



Working towards a Core Strategy for Wiltshire

# Topic paper 5: Natural environment

Wiltshire Core Strategy  
Consultation January 2012

Topic Paper 5: Natural Environment

This paper is one of 16 topic papers, listed below, which form part of the evidence base in support of the emerging Wiltshire Core Strategy. These topic papers have been produced in order to present a coordinated view of some of the main evidence that has been considered in drafting the emerging Core Strategy. It is hoped that this will make it easier to understand how we have reached our conclusions. The papers are all available from the council website:

Topic Paper 1: Climate Change

Topic Paper 2: Housing

Topic Paper 3: Settlement Strategy

Topic Paper 4: Rural Signposting Tool

Topic Paper 5: Natural Environment

Topic Paper 6: Retail

Topic Paper 7: Economy

Topic Paper 8: Infrastructure and Planning Obligations

Topic Paper 9: Built and Historic Environment

Topic Paper 10: Transport

Topic Paper 11: Green Infrastructure

Topic Paper 12: Site Selection Process

Topic Paper 13: Military Issues

Topic Paper 14: Building Resilient Communities

Topic Paper 15: Housing Requirement Technical Paper

Topic Paper 16: Gypsy and Travellers



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## Executive Summary

The aim of this topic paper is to gather evidence to inform the preparation of the Wiltshire Local Development Framework, particularly Core Strategy policies in respect of the natural environment. These policies are required in order to achieve the relevant strategic objective 'To protect and enhance the natural environment'. A wide range of source material has been reviewed including research, best practice, legislation and other relevant plans and strategies. The current policy framework (including emerging and adopted policy) has been analysed, key stakeholders and the public have been consulted, and community concerns and aspirations have been identified as part of the research.

The information gathered as a result of this investigation has identified a wide range of potential threats to Wiltshire's natural environment which could be exacerbated by the projected housing and employment growth over the plan period. However it also identifies opportunities to guide development in a sustainable manner through local policies that not only protect our natural environment, but also provide opportunities to enhance it for future generations.

Key themes which run throughout the paper and will need to be addressed in the Local Development Framework include:

- Areas of Outstanding Natural Beauty – nationally significant landscapes; Wiltshire holds a large proportion of the national resource; and national policies may not fully protect the setting of the AONBs.
- Strategic Nature Areas – regionally important areas as priorities for habitat restoration; development could potentially sterilise restoration potential; and masterplanning and landscaping provides opportunities to contribute towards targets for habitat creation / restoration.
- Local sites – important natural resources subject to negative trends; our communities desire to protect and enhance local sites; threats from development; and opportunities to enhance these sites through favourable management / restoration.
- Landscape Character Assessment – a comprehensive approach to landscape conservation; national pressure to use as a policy tool for planning; and potentially replace local landscape designations.
- Special Landscape Areas – an old local landscape designation; poorly defined and little supporting evidence; potentially replaced by landscape character assessment (LCA); however some landscapes may not be fully covered by LCA; further studies required.
- Green belt / rural buffers – strong national policy available on green belt; potential need for policy on local priorities or alterations to boundary; and national requirement to remove local rural buffers.
- Local Geological Sites – important natural resource; strong negative trends; threats from development; and opportunities to enhance / manage sites.
- Biodiversity Action Plan habitats and species –national and local priorities for conservation; historical negative trends; local desire to encourage wildlife; loss to development; and opportunities for restoration and enhancement through planning.
- Natural processes – the importance of connectivity to counter the effects of habitat fragmentation and facilitate climate change adaptation; the importance of healthy functioning ecosystems; potential damage caused by development; and opportunities to restore and enhance connectivity / functionality.
- Tranquillity – very important aspect of landscape quality; traditionally overlooked in planning; and improved assessment techniques and evidence available.

- Sustainable design –the context of the natural environment is often overlooked in the design process; sensitive masterplanning and landscaping; and opportunities to enhance urban environments for our communities and our wildlife.
- Disturbance – pressures of increasing recreational development on the natural environment; specific pressures on sensitive birds breeding on Salisbury Plain and in the New Forest; numerous cumulative effects on other wildlife across the county; and opportunities to reduce / offset impacts.

Policy options to address these issues and maximise opportunities for enhancement of our natural environment through the planning process have been explored within this topic paper. The most sustainable solution identified will involve an updated and enhanced policy framework with a broad scope, taking more proactive and holistic approach than the current policy framework. This takes a pragmatic approach to delivery of the strategic objective '*To protect and enhance the natural environment*', ensuring that this is delivered in the most sustainable and effective manner.

