

ALDBOURNE NEIGHBOURHOOD DEVELOPMENT PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This Habitats Regulations Assessment (HRA) has been undertaken to inform a Regulation 16 consultation response from Wiltshire Council to the Aldbourne Neighbourhood Development Plan 2021 to 2036 Part A Submission Plan June 2022, hereafter referred to as the NDP, submitted to Wiltshire Council in July 2022.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹, hereafter referred to as the Habitats Regulations. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites (formerly also referred to as Natura 2000 sites and now known as the national site network²) before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures³, 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, consult the appropriate nature conservation body and have regard to its representations. Both the screening, and any subsequent appropriate assessment, must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:
“Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.”⁴
- 1.4. Where appropriate assessment is undertaken, the competent authority may go on to authorise the plan or project provided that it will not adversely affect the integrity of any European sites. Where an **adverse effect on the integrity (AEoI)** of any European sites cannot be ruled out, and where there are no alternative solutions, the plan can only be authorised and proceed if there are **imperative reasons of over-riding public interest (IROPI)** and if the necessary compensatory measures can be secured.

¹ On 1st January 2021 the Conservation of Habitats and Species Regulations 2017 were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change [Changes to the Habitats Regulations 2017 - GOV.UK](https://www.gov.uk/government/news/changes-to-the-habitats-regulations-2017) (www.gov.uk)

² Due to the Conservation of Habitats and Species Regulations 2017 (as amended) being amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 on 1st January 2021.

³ Court of Justice of the European Union, Case C 323/17 “People Over Wind”/P. Sweetman v Coillte Teoranta

⁴ Commission of the European Communities v UK and NI, opinion of Advocate General KoKott, 9 June 2005, Case C-6/04

- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Aldbourne NDP. Where risks to European sites are identified, changes are recommended to remove or reduce the risks, and these should be incorporated into the plan before it is made. Likewise, if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

- 2.1. Each element of the plan has been categorised against screening criteria developed by Natural England (NE) to provide a clear audit trail for the screening assessment.

- 2.2. 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.

- 2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see table in section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is undertaken in subsequent sections.

3. Higher Level HRAs

Wiltshire Core Strategy

- 3.1 The Wiltshire Core Strategy HRA (October 2009, February 2012⁵, March 2013⁶, February 2014⁷ and April 2014⁸) identified general parameters to determine the likelihood of potential impacts on European protected sites. The following potential impact pathways and associated parameters were identified and assessed for the European sites stipulated below.

- *Recreation – European sites within 5km of the plan area, or where the New Forest Special Protection Area (SPA)/Special Area of Conservation (SAC) is within 13.8km (extended to 15km where HRA indicates this is necessary) of the plan area or where Salisbury Plain SPA/SAC is within*

⁵ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁶ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁷ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

⁸ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

15km (it should be noted that the relevant parameter for the latter has since been revised on the basis of data obtained by means of visitor surveys and is now 6.4km):

- Salisbury Plain SPA / SAC
- River Avon SAC
- New Forest SAC / SPA
- Bath and Bradford on Avon Bats SAC (added post adoption of Wiltshire Core Strategy)
- *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 – European sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA
 - Chilmark Quarries SAC (added post adoption of Core Strategy)
 - Mottisfont Bats SAC (added post adoption of Core Strategy)

Wiltshire Housing Site Allocations Plan

- 3.2 Since the Core Strategy was adopted, the Council published a pre-submission draft of the Wiltshire Housing Site Allocations Plan (WHSAP) together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. Subsequently, the WHSAP (Council Version, February 2020) was adopted by Full Council on 25th February 2020 and this was accompanied by the final WHSAP Assessment under the Habitats Regulations (Wiltshire Council, February 2020).

