

HRA and Mitigation Strategy for Salisbury Plain SPA

(in relation to recreational pressure from
residential development)

Reviewed in May 2018



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Front cover image: Stone curlew: Andy Hay (rspb-images.com)

1. Introduction

During the preparation of the draft Wiltshire Core Strategy (WCS), Natural England (NE) and the Royal Society for the Protection of Birds (RSPB) expressed some concern over the potential effects of increasing recreational pressure on breeding Stone Curlew populations at the Salisbury Plain Special Protection Area (SPA), particularly from planning residential housing for the local area.

In response to these concerns, Wiltshire Council (referred to hereafter as 'the Council') carried out a Habitats Regulations Assessment (HRA) to assess the effects of new residential development on the SPA, both alone and in-combination, based on the projected housing numbers in the draft WCS. That HRA was accompanied by a mitigation strategy (referred to hereafter as 'the Strategy'), which set out measures to identify, avoid and mitigate any potential effects of increasing recreational pressure on the SPA. The Strategy broadly required the following measures:

- Annual Stone Curlew monitoring – Identifying and monitoring Stone Curlew nests throughout the nesting season. Carrying out analysis of the results and compiling monitoring information in an annual report.
- Advice to landowners / tenants – informing land owners and tenants about the presence and location of active nests on their land, and advising them on how to carry out land management sensitively to avoid damaging / disturbing nests.
- Visitor monitoring - monitoring the effects of additional housing on visitor activity, particularly in order to understand whether changes in breeding activity are related to recreational pressures or other factors. Visitor surveys would be carried out and reported on a quinquennial basis.

The Strategy was developed with the support of key partners including NE, RSPB and the Ministry of Defence (MoD).

The documents were agreed by the partners in 2012, and the Strategy has been implemented by the Council ever since. No further concerns have been raised by partners during the intervening period, however much has changed in the past six years since the original documents were prepared.

The Council is also currently preparing another major planning document, the Wiltshire Housing Site Allocations Plan (WHSAP), and has commenced work on a wider review of the Local Plan. The Council therefore considers that this a timely opportunity to undertake a full review the best available evidence which underpins the HRA, and reflect on the effectiveness of the Strategy in supporting the conclusions of that assessment.

2. Context

Stone Curlew and Salisbury Plain

Salisbury Plain is a vast chalk plateau covering a large proportion of southern and eastern Wiltshire. Used for military training since the mid-19th Century, it is very sparsely populated and has largely escaped intensive post-war arable farming practices. This unique history of land use has resulted in the conservation of the largest remaining area of calcareous grassland in north-west Europe which supports internationally important populations of rare and declining bird species including the Stone Curlew.

Stone Curlews visit the UK to breed in summer (March – October), spending the rest of the year in south west Europe and Africa. It is a ground nesting species requiring open, flat ground with short vegetation in undisturbed locations to breed and invertebrate rich pasture to feed. Given its specific habitat requirements and sensitivities to disturbance, it has undergone significant declines across the UK largely as a result of changing farming practices, and by the early 1990s the British Stone Curlew population had declined to only 150-160 individuals¹. Salisbury Plain remained as one of the core strongholds, while elsewhere the former species range contracted due to conversion of grasslands to arable and increasing mechanisation, and indeed it is now absent from most of its previously known British range.

The Wessex Stone Curlew Project

The MoD has worked to protect the bird communities of Salisbury Plain for many years, however further focussed efforts by NE and the RSPB have also been required to secure the favourable conservation status of the Stone Curlew population

The “Wessex Stone Curlew Project” (WSCP) started in the 1980’s when RSPB first employed officers to carry out nest protection with landowners and farmers. Working with the MoD, the WSCP advised on setting up semi-permanent “nesting plots” on Salisbury Plain and the surrounding areas. Every year these plots are cultivated by the MoD and their tenants/licensees and kept free from vegetation throughout the nest establishment period. Monitoring work carried out by WSCP and MoD has been essential in making best use of land management resources by identifying those plots that require management in any one year, understanding why plots may be unsuccessful and informing decisions over whether to relocate plots.

Beyond the military training areas and across the wider project area, the WSCP has used funding from the SITA Trust and Biffa Award to work with tenant farmers and private landowners to set up Stone Curlew breeding plots under agri-environment schemes and provide timely monitoring and management advice essential to the success of these plots. Latterly, EU LIFE+ funding was used between 2012 and 2016 to build capacity amongst landowners to take advantage of Countryside Stewardship schemes and reduce the RSPB’s input.

¹ <http://jncc.defra.gov.uk/pdf/UKSPA/UKSPA-A6-58.pdf>

The effect of recreational pressure on breeding stone curlew was first recognised in 2008. As the WSCP started to wind down, the potential for new risks associated with the WCS became evident. The potential to utilise a scaled down version of the WSCP was therefore considered to continue the monitoring in order to detect long term change in response to increasing visitor numbers.

Legal Requirements

During the 20th Century negative population trends were recorded across Europe where Stone Curlew is now extinct across much of its former European range and, as a result the European Commission included it on Annex 1 of the Birds Directive (as adopted by the UK government in 1979). This Directive required the UK government to designate Salisbury Plain as a SPA due to its international significance for the conservation of bird species. The SPA designation puts a stringent responsibility upon the UK to protect the notified populations and avoid '*deterioration of habitats or any disturbances affecting the birds*'. The UK is responsible to the European Commission to meet the requirements of the Directive and action may be taken by the European Court of Justice to ensure compliance².