## 1 Introduction

### Background

- 1.1 Wiltshire's natural environment is arguably its greatest asset. Although Wiltshire is dominated by the vast sweeps of the chalk downs, its landscape is highly varied with intimate river valleys contrasting with open uplands and broad vales. This range and distribution of landscapes and habitats is a result of the underlying geological characteristics of the land upon which natural processes and human activities have operated in turn influencing patterns of land use as well as ecological and cultural character.
- 1.2 The chalk which dominates the south and east of the county has produced the vast open downlands of Salisbury Plain, Marlborough Downs and Porton Down; much of these landscapes are of national importance, as recognised by the North Wessex Downs Area of Outstanding Natural Beauty (AONB) designation, and are also internationally important for populations of rare birds and calcareous grassland habitats. In the south west of the county the chalk has given rise to wooded downlands including Cranborne Chase AONB due to different land uses and functions in this area, which supports a large proportion of Wiltshire's remaining ancient woodland resource. The limestone in the north west of the county supports a network of ridges and valleys including part of the Cotswolds AONB, supporting important river corridors, ancient woodlands, limestone grasslands and internationally important populations of bats. The band of greensand and clay which runs through the county, dividing the limestone from the chalk includes the important ancient hunting forests of Braydon and the extensive wetlands of the Cotswolds Water Park.
- 1.3 Rivers are also an important feature of the county, helping to shape its landscape. The most extensive river system is the Salisbury Avon draining to the south; this chalk river is internationally important for its habitats and bird life (designated as a Special Area of Conservation 'SAC'). The Bristol Avon drains much of the north of the county, forming an important corridor for wildlife through the landscape and providing valuable ecosystem services to hundreds of thousands of residents in Wiltshire's towns and the cities of Bristol and Bath further downstream. The upper reaches of the River Kennet also drain to the east; this is another internationally important chalk stream and floodplain. A small area in the north of the county also drains into the upper reaches of the Thames, an area which includes internationally important hay meadows within the floodplain.
- 1.4 All of these national and international designations help to demonstrate that Wiltshire has been bestowed with a remarkable proportion of the UK and Europe's most important landscapes and wildlife. Wiltshire's distinctive landscapes create its unique identity and character, while its natural processes provide us with clean water, fresh air, and food, and its sensitive ecosystems underpin our entire natural environment.
- 1.5 Wiltshire's communities have played a vital role in shaping the natural environment we see today; without responsible land management and stewardship we would not still enjoy the relatively high quality environments we enjoy today which have been all but lost from so many other parts of the country. However at the same time Wiltshire's natural environment has undergone slow and steady decline over the past century and this has the potential to accelerate in the future due to increasing pressures on land use and the effects of climate change. Wiltshire's Local Development Framework (LDF) provides an opportunity to set policies to manage land use in order to protect, maintain and enhance our valuable natural environment for future generations.



### **Aims and Objectives**

- 1.6 The aim of this topic paper is to gather evidence to inform and contribute towards the preparation of the Wiltshire LDF, particularly the development of Core Strategy policies related to the natural environment; these policies are required in order to achieve the relevant strategic objective '*To protect and enhance the natural environment*'.

In order to achieve this aim the following objectives have been addressed:

- Review all relevant legislation and policy which set the statutory framework for the LDF;
- Collate and review the latest relevant empirical research;
- Review the current local policy framework and its effectiveness through analysis of applications and consultation
- Review available best practice / guidance;
- Consult with key stakeholders involved in protecting and enhancing the natural environment;
- Identify community aspirations through a public consultation of draft policy, a review of Community Area Plans and strategies, and analysis of previous public consultations;
- Identify other relevant plans and strategies in the county which LDF policies might contribute towards;
- Propose policy options to achieve the strategic objective; and
- Develop policy wording for the preferred option.

## 2 International, National and Regional Regulations and Policy

### European / International

- 2.1 International treaties and European Directives require Member States to adopt legal instruments to meet their objectives (see Section 2.2), while several also have direct effect upon the statutory functions of local government, including planning. Table 1 below provides a summary of relevant international law.

<b>Habitats Directive (92/43/EC)<sup>1</sup></b>
The Habitats Directive requires Member States to take measures to maintain or restore natural habitats and wild species listed on its Annexes at a favourable conservation status, introducing robust protection for those habitats and species of European importance. These measures include designation and strict protection of the best resources of these habitats and species as Special Areas of Conservation (SACs), part of a coherent European network known as Natura 2000 <sup>2</sup> . Development plans and projects likely to affect a Natura 2000 site must undergo a strict 'Habitats Regulations Assessment process before they can be adopted or permitted.
<b>Birds Directive (2009/147/EC)<sup>3</sup></b>
The EU meets its obligations for bird species under the Bern Convention and Bonn Convention through the Birds Directive (the codified version of Council Directive 79/409/EEC). The Directive provides a framework for the conservation and management of, and human interactions with, wild birds in Europe including a mandatory requirement for the identification and classification of Special Protection Areas (SPAs) for rare or vulnerable species listed in Annex I of the Directive and all regularly occurring migratory species, paying particular attention to the protection of wetlands of international importance. SPAs form part of the Natura 2000 network and can trigger appropriate assessment of development plans and projects.
<b>Ramsar Convention on Wetlands of International Importance<sup>4</sup></b>
The Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources through local and national actions and international cooperation, as a contribution towards achieving sustainable development. Important wetland sites can be designated as 'Ramsar sites' under the convention, and form another element of the Natura 2000 network.
<b>Strategic Environmental Assessment Directive (2001/42/EC)<sup>5</sup></b>
This requires Member States to carry out a Strategic Environmental Assessment (SEA) to determine whether the plans/programmes are likely to have significant environmental effects; SEA is mandatory for all land use plans. Assessment of biodiversity impacts is a mandatory component of the SEA process. This Directive has 'direct effect' on planning authorities.
<b>Water Framework Directive (2000/60/EC)<sup>6</sup></b>
This Directive restructured water policy and set objectives for the future by adopting an integrated, catchment based approach, requiring Member States to establish and update River Basin Management Plans for all rivers in order to achieve 'good' status. These plans address issues relating to development including abstraction, pollution and physical modifications and

