1i	Nat Legislation	UK BAP	UK Biodiversity Action Plan priority species	BAP-2007
i1	WCA1ii	Nat Legislation	Wildlife and Countryside Act 1981 (Schedule 1 Part 1)	Birds which are protected by special penalties at all times.	WACA-Sch1_part1
i2	WCA5/9.1k/l	Nat Legislation	Wildlife and Countryside Act 1981 (Schedule 1 Part 2)	Birds which are protected by special penalties during the close season.	WACA-Sch1_part2
i3	WCA5/9.1t	Nat Legislation	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring))	Section 9.1. Animals which are protected from intentional killing or injuring.	WACA-Sch5_sect9.1(kill/injuring)
i4	WCA5/9.4c	Nat Legislation	Wildlife and Countryside Act 1981 (Schedule 5)	Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.	WACA-Sch5_Sect9.4c
i5	WCA8	Nat Legislation	Wildlife and Countryside Act 1981 (Schedule 8)	Plants which are protected from: intentional picking, uprooting or destruction (Section 13 1a); selling, offering for sale, possessing or transporting for the purpose of sale (live or dead, part or derivative) (Section 13 2a); advertising (any of these) for buying or selling (Section 13 2b).	WACA-Sch8
i6					
i7					

Sheet1



CHIPP31b



River Marden near Chippenham, Wiltshire

Ecological Appraisal

Report Prepared for Bremhill Parish Council
September 2020

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1. Introduction

1.1 Background

Avellana Ecology was commissioned by Bremhill Parish Council to undertake an Extended Habitat Survey and bat survey along the River Marden near Chippenham, Wiltshire.

The survey was requested in order to assess the habitats and species in this area in relation to the following planning application:

15/12363/OUT Outline Application for Mixed Use Development Comprising up to 1500 Dwellings New Distributor Road.

Avellana Ecology is an ecological consultancy based in Bristol run by Neill Talbot, providing a range of services to community groups, charities, private individuals, national and local government bodies, businesses and landowners. Neill has over twenty years' experience of survey work, training, research and advice from working in nature conservation for a Conservation charity (The Wildlife Trust); ecological consultancies; and local Authorities. His extensive experience includes working with businesses, local people and community groups, and landowners. Survey skills include botany, herpetology including great crested newts (Natural England licence holder since 2003), white-clawed crayfish (Natural England licence holder since 2003), mammals including badgers and bats, and birds.

Neill Talbot is an experienced bat surveyor, having undertaken bat surveys for various organisations including Leicestershire and Rutland Wildlife Trust, Leicestershire and Rutland Bat Group, Bat Conservation Trust, Avon Wildlife Trust, Avon Bat group, numerous ecological consultancies (including EDP, NPA, Simecology, BSG and Enzygo). Surveys undertaken include the National Pipistrelle Bat Monitoring and Waterway Surveys (Bat Conservation Trust) (since 2003); monitoring of lesser and greater horseshoe bat colonies for Avon Wildlife Trust and Bristol City Council (2016-2019).

Kay Snowdon is an experienced bat surveyor, having undertaken bat surveys for various organisations including Leicestershire and Rutland Wildlife Trust, Leicestershire and Rutland Bat Group, Bat Conservation Trust, Avon Bat group, and Avon Wildlife Trust. Surveys undertaken include the National Pipistrelle Bat Monitoring and Waterway Surveys (Bat Conservation Trust) (since 2003); monitoring of lesser and greater horseshoe bat colonies for Avon Wildlife Trust and Bristol City Council (2016-2019).

1.2 Site Location and Context

The site is located in the Marden Valley, near Chippenham in Wiltshire and is bordered by farmland to the north and south, with the edge of Chippenham approximately 500m to the south-west and Tytherton Lucas 475m to the north-east. The site is surveyed is approximately 1.1km in length.

The surrounding land is predominantly agricultural (pasture and arable), with hedgerows, woodland/scrub, river Avon, disused railway line (now National Cycle Route 403) near the site.

The closest international designation is the Bath and Bradford Bats SAC.

The Bristol Avon River County Wildlife Site (CWS) lies on the western site boundary and its floodplain extends across a significant proportion of the site.

Two statutory designated biological/geological sites (Sites of Special Scientific Interest/SSSI's) are situated within 5km of the site:

- Bencroft Hill Meadows an area of unimproved neutral hay meadow, 1.25km south-west.
- Kellaways River Avon, 430m north, a geological SSSI river bank.

The river and floodplain also lie within a *SSSI Impact Risk Zone*.

1.3 About this Report

This report sets out the results of an Extended Habitat survey and bat transect survey at part of River Marden near Chippenham, Wiltshire. The survey details records of bat activity, including identification of species, estimated numbers of bats, behaviour and approximate location.

The results obtained were subsequently used to inform the conclusions and recommendations presented in Section 4. The remainder of this report is structured as follows:

Section 2 sets out in detail the methodology applied for field survey work;

The results of the field survey are set out in Section 3;

Conclusions and recommendations are provided in Section 4.

Appendix A – Habitat Map; B - Bat Transect map; C - Species Lists; D – Bat transect description; E -Bat Survey records; F – References; G - Historic survey records (otters)

2. Methodology

2.1 Field Study

2.1.1 Extended Habitat Survey

An Extended Habitat Survey was undertaken on 22nd and 31st July 2020 by an ecologist experienced in conducting this type of survey (Neill Talbot, Associate Member, Chartered Institute of Ecology and Environmental Management - ACIEEM), during which the habitat types present across the Site and in immediately adjacent areas were recorded, based on the Joint Nature Conservation Committee (JNCC) guidance for Phase 1 Habitat Surveys.

The survey includes descriptions of the recorded habitat types, and plant species identified, together with incidental fauna records.

During the survey, the habitat was also assessed for the presence, or potential presence, of the following legally protected species:

2.1.2 Bats

An assessment was made of the potential for habitats within the Site boundary to support foraging and/ or commuting bats. A brief assessment of the suitability of trees to support roosting bats along the watercourse and adjacent areas was made, for example natural holes; woodpecker holes; cracks/splits in major limbs; loose bark; dense, thick-stemmed ivy; hollows/cavities; dense epicormic growth; bird and bat boxes (items listed are based on *Bat Conservation Trust guidelines*).

One survey was undertaken during the optimal survey period (between May and August), following Bat Conservation Trust (BCT) guidelines₁ by Neill Talbot and Kay Snowdon of Avellana Ecology.

The survey was undertaken on 8th August 2020.

The survey details records of bat activity, including identification of species, estimated numbers of bats, behaviour and approximate location. Records of foraging and/or commuting bats were noted, at ten transect stopping points. Two *Magenta Bat 4* heterodyne bat detectors were used to record echolocating bats.

The bat transect route as shown on the map (Appendix A) and detailed in the description (Appendix B) was selected so that it incorporated some of the best potential locations/habitats for bat activity, including: transect stopping points alongside/overlooking the river; near potential bat roosts (mature and dead trees); and potential bat foraging areas (scrub/hedgerows). Bats regularly navigate along corridors, predominantly hedgerows, woodland edges, watercourses, field margins and so on. Bats will often roost in and/or forage around mature trees, especially those with hollows and dead wood habitat present.

Following standard criteria¹ the survey was undertaken, starting at sunset for around 1.5 hours, stopping at each of the eight transect stopping points for six minutes, excluding points 1 and 7 where the stops were for 10 minutes each as these were only points where the river could be viewed fully. Bat activity was noted at each transect point and at all points between.

2.1.3 Reptiles

Reptiles exist within a variety of habitats that provide both shelter and foraging opportunities, (in the form of scrub or tall vegetation) and habitat suitable for basking in un-shaded areas. Log piles, brash and other piles of vegetation provide excellent cover and hibernation sites for reptiles. Areas of suitable reptile habitat within the site boundaries were identified during the field surveys.

2.1.4 Badger

A search for characteristic signs of badger (including setts, hairs, latrines and pathways) was undertaken within the site.

2.1.5 Nesting birds

During the breeding season, the nests, eggs and young of all British non-domesticated bird species are protected by law. A general assessment of the trees and other habitat areas was made for their suitability for breeding birds.

2.1.6 Invertebrates

Habitat that may support significant species or diverse assemblages of terrestrial and aquatic invertebrates (such as standing deadwood, bare ground, large areas of species rich grassland, and wetlands) were recorded.

2.1.7 Otter, water vole and common and widespread mammal species

During the survey the presence and suitability of habitat suitable for otter, water vole and widespread/common mammal species was also noted.

2.1.8 Invasive non-native plant species

The presence of non-native plants that are considered to be invasive was noted as part of the habitat survey.

3. Baseline Conditions

3.1 Habitat survey

This section presents the results of the Extended Habitat Survey conducted on 22nd and 31st July 2020. Appendix B contains the species lists for all of the survey sections.

Constraints included the fact that most of the banks were steep and/or inaccessible with some areas of very deep water so it was too dangerous to enter the river from the banks in almost all parts of the river bank. It was, however, possible to view the river from the banks in a number of places, using binoculars where required.

Overall, the river has a varied and natural structure (only modified slightly in a few areas), with a very good variety of submerged and marginal aquatic flora. Most areas have abundant riparian trees, in particular mature willows.

There are some hedgerows that provide wildlife corridors for a range of species, including bats, and link the river to the surrounding countryside.

Target Notes – ST93667412 to ST94457391 (refer to appendix A for locations)

1. Confluence with River Avon @ ST93667412



There are numerous mature/veteran white willow and crack willow trees in this area, including some with split limbs, rot/dead wood and bracket fungi, that are potential bat roosts.



split-limbed white willow – potential bat roost

The river banks are dominated by common nettle with thistle, burdock, teasel, bramble, dock, comfrey, hogweed and coarse grasses.

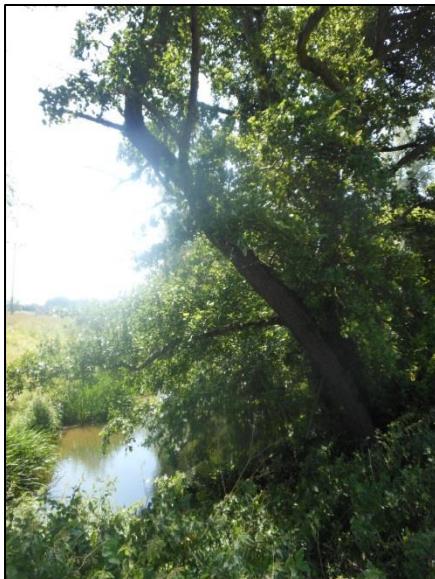
Aquatic flora species include Himalayan balsam, branched and unbranched bur-reed, reed canary-grass, and duckweed.

Kingfisher nesting holes are present on the river bank here.

The water here is slow-flowing with some pool areas.

2. Mature coppice/pollard alder @ ST93717414 with mature willows nearby – potential bat roost. Some aquatic/marginal plants here, including willowherb, unbranched bur-reed, water-lilies and angelica.

The river has gravel substrate in places here.



mature alder – potential bat roost

3. Cluster of mature white willows and crack willows @ST93767412 – potential roosting and foraging habitat for bats. Aquatic/marginal vegetation here includes common reed, hemlock, common nettle and Himalayan balsam. There is abundant woody debris in river, birds and other fauna.



4. White willow with fallen/split limbs - potential bat roost. Other tree species here include elder and *Prunus sp.* Common reed is abundant in this section of the river. There are also sections of riffle (fast flowing) and pool (slow-flowing/still) water, with a good variety of aquatic plants such as water-crowfoot and winter-cress present.



5. Badger sett (one hole found – outlier sett) @ ST939741 – not recently active.

6. Mature/veteran white willow @ ST93997410 - potential bat roost. In this section of the river much of the margin/bank is very densely treed with abundant crack willows, many of which are mature, with osier and white willow.



7. Abundant semi-mature ash and wild cherry trees, with some lime. Densely shaded (probably planted) copse @ ST941740, with dead willow trees between here and TN8.



8. Dead tree with abundant ivy @ST94257397 - potential bat roost.



9. Otter spraint and fresh paw prints @ ST94257396. Near here there is also some *Potamogeton* sp (pondweed) and water-crowfoot – both good indicator plant species of aquatic habitats.



10. River near bridge @ ST94367390 – banks mainly inaccessible on northern side.



Bankside vegetation is dominated by common nettle, false oat-grass, hemlock and thistles. Other vegetation includes bindweed, and hogweed. Aquatic vegetation here consists of bulrush, branched bur-reed, Himalayan balsam, reed canary-grass, reed sweet-grass, with willowherb on the margins. Tree species include old coppice crack willow (frequent), alder, goat willow and white willow, some mature trees providing good bat foraging habitat/potential roost sites. The tall grass margins here are good habitats for small mammals and some signs of vole activity were seen (holes and runs).

11. Copse of wild cherry with dog rose @ ST94457391, plus scrub consisting of hawthorn, ash and bramble.



Target Notes – ST950735 to ST949736 (Scott's Mill)

Only a small section of the river was surveyed near Scott's Mill, from the bottom of the garden along to the adjacent arable field, but was inaccessible after ST949736.



The river here is fairly fast-flowing with a gravel substrate. Aquatic vegetation includes water-crowfoot, branched bur-reed, unbranched bur-reed, reed canary-grass and Himalayan balsam. There is some large woody debris in the river.

The banks are narrow on the northern side with a wide bank dominated by nettles on the southern side. Bankside vegetation includes purple-loosestrife, hemp-agrimony, greater chickweed, comfrey, bindweed, bearded couch, winter-cress and angelica. Mature crack willow and some coppiced/pollarded willows – potential bat roosts – are present, along with goat willow and hazel. Next to the arable field at the end of the survey section the banks are dominated by nettle with burdock and thistle. White willow is abundant here.

3.2 Species surveys

3.2.1 Bat survey

On 8th August 2020 four species of bat were recorded, including a record of a *Myotis sp.* bat.

It is estimated that around eight individual bats were seen or heard.

Two species of pipistrelle – common and soprano – were seen or heard. Daubenton's was seen and heard along the river near the bridge.

NB: The *Myotis* bats can be a very difficult group to separate from their calls. There are six species found in Britain, five of which are found in this part of the country, i.e. Daubenton's bat *Myotis daubentonii*, Natterer's bat *Myotis nattereri*, Brandt's bat *Myotis brandtii*, Whiskered bat *Myotis mystacinus*, and Bechstein's bat *Myotis bechsteinii*.

Historic records indicate the presence of three rare species of bats in the locality of the river valley near Chippenham, these are greater horseshoe, lesser horseshoe, and barbastelle. There are records of roosting as well as foraging/commuting for these species. The following more common bat species have been historically recorded in the area: pipistrelle, serotine, Daubenton's, noctule and brown-long eared. Suitable foraging and commuting habitat are present throughout the site. Along the river margins there are a number of trees that could provide habitats for roosting bats.

Suitable foraging and commuting habitat is present throughout the course of the river. There are a large number of trees that could provide habitats for roosting bats. Not all of these trees are detailed in this report, however, some good examples are highlighted in the target notes above.

Recommendations with regards bats are provided in Section 4.

3.2.2 Reptiles

The scrubby margins and tall grass/herb margins of the river provide good hibernation and refuge habitat for common reptile species, such as grass snake and slow worm, including dead wood/log piles and old tree stumps. There are some open areas which provide areas for basking reptiles.

3.2.3 Badger

A badger sett was found in one area, though it didn't appear to have been active very recently. There was some other activity including badger pathways on site.

3.2.4 Nesting birds

The site is considered to provide very good opportunities for a range of nesting birds, with many mature trees, areas of scrub and hedgerows. It also provides nesting and foraging habitat for wetland bird species. A British Trust for Ornithology (BTO) survey of the Rivers Avon and Marden between Tytherton Lucas and Chippenham was undertaken annually from 2007 to 2011 by Norman Hartnell – notable species recorded included: nesting reed warbler; dipper; kingfisher; little grebe; cuckoo. Calne Angling Association have regularly seen a breeding pair of barn owls in recent years.²

3.2.5 Invertebrates

Significant stands of deadwood were identified during the surveys. These are likely to provide habitats for a range of woodland invertebrate species. Wet areas are likely to provide good habitats for aquatic species such as beetles. The diversity of floating and emergent plant species provides habitat for dragonflies, damselflies and a variety of other aquatic invertebrates, while the marginal vegetation provides extensive foraging resource for pollinating insects. There are large areas of

coarse and small woody debris in the river throughout much of its length, these provide potential foraging habitat and refuges for a range of aquatic invertebrate species, especially water-beetles.

3.2.6 Otter, water vole and widespread species of mammal

Signs of otters were recorded in one location (see Target note 9. above), though it is considered likely that there is otter activity in other sections of the river due to the presence of large areas of suitable habitat. In particular, otters are highly likely to be present in the area near the confluence with the River Avon as the habitat is ideal for otters here.

On the whole the habitat for water vole in the sections surveyed is considered to be sub-optimal and no signs of activity were seen, the most likely area for water voles would be the area near Scott's Mill as there more open grassland and it is less shaded.

Some of the tall grass margins provide good habitats for small mammals, with signs of vole activity seen (holes and runs). Harvest mouse, wood mouse, and rabbits are likely to be present in the rough grassland areas. Brown hares were seen not far from the river.

3.2.7 Invasive non-native plant species

Himalayan balsam is present in many parts of the river and spreads rapidly, taking over from native plant species and reducing the botanical diversity of areas where it is present.

4. Conclusions

HABITATS

Overall, the river has a varied and natural structure (only modified slightly in a few areas), with sections of riffle and pool, gravel substrate and significant areas of woody debris. There is a very good variety of submerged and marginal aquatic flora, including a number of indicator species such as water-crowfoot and *Potamogeton* pondweed. It is likely that there are many more aquatic plant species, though access issues meant that a detailed survey of these was not possible in most parts of the river. Most areas have abundant riparian trees, in particular mature willows but with some open unshaded sections. There are hedgerows adjacent to the river that provide wildlife corridors for a range of species, including bats, and link the river to the surrounding countryside.

The river and its associated habitats are wildlife-rich but also very susceptible to disturbance from development and pollution. Therefore, it is considered that fragmentation and loss of valuable habitats and species is highly likely if planning application 15/12363/OUT proceeds.

SPECIES

Bats

Records indicate the presence of three rare species of bats, greater horseshoe, lesser horseshoe, and barbastelle, though it is likely that the majority of the records are for foraging and/or commuting bats rather than roosts.

This survey provides a limited picture of bat species and activity on site as it only covers part of the site and was undertaken using non-recordable bat species, so it is possible that some bat species were missed.

Four species of bat were recorded on site and there were fairly good levels of foraging activity. These were mainly common species, though it is possible, though unconfirmed, that a less common species of *Myotis* bat e.g. Bechstein's, Brandt's bat or Whiskered bat was present.

The survey was undertaken at the optimal time of year, though weather conditions were good overall, it was probably slightly sub-optimal due to the fairly strong wind gusts on the evening of the survey.

Reptiles

Some suitable habitat was identified from the site, i.e. hibernation areas for common reptile species, including dead wood/log piles and old tree stumps. There are some open areas which provide areas for basking reptiles.

Badger

There were signs of recent badger activity found during the survey and a sett that had not been used recently.

Nesting birds

Large areas of suitable habitat were identified from the along the river, including the extensive tree cover with some trees with dead wood/holes/ivy which are beneficial to foraging and nesting birds.

Invertebrates

Extensive areas of suitable habitat were identified both in the river and on the margins, which are likely to support a wide range of invertebrate species.