Further to the Birds Directive, Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an 'appropriate assessment' of any plan or project requiring authorisation which would be likely to have a significant effect upon an SPA (as part of a process now referred to as Habitats Regulation Assessment or HRA). This assessment must demonstrate that based on the best available scientific information³, and in light of any suitable mitigation measures, the plan or project would not adversely affect the integrity of the site either alone or in combination with other plans or projects. A precautionary approach must be adopted in HRA, and where a loss of site integrity cannot be ruled out the plan or project may only be authorised under very exceptional circumstances following consultation with the European Commission.

The Habitats Directive has been transposed into domestic legislation as the Habitats Regulations (2017), and the provisions of Article 6 are largely satisfied by Regulations 63 and 105, and Government Circular 06/2005⁴ which establishes the statutory obligations for HRA alongside the European Commission's guidance⁵. The Habitats Regulations confirms the responsibility of all local planning authorities as 'competent authorities', requiring them to carry out HRA of all relevant planning applications and Local Plans.

² *R v Secretary of State for the Environment (ex parte Royal Society for the Protection of Birds)* Case C-44/95

³ *Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels v Staatssecretaris van Landbouw, Natuurbeheer en Visserij*. Case C-127/02.

⁴ Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf

⁵ European Commission (2001) *Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EC*
http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

Although the requirement to carry out a HRA of land use plans is clearly derived from the European Habitats Directive, the domestic Habitats Regulations will remain part of the UK statute following the UK's exit from the European Union. Further to this, the European Union (Withdrawal) Bill should ensure that all European legislation continues to have full effect following the UK's exit from the EU. Therefore no changes to the statutory requirement for HRA are expected in the short to medium term.

In the longer-term, the UK government will have the freedom to amend its domestic environmental legislation, however it is worth noting that the Birds and Habitats Directives largely fulfil existing commitments under the Bern and Bonn Conventions, which the UK ratified in 1982 and 1985 respectively. The Prime Minister has already confirmed that Brexit will not result in a lowering of environmental standards⁶, and if the UK did eventually amend or revoke the Habitats Regulations, it would be required to continue to uphold its obligations under the Bern and Bonn Conventions. It is therefore fully expected that any future changes to the UK's environmental legislation would continue to provide strong protection for areas such as Salisbury Plain.

Wiltshire Local Plan

In Wiltshire, the Local Plan currently includes the Wiltshire Core Strategy incorporating saved policies from district local plans, Chippenham Site Allocations Plan, and Minerals and Waste Plans⁷; these plans set out strategic plans for Wiltshire till 2026. A number of neighbourhood plans have also been adopted in recent years, which form part of the development plan, but not the local plan.

The emerging WHSAP is currently at the pre-submission stage and due to be submitted to the Secretary of State for examination during 2018. This plan will support the delivery of new housing set out in the WCS (adopted January 2015) until 2026⁸.

Other emerging plans include the Local Plan Review and the Joint Strategic Plan (with Swindon), however those plans are considerably less advanced than the WHSAP.

⁶ <https://www.gov.uk/government/speeches/prime-ministers-speech-on-the-environment-11-january-2017>

⁷ <http://www.wiltshire.gov.uk/planning-policy>

⁸ <http://www.wiltshire.gov.uk/planning-whsap>

3. Evidential Review

Stone Curlew monitoring (2012 – 2017)

The RSPB has continued to carry out monitoring of the Stone Curlew population in and around Salisbury Plain since implementation of the Strategy commenced in 2012. Annual reports⁹ have been produced each year, setting out numbers of:

- Breeding pairs
- Breeding attempts
- Fledged young

The results of this monitoring is shown below in Figure 1.

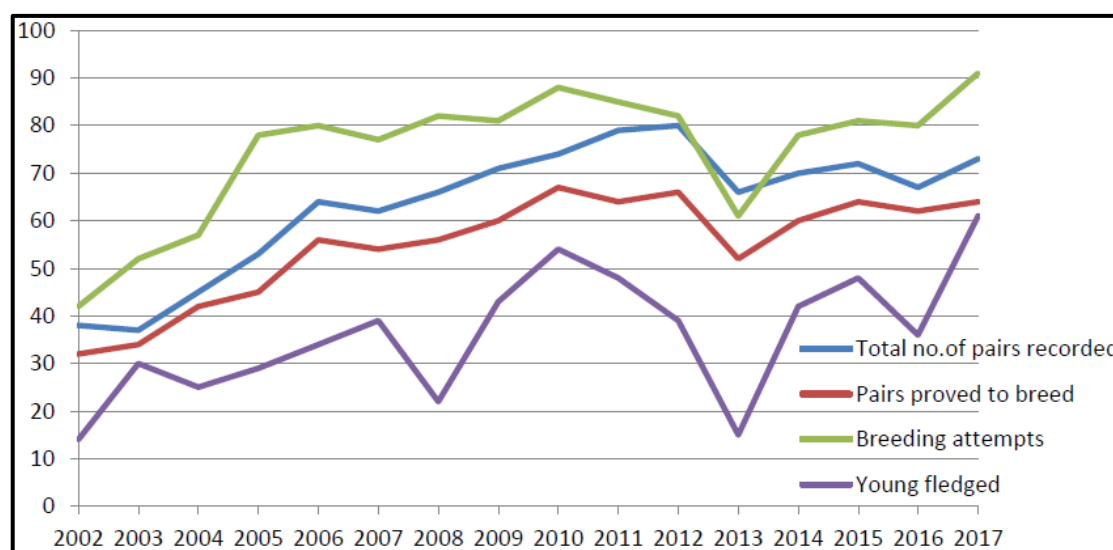


Figure 1 – Stone Curlew population monitoring at Salisbury Plain SPA (+ 5km buffer)

Since the implementation of the Strategy in 2012, there was a 20% population decline in 2013, however that was attributable to a very cold spring and consequent lack of food, with the population recovering during 2014 and 2015. There was a further small decline in 2016, however this reflected a wider decline across the entire Wessex area, and was therefore not due to any factors unique to Salisbury Plain. Indeed this decline was partially attributed to more challenging survey conditions during the 2016 breeding season, which made it more difficult to accurately confirm the outcome of breeding attempts. There was a further increase again in 2017, and the overall trend in the population in recent years appears to be a steady increase.