<sup>1</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:1992:206:0007:0050:EN:PDF>

<sup>2</sup> Please see Figure 1 for a plan showing the Natura 2000 network across Wiltshire

<sup>3</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:0025:EN:PDF>

<sup>4</sup> [http://www.ramsar.org/cda/en/ramsar-documents-texts/main/ramsar/1-31-38\\_4000\\_0](http://www.ramsar.org/cda/en/ramsar-documents-texts/main/ramsar/1-31-38_4000_0)

<sup>5</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32001L0042:EN:NOT>

<sup>6</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32000L0060:EN:NOT>

include actions and targets directly relating to planning, while local government is also responsible for implementing some of these targets.
<b>Convention on Biological Diversity<sup>7</sup></b>
The UK is a signatory of the Convention on Biological Diversity (CBD), which entered into force in 1993. It has three main objectives: 1) The conservation of biological diversity; 2) The sustainable use of the components of biological diversity; and 3) The fair and equitable sharing of the benefits arising out of the utilization of genetic resources. Article 6a requires each Contracting Party to develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity; in the UK this is currently achieved through the UK Biodiversity Action Plan.
<b>EU 2020 Biodiversity Strategy<sup>8</sup></b>
The European response to tackling biodiversity loss establishes a detailed set of target driven objectives and actions at both national and European level. The headline target for 2020 is "Halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible, while stepping up the EU contribution to averting global biodiversity loss". Spatial planning and land use management identified as vital mechanisms to implement this strategy across Member States.
<b>European Landscape Convention<sup>9</sup></b>
This convention seeks to further strengthen the protection, management and planning of England's landscapes. It applies to all landscapes, towns and villages, as well as open countryside; the coast and inland areas; and ordinary or even degraded landscapes, as well as those that are afforded protection. Article 5(d) specifically requires landscape to be integrated into planning policy, and the Government has recognised the need to make the statutory framework fully effective when reviewing policy <sup>10</sup> .

Table 1 – International Legislative / Policy Framework

## National

- 2.2 Much of the UK's domestic environmental legislation is transposed from EU directives or produced in response to international treaties (see Table 1) and sets the strict legal rules requiring compliance. Relevant national legislation is set out in Table 2 below.

<b>Habitats Regulations (2010)</b>
This transposes the Habitats Directive (92/43/EC) into UK law. Local planning authorities (LPAs) are defined as a 'competent authority', requiring all planning decisions to be screened for likely significant effects upon Natura 2000 sites and that an 'appropriate assessment' is carried out where such effects are likely. Also places a duty upon the LPA to have regard to potential impacts upon European protected species. Reg. 39 requires LPAs to include policies in their LDFs to protect ecological networks.
<b>Wildlife and Countryside Act (1981), as amended</b>
Section 28 requires that in the exercise of their functions, local authorities take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features of Sites of Special Scientific Interest (SSSIs), and must consult Natural England before carrying out or granting consent for any action which might damage a SSSI. Part 1 also affords

<sup>7</sup> <http://www.cbd.int/convention/text/>

<sup>8</sup> Our life insurance, our natural capital: an EU biodiversity strategy to 2020  
[http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1\\_EN\\_ACT\\_part1\\_v7%5b1%5d.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf)

<sup>9</sup> <http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=176&CM=8&CL=ENG>

<sup>10</sup> Natural England (2007) *European Landscape Convention – A Framework for Implementation*  
[http://www.naturalengland.org.uk/Images/elcframework\\_tcm6-8169.pdf](http://www.naturalengland.org.uk/Images/elcframework_tcm6-8169.pdf)

legal protection to breeding birds and certain animal and plant species.
<b>Natural Environment and Rural Communities Act (2006)</b>
Section 40 places a duty upon all local authorities to have regard to the purpose of conserving biodiversity in the exercise of its functions. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.
<b>Countryside and Rights of Way Act (2000)</b>
This Act significantly amended the Wildlife and Countryside Act, 1981 (above). It increased the protection of Areas of Outstanding Natural Beauty (AONBs) for the purpose of conserving and enhancing their natural beauty (which includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries), and established the option to create dedicated conservation boards. It also clarified the role of local authorities and conservation boards to produce and review management plans for AONBs. Finally it introduced a duty upon all public bodies to have regard for the purposes of AONBs when undertaking their work.

Table 2 – National Legislative Framework

- 2.3 National planning policy sets a statutory framework for determining applications in relation to specific issues and also establishes requirement for the development of local plans. A summary of the relevant current national planning policy framework is provided in Table 3 below.

