

IDMINSTON NEIGHBOURHOOD PLAN HABITATS REGULATIONS ASSESSMENT

1. Introduction

This HRA relates to the Draft Idminton Neighbourhood Plan (NP) dated 1 March 2015 V2 which covers the settlements of Idminton, Porton, Porton Camp, West Gomeldon, Gomeldon and East Gomeldon.

The HRA has been carried out to comply with Regulation 102 of the Habitats Regulations 2010. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites before deciding to give any consent, permission or other authorisation to that plan. If the screening exercise demonstrates that significant effects are likely then the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European Sites in question. Both the screening and the full appropriate assessment must consider the impacts of the plan alone and in combination with other plans or projects.

If an appropriate assessment is necessary, the competent authority may only authorise the plan after having ascertained that it will not adversely affect the integrity of the European site. Otherwise various other tests must be met.

Wiltshire Council has conducted the following HRA on behalf of Idminton Parish Council which is the competent authority for the Idminton NP. The HRA is iterative; where risks are identified amendments should be made to the plan to remove these. Likewise the HRA should be repeated after any significant changes are made and before the final plan is considered by a referendum. Before the referendum, the Parish Council must record the outcome of the HRA and any measures which are required to ensure there will be no likely significant effects / loss of site integrity.

2. Screening Methodology

Each element of the draft plan has been categorised against screening criteria developed by Natural England. This process provides a clear audit trail for the assessment and helps to identify any changes to policy wording or additional policies that are necessary to ensure the neighbourhood plan will not have a significant negative effect on a European site.

The screening criteria used are as follows:

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and

- Category D – Likely significant effects in combination.

The effect of each draft policy has been considered both individually and in combination (see table in section 4 below). The effects of the whole plan have also been considered in combination with the Wiltshire Core Strategy and in the light of the Housing Supply Paper (February 2015) produced to support the forthcoming Housing Site Allocations DPD.

3. Wiltshire Core Strategy HRA

The Wiltshire Core Strategy HRA (October 2009, February 2012¹, March 2013² and April 2014³) identified general parameters to determine the likelihood of potential impact on Natura 2000 sites. The following parameters were identified and assessed for the following Natura 2000 sites.

- *Recreation – Natura 2000 sites within 5km of the plan area, or where Salisbury Plain SPA/SAC is within 15km of the plan area.*
 - Salisbury Plain SAC and SPA
 - River Avon SAC
 - New Forest SAC / SPA
- *Hydrology / Hydrogeology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact.*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC

¹ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

² Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

³ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

- Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA

4. Screening of Policies in Draft Idminton Neighbourhood Plan

The draft Idminton Neighbourhood Plan comprises 6 sections of draft policies and proposals, which are entitled:

- Section 1: Idminton Parish – A brief history
- Section 2: The Parish's character and heritage
- Section 3: Deployment of community facilities and services
- Section 4: Infrastructure
- Section 5: Housing
- Section 6: Industry and employment

All parts of the draft plan have been screened for potential impacts on the Natura 2000 sites listed above including 22 policies and 21 proposals, as set out in the table below. The vast majority of policies and proposals will not lead directly to development because they relate to matters of design or other qualitative criteria (A1). A few relate to conservation and enhancement of the natural, built and historic environment (A3) and several others would have no effect because no development could occur through the policies/proposals themselves, the development being implemented through later policies or proposals (A5).

Two draft proposals allocate land for development, Proposal 18 which encourages new housing on the 10 sites shortlisted by the plan and Proposal 19 which actively encourages development of 15 dwellings on a site within DSTL ownership at Porton Down. The combined number of new dwellings proposed is 32. Neither proposal would lead to likely significant effects either alone or in combination with each other because individually and together both comply with policies in the Wiltshire Core Strategy.

In conclusion none of the draft policies and proposals has been carried through to a full appropriate assessment under Regulation 102 of the Habitats Regulations 2010. An in-combination assessment with the Wiltshire Core Strategy is provided in section 6 below.