- 3.3 The screening criteria for the adopted WHSAP and final HRA were modified for some European sites from those used for the Core Strategy subsequent to the acquisition of results from new surveys, and in light of advice from NE. The following screening applies the most up to date criteria available from the WHSAP and HRA.
- 3.4 Furthermore, since the Core Strategy was adopted, NE has advised Wiltshire Council of its concerns regarding the growing number of visitors to the North Meadow and Clattinger Farm SAC in recent years which has led to an increase in trampling. NE has advised that this is particularly evident at North Meadow (which is also a National Nature Reserve (NNR)) during April and May when visitors come to see the Snake’s-head fritillaries in flower. NE considers that the increase in recreational pressure upon the SAC is primarily as a result of increases in the local population, and that major new housing developments within a short travel distance of North Meadow are likely to add to the existing visitor pressure and trampling effects. An interim ZoI of 8km around the North Meadow element of the North Meadow and Clattinger Farm SAC is being used by Wiltshire Council as this is consistent with the approach being applied by Swindon Borough Council. The ZoI will be refined once bespoke visitor surveys have been undertaken.
- 3.5 Impacts of development in Wiltshire on the New Forest SPA were considered in the HRA for the South Wiltshire Core Strategy (SWCS) adopted in 2012⁹. The assessment used data from the Tourism South East PROGRESS survey for 2004/05 and census data from 2001 for the former Salisbury District to examine patterns of visitors to the New Forest from across south Wiltshire. That HRA concluded that the development in south Wiltshire would increase visitor pressure by less than 1% and 89% of this would be through additional local day visits from within 8 km of the National Park. The WCS addressed the New Forest’s mitigation requirements through Core Policy 50, identifying that a New Forest Mitigation Strategy would be prepared to address recreational impacts. Since the WCS was adopted, the council has joined a partnership of local authorities seeking to develop a strategic approach to address the impacts of recreational pressure on the New Forest SPA. A Government grant through the Planning Delivery Fund enabled visitor surveys to be conducted across the New Forest in 2018/19. This work was recently published, and the Council is now part of a steering group working to agree a common approach to mitigation including the extent of the ZoI and how to fairly reflect different visit rates within it. This evidence has informed the preparation of an Interim Recreation Mitigation Strategy by Wiltshire Council¹⁰.
- 3.6 The WCS adopted the 8km zone of influence, however, as discussed in the Interim Recreation Mitigation Strategy, from 1st September 2021 this has been revised to 13.8 km. Before this date, the mitigation scheme only applied to permitted dwellings lying within 8km of the New Forest designated sites whereas thereafter the scheme has been extended to apply to new residential and tourism development within 13.8 km of any of the New Forest designated sites and may be extended to include applications within 15km, where demonstrated to be necessary through a bespoke appropriate assessment.
- 3.7 Since the WCS was adopted and on the advice of NE, any plan or project that will lead to development within the catchment of the River Avon SAC must be phosphorous neutral and be subject to appropriate assessment which concludes no adverse effect on the SAC alone or in-combination with other plans or projects in order to be authorised.

Emerging Evidence and Advice from Natural England Subsequent to Adoption of WHSAP

- 3.8 Similarly, it came to light in spring 2020 that any plan or project that will lead to development within the catchment of the River Test must be nitrogen neutral as the Test drains into the Solent and this

⁹ South Wiltshire Proposed Submission Core Strategy HRA Report, Appendix 13. NPA for Wiltshire Council, July 2009

¹⁰ The Interim Recreation Mitigation Strategy has not been reviewed by Natural England at the time of writing.

region is protected by a number of European and international designations including the Solent Maritime SAC, Chichester and Langstone Harbours SPA, Portsmouth Harbour SPA and Solent and Southampton Water SPA and Ramsar site. In 2018 and 2019 NE undertook a number of condition assessments of the features of these designated sites around the Solent. These assessments identified that high levels of nitrogen and phosphorus are entering this water environment and that there is sound evidence that nitrogen in particular is causing eutrophication at the aforementioned designated sites and that the resulting excessive growth of green algae and plants, which reduces oxygen and light levels, is leading to negative effects on the special features for which the European sites are designated. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. These findings were published by NE in June 2020 in *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region*. This advice also stipulates that:

“There is uncertainty as to whether new growth will further deteriorate designated sites. This issue has been subject to detailed work commissioned by local planning authorities (LPAs) in association with Natural England, Environment Agency and water companies. This strategic work, which updates early studies, is on-going. Until this work is complete, the uncertainty remains and the potential for future housing developments across the Solent region to exacerbate these impacts creates a risk to their potential future conservation status.

One way to address this uncertainty is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

This report sets out a practical methodology to calculating how nutrient neutrality can be achieved. This methodology is based on best available scientific knowledge, and will be subject to revision as further evidence is obtained. It is our advice to local planning authorities to take a precautionary approach in line with existing legislation and case-law when addressing uncertainty and calculating nutrient budgets.”