<b>PPS1 Delivering Sustainable Development<sup>11</sup></b>
This national guidance identifies protecting important landscapes as part of achieving sustainable development, a high level of protection should be given to the most valued landscapes and wildlife habitats. It requires development plans to take account of the impact of development on landscape quality, the conservation and enhancement of wildlife species and habitats and the promotion of biodiversity.
<b>PPG2 Green Belts<sup>12</sup></b>
Green belts have been an important part of UK planning policy for over 50 years. This policy statement last amended in 2001, establishes the purpose of the green belt, including landscape and biodiversity objectives, and requires planning authorities to keep up to date approved boundaries for their green belt, to which the relevant policy will apply. It sets out the national policy framework for development within or close to green belt land.
<b>PPS7 Sustainable Development in Rural Areas<sup>13</sup></b>
The policies in this statement apply to the rural areas, including towns and villages and the wider, undeveloped countryside up to the fringes of larger urban areas. Requires local planning authorities to prepare policies and guidance that encourage good quality design throughout their rural areas, utilising tools such as Landscape Character Assessment, and conserve specific features and sites of landscape, wildlife and historic or architectural value. Includes national policy on strict protection of AONBs and the protection of valuable agricultural land.
<b>PPS9: Biodiversity and Geodiversity<sup>14</sup></b>
Planning Policy Statement 9 (PPS9) sets out the national planning guidance for biodiversity and

<sup>11</sup> <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1>

<sup>12</sup> <http://www.communities.gov.uk/publications/planningandbuilding/ppg2>

<sup>13</sup> <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147402.pdf>

<sup>14</sup> <http://www.communities.gov.uk/publications/planningandbuilding/pps9>

<p>geodiversity. It establishes a key principle of local planning policy that it ‘<i>should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests</i>’. It sets a framework for development of local policy, and includes development management policy.</p>
<p><b>PPS12: Local Spatial Planning<sup>15</sup></b></p>
<p>This policy statement sets out what the key ingredients of local spatial plans are and the key government policies on how they should be prepared. It identifies opportunities to protect and enhance designated sites, landscapes, habitats and protected species, and to create a positive framework for environmental enhancement more generally. It also sets out a key requirement that the core strategy should not repeat or reformulate national or regional policy.</p>
<p><b>PPG17: Open Spaces, Sport and Recreation<sup>16</sup></b></p>
<p>The policy statement sets out the objectives of planning for public open spaces and recreation. It sets out policies on such developments close to or in AONBs, SSSIs and green belts, and the importance of protecting visual amenity, heritage and nature conservation value of natural features and water resources.</p>
<p><b>PPS22: Renewable Energy<sup>17</sup></b></p>
<p>This sets out the national planning policy on renewable projects and includes guidance for the content of LDF policies on renewable energy. It recognises the potential sensitivities of landscape and nature conservation interests to these types of projects and provides policy and guidance on how these should be reduced and addressed.</p>
<p><b>Government Circular 06/05: Biodiversity and Geological Conservation: Statutory Obligations and Their Impact Within the Planning System<sup>18</sup></b></p>
<p>This circular sets out the procedures to be followed by planning authorities in order to discharge statutory responsibilities under the above pieces of domestic legislation. This includes procedures for carrying out appropriate assessment for Natura 2000 sites, authorising operations likely to damage SSSIs, protection of Biodiversity Action Plan species and habitats, and protected species.</p>

Table 3 – National Planning Policy Framework

- 2.4 The UK government has also recently published the draft National Planning Policy Framework (NPPF); this is a single policy document setting out the current government’s national planning policies. The aim of this approach is to consolidate and replace the entire current suite of Planning Policy Statements (including all of those listed in Table 3) with a single streamlined policy document. While there are broad similarities between the current and proposed planning frameworks, there are also some significant differences; in order to identify these changes in national policy an audit of the current and draft national policy frameworks has been carried out, and is included in Appendix A. The NPPF at the time of writing is currently in draft and therefore only limited weight can be afforded to it, nonetheless it does identify the direction of travel in national policy, and has therefore been considered below and in the development of local policies relating to the natural environment.

<sup>15</sup> <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

<sup>16</sup> <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicyguidance17>

<sup>17</sup> <http://www.communities.gov.uk/publications/planningandbuilding/pps22>

<sup>18</sup> <http://www.communities.gov.uk/publications/planningandbuilding/circularbiodiversity>

- 2.5 Other national policy relating to the natural environment is also relevant to planning, as this sets out the government’s broader objectives for protecting and enhancing our natural environment; these policies are summarised in Table 4 below.

<b>Natural Environment White Paper<sup>19</sup></b>
This sets out the government’s vision for the natural environment over the next 50 years and establishes nearly 100 commitments for government to address the challenges faced to achieve a healthy natural environment, several of which are directly relevant to spatial planning and land use management. This document is particularly important in highlighting the importance of ecological networks and ecosystem services.
<b>England Biodiversity Strategy<sup>20</sup></b>
This is the UK’s response to the Nagoya UN Biodiversity Summit and the EU Biodiversity Strategy (Table 1), with the overall target to ‘halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people’ by 2020. In order to achieve this it sets out a number of priorities and key actions, several of which are directly relevant to spatial planning.