[REDACTED]
Avellana Ecology

22.09.2020

Appendix A. Habitat map



Appendix B. Bat Transect map



Appendix C. Species Lists

River Marden near confluence with River Avon ST93667412 to ST94457391

TREES/SHRUBS

Scientific name	Common name	Comments
<i>Alnus glutinosa</i>	alder	Some mature/coppice
<i>Corylus avellana</i>	hazel	
<i>Crataegus monogyna</i>	hawthorn	
<i>Fraxinus excelsior</i>	ash	
<i>Prunus avium</i>	wild cherry	
<i>Prunus spinosa</i>	blackthorn	
<i>Prunus sp.</i>	plum/damson	
<i>Rosa canina</i>	Dog rose	
<i>Salix alba</i>	white willow	Many mature
<i>Salix caprea</i>	goat willow	
<i>Salix fragilis</i>	crack willow	Many mature
<i>Salix viminalis</i>	osier	
<i>Sambucus nigra</i>	elder	

HERBS/GRASSES/SEDGES/FERNS

<i>Angelica sylvestris</i>	angelica
<i>Arctium sp.</i>	burdock
<i>Arrhenatherum elatius</i>	false oat-grass
<i>Barbarea sp.</i>	winter-cress
<i>Calystegia sp</i>	bindweed
<i>Carduus crispus</i>	welted thistle
<i>Cirsium arvense</i>	creeping thistle
<i>Carex pendula</i>	pendulous sedge
<i>Cirsium arvense</i>	creeping thistle
<i>Cirsium vulgare</i>	spear thistle
<i>Conium maculatum</i>	hemlock
<i>Dactylis glomerata</i>	cock's-foot
<i>Dipsacus fullonum</i>	wild teasel
<i>Epilobium sp</i>	willowherb
<i>Galium aparine</i>	cleavers
<i>Glyceria maxima</i>	reed sweet-grass
<i>Glyceria sp.</i>	sweet-grass
<i>Hedera helix</i>	ivy
<i>Heracleum sphondylium</i>	hogweed
<i>Holcus lanatus</i>	Yorkshire fog
<i>Impatiens glandulifera</i>	Himalayan balsam
<i>Juncus effusus</i>	soft rush
<i>Juncus inflexus</i>	hard rush
<i>Lemna sp.</i>	duckweed
<i>Lythrum salicaria</i>	purple-loosestrife

<i>Nymphaeae</i>	water-lily
<i>Oenanthe crocata</i>	hemlock water-dropwort
<i>Phalaris arundinacea</i>	reed canary-grass
<i>Phragmites australis</i>	common reed
<i>Potamogeton sp.</i>	pondweed
<i>Ranunculus sub-genus</i>	water-crowfoot
<i>Batrachium</i>	
<i>Rubus fruticosus agg.</i>	bramble
<i>Rumex obtusifolius</i>	broad-leaved dock
<i>Schoenoplectus lacustris</i>	bulrush
<i>Sparganium emersum</i>	submerged bur-reed
<i>Sparganium erectum</i>	branched bur-reed
<i>Symphytum officinale</i>	common comfrey
<i>Symphytum x uplandicum</i>	Russian comfrey
<i>Urtica dioica</i>	stinging nettle

River Marden – Scott's Mill ST949736-ST950735

TREES/SHRUBS

Scientific name	Common name
<i>Corylus avellana</i>	hazel
<i>Salix alba</i>	white willow
<i>Salix caprea</i>	goat willow
<i>Salix fragilis</i>	crack willow

HERBS/GRASSES/SEDGES/FERNS

<i>Angelica sylvestris</i>	angelica
<i>Arctium sp.</i>	burdock
<i>Arrhenatherum elatius</i>	false oat-grass
<i>Barbarea sp.</i>	winter-cress
<i>Calystegia sp</i>	bindweed
<i>Cirsium arvense</i>	creeping thistle
<i>Cirsium vulgare</i>	spear thistle
<i>Elymus caninus</i>	bearded couch
<i>Epilobium hirsutum</i>	great willowherb
<i>Eupatorium cannabinum</i>	hemp-agrimony
<i>Heracleum sphondylium</i>	hogweed
<i>Holcus lanatus</i>	Yorkshire fog
<i>Impatiens glandulifera</i>	Himalayan balsam
<i>Lythrum salicaria</i>	purple-loosestrife
<i>Myosoton aquaticum</i>	water chickweed
<i>Oenanthe crocata</i>	hemlock water-dropwort
<i>Phalaris arundinacea</i>	reed canary-grass
<i>Ranunculus sub-genus Batrachium</i>	water-crowfoot
<i>Sparganium emersum</i>	submerged bur-reed

<i>Sparganium erectum</i>	branched bur-reed
<i>Symphytum officinale</i>	common comfrey
<i>Symphytum x uplandicum</i>	Russian comfrey
<i>Urtica dioica</i>	stinging nettle

Incidental fauna and fungi records

River Marden near confluence with River Avon ST93667412 to ST94457391

BIRDS

buzzard
 green woodpecker
 goldfinch
 swallow
 tawny owl
 kingfisher
 lesser black-backed gull
 great white egret
 wood pigeon

MAMMALS

otter (spraint/prints)
 badger (sett)
 roe deer
 brown hare (near church)
 field/bank vole (holes)

BUTTERFLIES

small tortoiseshell
 brimstone
 large white
 small white
 common blue
 gatekeeper
 red admiral
 meadow brown
 silver-washed fritillary

OTHER INVERTEBRATES

brown hawker dragonfly
 banded demoiselle
 blue-tailed damselfly
 white-legged damselfly
 common green grasshopper
 grasshopper spp.
 red-tailed bumblebee

River Marden – Scott's Mill ST950735

BIRDS

jay
wren
kingfisher
nuthatch
crow
wood pigeon

BUTTERFLIES

peacock

INVERTEBRATES

hawker dragonfly sp.
banded demoiselle

MAMMALS

brown hare

Appendix D. Bat Transect description (refer to Map B)

TRANSECT STOP	
1 – At confluence with River Avon – near large willow	ST93667412
2 – By cluster of mature white willows	ST93767412
3 – Just after bend nr willow with split limb	ST93857419
4 – By mature white willow	ST93997410
5 – By cluster of willows	ST94107403
6 – By dead tree with ivy	ST94257397
7 – Bridge (public footpath)	ST94367390
8 – Copse near hedgerow	ST94457391
Then continue along hedgerow for 5 minutes	

Appendix E. Bat survey records

Date: 08/08/2020

Start/finish time: 20:43/22:11

Temperature: 24/21°C

Weather: dry, mild

Wind: fairly strong gusts – 2/3 Beaufort scale

Transect stop	Time	Heard/Seen?	Species	Number	Activity
4	2113	Heard	<i>Myotis sp.</i>	1	F/C?
5	2124	Heard	Pipistrelle sp.	1	F/C?
Between 5/6	2128	Seen	Soprano pipistrelle	1	F/FB Circling over river/willows
6	2133	Heard	Soprano pipistrelle	1	F
6	2136	Heard	Soprano pipistrelle	1	F
6/7	2138/39	Heard	Soprano pipistrelle	2	F Near hedge
6/7	2140	Heard	Soprano pipistrelle	1	F
7	2142	Heard	Daubenton's	2?	F along river
7	2144	Heard	Pipistrelle sp.	1	F/C?
7	2145	Seen	Daubenton's	1	F/FB along river
7	2147	Heard	Common pipistrelle	1	F/C?
7	2148/50	Heard	Daubenton's	1/2?	F along river
7/8	2153	Heard	Common pipistrelle	1	F
8	2156-58	Heard	Soprano pipistrelle	1	F near river/hedge
8	2158-59	Heard	Common pipistrelle	1	F
Hedge	2208	Heard	Pipistrelle sp.	1	F/C along hedge (brief)

Activity key:

F = Foraging FB = Feeding buzz C = Commuting

Appendix F. References

¹ Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

² Bremhill Parish Neighbourhood Plan Part 1: policies, evidence & context (February 2018)

A Guide to British Bats Kate Jones, Allyson Walsh, Field Studies Council (FSC)

Bats Phil Richardson (2000) Whittet Books

The Wildflower Key by Francis Rose (*published by Frederick Warne/Penguin*) – updated edition revised by Clare O'Reilly

Field Flora of the British Isles by Clive Stace

British water plants Haslam, Sinker & Wolseley (FSC)

Appendix G. Historic survey records (otter)

All records listed on the National Biodiversity Network map <https://nbn.org.uk/>
(Helen Stuckey)

Link to 2019 sighting on Avon at Monkton Park

<https://records.nbnatlas.org/occurrences/806b7a5e-9b69-4dd6-aba4-a3a942040729>

2016 sighting of 2 young otters upstream on R Avon

<https://records.nbnatlas.org/occurrences/f63a1184-0cdd-4b8f-bc46-c9bc89e6d36d>

Chippenham from Jan 2020

<https://records.nbnatlas.org/occurrences/d5459d85-34bc-4565-970e-deb8b3cbd1ef>

CHIPP313

Response to the Wiltshire Local Plan Consultation on Chippenham, in particular to the proposals to prioritise development in Site 1, between Chippenham and Bremhill Parish.

From [REDACTED], 19 The Street, Cherhill SN11 8XP

This response is concerned with the future of the Avon and Marden Vale, the 700 + acres of productive farmland which constitute Chippenham Site 1. It addresses the choice of the Chippenham Option CH-B and the prioritisation for development of Chippenham Site 1. It has not been sent on the electronic form because that system is too restrictive and clunky. The consultation questions which the response addresses are listed at the start of each section.

It is recognised that farming and farmland is all too often seen as not being a planning issue. Yet planning cannot ignore the quality and use of soils because the protection of the Grade 3 A is a part of national planning policy and so the impact of development on such land should be properly considered. There are references in the Local Plan from time to time about the quality of the farmland being considered for development (eg Grade 3A). When positive or negative effects, and sustainability, of development are being weighed, the impacts on, loss of, and plan period futures of farmland cannot reasonably be ignored. Unfortunately, that has too much been the case with the Chippenham Local Plan. Examination of this is the purpose of this submission.

A1 The question begins by stating that “Land-use policies need to be evidence based, realistic, viable and achievable.” The evidence base put forward for the prioritisation of Site 1 depends almost entirely on the supporting Interim Sustainability Appraisal. Whilst the Chippenham section 5.2.5 makes several references to farms, and even to working farms, this is only in the context of the possible impact of ‘noise, odour, dust, pests etc’ on nearby housing, and the need to avoid impacts on farm houses. No attempt is made to assess the land use value of existing farms, their contributions to public benefit or their future potential in the plan period. This serious shortcoming is embedded in the construction and application of the 12 criteria in Appendix A in the impact summary in 5.2.5. For example the Land and Soil comment in 5.2.5 ignores the fact that there is a significant amount of Grade 3A (Best and Most Versatile) land in Site 1¹, and concludes (without any visible evidence) that development there has only a moderate impact in terms of soil and land. This shortcoming continues in the Site 1 analysis in Annex II, which fails to mention the Grade 3A land and to give any attention to possible positive futures for productive farming in the area. Another example is the 5.2.5 comment, where the question is protection of surface, ground and drinking water quality but where the contrast between farmed land and the impacted soil of roads and housing is not assessed. Similarly the farmland alternative (and ergo threatened loss) is demonstrably not considered in relation to minimising vulnerability to surface water flooding (Climatic Factors), or to renewable energy opportunities and green technologies (Energy), , locally valued landscapes, nor to the Landscape aim to ‘Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place’ and ‘minimise the impact on locally valued landscapes’.

¹ Clearly visible on the MAGIC web site but ignored throughout the Local Plan documents

Well managed farmland with community connections also has the capacity to contribute positively to healthy and inclusive Communities, but this too is not recognised and evaluated. That point is expanded later in the response to CP questions, as is farmland's contribution to an urban sense of place.

The lack of attention to the current and future benefits of farming and the costs of its loss is further exemplified in Empowering Rural Communities supporting document, in which (remarkably) the words farm and farming are completely absent.

This lack of attention to the value of productive farmland and the negative impact of its loss is a serious weakness in the land use policies which underpin the site selection process and conclusions. Moreover this is contrary to the expectations of para 170 of the NPPF which states that '*Planning policies and decisions should contribute to and enhance the natural and local environment by...(b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*

All of which also relates to the unspecified and hence unaccountable balance of qualitative judgements and evidence acknowledged in para 2.3.5 of the Interim Sustainability Appraisal, which this response returns to when answering Question CP3.

A2 As a practical step to reducing carbon emissions, the Local Plan should not only retain the farmland in Site 1 but plan for a future which encourages progressive farming methods such as agroecology that promote carbon fixing and lock up.

<https://www.agricology.co.uk/farming-themes/agroecological-approaches/biodynamic-farming>

and learn from the example of the leading agro-ecological farm in nearby Yatesbury , only 12 miles from Chippenham. <https://yatesbury.webs.com/>

This issue is also addressed in more detail in the CP responses.

A3 The farms in Site 1 (and elsewhere) should be retained and measured in terms of their net carbon emissions over time and policies adjusted accordingly in line with Government and Wiltshire carbon reduction targets.

CP1 The scale of housing increase for Chippenham is being challenged by the Town Council, the Parish Council of neighbouring Bremhill, and CAUSE. All have raised multiple objections. The large numbers proposed depend to a significant extent on the selection of Option CH-B, which allocates the majority of the housing area to Chippenham. This is only briefly described in several unevidenced assertions in Section 4.2, and the summary tables 4.2.3 4.2.6 and 4.2.9 of the Interim Sustainability Appraisal (ISA). The main justification for the tables that leads to the selection of CH-B is claimed in the two ISA Appendix documents. Neither is easily understood, and Appendix 1 is particularly hard to follow, with a bewildering selection of subjective judgements set out in boxes of text and coloured conclusions. That alone questions the validity of this process.

So that there is a procedural objection to this section of the Local Plan consultation. The data in Annex 1 is presented in such a way that it does not allow members of the public to understand it and form judgements. There is another mass of inaccessible information in Annex II where there are (for example) no clear divisions between the assessments of the different sites. There is no adequate explanation that Chippenham is covered in both Annex

1 and Annex II. So that anyone wanting to re-assess the arguments for and against the prioritisation of a site, or all the sites, faces what is for many an impossible uphill task. This is a presentational and democratic failure, which undermines the validity of the whole consultation exercise.

Secondly the evaluation is fatally flawed by its inherent subjectivity, which is made all too clear in para. 2.3.5 of the ISA.

'Evaluation involves forming a judgement on whether the predicted effects are likely to be significant. The principal technique used to assess the significance of effects is a qualitative assessment based on expert judgement and supported by specific evidence'

The significant shortcomings of the entire ISA process have already been highlighted in the linked CAUSE Local Plan response. Here it's worth repeating that the lack of verifiable validity is as serious failing, and becomes even clearer as the reader tries to plough through the morass of tables and colours in the two Annexes. So-called Decision Aid Questions (DAQs) are produced in each topic to guide conclusions about the level of positive or negative effects. These DAQs are nowhere justified, but will by definition influence the subjective judgments that follow. Unjustified questions lead to subjective judgement being piled on subjective judgement, accumulating in the end – again subjectively - in the boxes in para. 4.2.3 in the main ISA document. This is a very laborious and opaque process which simply produces fake rationality – and unsustainable conclusions.

Turning to specifics, Objective 2 in Annex1, on Chippenham as a whole, relates to land use. Amongst the five ill-assorted DAQs there is one on efficient use of land which gives no indication of what is meant by efficient. There is then a question on BMV land, where the answer reveals that the authors of this Plan do not understand the extent of BMV farmland around the town. This entirely undermines the validity of their judgement that building on this land would have only a moderate negative effect on high quality farmland into serious doubt.

Therefore there is no obvious reason that CH-B (maximum house allocation for Chippenham) is the most sustainable outcome. This is just one example of the poverty of the analysis. It is also a crucial result as this answer on Objective 2 plays a large part in the eventual positive rating for CH-B in the para. 4.2.3 table. If the impact on BMV land was properly assessed it could easily reduce its comparative score from -1.3 to -1.6, and the overall gap to one decimal point.

Under Objective 3, account is not taken of the loss of farmland's ability to retain water, and improve drainage. Similarly under Objective 5 no attention is given to the ability of progressively managed farmland to minimise water run off. Objective 7 is '*Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place*'. No mention is made there of the local distinctiveness (and importance) of the peri-urban farmland which separates Chippenham and Bremhill. Nor of the sense of place which Chippenham's farmland gives to the town. These are only a few examples of how taking farmland into these subjective judgements could reasonably lead to a different judgement of CH-B and the massive expansion now proposed for Chippenham.

Relevant to these concerns is that the claimed objectivity of this exercise is undermined by its failure to mention that the 'upper housing range' of the CH-B option had already been favoured by a political decision by the Wiltshire Council Cabinet to prioritise its consideration in April 2019.

Given these failings it is not surprising that the commentary in Section 4.2 of the ISA is opinionated and largely subjective, as is the conclusion in favour of CH-B.

Reduced housing targets, for example in line with the current Plan projections could readily be accommodated elsewhere than on Site 1 farmland, including on the brownfield sites that have been wrongly omitted from the current Local Plan calculations.

CP2 Planning for Chippenham proposes place shaping priorities for the town on pages 5-6. For the most part these concern the town centre. They are for the most part appropriate for that purpose. However insufficient attention is given to the relationship of the town to the open spaces of its hinterland, much of which is peri-urban farmland. Previous surveys have reported how much local people value that relationship and future priorities for place shaping must include those aspirations and the benefits that can be achieved.

Urban communities such as Chippenham can and should be shaped positively by the relationships with their peri-urban green hinterlands, including farms with strong connections to local communities. This point is developed further in the answers to CP 12 and CP 13. So that weight should be given in place shaping to the social and health benefits of peri-urban spaces. This particularly the case when neighbouring farmland is in public ownership and its relationship to the local community is open to shaping by positive policies. The current (ii), (iii) and (vi) should be amended and a new priority added to reflect the important contribution that strong public connection to progressively managed farmland can make. This is further elaborated in CP 12 and 13.

In that context priority (v) should be omitted , as badly planned roads could put the currently productive farmland at risk.

CP3 The case for selecting Site1 (along with 2 and 3) is mainly set out in the Chippenham Site Selection Report (CSSR), the main Interim Sustainability document and its Annex II. It is seriously flawed. Once again the inherently subjective methodology is a serious weakness. The subjective nature of the Interim Sustainability Appraisal has already been shown above in respect of the choice of the Chippenham CH-B maximum development option. The same core methodological shortcoming applies to the ISA site selection analysis and conclusions.

The Chippenham Site Selection is discussed in the main ISA in 5.2 on page 32. The starting point is a grouping of Chippenham sites into seven areas, which is very briefly proposed and explained, but not justified, on page 6 (para.16) in the Site Selection Report. On page 27 of the report four groups are briefly explained but no mention is made of the other three areas.

The use of this grouping deserves some attention, and comment. It is taken for granted in both the ISA and in the Principal Settlement analysis in the ISA Annexe II. In neither case it is discussed, let alone justified. The possible effect on the subsequent analysis is nowhere considered, as it should have been.

These three reports lead to the proposal to select Site 1 for development. The connections between them is unusual and needs first to be examined. The first part of the CCSR carries out a site by site analysis, with criteria different from those used in the ISA, which is then only used to exclude some sites. It presumably (but not explicitly) feeds into the grouping of Chippenham sites into seven areas, though this is nowhere justified – a regrettable omission. Though it too is not explained, the seven area so-called Sustainability Analysis is carried out in Annexe II and a tabulated version is then pasted into the ISA and then the CCSR. The ISA then produces a selective summary of the analysis in Annex II, as is briefly admitted at the beginning of section 5.2.5 on p. 46 and the summary Table 5.2 on p. 45. The CCSR then resumes and carries out a SWOT analysis on the seven areas and emerges with slight adjustment to the Annex II table, still with Site 1at the top.

This process does not map onto the diagram of the Site Selection process on page 4 of the CCSR. All this process confusion raises questions about the presentation, organisation and validity of the Chippenham Site Selection process.

The validity of the analyses in each of the steps in this tortuous process is further weakened by the absence in all of them of appropriate consideration of the value and potential of the farmland in Area 1. In the initial analysis of the individual sites in the CCSR, the criteria used are different from those in the ISA and Annexes, for reasons which are again not explained².

Two of those criteria are Landscape and Flood Risk. Landscape is explicated as follows : “A site that creates a harmful landscape or visual impact that is unlikely to be successfully mitigated may be rejected”. When it comes to the site by site commentary, no reference is made to the existence of productive farms and farmland, and the harm which would be done to the landscape by their destruction and replacement by road and houses. One of several example of this the commentary on Site 506b, which is labelled Hardens and New Leaze farms but then only comments on the Grade II listed Hardens farm buildings and not on the farm landscape which constitutes the area. If that is taken into account, it would not be possible to so quickly conclude that there are ‘no overriding significant impacts’. Similarly no attention is paid to the contributions that well managed farmland makes to managing water levels and flood reduction. These points are expanded in the sections CP 12 and 13 below. The wider concern – and Local Plan weakness – is that nowhere is the existence of farmland taken into account where it should be, in this case when reviewing landscape change.