- 3.9 In accordance with NE’s advice, any plan or project which will lead to development within the catchment of the River Test cannot be approved unless nitrogen neutrality has been demonstrated via quantitative means, and an appropriate assessment conducted by the competent authority has concluded beyond reasonable scientific doubt that there would be no adverse effects on the integrity of any of the Solent region European sites.
- 3.10 In 2022 the River Lambourn SAC was an additional European site identified by NE as being in unfavourable condition due to excessive phosphorus inputs. Therefore, any overnight accommodation development within the catchment of the SAC is now required to demonstrate phosphorous neutrality and be subject to an appropriate assessment which concludes no adverse effect on the SAC alone or in combination with other plans or projects in order to be authorised.

Screening of Aldbourne NDP Area

Recreation

- 3.11 The interim 8km ZoI around the North Meadow element of the North Meadow and Clattinger Farm SAC is situated approximately 11km from the closest point of the NDP area and as such appropriate assessment with respect of this European site can be screened out.

- 3.12 The NDP area lies well beyond the 13.8km Zol around the New Forest SAC/SPA within which the majority of day visitors to the New Forest originate¹¹.
- 3.13 Recreational pressure on the River Avon SAC is recognised to occur in limited circumstances predominately where significant development lies in close proximity to the SAC, and this will not occur as a result of this NDP.
- 3.14 In relation to Salisbury Plain, the SAC habitat features were screened out of appropriate assessment for the Core Strategy on the advice of NE. The Salisbury Plain SPA can also be screened out of appropriate assessment with respect of this NDP as the whole plan area is beyond the 6.4km zone around the SPA within which the majority (75%) of visitors to the Plain are expected to live. This is based on the data collated by means of a visitor survey commissioned by the Council in 2015.

Hydrology / Hydrogeology

- 3.15 In terms of hydrology/hydrogeology, the majority of the NDP area lies within the catchment of the River Kennet and tributaries, within the River Thames Basin District. This is within the Thames Water Swindon and Oxfordshire Water Resource Zones (WRZ). As such there is no potential for a likely significant effect on the River Avon SAC as a result of the NDP.
- 3.16 The Kennet and Lambourn Floodplain SAC lies approximately 4.19km to the southeast of the Aldbourne NDP area, and the NDP area lies within the Marlborough Community Area. The screening assessment detailed in the HRA of the Wiltshire Core Strategy Submission Draft (2012)¹² identified the potential for significant hydrological/hydrogeological effects on the Kennet and Lambourn Floodplain SAC as a result of Core Policy 14: Marlborough as the SAC and settlement of Marlborough are within the Thames Water Swindon and Oxford WRZ, and as such an appropriate assessment was undertaken.
- 3.17 Paragraph 3.2.38 of the HRA to the Wiltshire Core Strategy (2012) specified that the HRA screening assessment¹³ of schemes that were included in the preferred programmes for the Thames Water Swindon and Oxford WRZ in the draft final of the Thames Water Utilities Ltd Water Resource Management Plan (WRMP)¹⁴ concluded that, with mitigation taken into account, they are not likely to have a significant effect on the integrity of any European sites, and that in the context of Wiltshire, this is relevant to European sites associated with the River Kennet, namely the Kennet and Lambourn Floodplain SAC, Kennet Valley Alderwoods SAC and Lambourn Floodplain SAC.
- 3.18 The assessment in Appendix D of the HRA to the Core Strategy (2012) considered the potential significant effect of water abstraction upon the Kennet and Lambourn Floodplain SAC and its qualifying features as a result of the additional housing and employment development proposed by Core Policy 14, as this would lead to an increase in the consumption of water, which could in turn impact on the hydrological regime of the SAC through increased abstraction of water from rivers/groundwater. The assessment specified that the additional water consumption had been planned for within the WRMP which itself had been subject to an HRA, and also listed policies in the Core Strategy that it specified *'will contribute the achievement of demand management measures in the WRMP area.'* It recommends no amendments to the Core Strategy or other parts of the LDF in order to avoid the potential effect and concluded that there would be no residual significant adverse effect on the integrity of the SAC.
- 3.19 The assessment detailed in the HRA to the Wiltshire Core Strategy (March 2013)¹⁵ in respect of the Kennet and Lambourn Floodplain SAC stipulated: *'Site lies within the Thames Water Swindon and*

¹¹ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

¹² Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

¹³ Thames Water Utilities Ltd Habitats Regulations Assessment, December 2011

¹⁴ Water – Planning for the Future. Draft Final Water Resource Management Plan, Thames Water Utilities Ltd, December 2011

¹⁵ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

Oxfordshire Water Resource Zone and additional water consumption is planned for within the Water Resource Management Plan, which has itself been subjected to Habitats Regulations Assessment and concluded that additional housing would have no likely effects upon the site.’ It goes on to state: ‘HRA for the WRMP notes that Kennet and Lambourn Floodplain SAC was potentially impacted on by groundwater abstraction from the Chalk aquifer at Speen. Licensed abstraction from the aquifer was reduced as part of the SWMP.’