Table 4 – National Policy on the Natural Environment

### Local Policy Framework

- 2.6 The current Wiltshire policy framework comprises:

- Wiltshire and Swindon Structure Plan 2016<sup>21</sup>
- Salisbury District Local Plan 2011<sup>22,23</sup>
- North Wiltshire Local Plan 2011<sup>24</sup>
- West Wiltshire District Plan 1<sup>st</sup> Alteration<sup>25</sup>
- Kennet District Local Plan 2011<sup>26</sup>

Relevant policies from the Structure Plan and Local Plans are discussed in the following sections of this Topic Paper.

<sup>19</sup> <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

<sup>20</sup> <http://www.defra.gov.uk/publications/files/pb13583-biodiversity-strategy-2020-110817.pdf>

<sup>21</sup> Wiltshire County Council and Swindon Borough Council (2006) *Wiltshire and Swindon Structure Plan 2016: A Joint Structure Plan Alteration covering the Administrative Areas of Swindon Borough Council and Wiltshire County Council* <http://www.wiltshire.gov.uk/structureplan2016.pdf>

<sup>22</sup> Salisbury District Council (2003) *Salisbury District Local Plan 2011* <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/salisburydistrictlocalplan.htm>

<sup>23</sup> Please note that the emerging South Wiltshire Core Strategy will replace elements of this plan once adopted.

<sup>24</sup> North Wiltshire District Council (2006) *North Wiltshire Local Plan 2011* [http://www.wiltshire.gov.uk/north\\_wiltshire\\_local\\_plan\\_2011\\_-\\_written\\_text.pdf](http://www.wiltshire.gov.uk/north_wiltshire_local_plan_2011_-_written_text.pdf)

<sup>25</sup> West Wiltshire District Council (2004) *West Wiltshire District Plan 1<sup>st</sup> Alteration* <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/westwiltshirelocalplan.htm>

<sup>26</sup> Kennet District Council (2004) *Kennet District Local Plan 2011* <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/kennetlocalplan.htm>

### 3 COLLATION OF EVIDENCE

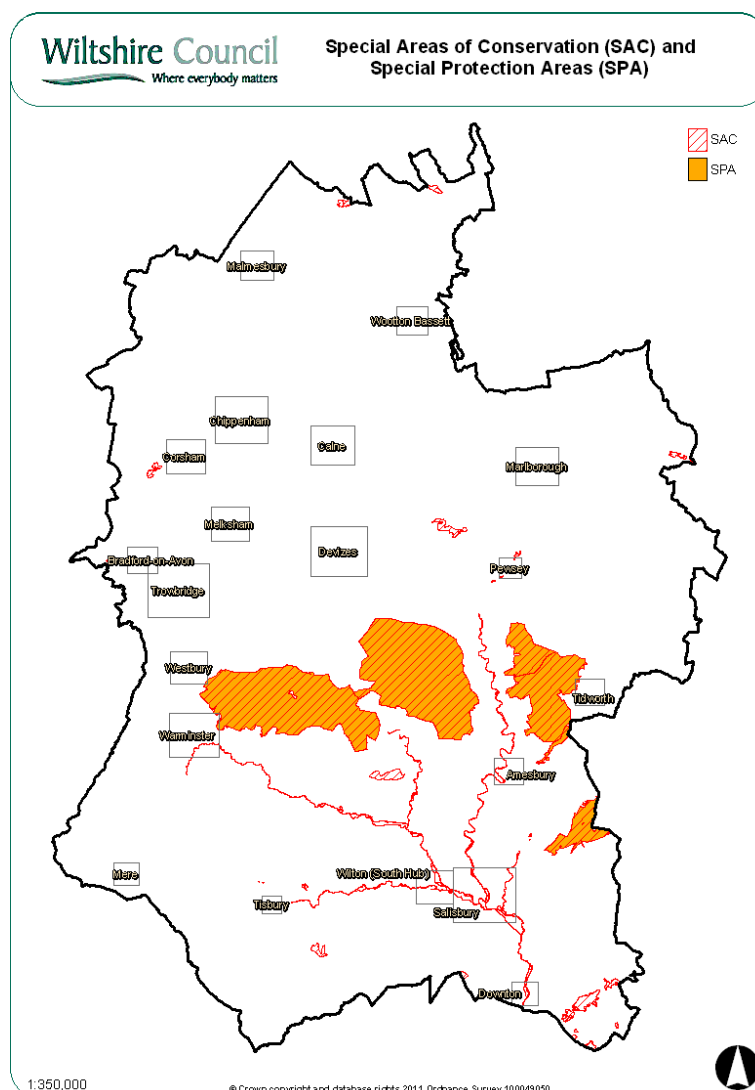
#### Natura 2000 Network

##### Evidence

- 3.1 There are 14 Natura 2000 sites present wholly or partially within Wiltshire, including three SPAs, 10 SACs and one Ramsar (see Table 5 and Figure 1).