It is worth noting that the SPA target for population abundance is ‘Maintain the size of the breeding stone-curlew population at or above a mean of 15 pairs, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent’¹⁰. Within the Salisbury Plain Training Area (SPTA), which is largely

⁹ Stone-curlew CIL Monitoring Area Report 2014, Stone-curlew CIL Monitoring Area Report 2015, Stone-curlew CIL Monitoring Area Report 2016, Stone-curlew CIL Monitoring Area Report 2017. All prepared by Nick Tomalin, RSPB for Wiltshire Council

¹⁰ Natural England (2017) European Site Conservation Objectives: Draft Supplementary Advice on Conserving and Restoring Site Features - Salisbury Plain Special Protection Area (SPA) <http://publications.naturalengland.org.uk/file/5562783965380608>

comprised of the SPA, the average number of pairs has remained fairly stable over the last 10 years at around 25, as shown below in Figure 2. It can therefore reasonably be concluded that the SPA is in favourable condition in respect of the number of breeding pairs of Stone Curlew.

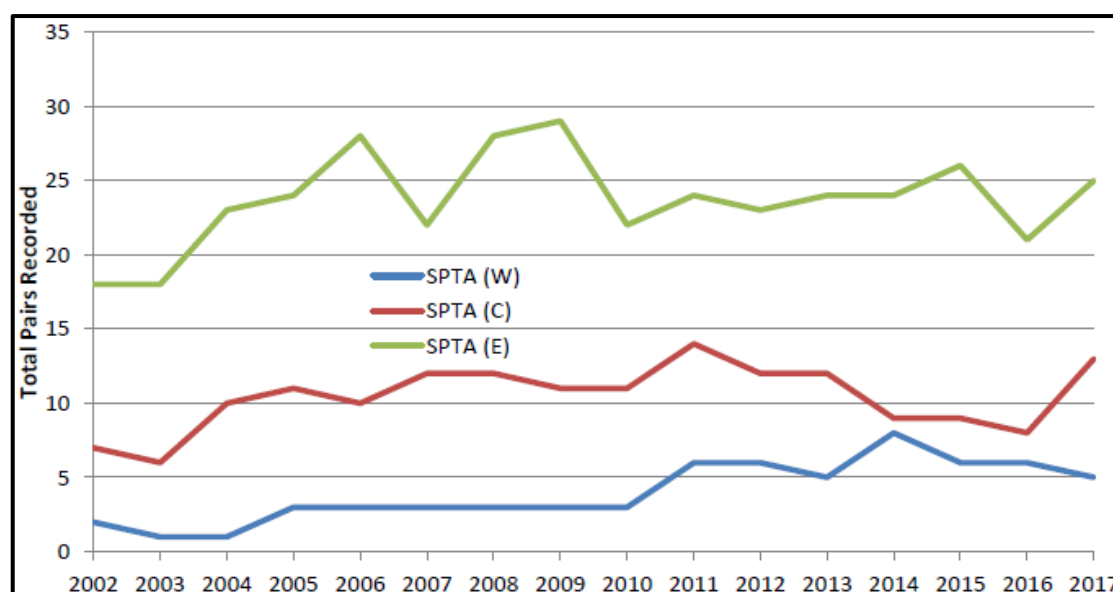


Figure 2 – Average number of breeding pairs within the SPA

The data collected during the monitoring surveys is also used to calculate an overall productivity figure (chicks per pair) for the population. Trends in productivity are a good indicator of the stability and sustainability of a population, and for the Stone Curlew population at Salisbury Plain, it has been estimated that an annual productivity of 0.61 chicks per pair (based on an average over the previous five years) is needed to maintain a stable population¹¹. The results of recent monitoring are shown in Figure 3 below.

¹¹ Salisbury Plain SSSI Integrated Site Assessment 2014-15, Wiltshire Conservation Team, Natural England, December 2016
<http://publications.naturalengland.org.uk/publication/5036536132796416>