The next contribution to site selection is the ISA Annex II. There are similar presentational shortcomings to those in Annex 1, which were criticised in CP1 above. If anything Annex II is even more dense and inaccessible. There are 231 pages in all, with no index or easily visible distinction between the sections dealing with different towns, or the sites within the towns. The opaque presentation is frankly an affront to democracy and ought in a sane world to be reason enough to abort this as a public consultation.

As things stand this Annex is crucial to the decisions that follow. The issues and questions which frame this Annex appear to push the responses in a direction favourable to predetermined outcomes. Throughout they restrict the opportunity to take account of the positive farming futures set out in CP 12 and 13 responses below. Even so, proper attention should - and can -be given the farmland and its benefits in the Site 1 text , for example:

- The Objective 1 text is one of the very few to even recognise the farmland nature of the area, but still attached no value to that in respect of biodiversity, habitats and protected species, and green infrastructure, which no doubt contributes to the subjective judgement that the adverse effect of building on this land is only minor.
- In Objective 2 there is a straightforwardly false statement that 3A and 3b land ‘cannot be separated out’. The MAGIC map referred to in the first footnote gives the lie to that. The separate 3A and 3B grades are clearly set out in the 1988 Agricultural Classification of England and Wales.³ This basic error further undermines the confidence in this Sustainability analysis. Objective 2 is also an example of where the lumping together of several sites gives a false impression. There are substantial areas of 3A land in site 506b, Hardens and New Leaze farms. Consequently, the

² In this case the judgements are made on Accessibility, Wider Impacts (Landscape, Heritage, Flood Risk and Traffic) and something called Strategic Context. The last is frankly admitted to be a subjective view of the cumulative outcomes of the other assessments (page 80).

³ MAFF, 1988, where 3A land is distinguished from 3B, and described as ‘Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.’

statement in DAQ 4 that there would be a ‘significant loss of medium quality land’ is not correct. The question asked will development here ‘*result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?*’ The answer should simply be Yes. The conclusion of this section is the fence sitting ‘Moderate (significant) adverse effect. When the error on 3 A land is corrected, the conclusion must be Significant Adverse Effect, which would in turn have an effect of the overall judgement of Site 1.

- Objective 3 is about using and managing water resources effectively. Farming has a mixed record on this to date but publicly owned farms have the means to prioritise positive contributions on this, which is again missing from the text. If that farmland potential was included the effect should be increased from Minor Adverse to Moderate or arguably Significant.
- Objective 4 – an objective analysis of these air quality and pollution questions would recognise that the adverse effect of massive development of Site 1 was Significant, not another fence sitting Moderate (Significant), which appears to invent a new category to allow for reduced impact.
- Objective 5 is to minimise the impacts on climate change now and in the future. To some extent this replicates Objective 3. Given what is already written here about flooding risks, and the neighbouring Avon and Marden rivers, it is remarkable (and wrong) that the conclusion is only a Minor Adverse effect. If the loss of farmland that can help with soil quality and drainage is included then the case for at least Moderate Effect is clear.
- Objective 6 is about renewable sources of energy. Once again the analysis ignores the effect of the loss of 700 acres of farmland with significant capacity to include sustainable energy generation alongside productive progressive farming. No calculation is offered of the benefits / disbenefits of replacing that farmland capacity with solar panels on houses, while at the same time increasing carbon emissions. This is also one example of where the DAQs themselves bias the answers in favour of development. In these circumstances the safest conclusion would be neutral.
- It is worth rehearsing the text of Objective 8 in full: *Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.* Here the first two DAQs reveal the bias in the process, as they obscure the Objective by referring only to nationally designated landscapes and then to minimising impact by building nicely designed houses. In addition to bias, this is arguably the most obvious example of avoiding any consideration of the loss of farmland and its actual and future potential . It is precisely the retention of the farmland in Site 1, including its two County Farms, that would make the best and most significant contributions to achieving this objective - not least by maintaining and strengthening local distinctiveness and sense of place. So that the loss of that farmland must have a Significant Adverse Effect. The Minor Adverse Effect conclusion is simply not sustainable.
- Objective 10 is about reducing poverty and deprivation. It is hard to understand how the building of expensive housing in the proposed ‘Chippenham suburbs’ can be talked up to be a Major Significant Positive Effect to this objective, as Annex II proposes. Conversely what would be lost is the ability of community-oriented farms to provide ongoing job opportunities, opportunities for volunteering and in general to provide the ‘accessible educational, health and amenity greenspace’ defined in the second DAQ. Community farms can also provide the ‘*public spaces and community facilities that support public health, civic cultural, recreational and community functions*’. That would in fact be a good definition of one of their key contributions, as set out in the CP12 response, below. So that the loss of those opportunities must be weighed in the balance against the overstated claims of the current text. This must lead to at best a Moderate Adverse Effect, in contrast to the current hyper positive conclusion.

- Objective 12 is about a vibrant and diverse local economy. Once again the loss of productive peri-urban farmland on Chippenham's doorstep is not taken into account. This Plan is looking many years ahead so it is bound to consider both the actual and potential losses against claimed for gains. Local small scale farms are unquestionably a contribution to a diverse local economy. They provide a variety of employment and employment land in response to one of the DAQs. Development of this site will remove that, which must reduce its overall benefit to at best Moderate.

The changed positive / negative effects resulting from a proper recognition of contributions of the Site 1 farmland and its future potential would significantly alter the balance of judgement on the development of the Site, currently set out in table 5.2 on p. 45 of the ISA. Some but not all of these changes would also apply to other areas but Site 1 has the specific characteristics of its river boundaries, its County Farms and the large proportion of publicly owned farmland.

The Site Selection process is then capped off by the SWOT exercise described on pages 32-38 of the CSSP. SWOT is by definition a subjective exercise, described on Wikipedia as “designed for use in the preliminary stages of decision-making processes” and also “SWOT is intended as a starting point... Menon et al. (1999)⁴ and Hill and Westbrook (1997)⁵ suggested “no-one subsequently used the outputs within the later stages of the strategy”. There are many other critiques of SWOT and a visible consensus that it should only be used at an early stage of a decision process. So that it is unusual to say the least to see it being used in final decision making. Moreover no information is provided on how many and which people participated in the SWOT process and how any differences of view were resolved. This is then compounded by the results of the SWOT being presented in an odd way – for example the first result for Site 1, is simply recorded as ‘Strength’, and a later one as ‘Neutral’. There is no indication of how these singular conclusions emerged from the SWOT review. Last but not least the SWOT used the Place Shaping Priorities still being consulted on in pages 5-6 and CP2 of the overarching Planning for Chippenham document – to which amendments have been suggested in CP2 above and no doubt by others. So that a provisional set of criteria were used to provide a conclusive recommendation in a process which is widely regarded as an early stage tool, with variations which are not explained, and with no information about who made the SWOT judgements. The results of this are set out on p. 45 of the CSSR as the basis for the Preferred Options for Development of Chippenham. They are simply not credible, and should be withdrawn as soon as possible.

As a footnote, the chart on p 42 shows conclusively that the place shaping priorities are designed to support development in all circumstances as there is no room for other priorities that might question development as the one answer for the town’s future. As such they exclusive of alternatives.

CP6 is about the range of uses proposed for the land. The responses to CP 12 and 13 make the case for retaining Site 1 as productive farmland, and the benefits of doing that have also been illustrated in the responses to CP2 and CP3. Retained and well managed farmland could already provide some of the uses listed on p. 10 of the Planning for Chippenham document – for example land for allotments, a community orchard⁶, and opportunities for renewable energy generation as well as walking and cycling.

⁴ Menon, A.; et al. (1999). "Antecedents and Consequences of Marketing Strategy Making". *Journal of Marketing*. American Marketing Association. **63** (2): 18–40

⁵ Hill, T. & R. Westbrook (1997). "SWOT Analysis: It's Time for a Product Recall". *Long Range Planning*. **30** (1): 46–52.

⁶ Also under consideration for the area of Monkton Park going down to the river

CP 12 (and 13) It is argued here, and by very many others elsewhere, that the housing numbers for Chippenham need to be adjusted and much reduced. Alongside that the case for prioritising development in Site 1 has been shown to be fatally flawed. At the same time, there is a credible and realistic future for the farmland in Chippenham Site 1 which includes the two Hardens Farms and New Leaze farm. This should be taken fully into account going forward. This response to CP12 outlines that positive case, and offers a 'Greenprint' for its further development.

The absence of attention to that positive alternative is an unfortunate omission from the discussion of Chippenham's future. So that this section is also a contribution to answering question CP13.

The farmland in Site 1 is just over 700 acres. In all just under 500 acres of this is believed to be in public (Wiltshire Council) ownership. The Hardens Farms are 200 acres, and these are also County Farms, held in stewardship by Wiltshire Council for the public benefit. County farms originate as a land use reform response to the late-Victorian agricultural depression, and were then embedded in legislation in 1892, 1908 and 1926.

*"Today, they remain one of the most powerful levers that a local authority has for directly helping new people into farming. They are a national public asset and in England alone cover a huge 200,000 acres. As such they have real potential to support the economic viability of local farming, to promote innovative farming methods, and to deliver environmentally sustainable farming."*⁷

A sizable area of this land is Grade 3A, Best and Most Valuable, as shown on the MAGIC map of local farmland quality.⁸ It is worth noting that some part of Site 1 has not yet been graded and it is remiss of the Council to propose it for development in the absence of that knowledge. As has already been pointed out the analysis in Annex II of the ISA has mistakenly claimed that 3A and 3B land cannot be differentiated, and therefore failed to identify the two areas of 3A land in Site 1 – one of which surrounds the Hardens Farm buildings.

Site 1 is bordered and defined by two rivers, the Avon and Marden, which contributes to its varied character and farming opportunities. Accordingly it can be thought of as the **Avon and Marden Vale** (AMV). It contains the two previously named working farms. Its character was briefly touched on in the Preliminary Environmental Assessment of Options Report (PEAOR)⁹. Its rather general account reported that '*the broad, flat, low-lying clay vale, is strongly characterised by the presence of the River Avon, River Marden and other tributaries*' (3.6.2) and that

'the lowland valley landscape comprises medium scale, mixed arable farmland with some grazed meadow that is strongly defined by a framework of woodland blocks and intact and predominantly well-managed hedgerows frequently with hedgerow trees, although in places hedgerows have been removed creating a more open and fragmented landscape character.' (3.6.3)

Views across the generally semi-open landscape within the study area mean that the extent of views are contained by subtle changes in landform, localised hillocks or ridges to the east and north-east of Chippenham. (3.6.6)

⁷ Graham, K et al, (2019), Reviving County Farms, CPRE

⁸ <https://magic.defra.gov.uk/>

⁹ part of the widely criticised Future Chippenham plans for a distributor road round Chippenham which would cross Area 1.

The report also acknowledges that '*Sensitive features identified in the Wiltshire Landscape Character Assessment, 2005 include: 'rural tranquillity; hedgerow pattern; water bodies and water ways of varied character and ecological value; streamside willows and other riparian vegetation; remnant hay meadows; wide open views; and settlement pattern of nucleated villages with variety of vernacular building materials'*'. (3.6.5)

This is peri-urban farmland. In the words of this Report '*The quality of the landscape is influenced by the proximity to Chippenham settlement edge*'. It is also defined by its proximity to the Conservation village of Tytherton Lucas, the hamlet of Stanley, both within the larger parish of Bremhill. In other words it is the neighbourhood farmland of urban Chippenham and rural Bremhill. Its destruction would have a significant adverse negative effect on both communities. Conversely both communities will benefit from its continuation and from the many opportunities there are for its improvement in the Plan period. Increasing attention is being given to the contribution of peri-urban farmland, for example the August 2020 Sustain Alliance¹⁰ report on Fringe Farming¹¹ in and around London, which highlighted the benefits of peri-urban farming for increased food production and resilience, skills and training and new routes to local markets. It also makes the case that '*notably this should include protection of the County Farms estate so it can provide land for new entrants, varied land holding sizes allowing farmers to progress in farming, and testing and demonstration sites of agroecological, nature- and climate-friendly farming systems*' (pp. 13-14)

The report included specific recommendations for Local Authorities:

- Those with land holdings in the urban fringe to take more responsibility for how their land is managed to achieve wider public benefits.
- Build relationships with landowners and any tenant farmers to identify opportunities and barriers to growing more agroecological food and getting it into local market outlets.
- Innovate and encourage different models of food production that include community engagement.
- Adopt new models of land management such as those presented by the Ecological Land Cooperative, the Soil Association and the Land Trust, to allow more flexibility and progression for farming careers.
- Integrate opportunities into Climate Change Action Plans and food procurement contracts.

These have immediate relevance for a positive future for the Avon and Marden Vale, and will be returned to later in this response.

Food production in peri-urban areas is often on a small scale, in smallholdings or modestly sized farms. One of the urban myths in some policy discussions is that small farms have no future and the only future is large scale agglomeration. This is not the case. The 2019 Defra Evidence Compendium (p. 70) shows that size of farm is not necessarily the issue but how well the farm is managed ; it shows that on a scale of farm profitability (defined by £ profit for every £100 of inputs) very small economic size farms make up 40% of the top 10% of such farms. Other evidence and argument in favour of small scale food production can be found in the 2017 'A Matter of Scale' study¹², which examined productivity data, local marketing, employment, reductions in waste and motivation for environmental improvement – all supporting the contribution that small farms make. Further support for the contribution of

¹⁰ <https://www.sustainweb.org/>

¹¹ <https://www.sustainweb.org/publications/Fringe-Farming-Briefing-Aug2020/>

¹² Laughton, R. (2017) A Matter of Scale: A study of the productivity, financial viability and multifunctional benefits of small farms (20 ha and less). Landworkers' Alliance and Centre for Agroecology, Coventry University.

small farms comes in the 2017 CPRE Uncertain Harvest report¹³ and a 2016 Prince's Countryside Fund Report¹⁴ recommends actions to improve small farm futures. The case for small farms is increasingly being made:

<https://landworkersalliance.org.uk/wp-content/uploads/2018/10/matterofscale.pdf>

None of which is to deny that small farms have been and are under pressure and that many have been unable to survive. So that a 'business as usual' approach to farming in the Avon and Marden Vale is not recommended. There is a bright farmland future for the Vale but it requires innovation (of which diversification is one example), funding and policy support, local connection and public engagement.

British farming, large and small is already moving down the diversification path. Defra has reported that "uptake of diversified activities has increased from 51% of farm businesses in 2009/10 to 66% in 2017/18. For those farms with a diversified activity, their income from that activity accounted for 28% of their profit in 2017/18."¹⁵ An excellent example of successful diversification can be found locally at Hartley Farm at Bradford on Avon <https://www.hartley-farm.co.uk/about/our-story/>. Local connectivity is crucial for success of this kind of diversification, which is returned to below.

Emerging environmental approaches to farming are another promising form of diversification open to the AMV farms. Perhaps the most promising for the future of the Avon and Marden Vale is *agroecology*, simply put the application of ecological principles to farming. Agroecology promotes farming practices that;

- **Mitigate climate change** - reducing emissions, recycling resources and prioritising local supply chains.
- **Work with wildlife** - managing the impact of farming on wildlife and harnessing nature to do the hard work for us, such as pollinating crops and controlling pests.
- **Put farmers and communities in the driving seat** - they give power to approaches led by local people and adapt agricultural techniques to suit the local area - and its specific social, environmental and economic conditions.¹⁶

One option for the future of the AMV can be seen in this extended discussion of agroecology:

"So instead of the conventional, monoculture-based industrial approach which relies on external inputs, we need to develop sustainable, regenerative farming systems that improve the well-being of small-scale farmers, create diversity to make food production resilient to a changing and unpredictable climate, and produce sufficient food whilst enhancing biodiversity. Instead of marginalising sustainable local food producers, we need to put sustainable local food at the centre of our food supply, with small-scale producers feeding local communities, rather than being squeezed by industrial-scale global supply chains.

Agroecological farming is needed to preserve natural resources. This includes recycling nutrients and energy on the farm, rather than using external inputs; integrating crop and livestock farming; diversifying species (and therefore genetic resources); and focusing on the ways in which crops and livestock can mutually benefit each other, rather than on individual species. By using organic matter and improving

¹³ Willis, G. (2017) 'Uncertain Harvest: Does the loss of farms matter?', CPRE

¹⁴ Winter, M. and Lobley, M. (2016) Is there a future for the small family farm in the UK? Report to The Prince's Countryside Fund, London: Prince's Countryside Fund. ISBN 978-902746-36-7

¹⁵ DEFRA Future Farming and Environment Evidence Compendium (2019 update) [PowerPoint Presentation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/)

¹⁶ From the Soil Association web site <https://www.soilassociation.org/causes-campaigns/a-ten-year-transition-to-agroecology/what-is-agroecology/>

the soil, farmers can promote better plant growth. This is an agro-ecology knowledge-intensive system, but the knowledge is developed by the farmer through understanding local conditions and experimenting.

Re-connecting farmers and consumers is important to help building vibrant local food economies. The aim is to support local producers, processors and retailers, and build links between consumers, local farmers and local food businesses. This means creating decentralized short supply chains, diversified markets based on solidarity and fair prices, and closer links between producers and consumers locally. Consumers should be able to purchase ecologically-produced food from small-scale producers. Short distance distribution models are also an important aspect for the closure of nutrient cycles, a basic need in agro-ecological farming practices. To return plant nutrients back into the loop, back to the soil, on the right spot, in the right composition and in the right amounts, is a complex issue. This complexity increases significantly over distance, so agroecology promotes closed production loop sand minimised external inputs. In this way local food economies answer the basic need for plant nutrients in agroecological farming practices.”¹⁷

There are several other online sources for agroecology¹⁸ but there is also a successful example of it in practice less than a dozen miles from the AMV, Yatesbury Farm:

<https://yatesbury.webs.com/>

where the principles are put into successful practice.

One example of agroecology is *agroforestry*, usually combining tree planting with pasture. Adding trees delivers multiple benefits especially in an area where the aim is to improve landscape and recreation for the local population – integrating trees within the farmed landscape to create a patchwork where the trees complement production or are part of it. More trees in the landscape would also combine farming with carbon storage and, if well managed, provide landscape enhancement.¹⁹

For example, one option for the flood plain would be planting of suitable tree species to create a woodland underplanted with wildflowers which local people could visit – perhaps via a new footbridge across the river – ie the floodplains in the AMV area could become managed wetlands – wetlands are increasingly being recognised for their carbon storage value as well as flood capacity, ability to filter out pollutants etc. In agroforestry models, these areas could be grazed or left undisturbed.

Fruit and horticulture also offer new smaller scale niche-farming options, which can sometimes be combined with arable and pastoral farms.

From all this it is evident that there are innovative and realistic options for small scale farming in the Avon and Marden Vale, which have the capacity to improve the soil²⁰, reduce the carbon footprint and explore the potential for carbon capture. Opportunities for – and the benefits of - engagement with local communities appears as a common theme. Local connections can include local markets and interactions with residents as consumers, but extend far beyond that. They can also provide opportunities for employment, volunteering, learning new skills and entry into the farming profession – one of the original aims of County

¹⁷ From the ARC 2020 web site <https://www.arc2020.eu/agroecology/briefing-note-agroecology/>

¹⁸ For example <https://www.agricology.co.uk/>

https://www.sustainweb.org/blogs/nov18_agroecology_future_ukfarming/

¹⁹ [About Agroforestry – The Agroforestry Research Trust](#)

²⁰ Back to the Land, 2021, CPRE

Farms. There would also be scope for the kind of small scale landholdings and micro businesses to grow food for local consumption.²¹

And of course these options could – and should - be accompanied by the provision of new allotments for local residents. Demand for allotments is likely to follow from developers cramming in houses with small ‘manageable’ gardens, alongside the benefits of growing your own at a time of visible food insecurity.