Site	Feature of Interest
Salisbury Plain SPA / SAC	Stone curlew, hen harrier, hobby, quail. Calcareous grassland and juniper heath supporting marsh fritillary butterflies.
Porton Down SPA	Stone curlew
Bath & Bradford on Avon Bats SAC	Horseshoe and Bechstein's bats
Chilmark Quarries SAC	Horseshoe, barbastelle and Bechstein's bats
Great Yews SAC	Yew woodland
Kennet & Lambourn Floodplain SAC	Desmoulin's whorl snail
New Forest SPA / SAC	Dartford warbler (breeding), honey buzzard (breeding), nightjar (breeding), woodlark (breeding) and hen harrier (wintering). Wet and dry heathland, woodland, grasslands, and wetland mosaics of mires, ponds, streams and fens.
North Meadow and Clattinger Farm SAC	Lowland hay meadows
Pewsey Downs	Calcareous grassland
Prescombe Down SAC	Calcareous grassland supporting early genitian and marsh fritillary
River Avon SAC	– Chalk river supporting Desmoulin's whorl snail, Atlantic salmon, bullhead, brook lamprey and sea lamprey

**Table 5 – Natural 2000 Sites in Wiltshire**



**Figure 1 – Natura 2000 Network within Wiltshire**

- 3.2 These sites support some of Europe’s rarest habitats and species, and also provide some of the finest remaining examples of these wildlife resources. They are widely recognised as being of major importance to the UK’s biodiversity and are major components in our ecological network. John Lawton’s recent review of the UK’s wildlife sites network has highlighted their importance and the need to increase their size and quality through favourable management in order to ensure that they remain strong components of the ecological network in the future<sup>27</sup>.
- 3.3 These sites are afforded the strictest protection under the Habitats Directive and through the implementation of the Habitats Regulations (2010), and can be sensitive to the effects of certain developments due to their size, nature or location, even when situated at a significant distance from the designated areas. In particular, those sites which are potentially susceptible to impacts as a result of development include:
- Increased recreational disturbance upon breeding birds on Salisbury Plain and in the New Forest;

<sup>27</sup> Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) *Making Space for Nature: a review of England’s wildlife sites and ecological network*. Report to Defra. <http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>



- Loss of bat roosts, habitat loss / fragmentation and lighting in the areas around the Bath and Bradford on Avon Bats SAC sites;
- Physical damage to habitats of the River Avon SAC;
- Water pollution issues associated with additional discharge from sewage treatment works discharging in the River Avon SAC; and
- Water shortages to accommodate increased abstraction in the River Avon SAC catchment.

### **Current Wiltshire Policy Framework**

- 3.4 Wiltshire Council screens all applications for potential impacts upon Natura 2000 sites, carrying out appropriate assessments in consultation with Natural England where necessary to ensure that there would be no likely significant effects upon these sites prior to issuing planning consent. This process is regulated under Regulation 61 of the Habitats Regulations, and is operated fully in accordance with principles of PPS9 and the procedures set out in Circular 06/2005 and European Guidance<sup>28</sup>.
- 3.5 Where an appropriate assessment indicates that adverse effects upon the integrity of a Natura 2000 site are likely or cannot be ruled out, the application must be refused unless there are imperative reasons of overriding public interest. Wiltshire Council has not consented any development projects which have failed an appropriate assessment.
- 3.6 Natura 2000 sites are also covered under saved local plan Policy NE5 of the North Wiltshire Local Plan, although they were not saved in other local plans as they duplicate national policy and legislation.

### **Sites of Special Scientific Interest**

#### Evidence

- 3.7 There are 135 SSSIs in Wiltshire covering over 29,000ha of calcareous grassland, lowland meadows, broadleaved woodland, streams, rivers, standing waters and a wide variety of other habitat types which also support important populations of British wildlife. The SSSI network is of national importance, providing a representative sample of our most important wildlife and geological sites. Wiltshire's proportion of the SSSI network has suffered significant declines in the past, with 75% currently in unfavourable condition, however recent investment in the network and the efforts of Natural England have ensured that almost all of those sites are now recovering, with only 0.52% of the SSSI network in Wiltshire in unfavourable declining condition (see Figure 3).

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<sup>28</sup> 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](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf)



Figure 3 – Condition of SSSIs in Wiltshire<sup>29</sup>

### **Current Wiltshire Policy Framework**

- 3.8 SSSIs are afforded statutory protection in the planning system under Section 28 of the Wildlife and Country Act, 1981 (as amended). This requires local planning authorities to consult Natural England on all planning applications which might affect a SSSI and to take their advice into account in determining the application. Damage to SSSIs as a result of development is understood to be very rare in Wiltshire due to strict compliance with the statutory procedures required by Section 28, as set out in PPS9 and Circular 06/2005.
- 3.9 SSSIs are also still covered under local plan policy NE6 of the North Wiltshire local plan although they were not saved in other local plans as they duplicate national policy and legislation.

### **Areas of Outstanding Natural Beauty**

#### Evidence

- 3.10 Approximately 44% of the area administered by Wiltshire Council is designated as AONB; this comprises 38% of the North Wessex Downs AONB, 61% of the Cranborne Chase and West Wiltshire Downs AONB and 6% of the Cotswolds AONB (see Figure 4). The primary purpose of AONB designation is to “*conserve and enhance natural beauty*”.