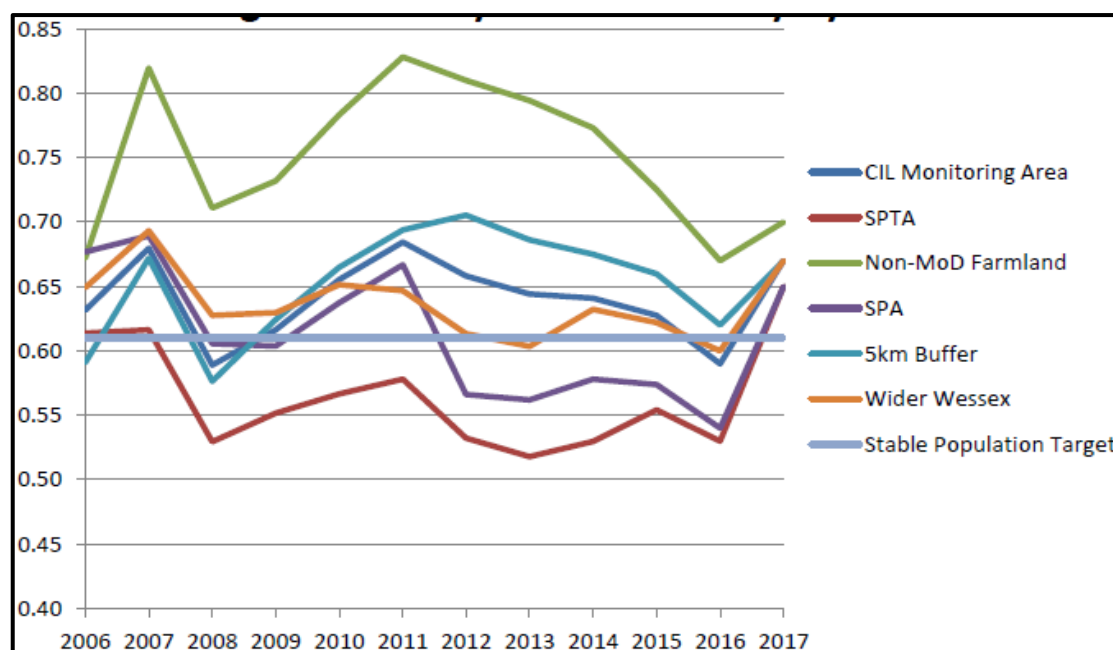


Figure 3 – Five year productivity figures for the SPA and surrounding areas

In 2017, the five year average productivity for the SPA was 0.65, indicating that the population is currently stable, although it is worth noting that followed a prolonged period when productivity remained below the 0.61 target, and it also reflects particularly high productivity of 0.95 chicks per pair in 2017. The breakdown of productivity figures shown in Figure 3 also shows that productivity tends to be higher on agricultural land outside the SPA than within the SPA itself. These trends highlight the importance of this surrounding functionally linked land in maintaining the overall favourable conservation status of the SPA populations.

The productivity of the Salisbury Plain population appears to be slightly higher than the wider Wessex populations, however that may be attributable to greater survey effort in and around the plains. Nonetheless, this does appear to indicate that the SPA population is not currently experiencing any specific pressures which are suppressing the population.

Despite the encouraging trends in population numbers and productivity, the monitoring reports continue to provide a useful commentary on factors which may be affecting the population. This indicates that weather conditions during the breeding season have the greatest influence on population numbers, as was witnessed in 2013. However other factors such as predation by ground based scavengers also appear to be having negative effects on chick productivity. Disturbance events have been noted by surveyors during the course of the monitoring visits, which have included military vehicles and photographers, but have predominately involved dog walkers.

Stone Curlew Management Plan¹²

The MoD actively manages the SPTA for the conservation of stone curlew in accordance with the Stone Curlew Management Plan. Management measures include the creation, management and maintenance of dedicated nesting plots in

¹² Ash et al (2014) A Progress Report and Management Plan for Stone Curlew; Salisbury Plain Training Area

appropriate locations to suit the particular requirements of nesting stone curlews. The first management plan was produced in 2000, and was revised in 2014 and includes a commitment to maintain 35 plots across the SPTA and monitor each plot's productivity, investigating the potential to move unsuccessful plots to more appropriate parts of the plain where appropriate. The evidence gathered as part of the Strategy, is therefore vital in supporting and informing the MoD's adaptive management of the SPTA in line with the objectives of the management plan.

Visitor Monitoring (2015)¹³

The Strategy was based on a visitor survey originally carried out by the MoD in autumn 2007¹⁴. That study had been focused on the eastern part of the SPTA, on the basis that public access is restricted in the central and western training areas. The study found that the vast majority of visitors (82%) visited from within 15km, which was taken as the visitor catchment for the eastern plain for the purposes of the Strategy. The study also found that a relatively high proportion of regular visitors came from within 4km of the plains.

When producing the HRA, it was agreed that consideration should be given to the central and western plains too, as recent monitoring had shown that the peripheral areas outside of the training areas were used by breeding Stone Curlew. Given that no visitor data was available for the central or western plains it was necessary to make an assumption about the visitor catchment for these areas, and it was agreed that the 4km radius would be a reasonable assumption.

In 2015, the Council commissioned a further visitor study intended to repeat the 2007 study and help to identify trends in visitor numbers on the plains. The methodology was broadly comparable, however it was extended to include the central and western plains in order to provide visitor data on these areas for the first time. It was also carried out during the summer months to provide a more accurate picture of access patterns during the Stone Curlew breeding season.

The 2015 study confirmed that the eastern plain does generally have a larger visitor catchment than the central and western plains, however the difference was not considered to be significant, and it was recommended that an average visitor catchment of 6.4km could be assumed for all the plains (see Figure 4). The study also found that the number of visits to the central and western plains were higher than expected, which was driven by regular visits from nearby market towns and villages to the north and west of the plains. This increase over the 2007 study is likely to reflect the survey period, with higher proportions of the local population visiting the plains during the summer period (June – August) than in the autumn (September – October). On the basis of the new study, it can be estimated that approximately 1% of the population within the visitor catchment are regular visitors to the plains.

It was not possible to draw any direct comparisons with the 2007 study about trends in visitor numbers due to the differences in the methodologies.