Community ownership and support should also be explored. There are practical and successful examples of community farm ownership, and one model offers shares in the local farm to the local community. Options could include promoting a public ownership stake in at least one of the AMV County Farms. [There is even a consultancy that specifically supports fresh thinking about farming ownership: https://sharedassets.org.uk/](https://sharedassets.org.uk/)

Community Supported Agriculture is a variation on ownership.²² The Soil Association defines CSA as a partnership between farmers and the local community, in which the responsibilities, risks and rewards of farming are shared. One community supported farm has 8,000 investor members. They can be farmer- or community-led and produce food on one acre or hundreds. Vegetables are most common, but produce also includes eggs, bread, meat, fruit and dairy. CSAs are also developing to manage woodlands.

Locally engaged farming would be a significant place shaping boost for the communities on both sides of the AMV, encouraging a sense of the important connections of the place where they live with the local countryside and food production – and very relevant to CP2, above.

These innovative approaches to diversified small scale farming are not only practical but have several opportunities to attract funding. The first comes within the Agricultural Transition Plan [Agricultural transition plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024) which could provide funding for a Local Authority wishing to invest in their council farmland to create new small holdings or incubator hubs for new entrants. This is being piloted in 2021 and due to launch by 2022.²³

At the same time, the whole of Government support for farming is undergoing radical change after the departure from the European Union. Government is clearly signalling a new farming focus on public benefit in addition to food production. The replacement will be the Environmental Land Management Scheme (ELMS). This will have three components, which are still being worked through.

<https://www.gov.uk/government/publications/the-environmental-land-management-scheme-an-overview>

<https://townsendcharteredsurveyors.co.uk/professional-services/environmental-land-management-schemes-elms/>

As they currently appear, two of these (Sustainable Farm Incentive and Local Nature Recovery) should provide opportunities for funding the innovative farming approaches described above, in the AMV. The SFI is broad based and covers farm land and will set standards for how land is managed for environmental improvement. The Local Nature

²¹ [ecologicalland.coop | For a Living, Working Countryside](https://ecologicalland.coop/)

²² <https://communitysupportedagriculture.org.uk>

²³ There is an introduction to the scheme on p 24

Recovery component seems likely to enable local priorities to be addressed, including improving or connecting up habitats, landscape and public access, as per the published Agricultural Transition Plan:

"Local Nature Recovery will focus on: creating, managing and restoring habitats such as woodland, wetlands, freshwater, peatland, heathland, species-rich grassland, and coastal habitat, as well as connecting isolated habitats to form networks; natural flood management; species management; rights of way, navigation and recreation infrastructure; education infrastructure, events and services; and geodiversity and heritage asset management."

²⁴[Agricultural transition plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024)

Locally engaged small scale food production should also be eligible for charitable funding.

Conclusion

This is strong evidence that recent innovative developments in farming methods offer promising opportunities for refreshed, small scale farming on the Avon and Marden Vale, which are in tune with emerging Government thinking on funding. These could also provide significant health, consumption and recreation benefits for the local community, including of course the people of Chippenham. The available benefits also include biodiversity / wildlife increase, carbon reduction, improved water and air quality, public access and landscape enhancement.

The publicly owned land in the AMV (currently designated as Site 1) provides the ideal opportunity to begin a change process to take advantage of these opportunities at time when food production and food security are rapidly rising up public concerns and policy priorities. The County farms should over time be the catalysts for wider change.

The recommendations emerging from this analysis are:

- ✓ first and foremost the retention of this Avon and Marden Vale land for a progressive farming based, locally connected future, and the removal of the land from any development priorities .
- ✓ Early discussions between the representatives of Chippenham and Bremhill Parish about the future options, particularly the future of the County Farms and other publicly owned farmland in the area
- ✓ To include any local farmers who are interested in these options
- ✓ An accompanying and parallel public debate, informed by appropriate outside expertise

²⁴ referenced above. This extract is from p33.

CHIPP317

**WILTSHIRE LOCAL PLAN REVIEW
CONSULTATION**

**REPRESENTATIONS
ON BEHALF OF
HALLAM LAND MANAGEMENT LTD**



Contents

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Date of Issue: March 2021



SECTION 1

REPRESENTATION FORMS



Wiltshire Council LOCAL PLAN

Looking to the future

The Emerging Spatial Strategy Consultation Response Form

Ref:

(For official use only)

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	[REDACTED]	[REDACTED]
First name	[REDACTED]	[REDACTED]
Last name	[REDACTED]	[REDACTED]
Job title (where relevant)	[REDACTED]	Director
Organisation (where relevant)	Hallam Land Management Ltd	Rocke Associates Ltd
Address Line 1		Number One
Address Line 2		Queen Square Place
Address Line 3		Bath
Address Line 4		

Postcode		BA1 2LL
Telephone Number		[REDACTED]
Email Address		[REDACTED]

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

See Section 2 (Representations)

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature: T S Rocke

Date: 08.03.21

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Chippenham Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	[REDACTED]	[REDACTED]
First name	[REDACTED]	[REDACTED]
Last name	[REDACTED]	[REDACTED]
Job title (where relevant)	[REDACTED]	Director
Organisation (where relevant)	Hallam Land Management Ltd	Rocke Associates Ltd
Address Line 1		Number One
Address Line 2		Queen Square Place
Address Line 3		Bath
Address Line 4		
Postcode		BA1 2LL

Telephone Number		[REDACTED]
Email Address		[REDACTED]

Section Two – Questions

CP1. What do you think to the scale of growth? Should there be a brownfield target?
Should this figure be higher or lower?

Answer:

See Section 2 (Representations)

CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

CP3. What land do you think is the most appropriate upon which to build?
What type and form of development should be brought forward at the town?

Answer:

CP4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

CP5. How can these concept plans be improved?

Answer:

CP6. Do you agree with the range of uses proposed, what other uses should be considered?

Answer:

CP7. Do you agree with the range of proposed uses? What should be located where and why?

Answer:

CP8. Do you agree with the location and amount of employment provided on sites 1 and 2?

Answer:

**CP9. Do you agree with the proposed locations for self build and custom build housing?
Would you prefer alternative locations?**

If so, please explain.

Answer:

CP 10. Do you agree with the proposed sites for renewable energy?

Is there a particular type of renewable energy that should be provided?

Answer:

CP11. Site 1 - Do you agree with the proposal for some housing to be located north of the North Rivers cyclepath?

Answer:

CP12. Site 1 - Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Answer:

CP13. Are there important factors you think we've missed that need to be considered in planning for Chippenham?

Answer:

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

T S Rocke

Date:

09.03.21

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."



SECTION 2

REPRESENTATIONS



Wiltshire Local Plan Review

Consultation

Representations by Hallam Land Management Ltd

March 2021

**ROCKE
ASSOCIATES**

The representations below set out the response of Hallam Land Management Ltd (HLM) to the matters identified in the title banners.

WILTSHIRE LOCAL PLAN REVIEW CONSULTATION

1 Emerging Spatial Strategy

Housing Market Areas

The HMAs identified in the emerging strategy broadly reflect and continue those that were previously identified in the Wiltshire Core Strategy (WCS). However, the evidence base does not suggest that there has been fundamental change in the functional relationships between where people live and work.

Wiltshire County covers a very large geographical area which was formerly administered by four separate district level authorities. As is correctly acknowledged in the consultation document, needs vary around the County, and it would not result in a sustainable pattern of development if there was a mismatch between the focus of development and the locus of need. Given the divergent housing and economic needs and potential across the County, its continued disaggregation into separate HMAs and the apportionment of growth accordingly, is considered to be a sound and sustainable strategy approach.

The economic evidence base confirms that the Chippenham HMA (formerly part of the North and West HMA) continues to be the ‘engine room’ of the Wiltshire economy given its relationship with the strategic road network (M4 / A350) and position in relation to major urban centres in the M4 corridor (Bristol / Swindon / Reading), together with its rail connectivity provided by the Great Western main line. A distribution of circa 45% of the County’s overall housing growth to the Chippenham HMA is therefore not disproportionate as part of a strategy to deliver a step change in economic growth and increase self-containment.

With regard to the overall housing need to be apportioned to the HMAs, the Council’s approach to plan to exceed the minimum figure that arises from the Government’s Standard Method, by 11.7% (4,795 dwellings), is considered to an appropriate approach in order to provide flexibility should a number of sites be delayed in coming forward. However, it is noted that the Swindon Borough Council and Wiltshire Local Housing Needs Assessment 2019 identifies a higher requirement of 2,285 dwellings per annum based upon meeting the aspirations of the Economic and Development Needs Assessment. HLM believe that this would be a more appropriate figure to adopt.

As the Council correctly acknowledges, their proposal to exceed the Standard Method figure incorporates a contingency that will provide a buffer against delivery shortfalls which could result in sanctions arising from the annual Housing Delivery Tests, and increases the prospects of the minimum need being 'met' within the plan period. The evidence base confirms past shortfalls in housing delivery in relation to identified needs, not least at Chippenham¹ where considerable reliance has been placed on large strategic sites which have failed to come forward in accordance with the anticipated trajectory. The incorporation of a contingency that plans to exceed the minimum figure arising from the Standard Method will assist with ensuring that the minimum need is met. However, in order to deliver the step change in housing delivery that is required, the higher figure of 2,285 dwellings should be adopted. This would be consistent with the Government's objective of 'significantly boosting' the supply of housing.

The incorporation of a contingency allowance of 10-20% as a non-implementation allowance is common and good practice in allocating land for development. It is unlikely to result in the minimum housing need identified by the Standard Method being exceeded, but is more likely to ensure that it is met.

It is also germane that, in order to comply with the NPPF requirement for strategic policies to look ahead over a 'minimum' 15 year period from adoption², the plan period will need to be extended beyond 2036. This, in turn, will increase the minimum housing requirement for which it must provide, and in consequence the overall quantum of homes for which provision must be made in accordance with the Council's approach to plan to exceed the minimum figure.

Chippenham Housing Market Area

The emerging strategy for the Chippenham HMA is broadly supported, which indicates a step change in growth at Chippenham compared with the Core Strategy, and to a lesser extent at Melksham, with the other main settlements maintaining equivalent or slightly reduced levels of growth. The emerging strategy is supported by both the Sustainability Appraisal and the economic assessments contained in the evidence base.

The evidence base indicates that Chippenham has underperformed in terms of employment development, but that Melksham has experienced higher rates of employment development than envisaged³. However, it is also acknowledged that "... there have been very low rates of house building in Chippenham in recent

¹ Formulating Alternative Development Strategies (ADSs) Wiltshire Council Chippenham Housing Market Area, p.27, Figure 3

² NPPF, para. 22

³ Formulating Alternative Development Strategies (ADSs) Wiltshire Council Chippenham Housing Market Area, paras. 82-83

years because (until recently) there has been little land available for development⁴. This has accounted for past under-delivery of housing at Chippenham, and consequential shortfall (-189%) in relation to what would be needed to roll the current strategy forward, compared with Melksham where the shortfall is much lower (-27%)⁵. The evidence therefore confirms the economic potential of the A350 corridor given the higher rates of employment growth than anticipated, but also indicates the critical relationship between housing and economic growth, and that shortfalls in housing delivery can act as a brake on economic development. The same constraints have been witnessed in neighbouring Swindon at times when housing growth has fallen substantially behind delivery trajectories and has acted as a brake on economic development.

Whilst acknowledging that the forecast housing need for the Chippenham HMA is by far the largest over the plan period and poses significant challenges, there is no evidence to suggest that the step change required cannot be achieved to support the Council's ambitions for economic growth. However, it will only be achieved if suitable and deliverable housing land is genuinely available. If the focus is on meeting the requirement through a limited number of large strategic sites, which derives support from the NPPF where the delivery of large numbers of new homes is necessary⁶, then the recent experience at Chippenham confirms the imperative to plan for the release of early, discrete phases which can be served from existing infrastructure to ensure that homes are provided when required. Moreover, to stand any prospect of the plan period requirement being met, early, continuous and consistent delivery throughout the plan period is essential.

Given that there are ceilings to the level at which both the development industry and the market can sustain annual housing growth, delivery must start, and reach its optimum level, as early as possible during the plan period. Given that nearly five years of the period have already elapsed, and having regard to the lead times for procuring medium to large sites which are confirmed through research studies⁷, it is imperative that the procurement of early phases is commenced without delay.

HLM therefore supports a strategy for the Chippenham HMA based on Chippenham B (CH-B), which the evidence confirms is the most sustainable and most likely to deliver the balanced growth required. No other strategy is consistent with achieving the Council's objectives for sustainable (economic and population) growth, or has the potential to deliver the plan period requirements. However, this is providing suitable land

⁴ Ibid, para. 71

⁵ Ibid, p.27, Figure 3

⁶ NPPF, para. 72

⁷ Start to Finish (Second Edition), Lichfields

is available immediately, necessitating early release of discrete sites associated with the two principal urban extensions that are canvassed in the options for the HMA.

WILTSHIRE LOCAL PLAN REVIEW CONSULTATION

2 Planning for Chippenham

For reasons set out in response to the 'Emerging Spatial Strategy', HLM supports the broad spatial strategy for the Chippenham HMA, which is considered to provide the potential for sustainable growth subject to attention to the necessary pre-conditions for delivery. The focus of HLM's response to the Planning for Chippenham consultation document is on the potential development sites that are canvassed for consideration.

HLM supports the inclusion of Site 3 (east of the B4578). This is a highly flexible option that can be developed either on a solus basis as a logical conclusion to the existing South West Chippenham urban extension, or as part of a wider South Chippenham allocation offering potential for an early phase of development.

Land east of Showell Farm was promoted through the Chippenham Site Allocations Plan, but was assessed in conjunction with rising land to the south, and rejected at that stage largely on the basis of the impact of development on that more elevated land. It is a natural extension of the existing South West Chippenham allocation to the roundabout at the junction of the A350 with the B4578, and will provide a logical and defensible south western limit to the urban area.

As is evident from the Site Selection Report, in Stage 4 of the Site Selection Process, Site 3 is one of the strongest performing of all of the site options that are considered. It is the only site that is assessed to have strengths in relation to PSP3-6 inclusively, and is neutral on the other two. Whilst it is assessed as 'neutral' in relation to PSP1 since the amount of employment land that it could contribute is limited, given the proximity of existing employment land in the immediate vicinity to the west of the B4578, which remains available for development, there is no requirement for additional employment land in this location, and its relationship with existing such land should be construed as a strength. Whilst it emerges from Stage 4 in joint first place, it should properly hold first place on its own.

It is therefore clear from the evidence base, and the Site Selection Report in particular, that Site 3 should be included on its own merits, and irrespective of any wider and/or alternative allocations at South or East Chippenham, or anywhere else. It is a clear and logical completion of the existing South West Chippenham allocation, and will provide an appropriate new south-western gateway to the town from the A350. The site can be accessed directly from the B4578, and can therefore be developed independently without any wider development or as an early phase of a wider South Chippenham allocation. It could also be served from the proposed Southern Link Road if this goes ahead. For reasons set out in earlier representations relating to the 'Emerging Spatial Strategy', early phases of development are critical to achieving the step-change in housing delivery that is required.

Site 3: Concept Plan

Whilst HLM support the allocation of Site 3, they comment specifically on the preliminary concept plan in relation to the following matters:

- Heritage *cordon sanitaire*
- Possible Renewable Energy Site
- Flood Risks

Heritage

The evidence base does not include a detailed heritage assessment, and the *cordon sanitaire* indicated on the Concept Map for Site 3 is therefore not informed by any detailed assessment.

HLM have commissioned their own assessment of the significance of the heritage assets, and the contribution of Site 3 to that significance, which is included at Annex 1 to these representations. The findings of the assessment of significance are that there is no historic association between the subject land to the east of the B4578 and the heritage assets to the west. The evidence indicates an historical association between the Showell Farm buildings with land to the north and west, and that it comprised part of the Talbot estate of Lacock. Based on the 1764 Parish Map, all of the land forming part of Showell Farm was located to the west of (what is now) the B4578, whereas the subject land to the east was in separate

ownership. Therefore the associative historic link is between Showell Farm and the settlement of Lacock, and not the subject land.

The finding of the assessment is therefore that a buffer zone of circa 340 metres is excessive, includes land beyond the farm's ownership at the Tithe Survey, and the eastern limit of which appears to coincide with the footpath from Lacock to Chippenham shown on the 1764 Parish Map, rather than being defined with reference to the agricultural holdings of the farm. Whilst the footpath may be an historic feature, its relationship to the heritage assets and their significance is tenuous. There is little justification in terms of the historical understanding of the buildings and their function for it to define the eastern extent of the buffer zone. Given the evidence of the two historic hedgerows between the footpath and the farm buildings to the west, any putative historic views would have been extremely limited.

It is germane that the field parcels to the north and west of the heritage assets are allocated for employment development, with a buffer zone of 130 metres⁸. If a *cordon sanitaire* of that magnitude is sufficient on land which has a much closer and greater historical association with the heritage assets, then to require a zone of 340 metres on land with much weaker historical association, is disproportionate and unnecessary. It is therefore inconsistent with the Government's objective to promote an effective use of land in meeting the need for homes and other uses⁹.

Informed by the Statement of Significance, HLM have therefore proposed a revised *cordon sanitaire*, which is shown on the concept plan at Annex 2.

Furthermore, in order to demonstrate HLM's commitment to providing an appropriate setting and mitigation to ensure there is no adverse impact on the setting of the listed building, a programme of advanced planting is being undertaken to ensure that the mitigation is provided ahead of any development taking place. This will provide sufficient time for the planting to grow and mature well in advance of any development.

Renewable Energy

HLM objects to the inclusion of a renewable site within Site 3.

⁸ Planning for Chippenham Document, Figure 6 Concept Map for Sites 2 and 3 ... (Planning Permission ref: 20/002511/REM)

⁹ NPPF, para 117

The Government's future strategy to reduce carbon emissions from residential development is focused on 'on plot' measures to increase the energy efficiency requirements of new homes, use of heat pumps for domestic heating as an alternative to gas heating, combined with a de-carbonisation of the grid electricity through the delivery of wind farms. These will be implemented through changes to Part L of the Building Regulations and the Future Homes Standard.

Whilst heat networks can be considered where there is a waste heat source to utilise, or low grade heating such as community ground source heat pumps, these are not suitable for all circumstances, and require to be located centrally within a development. Site 3 does not meet the essential preconditions for the location of a centralised energy strategy given its peripheral location to the overall development.

Site 3 is not a suitable location for a renewable energy site. It would sterilise land for a purpose that is unlikely to be implemented, and in consequence would be an inefficient use of land contrary to the requirements of the NPPF.

Given the Government's future strategy for de-carbonisation, together with the inappropriateness of the location, land should not be safeguarded within Site 3 for a renewable energy facility.

Flood Risks

In the Stage 2 assessment of Site 3¹⁰ reference is made to the site having a medium flood risk due to the proximity of the River Avon and the historical flooding that has taken place on the eastern side of the site, and also that there is a risk of surface water flooding and groundwater flooding.

HLM have commissioned a preliminary assessment of the flood risks, which is included at Annex 3 to these representations. The assessment confirms:

- The majority of the site lies within Flood Zone 1 in terms of fluvial flooding.
- The risk of surface water flooding across the majority of the site is low to medium, and will be low following the implementation of further mitigation measures.
- The North Wiltshire Strategic Flood Risk Assessment does not identify any risk of groundwater flooding.

¹⁰ Wiltshire Council Local Plan, Site Selection Report for Chippenham, p.18

- The proposed drainage strategy incorporating SuDS, with associated on-site attenuation, will ensure no increase in surface water discharge rates from the site and result in betterment in terms of water quality.

The overall findings of the flood appraisal are therefore that, other than on that part of Site 3 that is affected by fluvial flooding and identified as an extension of the Riverside Country Park, there are no constraints on grounds of flood risk on developing the remainder, and majority, of the site.