- 3.20 As per the 2012 HRA of the Core Strategy, the 2013 HRA likewise does not recommend any amendments to the Core Strategy or other parts of the LDF in order to avoid the potential effect and concluded that there would be no residual significant adverse effect on the integrity of the SAC.
- 3.21 The Updated HRA of the Wiltshire Core Strategy (April 2014) reviewed the findings of the March 2013 HRA in light of all modifications proposed since that assessment and included an in-combination assessment which identified any plans or projects which had been subject to HRA since March 2013.
- 3.22 The appropriate assessment of the proposed modifications in respect of water abstraction and the Kennet and Lambourn Floodplain SAC states: *‘Proposed modifications to the Marlborough Community Area policy (CP14) could have LSE upon the Kennet and Lambourn Floodplain SAC through increased water abstraction. The proposed modifications would result in approximately 70 additional dwellings at Marlborough which will increase the demand for water and contribute towards additional abstraction across the catchment. As with the River Avon SAC, there is potential for the Kennet and Lambourn Floodplain SAC to be adversely affected low flows, which could be exacerbated by over abstraction. Abstraction licenses in the River Kennet have been subject to the same RoC process as those within the River Avon SAC catchment and all such licences are now understood to have been found Habitats Regulations compliant by the EA.’*
- 3.23 The HRA then states: *‘Thames water has confirmed that the water demand from the increased number of proposed dwellings at Marlborough can be accommodated within the existing Marlborough groundwater abstraction licence and the future Axford groundwater abstraction licence. **The council therefore concludes that the additional water demand from the proposed WCS housing figures (including the additional 70 dwellings) would not have an adverse effect upon the integrity of the Kennet and Lambourn Floodplain SAC.’***
- 3.24 The Aldbourne NDP includes Policy 27 which allocates a site for residential development. Given that the NDP area lies within the catchment of the River Kennet and tributaries and is within the Thames Water Swindon and Oxfordshire WRZ, and that the residential development proposed is additional to that assessed in the HRA to the Core Strategy, there is a mechanism for a significant effect on the Kennet and Lambourn Floodplain SAC on account of an increase in water abstraction.
- 3.25 A very small section of the eastern extent of the NDP area lies within the catchment of the River Lambourn SAC. Consequently, any proposal for development within that section of the NDP area will trigger a HRA and will need to demonstrate phosphate neutrality. None of the policies in the NDP allocate sites for development within the catchment of the River Lambourn SAC.

Air Pollution / Nitrogen Deposition

- 3.26 The Wiltshire Core Strategy HRA identified that increased traffic would lead to potential effects through an increase in atmospheric pollution and nitrogen deposition upon a range of European sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level¹⁶. Although the Aldbourne NDP does allocate a site for residential development, the number of dwellings proposed is small in relation to the total for the county. Furthermore, all of the European sites listed above are a considerable distance from the NDP area and as such it is concluded

¹⁶ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

that the NDP will not result in significant effects on European sites as a result of nitrogen or particulate matter deposition.

Physical Damage / Interruption of Flight Lines / Disturbance

- 3.27 In terms of the potential to cause physical damage to features which provide habitat for bats, such as breeding, roosting and foraging habitat, and the potential to interrupt or fragment bat flight lines, or to cause disturbance to such features, it is deemed that the NDP area is too remote to have implications for bats associated with the Bath and Bradford on Avon Bats SAC, Chilmark Quarries SAC or indeed the Mottisfont Bats SAC.
- 3.28 The NDP area is also beyond the potential zone of influence with respect of stone curlews breeding at Porton Down SPA and Salisbury Plain SPA and will not result in physical damage to the habitats within or functionally linked to the aforementioned European sites, nor will it result in the interruption of flight lines or disturbance to breeding stone curlew, such as by means of the introduction of visual stimuli or noise.