¹³ Footprint Ecology (2015) Salisbury Plain Visitor Survey 2015

¹⁴ Liley, D., Payne, K. & Peat, J. (2007). Access patterns on Salisbury Plain. Unpublished report for Enviro Ltd. Footprint Ecology, Wareham, Dorset

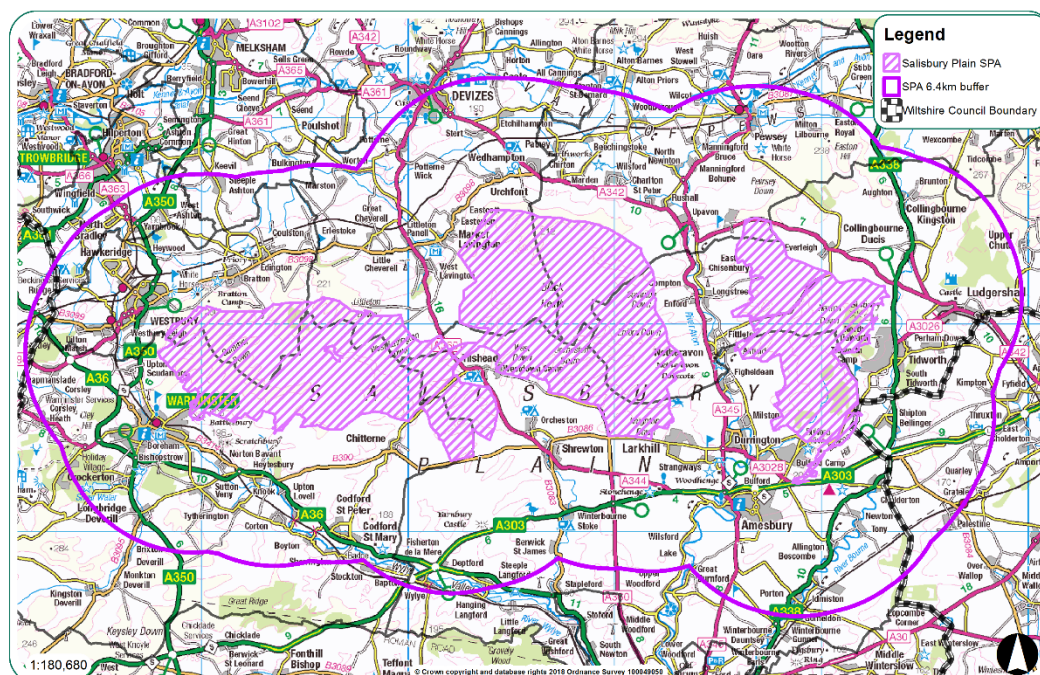


Figure 4 – Salisbury Plain SPA and visitor catchment

Housing Numbers

Predictions about housing growth used in the 2012 HRA were based on the Housing Requirement Technical Paper¹⁵ which accompanied the pre-submission draft of the WCS; this set out housing requirements for each principal settlement, market town and community area (CA) in order to meet local needs until 2026. However, during the course of the Examination in Public the housing numbers were revised upwards in several locations, and the minimum housing requirements for these settlements and areas were considerably higher in the adopted version of the WCS (2015).

The Council has subsequently produced a series of annual Housing Land Supply Statements¹⁶, which set out running totals of permissions and completions for each principal settlement, market town and CA. The latest of these statements provides a useful indication of what proportion of the housing assessed in 2012 has already been delivered within the visitor catchment¹⁷. This shows that within the visitor catchment of Salisbury Plain, approximately 58% of the housing proposed in 2012 had already been delivered by 2017, as summarised in Table 1.

¹⁵ Topic Paper 15 – Housing Requirement Technical Paper
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase.htm>

¹⁶ <http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence>

¹⁷ Wiltshire Housing Site Allocations Plan Pre-submission draft plan Topic Paper 3 Housing Land Supply <http://wiltshire.objective.co.uk/file/4616894>

Settlement / CA	Proposed housing requirement (2006-26)¹⁸	Completions (2006-17)¹⁹	% of requirement delivered
Amesbury, Bulford and Durrington	2,100	1,311	62
Amesbury CA	300	179	60
Devizes	1,730	1,447	84
Devizes CA	420	286	68
Pewsey CA	600	426	71
Tidworth and Ludgershall	1,750	728	42
Tidworth CA	150	93	62
Trowbridge	5,660	2965	52
Trowbridge CA	260	255	98
Warminster	1,650	603	37
Warminster CA	120	90	75
Westbury	1,290	877	68
Westbury CA	100	61	61
Total	16,130	9,321	58

Table 1 – Percentage of the 2012 housing requirement delivered by April 2017

The draft WHSAP allocates sites for residential development broadly in line with residual WCS housing requirements. It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set in the WCS. The WCS explains that the housing levels set out for individual settlements and CAs are indicative and that there needs to be some flexibility. They are approximate and neither minimum or maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period.

The draft WHSAP shows that some areas have already met the WCS indicative requirements, which are expected to be significantly exceeded by 2026. When the proposed housing requirements used in the 2012 HRA are compared with the indicative actual delivery proposed in the draft WHSAP, there is a significant net

¹⁸ Taken from the 2012 Topic Paper 15 – Housing Requirement Technical Paper

¹⁹ Taken from the pre-submission draft of the WHSAP
<http://wiltshire.objective.co.uk/file/4665374>

increase of planned housing within the visitor catchment of an additional 1,245 dwellings over the plan period, as shown in Table 2.