TABLE: Habitats Regulations Screening Assessment of the Draft Idminton Neighbourhood Plan

A / B (Green) – Screened out

C / D (Red) – Screened in

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
Idminton Parish – A brief history	Policy 1 –Village separation – maintain separation between villages	A1	
	Policy 2 – Conservation – of riverside landscape	A3	
	Policy 3 – Future developments – minimise visual impact on village edges	A1	
	Policy 4 – Maintaining the rural feel – by incorporating a landscaping scheme	A1	
	Proposal 1 – Village separation	A1	
	Proposal 2 – Maintaining the rural feel	A1	
The Parish’s character and heritage	Policy 5 – Protect character and heritage – preclude building on skyline	A3	
	Policy 6 - New conservation areas – enhance historic core	A3	

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
	Policy 7 – Maintaining historical legacy – developments to reflect historic legacy	A1	
	Policy 8 – Maintaining and enhancing character – of the villages	A1	
	Proposal 3 – Conservation status Idminston	A3	
	Proposal 4 – Protect historical buildings	A3	
Deployment of community facilities and services	Policy 9 – Community infrastructure – identify feasible requirements	A1/A5	
	Policy 10 – To maximise use of CIL contributions – new development to contribute to infrastructure through CIL	A1/A5	
	Policy 11- Partner Porton Down employers – to manage infrastructure requirements	A1/A5	
	Proposal 5 – Provide additional community facilities	A1/A5	
	Proposal 6 – Actively engage with Porton Down management – to manage impact of their developments	A1/A5	All three main employers (DSTL, PHE and PSP) are signed up to delivering the Porton Down Stone Curlew Conservation Project which monitors and manages the stone curlew population and can respond to positively support the population if declines become apparent
	Proposal 7 – Provision of diverse open space –	A1	

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
	maximise open space within new development		
	Proposal 8 – Raise the Porton recreation ground - feasibility	A5	
	Proposal 9 – Use of open space – secure use of non-public open space	A1	
	Proposal 10 – Porton Down sports facilities – increase use and access	A1/A5	
Infrastructure	Policy 12 – Long term infrastructure requirements – to take future growth into account	A1/A5	
	Policy 13 – short term infrastructure requirements – to manage congestion, parking and safety	A1/A5	
	Proposal 11 – Infrastructure community safety – to be supported by plan	A1	
	Proposal 12 – New access road to Porton Down – continue discussions	A5	
	Proposal 13 – Traffic management and calming – between A338 and Winterslow road	A1	
	Proposal - School parking – reduce impacts	A1	
	Proposal 15 – Porton centre	A1	

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
	parking – new parking to reduce congestion		
	Proposal 16 – Idminton halt – explore re-opening railway station	A1	
	Proposal 17 – CIL contributions, priorities	A1/A5	
Housing	Policy 14 – Housing needs – sufficient affordable housing to be available	A1	
	Policy 15 – Developments – consider partnering arrangements	A1	
	Policy 16 – New builds on old plots – retain setting	A1	
	Policy 17 – Development criteria	A1	
	Policy 18 - Preventing overcrowding – adequacy of plot	A1	
	Proposal 18 – New development sites – only those identified in the NP	B	The quantum of housing being proposed is within the total number allocated for Amesbury Community Area remainder which has been assessed through the HRA for the Wiltshire Core Strategy.
	Proposal 19 Liaison with MoD – Actively encourage development at site PC1	B	All development at Porton Down is facilitated by the Stone Curlew Conservation Project which is being implemented to protect and enhance the stone curlew population at the site and thereby offset any impacts from increased development.
	Proposal 20 – Liaison with county planners – ensure NP forms basis for future	A1	

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
	decisions Proposal 21 – Engaging with developers – to ensure consistency with NP policies	A1	
Industry and employment	Policy 19 – Minimising Impact on surrounding Countryside – of new agricultural buildings	A1	
	Policy 20 – Porton Down developments – design to reduce impact on landscape	A1	
	Policy 21 – Partnering Porton Down employers to protect the Parish – collaboration over infrastructure requirements	A1/A5	
	Policy 22 Support to local businesses	A1	