4. Screening of Policies in Aldbourne Neighbourhood Development Plan 2021 – 2036 Part A Submission Plan June 2022

- 4.1 The Aldbourne NDP comprises 27 policies, with 1 policy allocating a site for residential development at Lottage Farm. These are detailed and assessed in Table 1 below.
- 4.2 All parts of the NDP have been screened for potential impacts which may arise from the plan alone or in combination with other plans and projects. Taking into consideration the location, scale and nature of proposals in the NDP, there is a mechanism for effect on one European site, the Kennet and Lambourn Floodplain SAC. This is on account of one policy allocating a site for residential development, Policy 27 Lottage Farm. The NDP area lies within the catchment of the River Kennet and tributaries and is within the Thames Water Swindon and Oxfordshire WRZ, and the policy allocating residential development has the potential to give rise to significant effects on the aforementioned European site due to an increase in water abstraction which could impact the hydrological regime of the River Kennet and the Kennet and Lambourn Floodplain SAC.
- 4.3 The development of approximately 32 dwellings proposed by way of 1 policy in the Aldbourne NDP is additional to that which has been assessed in the HRA of the Core Strategy. However, Thames Water Utilities Ltd have confirmed in writing that the Water Resources Management Plan (WRMP) and HRA have been updated by Thames Water and that the residential development proposed in the Aldbourne NDP can be covered by the existing groundwater abstraction licence(s) and still be compliant with the HRA conducted by the Environment Agency (EA). Therefore, Policy 27 in the NDP which allocates a site for residential development can be screened out of appropriate assessment.
- 4.4 The other policies within the NDP would either not lead directly to development or relate to design or other qualitative criteria for development and would have no significant effects either alone or in combination with other plans and projects.
- 4.5 Any changes made to the plan as a result of the examination in public should be rescreened before the Council adopts the plan.

TABLE 1: Habitats Regulations Assessment Screening of the Aldbourne NDP

A / B (Green) – Screened out

C / D (Red) – Screened in

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations
Policy 1: Renewable Energy in Developments	A1	<p>This policy specifies that development proposals that demonstrate a commitment to site the generation of renewable energy on site or in any building will be supported. It also encourages the retrofit of heritage properties/assets to generate renewable energy where appropriate, provided it safeguards historic characteristics and development is done with engagement and permissions from relevant organisations. Reference is also made to Wiltshire Council’s Climate Strategy.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy (Adopted January 2015) and the National Planning Policy Framework 2019 (NPPF).</p>
Policy 2: Renewable Energy Production	A1	<p>This policy stipulates that proposals for community scale energy production from solar/photovoltaic panels, local biomass facilities, anaerobic digestion and wood fuel products will be supported subject to several criteria set out within the policy.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 3: Ultra Low Emission Vehicle Charging	A1	<p>This policy states that provision should be made for charging of electric vehicles for all new dwellings and buildings undergoing material change of use to create a new dwelling. It also states that new employment, leisure or retail developments will provide charging facilities for both staff and other users. The policy supports the retrospective installation of charging infrastructure at existing dwellings or within other non-residential car parks.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 4: Sustainable Design and Construction	A1	<p>This policy stipulates that the design and standard of any new development should aim to meet a high level of sustainable design and construction and be optimised for water and energy efficiency, targeting zero carbon emissions. A number of requirements are then set out within the policy including, for example, the requirement for non-residential developments to aim to meet the Buildings Research Establishment BREEAM building standard ‘excellent’ and the installation of fittings to ensure that the consumption of water need not exceed 110 litres/person/day.</p>

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations
		<p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 5: Reducing Flood Risk	B	<p>This policy requires that all developments in flood-sensitive areas, and those where development might increase flood risk, will be designed and constructed to reduce the overall level of flood risk. This issue must be considered where applications may impact on the hydrological regimes relevant to Aldbourne.</p> <p>Information should be included to confirm the headroom capacity of the Ramsbury Sewerage Treatment Works and the associated sewerage network to ensure the feasibility of the development.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 6: Permeable Surfaces	A1	<p>This policy supports planning applications for the paving of house drives, hard standing and parking areas with permeable surfaces where it will be in keeping with the local character, and where boundary features such as walls and hedges can be retained or enhanced. It also requires sustainable surface water drainage for proposals for surface treatments in residential, commercial and public parking areas. Applicants are also required to demonstrate compliance with the Thames Abstraction Licensing Strategy.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 7: Water and Wastewater Infrastructure	A1	<p>This policy states that conditions will be attached to developments which result in the need for off-site upgrades to water and wastewater infrastructure to ensure that occupation of the development is aligned with the delivery of necessary infrastructure upgrades.</p> <p>This policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 8: High Quality Design	A1	<p>This policy encourages development proposals to respond positively and distinctively to the National Model Design Code and the Aldbourne Design Statement. Development proposals should be designed to take account of their surroundings in their built form, height, materials, historic character and boundary treatments.</p>