Area	Proposed housing requirement (2006-26)²⁰	Indicative actual delivery (2006-26)²¹	Difference
Amesbury, Bulford and Durrington	2,100	2,412	+312
Amesbury CA	300	237	-63
Devizes	1,730	2,136	+406
Devizes CA	420	468	+48
Pewsey CA	600	605	+5
Tidworth and Ludgershall	1,750	1,836	+86
Tidworth CA	150	96	-54
Trowbridge	5660	5590	-70
Trowbridge CA	260	278	+18
Warminster	1,650	1,658	+8
Warminster CA	120	143	+23
Westbury	1,290	1,808	+518
Westbury CA	100	108	+8
Total	16,130	17,375	+1,245

Table 2 – Comparison of proposed housing requirement (2012) and current projections of housing delivery within the visitor catchment of Salisbury Plain

In-combination development

Since 2012, the MoD's Army Basing Programme (ABP) has also been planned and is currently being delivered in and around Salisbury Plain; this programme includes significant improvements to the military training infrastructure, improvements to the main garrisons, and 917 Service Family Accommodation (SFA) units. A masterplan covering the main elements of the ABP was subject to a HRA.

One of the main issues considered by the HRA was the additional recreational pressure from the 917 proposed SFA units in close proximity to the SPA. The HRA

²⁰ Taken from the 2012 Topic Paper 15 – Housing Requirement Technical Paper

²¹ Taken from the pre-submission draft of the WHSAP
<http://wiltshire.objective.co.uk/file/4665374>

of the final scheme (18 December 2015), therefore committed the MoD to providing the following mitigation to reduce any residual impacts:

- i. Revision of the Stone Curlew Management Plan to improve the management and number of plots on the plains.
- ii. Prepare a Recreation Access Action Plan to review existing Public Rights of Way and accessible open spaces and identify opportunities for additional routes for running and dog walking which would reduce potential conflict with Stone Curlew plots.
- iii. Provide information on responsible access for service personnel and families. This would include information on existing access arrangements and suggested local walking/ running routes based on the results of the above study, alongside information about the environmental sensitivity of the Salisbury Plain training Area and the importance of keeping to existing tracks.

The Council and NE agreed with the conclusion of the HRA that additional visits generated by the proposed SFA would not have an adverse effect on the Salisbury Plain SPA in combination with the WCS.

The revision of the Stone Curlew Management Plan has already been completed, while the remaining measures have been secured through a planning conditions / obligations and will be implemented by the MoD in tandem with the delivery of the SFA units.

4. Mitigation Strategy

The Strategy remains largely the same as it was in 2012, utilising monitoring and management advice to inform adaptive land management in and around the SPA. This approach was considered to be the preferred option by the partners over other approaches in the context of Salisbury Plain when the Strategy was developed in 2012.

Stone Curlew Monitoring

RSPB officers regularly survey and record locations of all Stone Curlews on the SPA and up to 5km away and monitor the breeding success of all known pairs from early April to early October each year. RSPB project staff are trained and licensed, and provide full coverage of all areas considered suitable for breeding Stone Curlew.

In early April surveying is concentrated on searching in suitable areas for returning birds, and behaviour is monitored to identify breeding pairs. Nest scrapes are visited to weigh and measure eggs in order to predict hatching date. Each breeding attempt is then monitored on subsequent visits to determine breeding outcome, using accepted definitions of breeding outcome.

Chicks are also ringed with a combination of one BTO metal ring on the tarsus and three colour rings in a unique combination on the tibia and tarsus. This allows individual identification on colour ring re-sighting. To gain as much information as possible from the ringing programme, the RSPB aim to ring as many chicks as possible within the monitoring area.

From July onwards, roost sites are also visited to record numbers of adults and fledged juveniles. Where possible, fieldwork is carried out during dry, calm weather when the birds are more active.

Key indicators measured by the monitoring include total numbers of birds, breeding attempts and fledged young, and productivity figures on an annual and five year average.

Management Advice

Suitable nesting habitats within the survey area are identified and assigned to one of four habitat categories to standardise reporting, and focus monitoring effort and advice as follows:

1. Semi natural – this includes semi natural grassland, chalk scrapes and chalk areas, and arable reversions. Requires no annual management or advice (beyond some grazing).
2. Plots within grassland – any specially-created nesting plots for stone-curlew which are more than 50% bounded by grassland. Require advice to landowners on how and when to manage plots – termed ‘soft intervention’.
3. Plots within arable – any specially-created nesting plots for stone-curlew which are more than 50% bounded by arable. Require soft intervention.
4. Cropped land – all other cropped habitats, including crops, fallow or disturbed ground, game and wild bird cover plots. These are not specially-created for stone-curlew and often require us to be present to ensure nest/chick survival – termed ‘hard intervention’.

The information gathered during the nest monitoring is used to inform appropriate management aimed at improving the chance of breeding success, and to identify the timing for any failures.

In addition to working with agricultural land owners and tenants, the RSPB officers also share their data with staff at the MoD in order to inform land management and planning of training activities within the SPTA during the breeding season and inform the delivery of their Stone Curlew Management Plan.

Officers also identify instances where members of the public potentially cause disturbance of active Stone Curlew nests, and in some cases are able to speak to the public about the sensitivities of the area and ways to reduce their impact.

The results of the survey work are analysed and written up in an annual report to the Council which is shared with NE and the MoD.

Visitor Monitoring

In addition to monitoring the number, distribution and productivity of Stone Curlew nests across the plains, the Strategy includes provision for monitoring the scale and distribution of visitor pressure across Salisbury Plain. The first survey was carried out in 2015 and should be repeated every five years.

The surveys utilise a range of methods including automated counters, face to face surveys, and driving transects carried out during the Stone Curlew nesting season.