5. Screening of Idminton Neighbourhood Plan in-combination with the Wiltshire Core Strategy and South Wiltshire Core Strategy

a) General

The Wiltshire Core Strategy provides the most up to date housing allocations for the county. Core Policy 2 allocates 345 new dwellings for the Amesbury Community Area Remainder. The latest housing supply estimates⁴ show that 130 dwellings have been completed in the period 2006 – 2014, 31 dwellings have been permitted and could be built up to 2026 leaving 184 dwellings yet to be allocated. Following the Examination in Public the inspector concluded that sufficient safeguards were in place through the Core Strategy to protect the European sites and therefore housing allocations would not give rise to significant effects in combination with other policies, plans and projects.

b) Recreation

Salisbury Plain SPA/SAC – Idminton is the closest village to Salisbury Plain SPA, which is just over 5km away and people can be expected visit the Plain for recreation. The Wiltshire Core Strategy HRA concluded that adequate safeguards were in place through the guidance document “HRA and Mitigation Strategy for Salisbury Plain SPA”⁵ to ensure that additional recreational pressure brought by residential growth would not impact on the population of breeding stone curlew. To date the strategy has relied on S106 agreements but in future CIL payments will be used to fund the strategy which delivers monitoring and adaptive management for stone curlews in the Salisbury Plain area. Core Policy 50 of the Wiltshire Core Strategy implements this approach.

Following the Core Strategy HRA, further housing proposed as part of Army Basing has been calculated to deliver a further 20% increase in recreational pressure. The MoD has prepared a HRA of its Masterplan and though this is committed to contributing to the Stone Curlew Mitigation Strategy and providing alternative green infrastructure to reduce visits to the Plain.

The 32 new dwellings proposed under the Idminton NP is within the total number of dwellings considered by the HRA for the Wiltshire Core Strategy and the HRA for the Army Basing Masterplan and therefore no further in-combination effects are expected to occur.

River Avon SAC – Two areas of wetland covered by the River Avon SAC designation occur within 200 – 300 metres of West Gomeldon. There are no public rights of way through either site. The HRA for the Wiltshire Core Strategy concluded that the potential impacts of increased recreational pressure would be identified, assessed and mitigated through the Council’s in-house procedures⁶. The scale of potential residential development from this neighbourhood plan is so small that it is unlikely to give rise to significant effects from recreational pressure at these two sites or other sites with public access further downstream.

⁴ Wiltshire Housing Site Allocations Development Plan Document: Informal consultation on initial site options, Housing supply paper, February 2015

⁵ HRA and Mitigation Strategy for Salisbury Plain SPA in relation to recreational pressure from development, Wiltshire Council, 30 March 2012

⁶ Habitats Regulations Assessments for projects potentially affecting the River Avon SAC: Procedures for Wiltshire’s development management teams (11/03/13)

New Forest SPA – The HRA for the Core Strategy⁷ predicted an increase in the numbers of visitors to the New Forest with the majority of these expected to come from within 8km of the forest. Through Core policy 50 the Council is committed to preparing and funding a New Forest Mitigation Strategy to offset these impacts. This strategy is not yet in place and the core strategy therefore requires individual applications to be subject to bespoke HRA and mitigation as required. As the Idminton NP area is over 15km from the boundary of the New Forest SPA and the developments proposed are small, it is unlikely that a project specific HRA would identify likely significant effects and bespoke mitigation is unlikely to be required.

c) Hydrology/Hydrogeology

The scale of development proposed by the neighbourhood plan is small enough not to individually affect Wessex Water's Water Resource Management Plan which in any case has taken the quantum of development proposed by the Wiltshire Core Strategy into account. The majority of European sites listed under this topic in Section 3 above were screened out by the Wiltshire Core Strategy but impacts arising from abstraction and sewage discharge to the River Avon SAC were carried through to appropriate assessment.

River Avon SAC Water Resources – The HRA for the Wiltshire Core Strategy⁸ concluded that the proposed quantum of development would not lead to significant effects on the River Avon SAC provided that it did not exceed the headroom in existing discharge permits issued for the catchment. Wessex Water confirmed that the proposed housing numbers were within headroom and Core Policy 68 requires development to demonstrate appropriate water efficiency measures.