Conclusions

HLM therefore broadly supports the inclusion of Site 3 as a preferred option for allocation, but objects to the conceptual proposals as currently shown on Figure 6 (Concept Map for Site 2 and 3 ...). The *cordon sanitaire* currently shown to the east of the Showell Farm buildings is excessive and disproportionate, and not justified by any evidence. The Statement of Significance included at Annex 1 to these representations confirms that the extent of the buffer is not justified in heritage terms, and that the alternative proposals shown on the Concept Plan at Annex 2 to these representations will provide a proportionate and effective balance between the objectives to protect heritage assets and make effective use of land in meeting the need for homes and other uses. There are no contributory reasons on grounds of flood risks for *the cordon sanitaire* that is identified.

HLM also objects to the potential renewable energy site shown on the Figure 6 which is neither consistent with the Government's current strategy for reducing carbon emissions which focus on 'on-plot' measures combined with de-carbonising the grid, nor would it be appropriately located within the overall development for delivering a district heating network.

HLM's revised concept plan at Annex 2 has been prepared taking into account all known constraints, including those foreshadowed in the consultation documents and considered in the foregoing representations. It demonstrates how Site 3 can accommodate approximately 450 dwellings at a similar density to the South West Chippenham urban extension to the north, whilst protecting the setting of the heritage assets and incorporating existing watercourses into the green infrastructure provisions.

The revised concept plan demonstrates how the site can be accessed from the existing highway network (B4578), and can therefore be delivered at an early stage during the plan period, thus making a significant and essential contribution to housing land supply. It also demonstrates that the proposed development



could accommodate the Southern link road on an appropriate alignment to connect with the existing roundabout on the A350, contain the southern limit of development, and maintain land use efficiencies.

HLM therefore commends the conceptual proposals set out on the plan at Annex 2 to these representations as a more appropriate and efficient basis for the development of Site 3.

List of Annexes

- 1 Statement of Significance
- 2 Concept Plan
- 3 Flood Risk and Drainage Appraisal



Annex 1

Statement of Significance

Land East of Showell Farm, Chippenham, Wiltshire
Statement of Significance
March 2021

**Land East of Showell Farm, Chippenham, Wiltshire
Statement of Significance
March 2021**

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Report**Statement of Significance****Site**

Land east of Showell Farm, Chippenham, Wiltshire

Client

Hallam Land Management

Planning Authority

Wiltshire County

Grid Reference

ST 91233 70862

Prepared By

██████████ BA (Hons) MA (Cantab) MSc IHBC

Reviewed By

██████████ BA MA MCIfA

Report Status

FINAL

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March 2021

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Executive Summary

This Statement of Significance considers Showell Farm, Chippenham, Wiltshire (hereinafter referred to as the “Subject Buildings”). In accordance with government policy (*National Planning Policy Framework 2019*) and guidance (Historic England’s *Conservation Principles, Policies and Guidance 2008*), this assessment outlines the historical development of the Subject Buildings, analyses their physical attributes and assesses the heritage significance of them in accordance with the listing criteria set out in *Principles of Selection for Listed Buildings* (DCMS, 2018). The latter document sets out the general principles that the Secretary of State applies when deciding whether a building is of special architectural or historic interest and should be added to the list of buildings compiled under the *Planning (Listed Buildings and Conservation Areas) Act 1990*.

The document also considers the contribution made by the asset’s setting to its significance in accordance with Historic England’s GPA3: Setting of Historic Assets, in order to understand the historic land ownership in greater detail and its importance to the Subject Building in terms of its significance.

The overall conclusion of this assessment is that the land to the east of the Chippenham/Lacock Road is documented as only having formed part of the Showell Farm holdings from the nineteenth century onward and consequently has less functional association with the farmstead than the lands to the west of the farmhouse. Whilst the Chippenham/Lacock footpath is a historical feature within the landscape, its function in relation to the setting and significance of the assets is of a considerably lesser order than the historically associated farmland, and its employment as the setting boundary for the asset is considered to be arbitrary, rather than as a true reflection of the asset’s historical significance.

1.0 Introduction

- 1.1 This Statement of Significance considers Showell Farm, Chippenham (hereinafter referred to as the “Subject Buildings” or “Buildings Group”) which is located at grid reference ST 91233 70862.
- 1.2 In accordance with relevant Historic England guidance and advice notes, including *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* document (2008) and *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Advice Note 12, 2019), this assessment:
- outlines the historic development of the Subject Buildings and provides an assessment of the heritage values that contribute to their significance;
 - includes the results of a site survey undertaken on 24th February 2021, including external inspection of the buildings;
 - includes an examination of published and unpublished records, charts historic land-use through a map regression exercise and identifies key changes, including additions to the subject buildings, that have occurred over time. As part of the latter, historic planning records have been reviewed to determine more recent changes in particular.
- 1.3 The key objectives of this analysis are to:
- identify heritage values associated with the Subject Buildings and/or parts of them;
 - assess significance to establish the level of significance associated with the Subject Buildings; and
 - determine the contribution made to the significance of the building by the land parcels contained within the land to the east in the client’s ownership.
 - Investigate the validity of the buffer area in the Council’s proposed allocation.
- 1.4 The assessment enables relevant parties to assess the level of significance of the Subject Buildings and to determine which parts are of no heritage value.

Location and description

- 1.5 The Subject Buildings are located to the west of the B4528, c. 4.5km south of Chippenham (Figure 1). A summary of the key elements is provided below with a more detailed physical description and fabric analysis in section 4.
- 1.6 The building group comprises three Grade II listed buildings: Showell Farmhouse (NHL 1022145, Barn to the south east of Showell Farmhouse (NHL 1198151) and Granary to the south of Showell Farmhouse (NHL 1363926). The main body of the Farmhouse dates from c. 1820, with a late seventeenth century wing, and the barn and granary date from the eighteenth century.

2.0 Planning background including policy and guidance

Planning (Listed Building and Conservation Areas) Act 1990

2.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out broad policies and obligations relevant to the listing of special buildings.

2.2 Section 1(1) of the Act states:

For the purposes of this Act and with a view to the guidance of local planning authorities in the performance of their functions under this Act and the principal Act in relation to buildings of special architectural or historic interest, the Secretary of State shall compile lists of such buildings, or approve, with or without modifications, such lists compiled by the Historic Buildings and Monuments Commission for England (in this Act referred to as ‘the Commission’) or by other persons or bodies of persons, and may amend any list so compiled or approved.

2.3 Section 1(3) of the Act states:

In considering whether to include a building in a list compiled or approved under this section, the Secretary of State may take into account not only the building itself but also

- a) any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and*
- b) the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.*

2.4 The *Planning (Listed Building and Conservation Areas) Act 1990* also sets out broad policies and obligations relevant to the protection of Listed Buildings and their settings.

2.5 Section 66(1) states:

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

2.6 Government policy in relation to the historic environment is outlined in Section 16 of the *National Planning Policy Framework (NPPF)*, entitled *Conserving and Enhancing the Historic Environment*. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;

- understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
 - conservation of England's heritage assets in a manner appropriate to their significance; and
 - recognition of the contribution that heritage assets make to our knowledge and understanding of the past.
- 2.7** Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.
- 2.8** Paragraph 187 requires local planning authorities to maintain or have access to a historic environment record, which can be used to assess significance of heritage assets and the contribution they make to their environment. Paragraph 188 also requires that authorities make information about the historic environment gathered as part of plan-making or development management publicly accessible.
- 2.9** *Heritage Assets* are defined in Annex 2 as: a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
- 2.10** *Designated Heritage Assets* comprise: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.
- 2.11** *Significance* is defined as: the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2.12** *Setting* is defined as: the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 2.13** The NPPF is supported by the *National Planning Policy Guidance* (NPPG). In relation to the historic environment, paragraph 18a-001 states that:
- Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the 'Core Planning Principles'.*
- 2.14** Paragraph 18a-002 makes a clear statement that any decisions relating to Listed Buildings and their settings and Conservation Areas must address the statutory considerations of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.
- 2.15** Paragraph 18a-013 outlines that the assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered, and the degree to

which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.

2.16 The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

2.17 Paragraph 18a-013 concludes:

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

Principles of Selection for Listed Buildings (DCMS 2018)

- 2.18** The *Principles of Selection for Listed Buildings* (DCMS, 2018) sets out the general principles that the Secretary of State applies when deciding whether a building is of special architectural or historic interest and should be added to the list of buildings compiled under the *Planning (Listed Buildings and Conservation Areas) Act 1990*.
- 2.19** The statutory criteria for listing are the special architectural or historic interest of a building. Many buildings are interesting architecturally or historically but, in order to be listed, a building must have 'special' interest.
- 2.20** Buildings on the list are graded to reflect their relative architectural and historic interest. Buildings of historic interest may justify a higher grading than would otherwise be appropriate.
- Grade I buildings are of exceptional interest;
 - Grade II* buildings are particularly important buildings of more than special interest;
 - Grade II buildings are of special interest, warranting every effort to preserve them.

Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England 2008)

- 2.21** The *Conservation Principles Policies and Guidance* (English Heritage, 2008) defines the significance of a place as:

'The sum of the cultural and natural heritage values of a place, often set out in a statement of significance'.

It goes on to state that:

A 'statement of significance' of a place should be a summary of the cultural and natural heritage values currently attached to it and how they inter-relate, which distils the particular character of the place. It should explain the relative importance of the heritage values of the place (where appropriate, by reference to criteria for statutory designation), how they relate to its physical fabric, the extent of any uncertainty about its values (particularly in relation to potential for hidden or buried elements) and identify any tensions between potentially conflicting values.

and that:

To identify the cultural and natural heritage values of a place, its history, fabric and character must first be understood. This should include its origins, how and why it has changed over time (and will continue to change if undisturbed), the form and condition of its constituent elements and materials, the technology of its construction, any habitats it provides, and comparison with similar places. Its history of ownership may be relevant, not only to its heritage values, but also to its current state.

2.22 The guidance states that to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:

- who values the place, and why they do so;
- how those values relate to its fabric;
- their relative importance;
- whether associated objects contribute to them;
- the contribution made by the setting and context of the place; and
- how the place compares with others sharing similar values.

Understanding and articulating the values and significance of a place is necessary to inform decisions about its future. The degree of significance determines what, if any, protection, including statutory designation, is appropriate under law and policy.

2.23 Paragraphs 35-60 within the ‘Understanding the Values’ section describes a range of heritage values, arranged in four groups, which may be attached to places. These are:

- Evidential value: the potential of a place to yield evidence about past human activity.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Historic Environment Good Practice Advice In Planning Notes

Historic Environment Good Practice Advice In Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)

2.24 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and NPPG. It outlines a six-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

- 2.25 Historic England's Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.
- 2.26 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.
- 2.27 The Good Practice Advice Note sets out a five-stage process for assessing the implications of proposed developments on setting:
 1. Identification of heritage assets which are likely to be affected by proposals;
 2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
 3. Assessing the effects of proposed development on the significance of a heritage asset;
 4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
 5. Making and documenting the decision and monitoring outcomes

3.0 Historical development

Introduction

- 3.1 The following section presents a historical development of the Subject Buildings through the results of a map regression exercise and review of relevant background documentation, including historic plans and relevant planning decisions.

Historical Background

Lacock and Lackham : summary

- 3.2 At the time of the Domesday Book, 1086, the settlements at Lacock and Lackham were roughly similar in size although Lacock possibly had a small church. Estimating population from the Domesday returns is difficult but modern interpretation of the record would suggest a population for Lacock of between 160 and 190 and for Lackham between 170 and 200. Lacock had 2 mills and 1/2 an acre of vineyard while Lackham also had 2 mills.
- 3.3 The manor of Lacock came into the possession of the Norman, Edward of Salisbury, and by the early 13th century it had descended to Ela, Countess of Salisbury. She began legal measures to set up an abbey here in 1229 but the accepted date of the foundation is 1232.
- 3.4 Outside the abbey was the medieval village and manor. The village had developed to the west of the late 11th century church of St. Cyriac with the market-place lying

immediately west of the churchyard. A grid pattern of streets was created with Church Street and High Street running parallel to one another, east to west, joined by East Street and West Street parallel to one another north to south. This grid pattern gives Lacock the appearance of a small medieval town and it was often referred to as the town of Lacock.

- 3.5 After the dissolution, the abbey buildings were stripped of most of their lead (it was sold for £193 and 12 shillings) and handed over to William Sharington, who completed the purchase of the abbey lands on 26th July 1540. He demolished the abbey chapel but retained most of the other buildings of the nunnery and made some good additions which showed both Italian and French influence.
- 3.6 The abbey passed to the Talbot family by marriage but the most substantial change came in 1618 when the royal forest was sold, allowing private development to the east of the river. There had been limited development on the lower slopes - Bewley Court was a 15th century hall house - but now trees could be felled for timber and more dwellings built. By now there were tanning pits near the packhorse bridge and in the 17th century the bridge near the abbey was built bringing the London to Bath road off Bowden Hill and into the High Street, instead of off Naish Hill and over Reybridge. During the Civil War Lacock was occupied by both Royalists and Parliamentarians and although the Royalist Talbots were fined, they managed to keep their land. After the restoration Charles II visited the Abbey as, at a later date, did Queen Anne.
- 3.7 By the mid-18th century the nun's tithe barn was being used as a market hall for perishable goods alongside the outdoor market in the High Street. A pest house for victims of infectious diseases, such as smallpox, on Bowden Hill continued to be used through the 18th century. At this time Lacock was a thriving small town with industries of spinning, weaving, chair-making, tanning and hurdle-making, set in a prosperous farming community. This situation was to change from 1783 when a new road to Bath (the present A4) was created and the old route that passed through Lacock fell into disrepair.
- 3.8 The 19th century saw the extinction of the cloth industry as factories were built in the nearby towns and Lacock became fossilised architecturally with virtually no new buildings after the 18th century.
- 3.9 The markets did survive well into the 19th century. In 1833 a larger workhouse was built, near the tan yard, a gaunt factory-like building that still survives. This accommodated an increasing number of local people as work declined and in 1841 the large total of 136 Lacock men from the workhouse were working in railway gangs on the G.W.R. line being built in the west of the parish.
- 3.10 Under the aegis of William Henry Fox Talbot, the later nineteenth century saw much improvement of the estate, both in the village and the surrounding farms.

Showell Farm : summary

- 3.11 Reference to Showell Farm with Milbourne is given in the 1755 Book of maps of farms and lands in Lacock (Ref: 2664/1/2D/21) as being within the estate of the Talbot Family of Lacock. The Talbot family had ownership of Lacock Abbey and the village of Lacock from the early seventeenth century onwards.

- 3.12 A map of the estates of Thomas Kington called Showells and Notton, Lacock also dates from 1775 and is referenced in the NHLE listing for the Barn at Showells Farm. This would seem to indicate that the farmstead passed out of Talbot ownership during this year.
- 3.13 In the 1764 Parish Map (Figure 1), Showell Farm is labelled as Shouhill Farm, and is surrounded by field parcels bearing the same name, all located to the west of the Lacock to Chippenham Road, no ownership name is given for the Shouhill land parcels.
- 3.14 To the east of the Lacock/Chippenham Road, the field parcels in the 1764 map are recorded as being in the ownership of Mr Anthony Kingston, and a footway is recorded running north/south through the field parcels, parallel with the road, noted as the footway from Lacock to Chippenham.
- 3.15 By the 1840 Lacock Tithe map (Figure 3), Showell Farm is recorded in the ownership of Thomas Rumming, who also now owns a number of the field parcels to the east of the Lacock/Chippenham Road. The apportionment records the following ownership and field names:
- 633 Great Marsh owned by Henry Burrard occ John and Joseph Freeth (sic)
 - 634 Withy Bed owned and occupied by Thomas Rumming
 - 636 Little Marsh owned by Henry Burrard occ John and Joseph Freeth (sic)
 - 637 Lowe Paddock and Shilling owned and occupied by Thomas Rumming
 - 638 Lower Five Acres owned and occupied by Thomas Rumming
 - 639 Upper Five Acres owned and occupied by Thomas Rumming
 - 641 Popes Hill owned and occupied by Thomas Rumming
 - 642 The Ten Acres owned and occupied by Thomas Rumming
 - 643 Great Marsh owned and occupied by Thomas Rumming
 - 644 Pick and Cat Hide owned by Frederick William Rooke and occupied by Richard Sergeant
 - 645 Lots in Normead three owned by Frederick William Rooke and occupied by Richard Sergeant
 - 646 Six lots in Normead, owned by William Henry Talbot and occupied by David Clark
 - 647 Lots in Normead owned by Sophia Rumming and occupied by Thomas Rumming
 - 648 Four lots in Normead, owned by John Neale and occupied by Edward Ponting
 - 650 Seven lots in Normead owned by Henry Burrard occ John and Joseph Freeth (sic)
- 3.16 The Tithe map shows the presence of Showell Cottages to the north of the farmstead, although these are not labelled as such until the first edition Ordnance Survey mapping of 1885 (Figure 4). The first edition survey shows roughly the same configuration of buildings to the farmstead as the Tithe map, but the extension of the range to the south-west is noted as well as a reduction in footprint of the building to the south east of the farmhouse.
- 3.17 The 1899 edition of the Ordnance Survey mapping (Figure 5) shows further expansion of the farmstead with a new barn range located to the south-east, oriented north-south, and a further ancillary building located to the north-east of the farmhouse adjacent to the Lacock/Chippenham Road.

x

- 3.18 The 1922-25 edition of the Ordnance Survey mapping (Figure 6) shows the construction of a further cottage to the north of the farmstead as well as an increase in footprint of the two ancillary buildings furthest north of the farmhouse.
- 3.19 The mapping from 1956-60 (Figure 7) shows the beginnings of the Showell Nursery buildings to the north-east of the farm, as well as the loss of one of the northern barn ranges.
- 3.20 The position remains the same until the mapping of 1982 (Figure 8) which shows the expansion of the Showell Nurseries, and the redevelopment of the northern most barn footprint into an inverted u shape, together with the loss of the L-shape building immediately to the north of the farmhouse.
- 3.21 Mapping from 1990 (Figure 9) shows the loss of the south-eastern most barn, first depicted in the 1899 mapping.
- 3.22 The building of two further ancillary buildings on the footprint of the L-shape building is evident from the mapping of 2001 (Figure 10), whilst the 2020 edition of the mapping (Figure 11) shows the removal of the building immediately to the north-east of the farmhouse, the footprint of which is recorded since the Tithe mapping, although there is a change to its extent in the 1982 edition of the Ordnance Survey, which may indicate its alteration/replacement at this time.

Showell Farm: Planning History

- 3.23 Below is a selection of the permissions relating to the listed buildings within the Subject Group (omitting those which were withdrawn).
- 3.24 Approval for conversion of the listed Barn at Showells Farm to residential accommodation in 1988 (N/88/00202/FUL and N/88/00201/LBC) and conversion of garage into ancillary residential accommodation (N/91/00792/LBC). No documentary information held by LPA online regarding the details of conversion.
- 3.25 Approval for conversion of barn to business use internal and external alterations in 2005 (N/05/00067/LBC and N/05/00067/FUL)
- 3.26 Approval for external and internal alterations to the House and Workshop/Hayloft at The Dove House, Showell Farm and construction of Glazed Garden Room in 2006 (N/06/01422/LBC and N/06/04121/FUL)
- 3.27 Approval for conversion of barn into two residential units in 2015 (15/08340/LBC and 15/08293/FUL following approved applications for the same in 2011 and 2008.

4.0 Assessment of significance

Description

- 4.1 The significance assessment draws on the historical development included above (section 3), the review of information held on the NHLE for the designated buildings and has been informed by a physical survey covering the exterior of the Subject Buildings (section 4).
- 4.2 The listing descriptions for the three buildings are given as follows:

Showell Farmhouse

Farmhouse, c1820 with late C17 attached wing. Main range is red brick with ashlar dressings, slate low-pitched roof, coped gables and end stacks. Formal 2-storey, 3-window front with ashlar plinth, flush quoins, moulded cornice, parapet and flush window surrounds. Twenty-pane outer windows, 12-pane to first floor centre over ashlar doorcase, broad elliptical-arched surround with keystone framing full-width fanlight over 6-panel door and sidelights. Attached wing is 2-storey, rubble stone with slate roof. To left, cyma-moulded 2-light recessed mullion-and-transom window with hoodmould and 2-light window above, centre door in chamfered surround with rounded shoulders. To right is double-fronted stable section with two 2-light beaded mullion windows of C18 type and centre door to each floor. Dove openings to upper floor. Across forecourt is early C18 screen wall, originally with iron railings, now with ashlar block walls between piers to 2 gateways. Rusticated piers with gate stops, cornices and urn finials. Early C19 iron gates. Wing rear wall has chimney gable and 4-light mullion-and-transom window to right.