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<sup>29</sup> Natural England SSSI Condition Summary for Wiltshire compiled 1 September 2011  
<http://www.sssi.naturalengland.org.uk/special/sssi/reportAction.cfm?Report=sdrt18&Category=C&Reference=1046>

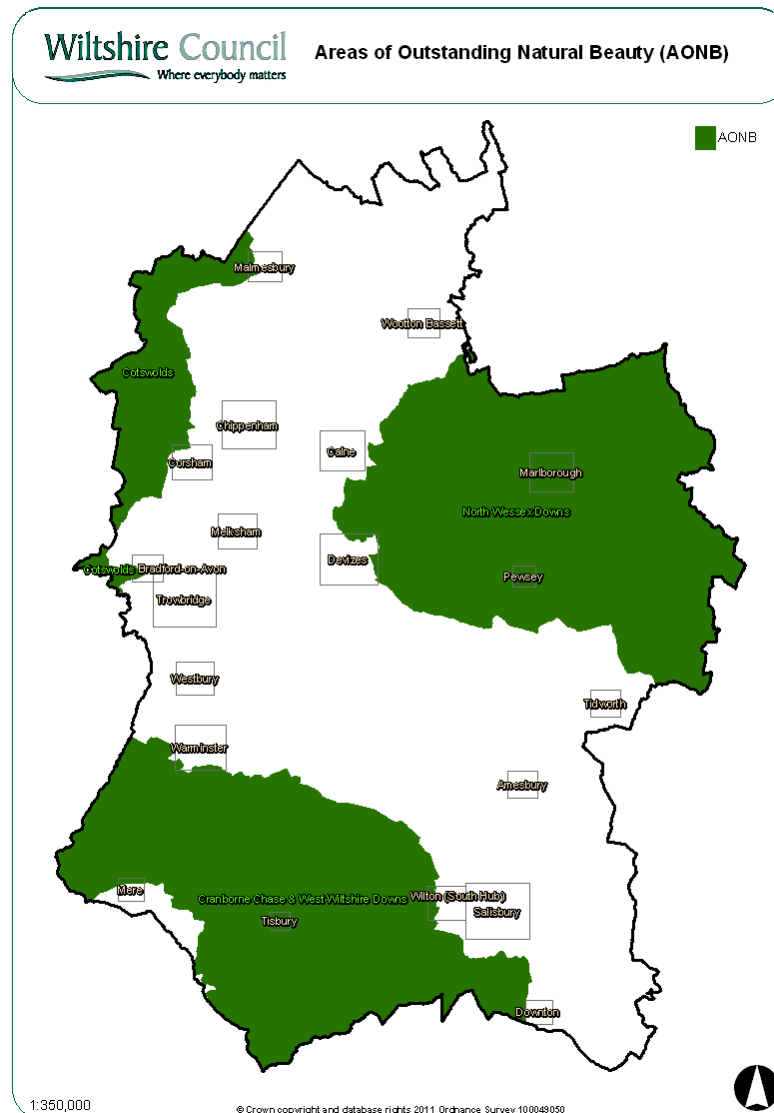


Figure 4 – AONBs in Wiltshire

North Wessex Downs AONB

3.11 The North Wessex Downs AONB is the third largest in the country at 1730km<sup>2</sup>, stretching from the east of Devizes to Reading, comprising a predominantly a chalkland landscape of dramatic scarp slopes and moulded dip slopes that reflect the underlying chalk geology; this is made up of eight landscape types<sup>30</sup>:

- Open Downland
- Downs Plain and Scarp
- Downland with Woodland
- Vales
- Wooded Plateau
- River Valleys
- High Chalk Plain

<sup>30</sup> Land Use Consultants (2003) North Wessex Downs AONB – Integrated Landscape Character Assessment <http://www.wiltshire.gov.uk/north-wessex-downs-aonb-lca-smaller.pdf>

- Lowland Mosaic
- 3.12 The management plan for the AONB<sup>31</sup> identifies a number of threats to the landscape including development pressure but also identifies opportunities to manage change and enhance its character. It recognises that there is a need to manage development pressures with sensitivity within the AONB and its setting in order to maintain a balance in promoting economic and social viability whilst retaining its landscape character. Key issues identified in relation to development include:
- Remoteness and tranquillity – at risk from intrusion, artificial lighting and noise
  - Sensitivities to wind turbines – all of the landscapes within the AONB are constrained to a degree<sup>32</sup>
  - Green infrastructure – an opportunity for development to secure and enhance the green infrastructure of the AONB and deliver multiple benefits
  - Urban fringe – expansion of urban areas (although this relates predominately to Swindon)
  - Equine related activities – impacts of gallops and associated facilities;
  - Noise – impacts of increased noise upon tranquillity
  - Built environment - appropriate and sympathetic design and siting of development, including brownfield sites especially MoD land, should be guided by local landscape character
- 3.13 In relation to biodiversity it also highlights potential threats including the fragmentation of habitats and loss of wildlife corridors, particularly in relation to the effects of climate change, and the effects of increased recreational pressure through erosion and disturbance, especially from dog walkers.