The aim of this work is to identify trends in visitor pressure which appear to be related to patterns of recently delivered housing development, and correlations between localised increases in visitor pressure and changes in Stone Curlew numbers and productivity recorded by the RSPB (as described above).

It was not possible to draw any direct comparisons between the 2007 and 2015 visitor surveys due to changes in the methodology used, however it is expected that any comparison will become more relevant in future surveys, as the methodology should remain broadly consistent. The next survey is planned for 2020.

Delivery

When the original Strategy was prepared, the Council had not yet become a CIL charging authority, and developer contributions were individually calculated and collected for major developments within the visitor catchment. Although this approach was effective in collecting sufficient funds to delivery of the Strategy, it did create an administrative burden for the Council, calculating the correct amount, drafting bespoke S106 clauses and tracking the funds pending and received once permissions were granted and development had commenced.

In 2013 the Council became a CIL charging authority and adopted its Regulation 123 list, which includes funding for '*Stone Curlew and Salisbury Plain Special Protection Area*'. The Council's Supplementary Planning Document on Planning Obligations, which supports Core Policy 3 also identifies the Strategy as one of a number of mitigation strategies needed to mitigate the effects of strategic growth, and confirms that: '*To meet the strict requirements of the Habitat Directive to ensure that these strategies are delivered, funds will be ring-fenced annually from CIL receipts prior to spending on any other infrastructure item*'²².

²² <http://www.wiltshire.gov.uk/wiltshire-may-2015-planning-obligations-spd.pdf>

Funding to deliver the Strategy is therefore considered to be on a strong footing through CIL. It is expected that this will continue to be the main funding mechanism on an ongoing basis, although it is possible that the government may review the CIL Regulations in future years, which may require a review of this funding mechanism.

5. Strategic Habitats Regulations Assessment

Likely Significant Effects

Screened in:

This HRA considers the likely significant effects of recreational pressure as a result of planned residential growth in Wiltshire on Stone Curlew, as a qualifying feature of the Salisbury Plain SPA.

For the purposes of this assessment, likely significant effects are considered to arise from all residential development from within the visitor catchment of the SPA, which is expected to include land within 6.4km of the SPA (based on the latest visitor survey data).

The scale and distribution of planned growth is as set out in the Council's adopted WCS and the draft WHSAP.

The in-combination effects of the ABP are also considered.

Screened out

The effects of growth from neighbouring local authorities has not been considered, as it falls outside of the visitor catchment.

The effects of other forms of growth e.g. employment, commercial, retail etc have not been included in the assessment, as they are considered to have a negligible effect on recreational pressure.

The effect of increasing recreational pressure on other qualifying features of the SPA e.g. Hen Harrier, have not been considered as they are not understood to be sensitive to recreational pressure.

Effects of recreational pressure on the Salisbury Plain Special Area of Conservation (SAC) are not included, as the qualifying features are not considered to be sensitive to recreational pressure.

Other likely significant effects of development e.g. habitat loss etc are not considered in this HRA, but may be considered by the Council in the HRA of relevant plans and projects, if necessary.

Integrity Test

Effects of planned growth

The following assessment takes a similar approach to that of the 2012 HRA, and is made in light of the best available scientific information, as set out in the evidential review carried out above (Section 3). It quantitatively assesses the effects of both recent housing delivery in the visitor catchment since 2006 (Table 1) and current projections for actual delivery within this area (Table 2) over the plan period (till 2026), whilst also including a qualitative assessment of the potential residual effects from other in-combination development, namely the ABP.

While the methodology remains largely the same, the supporting evidence which underpins the calculations has changed significantly from that used in 2012, particularly as a result of the 2015 visitor survey. These changes had the following effects on the calculations:

- The revised visitor catchment (6.4km) incorporates several additional settlements to the north and west the plains, increasing the proportion of planned growth to be considered in the assessment.
- The proportion of the local population within the visitor catchment expected to regularly visit the plains has increased very significantly (from 0.14 to 1%), multiplying the effects of growth on visitor pressure.

It is therefore not possible to make direct comparisons between the results of the 2012 and 2018 HRAs. However it is possible to retrospectively assess the 2012 housing figures using the 2018 methodology in order to provide a comparison between the resulting recreational pressure of the 2012 housing requirement and planned growth projections. These comparative figures are provided in order to put any increase in planned growth projections into context.

For the purposes of this assessment, references to the '2012 housing figures', are those set out in the Housing Requirement Technical Paper. 'Planned growth' is as set out in the current draft WHSAP. The 'plan period' is that of the WCS and WHSAP, namely 2006-26.

Additional residents within the visitor catchment

A total of 17,375 dwellings are currently expected to be delivered within the visitor catchment during the period 2006-2026 as a result of planned growth. However, it is worth noting that, a total of 9,321 (54%) of those dwellings have already been delivered. The average occupancy rate in Wiltshire is 2.27 people per dwelling, therefore this level of growth can be expected to result in a total population increase of 39,441 residents over the plan period, of which 21,159 are expected to be resident already as a result of recently delivered growth (since 2006), and an additional 18,282 residents are expected as a result of further growth during the remainder of this period (2018 – 26).

If the 2012 housing figures are reassessed using the latest visitor survey data, this would equate to planned growth of 16,130 dwellings within the current visitor catchment, resulting in an estimated population increase of 36,615 people over the plan period. By comparing these figures, it is estimated that current planned growth will result in an additional 2,826 residents within the visitor catchment over and above those which would have resulted from the 2012 housing figures.