Since then, further housing is being proposed in south Wiltshire as a result of Army Basing proposals. The management of water abstraction and disposal for army housing developments within and outside the garrisons is being co-ordinated through a Water Management Strategy which is being prepared by the Defence Infrastructure Organisation with advice from its water supplier, the EA and Natural England. The EA and Natural England have accepted that this mechanism is an acceptable way forward and will ensure that the features of the SAC are protected.

River Avon SAC Water Quality – Two aspects of water quality were considered namely the effects of run-off during construction and operational phases of new development and the effects of increased phosphates arising from further sewage discharges. The HRA for the Wiltshire Core Strategy concluded that impacts to SAC features caused by run-off from various sources could be controlled by the Council's in house development management procedures⁹ and the use of construction method statements through Core Policies 69 and 67.

Since the Core Strategy was adopted, a Nutrient Management Plan (NMP) has been prepared for the River Avon SAC by David Tyldesley and Associates¹⁰ on behalf of the EA, Natural England and the Council. This confirms that further discharges can be made to sewage treatment works within permitted headroom provided this does not compromise deliverability of the NMP. The River

⁷ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

⁸ explained in a "Note to the inspector regarding phosphates and the River Avon SAC" dated August 2013

⁹ Habitats Regulations Assessments for projects potentially affecting the River Avon SAC: Procedures for Wiltshire's development management teams (11/03/13)

¹⁰ River Avon Special Area of Conservation nutrient management plan for phosphorus, Final Version April 2015, David Tyldesley and Associates

Bourne is not considered to be a high risk waterbody under the plan and therefore it is unlikely that development proposed under the neighbourhood plan would compromise the NMP.

The in-combination effects of Army Basing will be dealt with through the DIO's Water Management Strategy discussed above.

It is concluded that proposals for housing in the draft Idminton NP would not adversely affect Natura 2000 sites through hydrological/hydrogeological changes.

d) Air Pollution / Nitrogen Deposition

The Wiltshire Core Strategy HRA identified the potential for significant effects on several Natura 2000 sites through increased traffic arising from new development. Increased atmospheric pollution and nitrogen deposition could occur on sites within 200m of a main road as well as from new industrial development. Changes were therefore incorporated into Core Policy 55 and its supporting text and as a result it was concluded that The Core Strategy would not have an adverse effect on any European sites. The proposals in the Idminton NP do not alter the conclusions of the Wiltshire Core Strategy HRA.

e) Physical Damage / Interruption of Flight Lines / Disturbance

The Bath and Bradford on Avon Bat SAC - This European site and its associated core areas identified in the council's HRA guidance¹¹ are over 40 km away from the Idminton NP area. Key flight lines and foraging areas are therefore unlikely to be significantly affected by the plan.

Porton Down SPA – The Porton Down Stone Curlew Conservation Project Document (September 2014) was made a condition of planning permission for the Large Energetics Enclosure at Porton Down (application number 14/09177). This document identifies the monitoring, protection and enhancement measures that will be undertaken for stone curlew to support all development at Porton Down within the lifetime of the Core Strategy. This document fulfils the requirements of Core Policy 5 to develop an Integrated Business and Ecology Management Plan for the site. Now that the project is up and running, Proposal 19 of the Idminton NP is unlikely to give rise to significant effects.

6. Conclusions

The majority of the draft policies and proposals in the draft Idminton NP do not allocate new land for development and largely provide qualitative criteria for development focused on improving the parish for local people, businesses and visitors, including some environmental policies and suggestions for the design of development sites. Consequently none of these policies and proposals would give rise to likely significant effects on Natura 2000 sites.

Draft Proposals 18 and 19 identify ten sites for housing across Gomeldon, Idminton and Porton, a total of 32 dwellings. This HRA has found that there would be no significant impacts of these proposals either alone, in-combination with each other, or in-combination with the Wiltshire Core Strategy.

¹¹ Bat Special Areas of Conservation (SAC): Planning Guidance for Wiltshire (11 November 2014)

This HRA should be reviewed if the plan is altered significantly and for the final document before it is considered by a referendum.