Barn to Southeast of Showell Farmhouse

Barn, C18, rubble stone with timber-framed side walls clad in corrugated iron. Bridgwater tile roof with coped gables. Projecting gabled east cart-entry with lean-to additions each side. Side walls on rubble stone plinth. South end blocked Tudor-arched opening. Three-bay, 2-purlin roof with tie-beam-and-collar trusses. A 1775 map of Showell and Nottton lands of T. Kington in W.R.O. shows barn.

Granary to south of Showell Farm House

Granary, late C18, weatherboarded timber frame with Bridgwater tile half-hipped roof, raised on 3 x 3 staddle stones.

- 4.3** The Subject Buildings' historical value derives from the age of the built fabric, its consequent relative scarcity of survival, the agricultural typologies of the buildings and their historic function, and the level of intactness of the built fabric. Historic associative value is also derived from the assets' ownership by the Talbots.
- 4.4** The buildings form a coherent group with their former historic purpose continuing to be legible through their configuration and typology, although change of ownership and use generates a degree of dilution of this aspect of the buildings' value.

Architectural Value

- 4.5** The architectural value of the buildings principally resides in their typologies and the vernacular forms of construction of the 17th and 18th century buildings. The 18th century screen wall evidences the gentrification of the farmstead through its architectural ornamentation, and this is reinforced by the classical character of the detailing to the early nineteenth-century element of the main farmhouse. The conversion of the ancillary buildings to residential function serves to erode the original hierarchy of the group through the domestication and change in character of the subservient structures. Conversion has also occasioned alteration to the historic floor plans of these buildings with consequent loss of a degree of historic and architectural value.

Contribution of Setting

- 4.6** The building group occupies a relatively isolated position within a rural and agricultural landscape which reinforces its historic function as a farmstead. The allocation of the land in its environs by the Local Planning Authority for the southward expansion of Chippenham has resulted in a large degree of change within the asset's setting generally. The Council have identified a green space buffer zone to the assets which, to the west, follows the historic plot boundary of the field parcel in which the buildings are located. This land, as evidenced in section 3 above (Figure 12) is identified with the farm group in the historic ownership of the Talbots, and thereby has an associative historic link to the settlement of Lacock, albeit that it lies to some degree distant. Field parcels to the north and west of the parcel to which the assets are located, which also formed part of the historic holding have been allocated as employment development, and this will generate a degree of erosion to the historic setting of the asset. The buffer to this aspect of encroachment on the setting is located c.130m from the building group.
- 4.7** To the east of the building group is a field parcel which incorporates six historic land parcels within its area, although the loss of any associated hedgerow boundaries mean that its historic configuration is no longer legible save by the combined outline hedgerow boundary. None of these field parcels were associated by ownership to Showell Farm until the nineteenth century, and whilst they therefore have a degree of association with the c. 1820 element of the farmhouse building, their relationship with the 17th and 18th century farmstead elements is much weaker.
- 4.8** The buffer drawn by the LPA to the assets in their allocation document is set at c. 340m to the east of the Showell Farm building group and incorporates a parcel of land outside of the farm's ownership at the Tithe survey, although the remainder of the parcels were in the ownership of Thomas Rummung at this time (Figure 13).

The boundary line for the buffer extent appears to be given as the line of the footway from Lacock to Chippenham, shown on the 1764 Parish Map, rather than as any reference to the agricultural holdings of the farm.

- 4.9 Whilst the footpath is a historic feature, its relationship to the assets and their significance is much more tenuous than the documented historic ownership ties, and there is therefore little justification to be had in adopting it in terms of historical understanding of the buildings and their function. The sole argument in relation to this buffer would be the putative historic view of the farmstead from the footpath, and given that there would likely have been two historic hedgerow boundaries intervening, such a view would have been severely limited.
- 4.10 If erosion of the assets' setting to the west is permissible to within a field parcels' width (given the mitigation of associated tree-screening) on land with a much longer historical association to the assets, it is considered that it is not unreasonable to employ a similar buffer level to the east of the building group, given the weaker historic association with the assets at Showell Farm.
- 4.11 The Concept Masterplan proposed by the Hallam Land Management show a buffer to the east of the assets that lies on the approximate eastern boundary line of the historic field parcels nearest to the asset to the east. Beyond the boundary planting is open green space, orchard planting and proposed allotment planting, all of which would assist in the retention of a verdant character to the east of the Showell Farm assets, although departing from the open field character at present. It is considered that the proposed new use is not unsympathetic to this historic context, given that the single open expanse of the present field parcel was not historic experience of the land in the vicinity of the Farmhouse and its buildings.

6.0 Summary and Conclusions

- 6.1 In accordance with government policy (*National Planning Policy Framework 2019*) and guidance (Historic England's *Conservation Principles, Policies and Guidance* 2008), this assessment outlines the historical development of the subject buildings, analyses their physical attributes and assesses the heritage significance of these together with an analysis of the setting of the asset and what it contributes by way of significance.
- 6.2 The overall conclusion of this assessment is that the land to the east of the Chippenham/Lacock Road is documented as only having formed part of the Showell Farm holdings from the nineteenth century onward and consequently has less functional association with the farmstead than the lands to the west of the farmhouse. Whilst the Chippenham/Lacock footpath is a historical feature within the landscape, its function in relation to the setting and significance of the assets is of a considerably lesser order than the historically associated farmland, and its employment as the setting boundary for the asset is considered to be arbitrary, rather than as a true reflection of the asset's historical significance.
- 6.3 The proposed layout and planting details indicate a mixture of boundary planting treatment, orchard planting, open green space and allotment allocation which all contribute to a rural landscape character, albeit arranged differently to the present appearance of the field parcels. It is, however to be borne in mind that the parcel as it is currently experienced has departed significantly from its historic appearance from the loss of plot boundaries and associated hedgerow and planting.

Sources

General

Wiltshire Historic Environment Record (WHER)
 Wiltshire & Swindon History Centre (WSHC)
 British Library (BL)
 National Archives (NA)

Cartographic

1764 Plan of Lacock Parish (WSHC 2664/1/2E/19L)
 1801 Ordnance Survey Drawing 61 Bradford Leigh (BL)
 1840 Lacock Tithe Map (NA)
 1885 OS 1:10,560 Scale Map
 1922-25 OS 1:10,560 Scale Map
 1956-60 OS 1:10,560 Scale Map
 1982 OS 1:10,000 Scale Map
 1990 OS 1:10,000 Scale Map
 2001 OS 1:10,000 Scale Map
 2020 OS 1:10,000 Scale Map

Websites

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 MAGIC - www.magic.gov.uk
 Pastscape - www.pastscape.org.uk
 British History Online – www.british-history.ac.uk
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 Wiltshire College and University Centre – www.wiltshire.ac.uk

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 English Heritage 2012 Comparison of PPS5 Policies with Historic Environment-Related Policies in the NPPF – Parts 1 & 2.
 Historic England 2015 Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment
 Historic England 2017 Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets
 Ministry of Housing, Communities & Local Government 2019 *National Planning Policy Framework*
 Ministry of Housing, Communities & Local Government 2019 *Planning Practice Guidance*

Illustrations

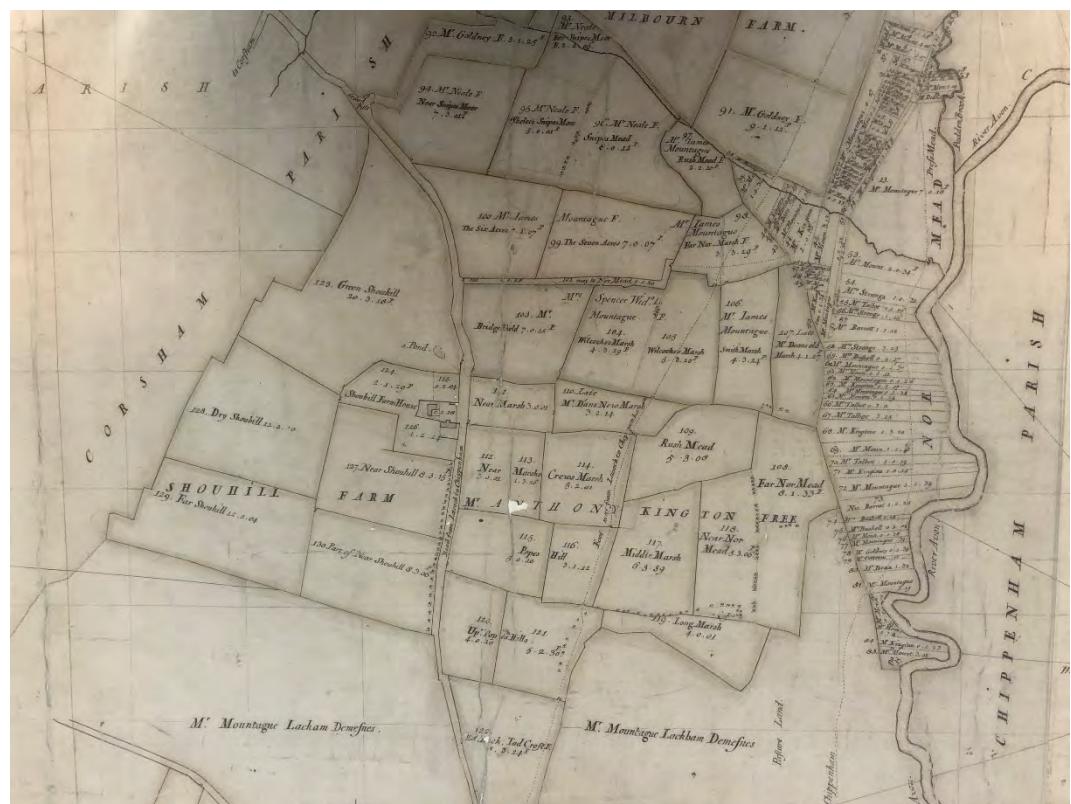


Figure 1 1764 Plan of Lacock Parish (WSHC 2664/1/2E/19L)



Figure 2 1801 Ordnance Survey Drawing 61 Bradford Leigh (BL)

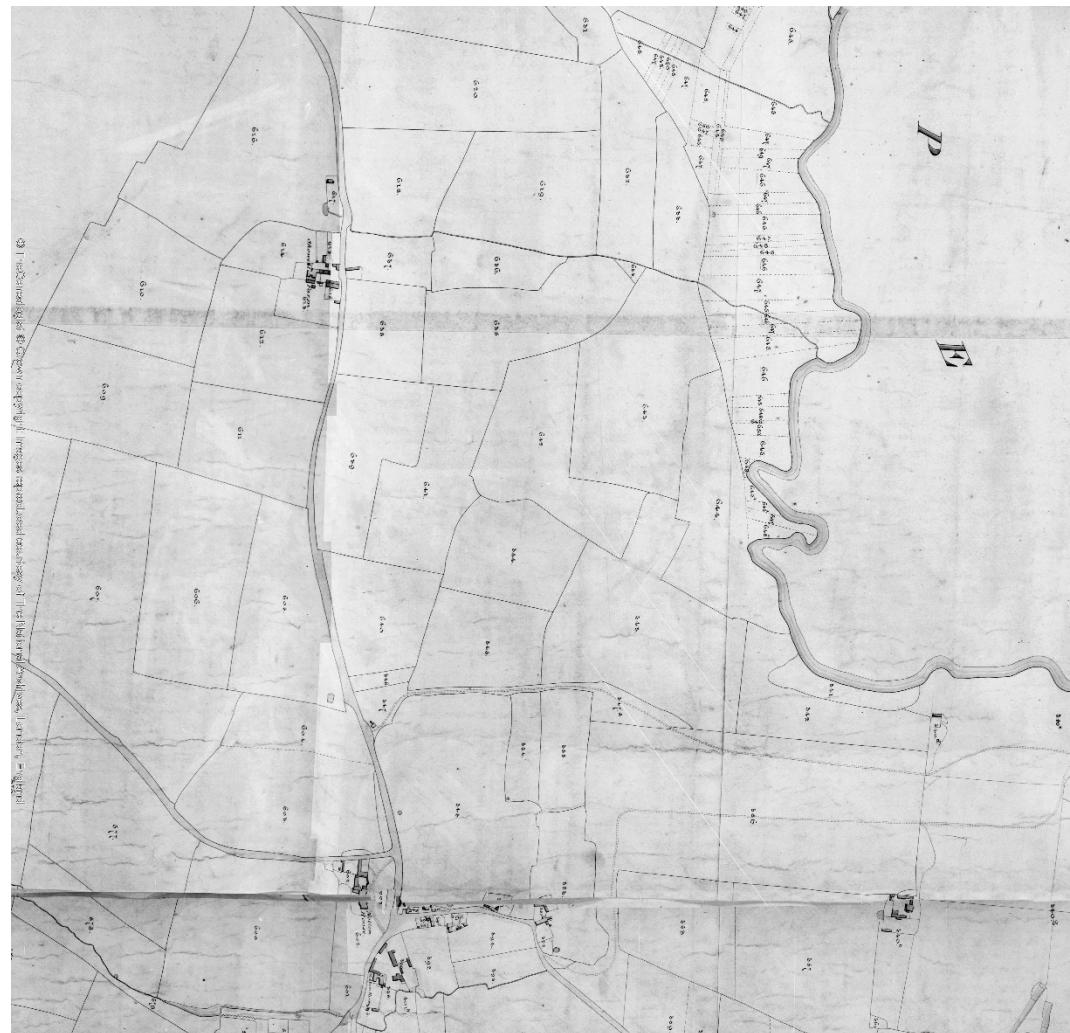


Figure 3 1840 Lacock Tithe Map (NA)

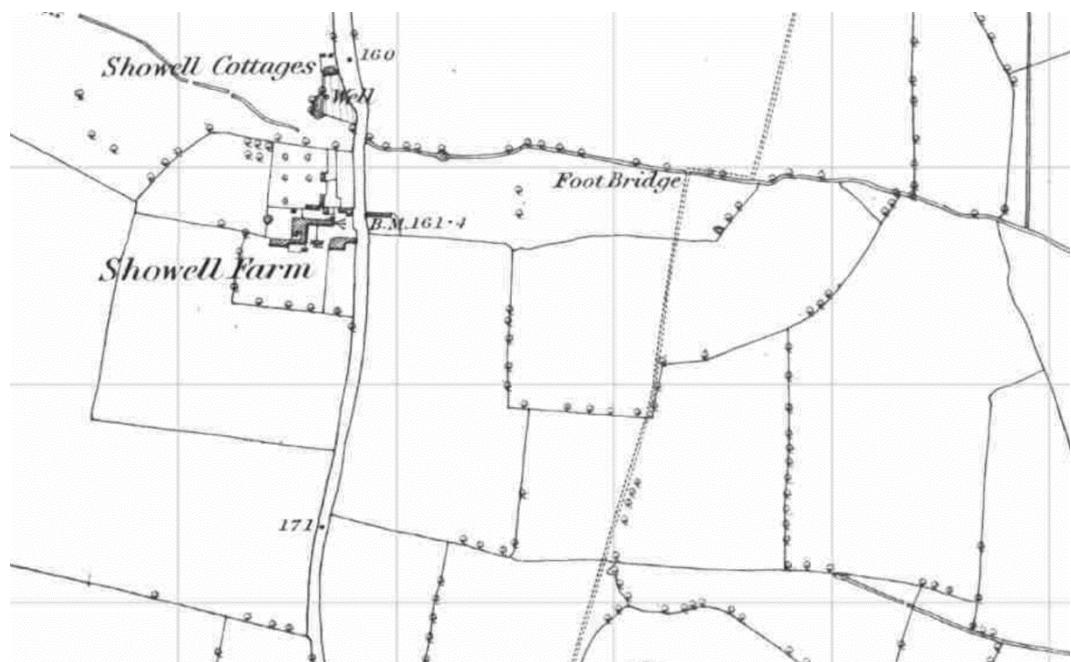


Figure 4 1885 OS 1:10,560 Scale Map (Extract)

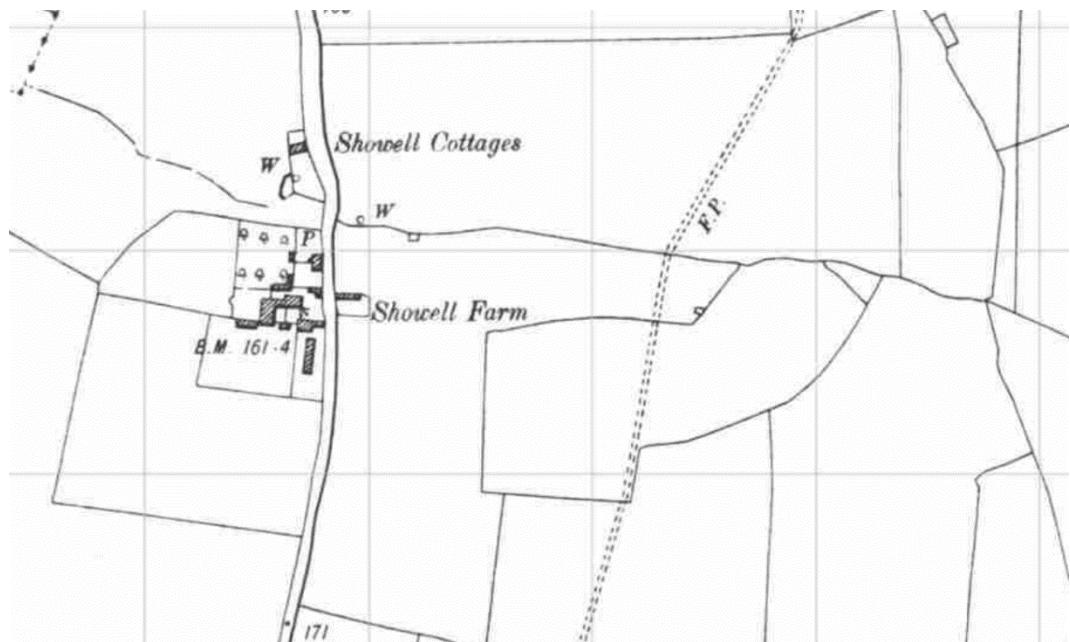


Figure 5 1899 OS 1:10,560 Scale Map (Extract)

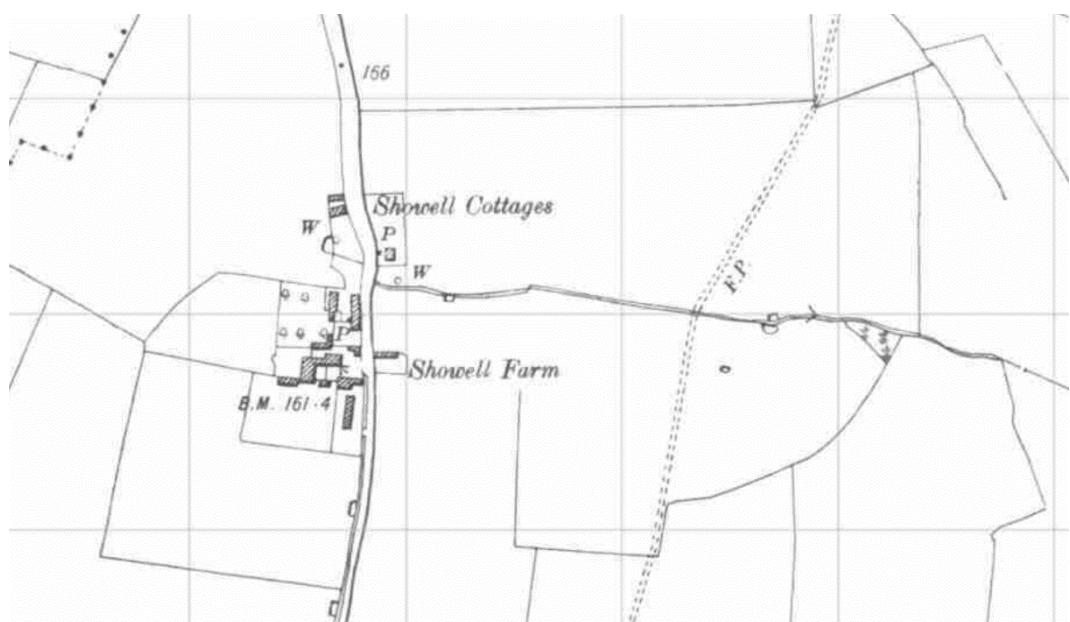


Figure 6 1922-25 OS 1:10,560 Scale Map (Extract)