Additional visitor pressure to Salisbury Plain

The data gathered by the 2015 visitor survey indicates that approximately 1% of residents within the visitor catchment visit the plains regularly. Planned growth within the visitor catchment can therefore be expected to result in a total additional 394 visits per day over the plan period. Of these additional visits, it is estimated that 212 visits per day are likely to be occurring already, and an additional 183 visits per day can be expected by the end of the plan period.

If the 2012 housing figures for the visitor catchment are assessed in the same way, this estimates that growth would result in an additional 366 visits per day over the plan period. By comparing these figures, it is estimated that current planned growth will result in an additional 28 visits per day during the plan period over and above those which would have resulted from the 2012 housing figures. To put this in context, planned growth would result in an estimated additional 1% of visitors over the plan period, compared to the 2012 housing figures.

Effects of the ABP

The Council has previously estimated that the 917 SFA proposed as part of the ABP could result in an additional 38 visits per day if unmitigated (based on the 2015 visitor survey data). However, the MoD has prepared a bespoke package of mitigation measures which should significantly reduce levels of recreational visits to the plains arising from these SFA units, particularly by dog walkers. The measures may also help to absorb some visits to the plains which would otherwise have been made by existing local residents in the area. Nonetheless, the plains do have a considerable recreational appeal, and it must be expected that there will be some residual increase as a result of this new development.

It therefore remains to be seen what net effect ABP will have on visitor pressures in practice, and it is not possible to quantify this at the current time. The HRA of the ABP masterplan has been signed off by Natural England, therefore it may be assumed with a reasonable degree of confidence that the proposed mitigation measures should be effective, and as such for the purposes of this assessment, it is considered that any residual effects which could potentially arise from ABP will be relatively minor.

Constraints and assumptions

The European Commission's guidance on application Article 6 of the Habitats Directive requires that a precautionary approach is applied in carrying out a HRA, therefore in order to counteract any constraints of the data used, a number of precautionary assumptions have been made in the analysis:

- All people who visit the plain regularly would do so every day (the evidence indicates that a significant majority of visitors do visit daily, and indeed those exercising dogs may visit twice a day);
- All people using the plain are walking their dog (evidence indicates that the actual figure is lower, at approximately 74%); and
- Where a market town (of part thereof) lies within the visitor catchment, the total housing projection for that Community Area is included in the analysis.

The above assumptions were also included in the 2012 HRA and were made based on the visitor surveys, the professional opinion of Natural England, RSPB, Wiltshire Council, and Defence Infrastructure Organisation staff following extensive discussions on this issue.

Effectiveness of mitigation measures

The Strategy has been successfully implemented for the past six years. During this period, it has successfully delivered all of the expected outputs, namely:

- Four annual Stone Curlew monitoring reports
- One visitor survey
- Ongoing advice to land owners / managers in and around the plains

Although the distribution of housing within the visitor catchment has differed slightly from that set out in the WCS during this period, the overall quantum of housing delivered has been broadly in line with requirements of the WCS, with 54% of the housing requirement having been delivered in the first 11 years of the 20 year plan period.

The WHSAP will boost housing supply within the visitor catchment, however this is targeted at meeting any localised deficit for individual settlements or Community Areas. The net result of this additional housing is only 1% higher visitor pressure

than would have resulted from the original 2012 housing figures which the Strategy was intended to address.

Monitoring of the Stone Curlew population shows that the site has remained in Favourable Conservation Status in terms of the number of breeding pairs and productivity despite these recent housing delivery over the plan period, indicating that the current approach of monitoring to inform land management advice and adaptive managing is effective.

During the implementation period of the Strategy, none of the partners have raised any concerns about either its delivery or its effectiveness.

The effects of planned growth will see visitor numbers increase by a further 46% over the plan period therefore there remains a degree of uncertainty over the final effects of the WCS and draft WHSAP. The ABP has also only recently begun delivery, therefore the effects of that project and its bespoke mitigation strategy also remain to be seen. In order to overcome this uncertainty, there is an ongoing need for an effective mitigation strategy for Salisbury Plain SPA to avoid any adverse effects of planned growth on the integrity of the site. Added to this, the accumulating database gathered as part of the strategy provides the best opportunity to detect and account for unexpected long term changes and plan for any necessary mitigation as appropriate.

Based on the best available evidence, the Strategy is considered to provide an effective means of mitigating the effects of increasing recreational pressure on the SPA, and the Council will continue to implement it with its partners (subject to periodic review) while also continuing to deliver housing growth within the visitor catchment.

Conclusion

The WCS, draft WHSAP and ABP will all continue to have likely significant effects on the Salisbury Plain SPA through increasing recreational pressure as a result of the delivery of residential development within the visitor catchment. Over the plan period. The Strategy provides an effective, timely and reliable means of mitigating these effects, and as a result **it is concluded that planned growth as a result of the WCS, WHSAP and ABP, will not have an adverse effect on the integrity of the Salisbury Plain SPA, either alone or in-combination with other plans and projects.**

Where new development is proposed within the visitor catchment which is within overall housing figures set out in the WCS, draft WHSAP and ABP masterplan, the Council may continue to rely upon the conclusions of this strategic level HRA, without the need to carry out individual project level HRAs of individual planning applications (subject to the advice of NE in relation to specific projects). Likewise, developers and applicants should therefore not normally need to prepare or submit HRAs of their projects in support of their planning applications for residential development, so long as the overall quantum of development within the visitor catchment remains within the figures assessed herein.

Where the quantum of planned housing within the visitor catchment exceeds the figures considered in this assessment, the Council may need to reassess the effects of that additional development, and may require further information or bespoke mitigation measures from the applicant in order to inform the HRA process and ensure that there will be no adverse effect on the SPA.