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations
		The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.
Policy 9: Design in the Conservation Area	A1	<p>The policy requires that developments within the Aldbourne Conservation Area must demonstrate regard to the significance, character and appearance of the Conservation Area as set out in the Aldbourne Conservation Area Statement and the Aldbourne Community Character and Design Statement.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 10: Overall Heritage	A1 and A3	<p>This policy stipulates that development should respect the history and heritage of Aldbourne in accordance with national and local policy by adhering to a range of criteria which are then set out within the policy.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 11: Archaeology	A1 and A3	<p>This policy requires that development proposals should be informed by archaeological investigation and stipulates that any impact on archaeological remains should be mitigated to reflect the significance of those remains, either by including provision for the preservation in situ of high value remains where the potential loss is not outweighed by the public benefits of the development or by the recording any loss via archaeological excavation.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 12: Locally Valued Unlisted Heritage Assets	A1	<p>This policy pertains to buildings, features and structures which are not listed, but which are of local significance for their heritage value. The policy goes on to stipulate several criteria that should be met in the event that any proposals for development are put forward that would affect the character, setting or integrity of buildings, features and structures which are identified as Locally Valued Heritage Assets.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 13: Community Engagement	B	This policy strongly encourages potential applicants of development proposals to adhere to the Pre-Application Engagement Protocol that comprises an appendix to the NDP.

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations
		<p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 14: New Housing	A1	<p>This policy requires that proposals for new housing developments comprise houses of types and sizes that reflect the demographic needs of Aldbourne, with particular regard to the need for affordable homes and smaller homes for downsizing.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 15: Working from Home	B	<p>This policy specifies that development to provide space and services to enable home working will be supported, subject to it respecting local character, residential amenity and highway safety. Homes are expected to be designed to meet the Nationally Described Space Standards so no rooms can be designated specifically and solely for home working.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 16: Landscape	A1 and A3	<p>This policy stipulates that planning applications proposing development that could impact on the Area of Outstanding Natural Beauty (AONB) will only be supported where it can be demonstrated that the proposals will result in enhancement of, rather than detract from, the visual qualities and essential characteristics of the AONB. The policy then states that development that conserves and enhances local landscape character and those features detailed in the Aldbourne Community Character and Design Statement will be supported. It goes on to specify that development proposals should be informed by relevant existing landscape assessments and should be supplemented by additional site-specific assessment.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 17: Views	A1	<p>This policy requires that any development proposals likely to affect any of the 6 views listed in the policy and described in the Aldbourne Neighbourhood Plan Part B: Aldbourne Parish Community Character and Design Statement should assess the effect of the proposals and demonstrate how adverse effects have been addressed.</p>

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		<p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 18: Biodiversity	A1, A2 and A3	<p>This policy specifies that development proposals should retain features of biodiversity value including mature trees, species rich hedgerows, ponds, streams and existing areas of woodland. It states that development which will result in loss or deterioration of habitats will not be supported, unless the need for, and benefits of, the development in that location clearly outweigh the loss. The policy also requires development proposals to deliver a net gain in biodiversity value.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 19: Local Green Spaces	B	<p>This policy proposes that the green spaces shown on an accompanying map (map number and map itself currently omitted from the NDP) and listed in the policy (list currently omitted from the policy) shall be designated as Local Green Spaces in accordance with the provision of paragraph 99 of the NPPF.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 20: Green and Blue Infrastructure	A1 / A2	<p>This policy supports developments that will result in the creation of new green infrastructure and/or contributes to the protection, management, enhancement and connectivity of existing green infrastructure assets. The policy sets out the criteria for information to be included with development proposals.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 21: Footpaths, Bridleways and Cycleways	A1	<p>This policy stipulates that applications for developments adjacent to the Public Rights of Way shown on Map 6, should, where it is appropriate, ensure links to those routes are provided. The policy also encourages applicants to make contributions to other local routes to help ensure a connected local network.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 22: Community Facilities	A3	<p>This policy specifies that there will be a presumption in favour of safeguarding existing facilities (a figure is referenced that is not yet included within the NDP) against any proposals that would result in their loss. It goes on to state that proposals that</p>