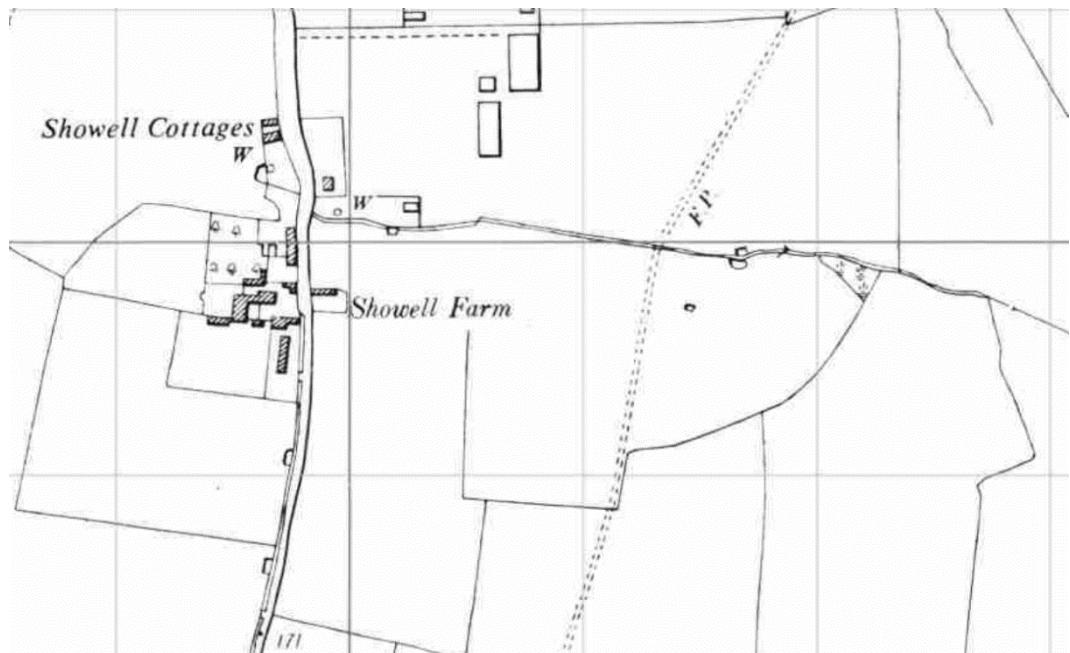


Figure 7 1956-60 OS 1:10,560 Scale Map (Extract)



Figure 8 1982 OS 1:10,000 Scale Map (Extract)

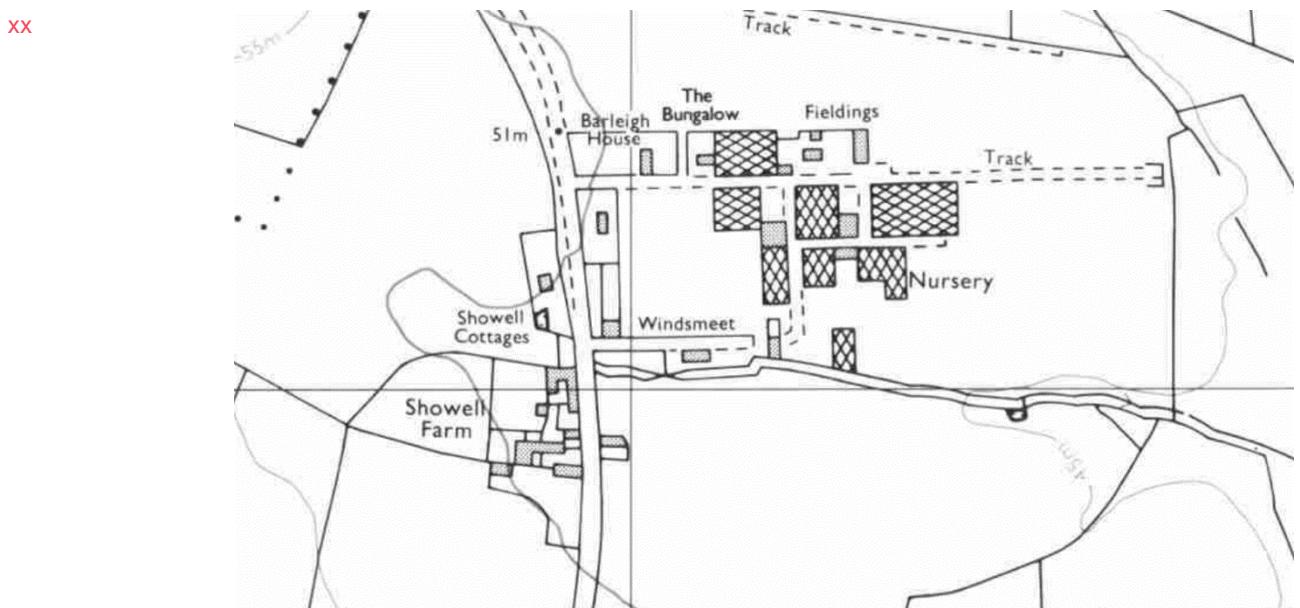


Figure 9 1990 OS 1:10,000 Scale Map (Extract)



Figure 10 2001 OS 1:10,000 Scale Map (Extract)

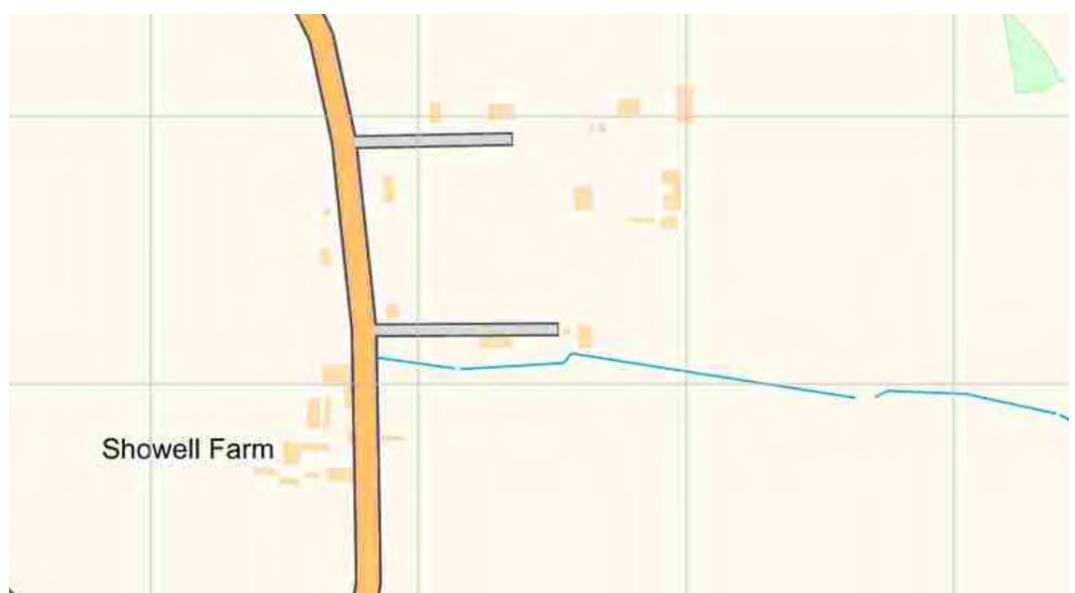


Figure 11 2020 OS 1:10,000 Scale Map (Extract)

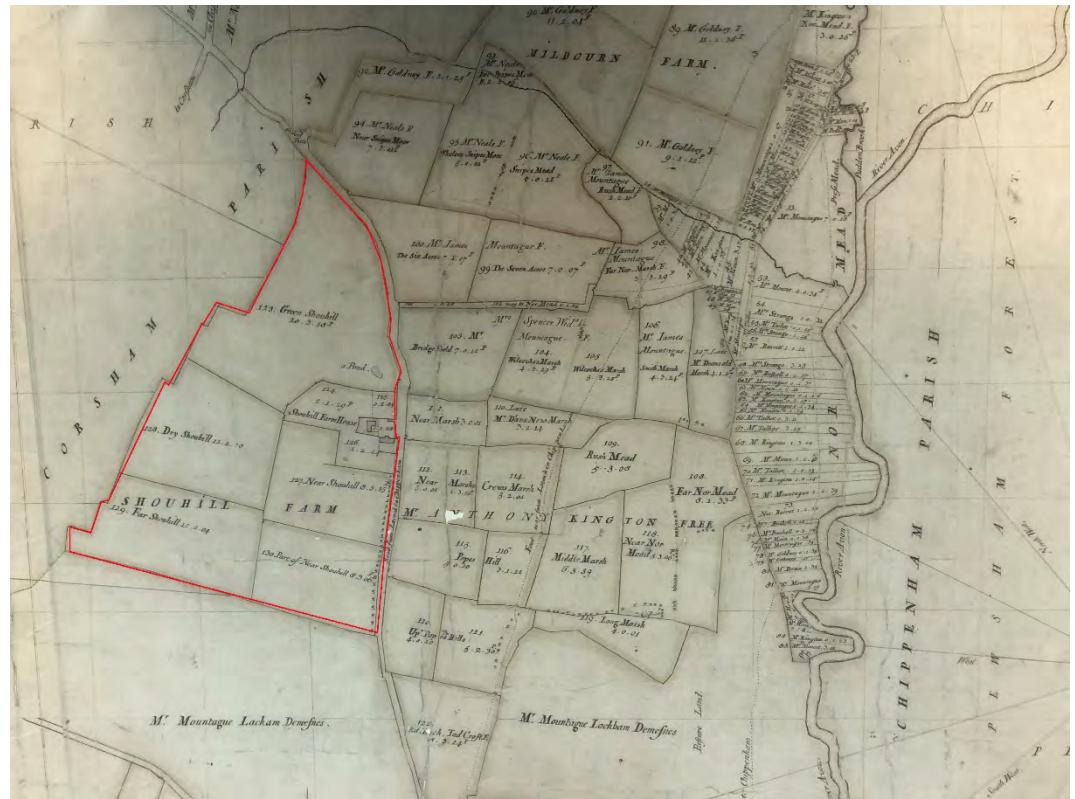


Figure 12 Shouhill Holdings shown on 1764 Parish Map

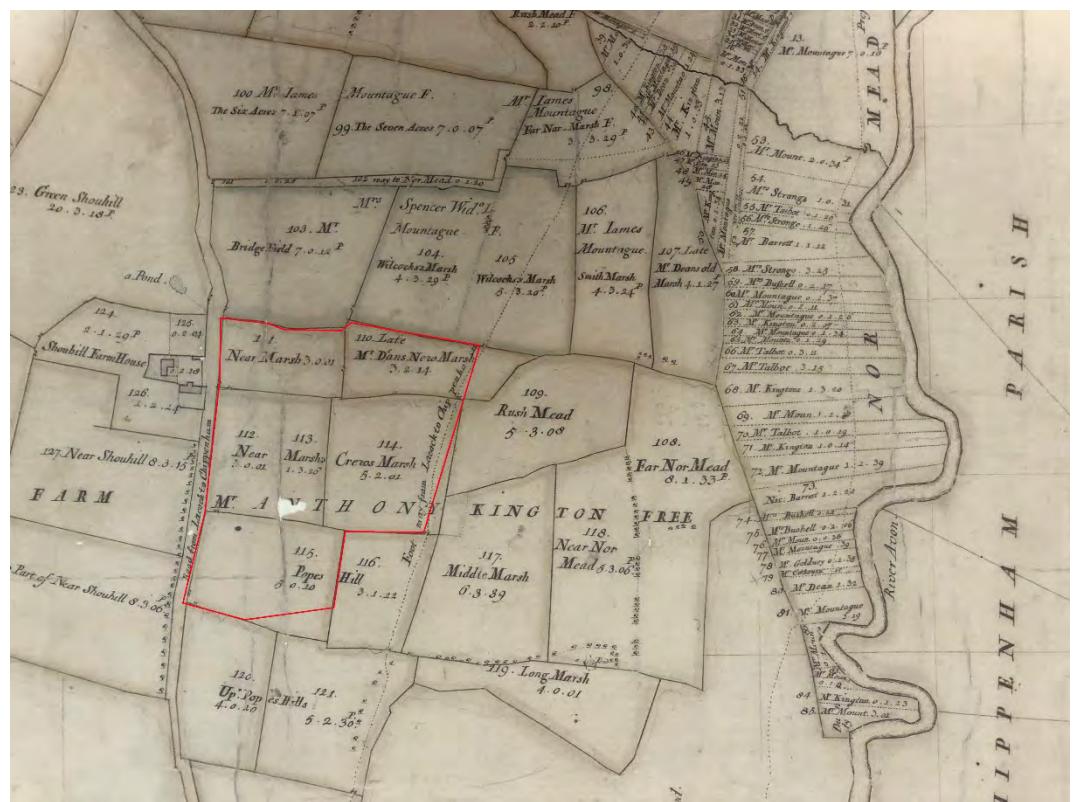
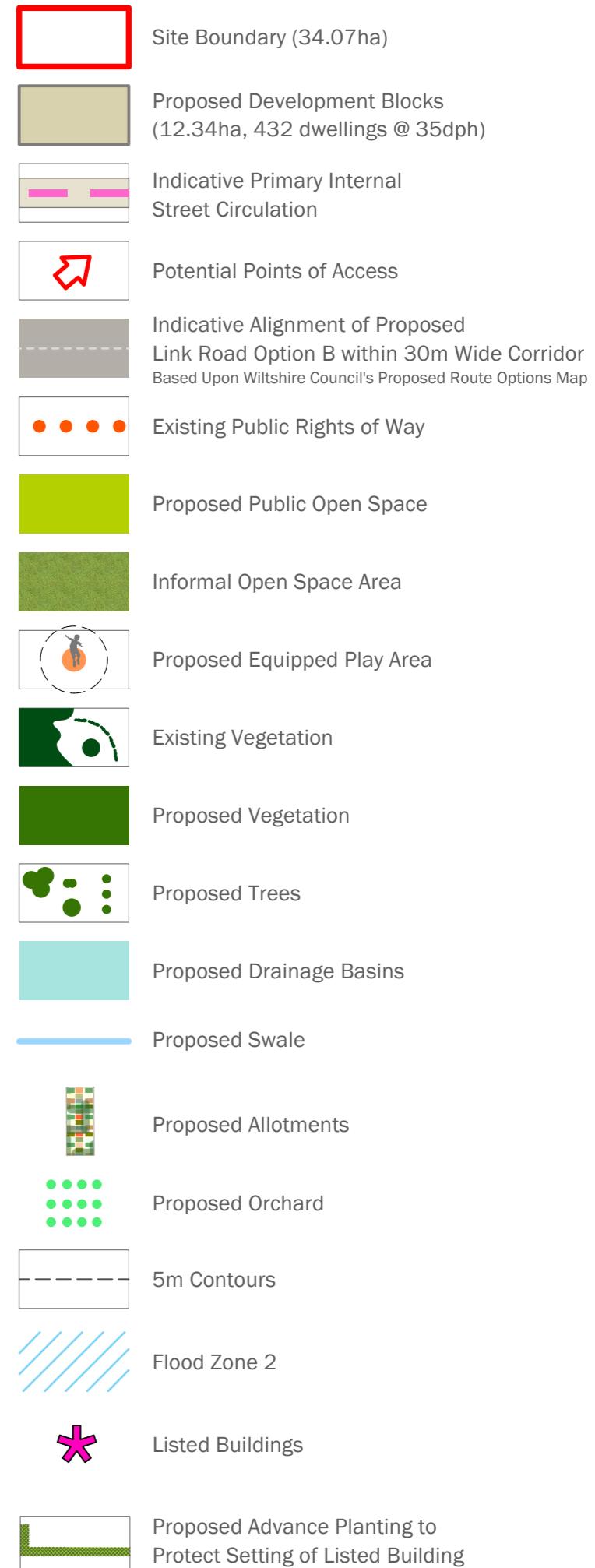


Figure 13 LPA Buffer shown on 1764 Parish Map



Annex 2

Concept Plan



client
Hallam Land Management

project title
Land East of Showell Farm, Chippenham

drawing title
Concept Masterplan

date **08 MARCH 2021**
drawing number **edp2272_d014b**
scale **1:2,500 @ A2**

drawn by **JGo**
checked **PW**
QA **XXX**



Annex 3

Flood Risk and Drainage Appraisal

10741 Land at Showell Farm, Chippenham

Technical Note 1: Preliminary Flood Risk and Drainage Review

9th March 2021

1 Introduction

- 1.1 Brookbanks is appointed by Hallam Land Management Ltd to undertake an initial review of a potential site in Chippenham, Wiltshire.
- 1.2 This note, in brief, includes findings of the study and specifically addresses the following issues in the context of the current legislative regime:
 - Flooding risk
 - Surface water drainage

Site Location

- 1.3 The site is located approximately 2.5km south of Chippenham. The Site is currently undeveloped agricultural land and is not thought to have been historically subject to any significant built development. The site location and boundary is shown indicatively on **Figure 1-1** below.

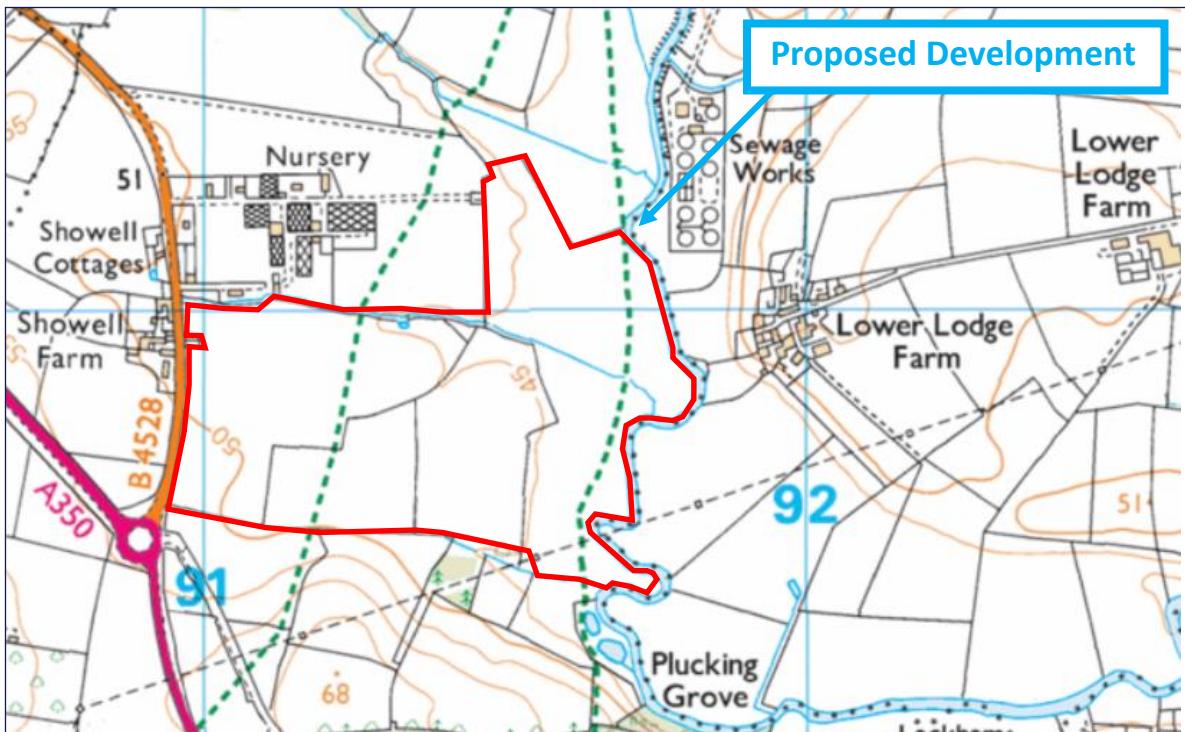


Figure 1-1: Site Location

2 Watercourse Systems & Drainage

- 2.1 With reference to the Flood Estimation Handbook (FEH) online, the site is shown to be a part of the drainage network belonging to the River Avon, which forms the eastern boundary of the site.
- 2.2 The majority of the site is shown to have a Low Productivity aquifer with only the south western corner lying within an area of a highly productive aquifer.
- 2.3 The FEH catchment is illustrated in **Figure 2-1** below:

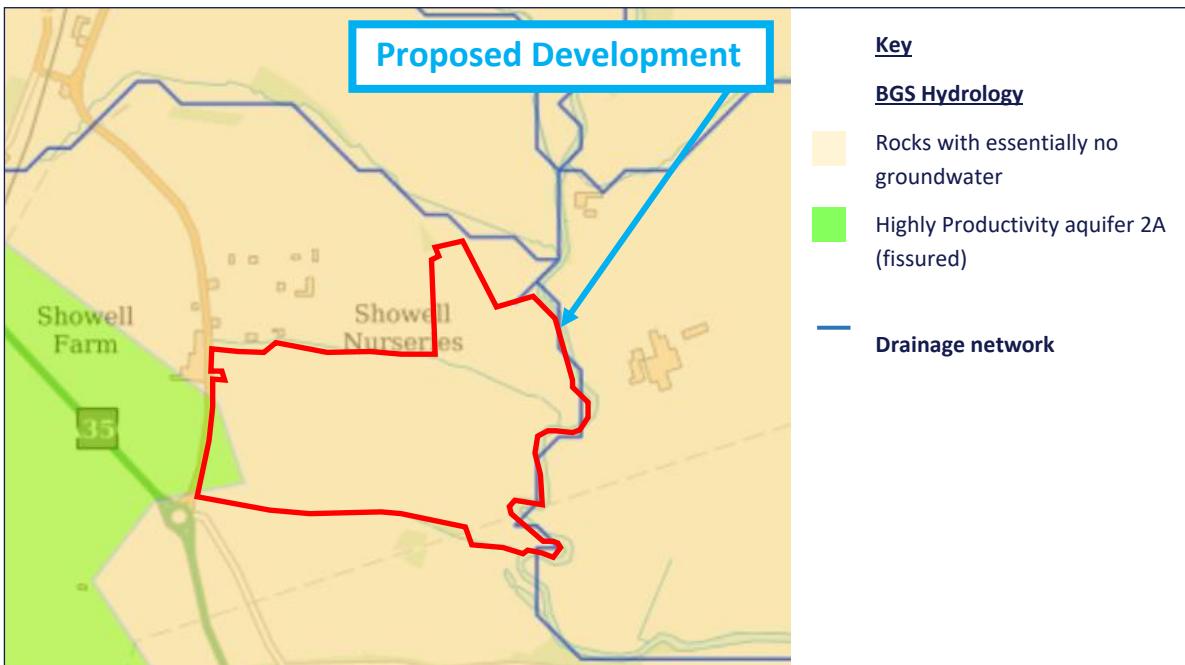


Figure 2-1: FEH (online) Reported Catchment

3 National Planning Context

- 3.1 In line with current planning procedures, the existing flood mechanisms on site will need to be understood. The National Planning Policy Framework (NPPF) 2019 sets out government policies on a range of matters, including development and flood risk.
- 3.2 Allocating and planning of development must be considered against a risk-based search sequence, as provided by the NPPF. In terms of fluvial flooding, the guidance categorises flood zones into three principal levels of risk, as shown in **Table 3-1** below.

Flood Zone	Annual Probability of Flooding
Zone 1: Low probability	< 0.1 %
Zone 2: Medium probability	0.1 – 1.0 %
Zone 3a / 3b: High probability	> 1.0 %

Table 3-1: NPPF Flood Risk Parameters

4 Flood Mechanisms

- 4.1** Having completed a site hydrological desk study, the possible flooding mechanisms at the site are identified and presented in the table below and explained further within the following paragraphs.

Mechanisms	Potential	Comment
Fluvial	Y	The eastern third of the site lies within flood zone 3.
Coastal & tidal	N	No tidal watercourses lie within an influencing distance of the proposed development.
Overland flow (pluvial)	Y	There is a high risk of surface water in the east of development site, with a medium risk along the existing ditches.
Groundwater	N	No groundwater flooding was identified within the SFRA.
Sewers	N	No sewer flooding was identified near the site within the SFRA.
Reservoirs, Canals, etc.	Y	A small area of Flood Zone 3 also lies within an area of Reservoir Flooding.

Table 4-1: Potential Flood Mechanisms

Fluvial Flooding

- 4.2** The mapping shows that the western two thirds of the development site lies within Flood Zone 1; being an area of Low Probability of flooding, outside both the 1 in 100 (1% AEP) and 1 in 1,000 (0.1% AEP) year flood events. However, the eastern third of the site lies within Flood Zone 3; being an area having a 1% or greater probability of flooding from rivers.
- 4.3** Fluvial flood risk on site is illustrated below in **Figure 4-1**.

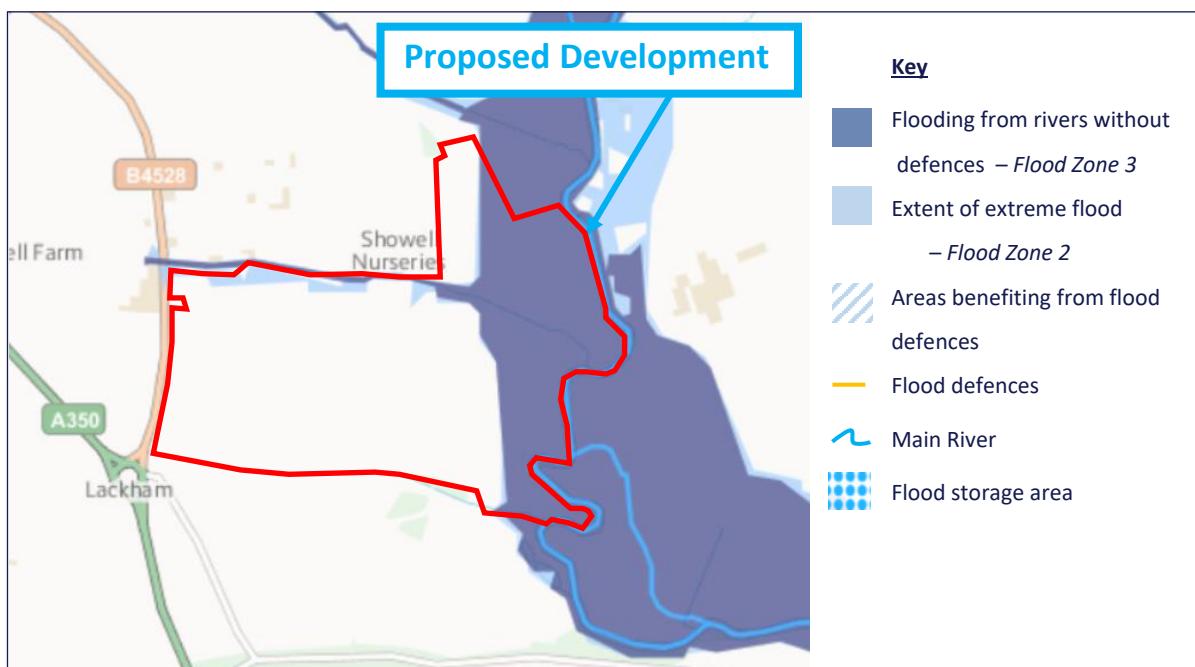


Figure 4-1: Environment Agency / Gov.UK – Flood Probability Map

Coastal Flooding

- 4.4 The site lies a significant distance from the nearest tidal watercourse and the coast. As such there is no risk of tidal or coastal flooding at this location.

Overland Flow (pluvial)

- 4.5 Overland flow mechanisms result from the inability of unpaved ground to infiltrate rainfall or due to inadequacies of drainage systems in paved areas to accommodate flow directed to gullies, drainage downpipes or similar. In minor cases, local ponding may occur. In more extreme events, flows accumulate and may be conveyed across land.

- 4.6 Figure 4-2 below illustrates the flood risk on site.

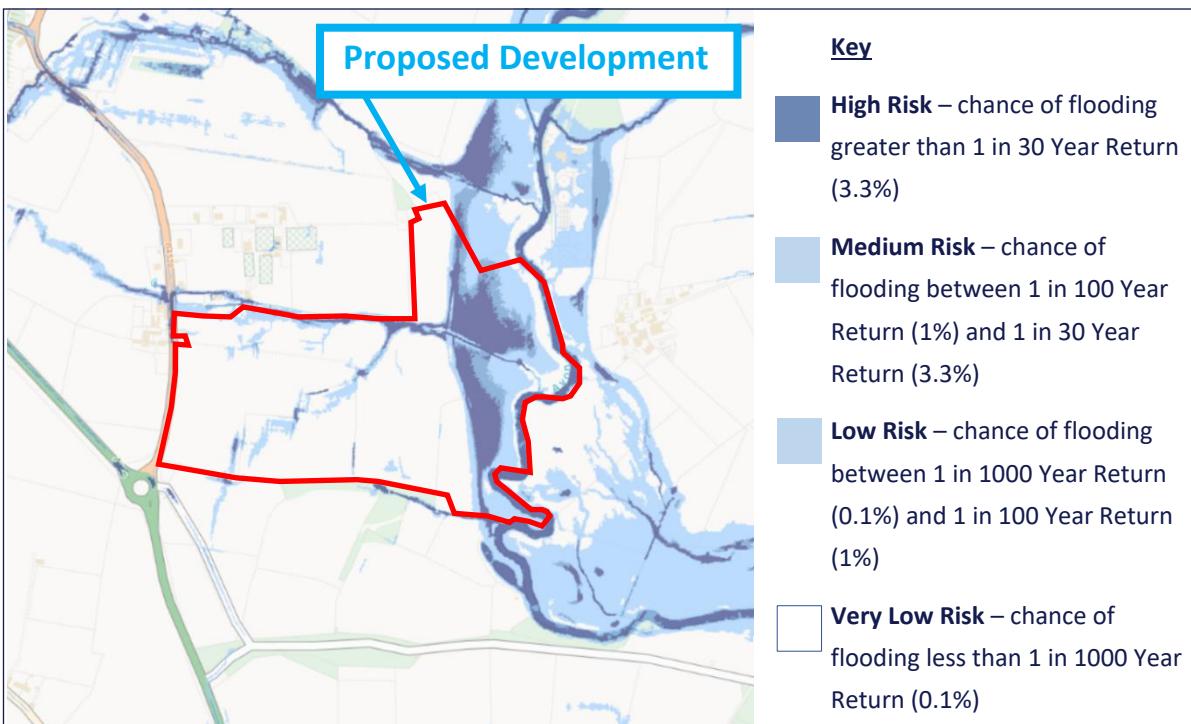


Figure 4-2: Environment Agency / Gov.UK – Flood Risk from Surface Water Map

- 4.7 The mapping provided by the EA identifies the site has a high risk of surface water flooding within the eastern third of the site. There is a low to medium risk of surface water flooding along the exiting drainage networks along the northern and southern boundaries, as well as, within the low lying areas of the site.
- 4.8 Given the baseline site characteristics and further mitigating measures to be implemented, residual flood risk from an overland flow mechanism is considered to be a low probability.
- 4.9 Before the site is developed, the land will be levelled out. This will remove the risk of surface water ponding within the low lying areas. The addition the proposed SuDS will remove the risk of the surface water flooding across as the site as they have been designed to convey and store surface water from the development.

Groundwater

- 4.10 Groundwater related flooding is fortunately quite rare, although where flooding is present, persistent issues can arise that are problematic to resolve. Such mechanisms often develop due to construction activities that may have an unforeseen effect on the local geology or hydrogeology.
- 4.11 North Wiltshire Strategic Flood risk Assessment (SFRA) does not identify any risk of groundwater flooding.
- 4.12 Positive drainage systems incorporated into the Proposed Development will further reduce the risk of flooding within the built development. Given the baseline site characteristics and further mitigating measures to be implemented, residual flood risk from a ground water mechanism is considered to be of a low probability.

Sewerage Systems

- 4.13 No reports of sewer flooding were identified within the site boundary within the SFRA.
- 4.14 Positive drainage measures incorporated on site, coupled with sustainable drainage systems (SuDS) will ensure that no increase in surface water will result from the site. Flood risk associated with sewer flooding is therefore considered to be a low probability.

Artificial Water Bodies - Reservoirs & Canals

- 4.15 Non-natural or artificial sources of flooding comprises of reservoirs, canals and lakes where water is retained above the natural ground level. However unlikely, reservoirs, canals and other artificial sources have a potential to cause flooding due to the release of large volumes of water, resulting from a dam or bank failure.
- 4.16 The area of flood risk, lies within Flood Zone, therefore, any development will be located away from the risk of this type of flooding.

5 Surface Water Drainage Options

- 5.1 As the site is currently Greenfield, initial investigations assume that surface water currently drains into the River Avon and existing ditch that lies along the boundaries of the proposed development.
- 5.2 The following paragraphs in this section outline the proposed drainage strategy to meet national and local design requirements and guidance.
- 5.3 It will be necessary to implement a SuDS scheme consistent with local and national policy at the Proposed Development.
- 5.4 When appraising suitable storm water discharge options for a development site, the following search sequence identifies the most appropriate drainage methodology.

"Rainwater from a system provided pursuant to sub-paragraphs (1) or (2) shall discharge to one of the following, listed in order of priority -

- a) *an adequate soakaway or some other adequate infiltration system; or where that is not reasonably practicable,*
- b) *a watercourse; or where that is not reasonably practicable,*
- c) *a sewer."*

- a) **Into the ground via Infiltration** – The north of the Site is shown to be underlain by sandstone, siltstone and mudstone in the eastern two thirds of the sites with the western third comprising of Limestone. The site contains superficial deposits of Alluvium and River Terrace Deposits. As such; infiltration might be a viable option for discharge. However, infiltration testing should be undertaken to confirm this.
 - b) **To a surface water body** – The attenuation basins will be positioned in the lowest points of the site, there is an existing drainage network across the site and along the site boundaries that drain into the River Avon that lies along the eastern boundary. However, a site investigation will need to be undertaken in order to determine the existence and location of a drainage network that operates on site.
 - c) **To a surface water sewer** – Should the above prove to not be possible surface water discharge directly into sewers would require a pre-development enquiry to determine Wessex Water's preferred discharge connection point and a capacity assessment of their network.
- 5.5** The search sequence outlined above indicates that the existing watercourse and drainage network across the development site is the most likely receptor for storm water. SuDS will have the potential to employ source control measures to control peak discharges to no greater than the baseline conditions.
- 5.6** Coupled with the storm water control benefits, the use of SuDS can also provide betterment on water quality. National guidance in the form of CIRIA 609 outlines that by implementing SuDS, storm water from the site can be polished to an improved standard thus ensuring the development proposals have no adverse effects on the wider hydrology.

Preliminary Drainage Proposals

- 5.7** Surface water from the site will be conveyed and stored on site before discharging into the existing drainage network.
- 5.8** Discharge from the development will be no greater than the existing greenfield run off rates, which will ensure that no increase in surface water will result from the site. The use of SuDS can also provide betterment on water quality.
- 5.9** The image below indicates the potential SuDS location for the proposed site, which will be designed to accommodate surface water for the 1 in 100 year + 40% climate change storm event.

Drainage Strategy

- 5.10** The developable area comprises of 11.18ha.

Catchment	Developable Area (ha)	Impermeable Area (ha)	Existing 100 Year Run-off	Design Discharge Rate (l/s)	Volume Required (m3)	Area Required (m2)
A	4.71	22.85	1.20	5.00	2,648	2,642
B	2.80	1.69	0.72	3.00	1,563	1,630
C	4.97	3.01	1.27	6.00	2,720	2,704

Table 5-1: Run Off Calculations

- 5.11** An indicative surface water drainage strategy for the site can be seen in **Figure 5-1**.

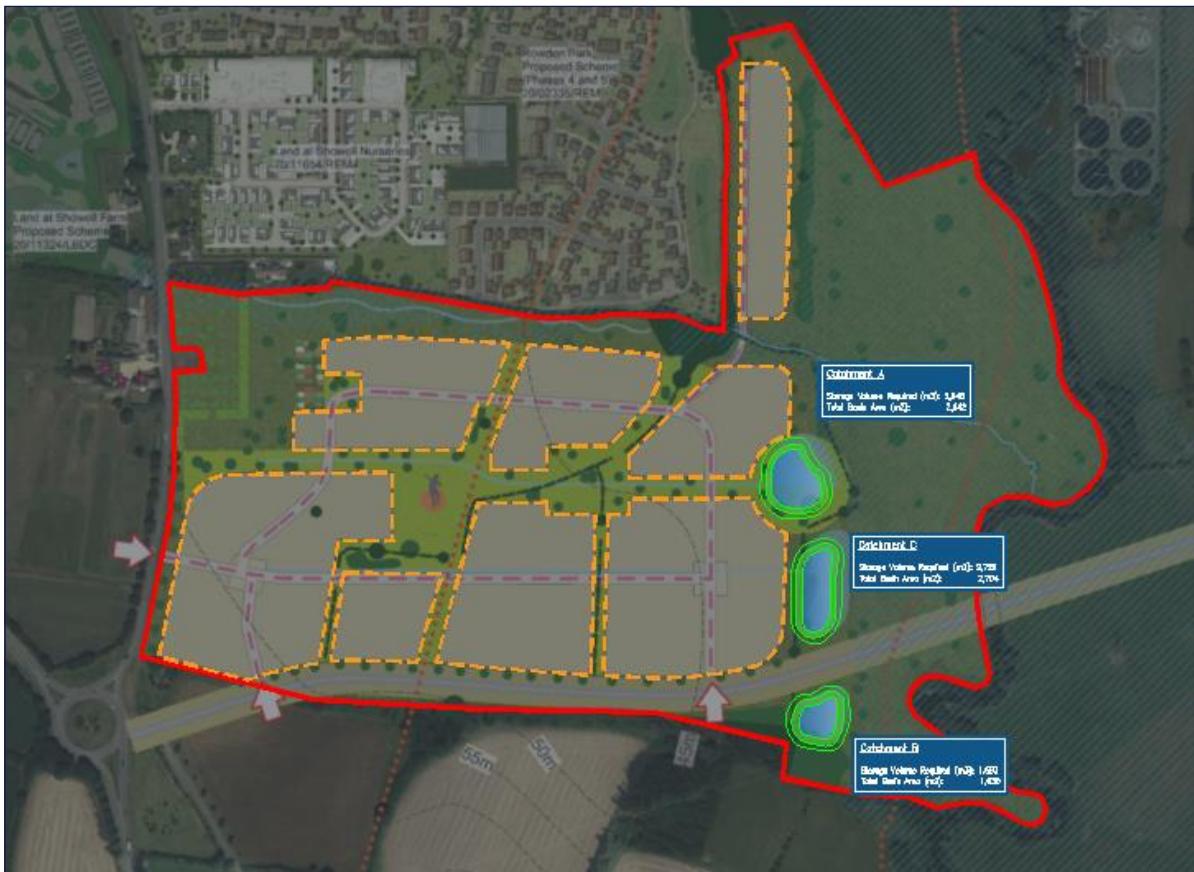


Figure 5-1: Surface Water Drainage Strategy

6 Limitations

- 6.1** The conclusions and recommendations contained herein are limited to those given the general availability of background information and the planned usage of the Site.
- 6.2** Third party information has been used in the preparation of this report, which Brookbanks by necessity assumes is correct at the time of writing. While all reasonable checks have been made on data sources and the accuracy of data, Brookbanks accepts no liability for same.
- 6.3** The benefits of this report are provided solely to Hallam Land Management Ltd for the proposed development at Land East of Showell Farm only.
- 6.4** Brookbanks excludes third party rights for the information contained in the report.