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations
		<p>could result in loss of any facility will only be supported where it can be demonstrated that the facility is no longer fit for purpose or viable, or where an equivalent facility is available in the Parish.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 23: Retaining Employment	B	<p>This policy supports changes of use of existing business premises where evidence can be provided to demonstrate that the existing use is no longer economically viable.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 24: New Employment	A1	<p>This policy supports in principle, the provision of local employment, subject to an assessment of the impact of the proposals on residential amenity, the transport network and parking provision and biodiversity and the environment. It should also make a valuable contribution to the growing shift to modes of active travel. The policy goes on to stipulate that the design of any facilities must accord with the Aldbourne Community Character and Design Statement.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 25: Loss of Parking	A1	<p>This policy states that developments that result in a loss of or have an adverse impact on car parking provision will not be supported. It must be demonstrated that the loss will not have an adverse impact or that <i>'adequate and convenient car-parking of equivalent or better standard will be provided in the nearby area'</i>.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>
Policy 26: Parking Provision	A1	<p>This policy requires developments to provide adequate parking on site and not to rely on on-street parking. A reliance on on-street parking will not be permitted where streets are narrow, already have parking issues or would impact on road users and the character of the area.</p> <p>The policy will not result in a likely significant effect to any European sites. Details of any development(s) would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>

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Policy 27: Lottage Farm	B	<p>This policy allocates a site at Lottage Farm for a residential development of approximately 32 dwellings and sets out a number of requirements and criteria that any proposed development at the site must meet.</p> <p>The proposed allocated site, and indeed the whole NDP area, lies within the catchment of the River Kennet and tributaries and is within the Thames Water Swindon and Oxfordshire WRZ. As such, a potential pathway for effects on the River Kennet upstream of the Kennet and Lambourn Floodplain SAC, exists, as the development allocated by means of the policy would likely lead to an increase in water abstraction.</p> <p>However, Thames Water Utilities Ltd has confirmed in writing that the Water Resources Management Plan 2019¹⁷, which has been subjected to an updated HRA, and their existing water/groundwater abstraction licenses have included additional headroom to allow for uncertainties in the total growth for the area and therefore have capacity to accommodate the additional growth set out in the Aldbourne NDP.</p> <p>The EA has confirmed in writing that the existing water abstraction licence, which Thames Water has advised could accommodate the additional development, has been subject to thorough assessment by the EA under the Habitats Regulations with the conclusion of no adverse impact on the European sites associated with the River Kennet. The EA also confirmed that existing consents have been subject to HRA over the last ~15 years to ensure they are not resulting in adverse effects on European sites.</p> <p>It is therefore considered that the quantum of housing proposed in Policy 27 could be accommodated within the headroom of the existing consents which have been subject to a HRA by Thames Water and the EA, and therefore would not have likely significant effects on the Kennet and Lambourn Flood Plain SAC. Policy 27 has therefore been screened out of appropriate assessment.</p> <p>Details of any development would be considered at the planning application stage to ensure acceptability in respect of other Development Plan policies of the Wiltshire Core Strategy and the NPPF.</p>

¹⁷ Water Resources Management Plan 2019, Thames Water Utilities Ltd, April 2020

5. Conclusion

- 5.1 The Aldbourne NDP has been screened for potential impacts which might arise from the plan alone or in combination with other plans and projects. There is a mechanism for effect on one European site, the Kennet and Lambourn Floodplain SAC as a result of one policy allocating land for housing, Policy 27 Lottage Farm. This policy has the potential to give rise to significant effects due to an increase in water abstraction which could impact the hydrological regime of the River Kennet and the Kennet and Lambourn Floodplain SAC.
- 5.2 Thames Water have confirmed that the housing allocations in the Aldbourne NDP can be covered by the existing groundwater abstraction licence(s) and still be compliant with the HRA conducted by the EA. Therefore, Policy 27 will not result in a significant effect on the SAC and can be screened out of appropriate assessment.
- 5.3 It can therefore be concluded that the Aldbourne NDP dated June 2022 would have no likely significant effects upon any European sites alone or in combination and no appropriate assessment is currently required.
- 5.4 If any alterations to the policies are made, then this HRA must be reviewed.

Prepared by [REDACTED] Ecologist, Wiltshire Council, 26 July 2022

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