#### Cranborne Chase and West Wiltshire Downs AONB

- 3.14 This designation covers 380 sq miles of countryside overlapping the boundaries of Wiltshire, Dorset, Hampshire and Somerset. It is a diverse landscape which includes areas of rolling chalk grassland, ancient woodlands, chalk escarpments, downland hillsides and chalk river valleys each with distinct and recognisable characters. Eight landscape types have been identified in the AONB<sup>33</sup>:
- Chalk Escarpments
  - Open Chalk Downland
  - Wooded Chalk Downland
  - Downland Hills
  - Chalk River Valleys
  - Greensand Terrace
  - Greensand Hills

<sup>31</sup> North Wessex Downs AONB (2009) *North Wessex Downs AONB Management Plan 2009-2014* [http://www.northwessexdowns.org.uk/wba/nwd-aonb/NWDWebsiteV2.nsf/\\$LUcontent/4.4?OpenDocument](http://www.northwessexdowns.org.uk/wba/nwd-aonb/NWDWebsiteV2.nsf/$LUcontent/4.4?OpenDocument)

<sup>32</sup> North Wessex Downs AONB (2006) *A Study of Landscape Sensitivities and Constraints to Wind Turbine Development* [http://www.northwessexdowns.org.uk/wba/nwd-aonb/NWDWebsiteV2.nsf/\\$LUcontent/5.02?OpenDocument](http://www.northwessexdowns.org.uk/wba/nwd-aonb/NWDWebsiteV2.nsf/$LUcontent/5.02?OpenDocument)

<sup>33</sup> Land Use Consultants (2003) Cranborne Chase and West Wiltshire Downs AONB – Integrated Landscape Character Assessment [http://www.ccwwdaonb.org.uk/docs/LandscapeCharacterAssessment\\_FULLL.pdf](http://www.ccwwdaonb.org.uk/docs/LandscapeCharacterAssessment_FULLL.pdf)

- Rolling Clay Vales
- 3.15 The management plan<sup>34</sup> identifies a number of threats to the landscape and biodiversity of the AONB related to planning:
- Sense of place – distinctive features are being replaced by standard designs and materials in developments, eroding local character and distinctiveness
  - Roads and traffic - noise pollution, traffic and damage to rural lanes can seriously detract from the rural character of the AONB, local distinctiveness and tranquillity
  - Landscape character sensitivity - a lack of awareness regarding AONB sensitivities leading to inappropriate development and land management schemes and policies
  - Development pressures – residential development and tall structures e.g. wind turbines, threaten the special and perceptual sense of rurality, remoteness, tranquillity and dark skies
  - Declines in chalk grassland and bird populations
  - Habitat fragmentation
  - Invasive species

#### Cotswolds AONB

- 3.16 The Cotswolds is the second largest protected landscape in England after the Lake District National Park, and the largest of the 40 AONBs in England and Wales, covering 2,038km<sup>2</sup>. Nineteen different landscape types have been identified, however the area within Wiltshire is dominated by the dip-slope lowlands and enclosed limestone valleys<sup>35</sup>.
- 3.17 The management plan<sup>36</sup> recognises the importance of planning to maintain the character, appearance and biodiversity of the area and also identifies a number of key issues associated with development, including:
- The need to manage development pressures both within and in the setting of the AONB, maintaining economic and social viability whilst retaining traditional Cotswolds character
  - The importance of providing affordable housing to ensure that balanced communities can survive and prosper
  - Concern regarding loss of local facilities and services
  - Potential impacts of converting traditional agricultural buildings, and the need to retain distinctive features
  - Noise, activity and lighting associated with development can impact on tranquillity
  - Equine related activities can damage landscape characteristics and need to be controlled
  - Potential impacts of wind turbines and support for alternative sources of renewable energy

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<sup>34</sup> Cranborne Chase and West Wiltshire Downs AONB (2009) *Cranborne Chase and West Wiltshire Downs AONB: Management Plan (2009-2014)* <http://www.ccwwdaonb.org.uk/docs/ManagementPlan/ManagementPlanFull.pdf>

<sup>35</sup> Landscape Design Associates (2003) *Cotswolds AONB Landscape Character Assessment and Landscape Strategy and Guidelines* [http://www.cotswoldsaonb.com/landscape\\_character\\_assessment/cotswoldslandscape.htm](http://www.cotswoldsaonb.com/landscape_character_assessment/cotswoldslandscape.htm)

<sup>36</sup> Cotswolds Conservation Board (2008) *Cotswolds AONB: Management Plan (008-2013)* <http://www.cotswoldsaonb.org.uk/userfiles/file/Publications/manplan08-13.pdf>

- Potential impacts of re-using brownfield land, particularly MoD sites in the countryside
- Habitats and species are in decline
- Over abstraction for development
- Recreational disturbance upon wildlife
- The need to protect, enlarge and reconnect wildlife sites

### **Current Wiltshire Policy Framework**

- 3.18 North and west Wiltshire local plans contains specific detailed policies on AONBs (NE4 and C2 respectively), establishing the conservation and enhancement of the landscape as being of primary importance, and include criteria based policies on restricting development in these areas, although these largely reflect national policy (PPS7). Salisbury Local Plan includes a rather broad policy requiring that particular attention should be paid to conserve the character and scenic quality of the landscape within the AONB. Kennet local plan did contain a policy on AONBs, however this was not saved, as it duplicated national policy. The Structure Plan contains a short policy requiring that planning authorities have regard to the designation and the need to protect, conserve and enhance by positive measures and that major development would be unacceptable unless in the national interest. PPS1 and PPS7 afford strong protection to AONBs in the planning process, although this refers to development within the designated areas and does not address their context or setting, which has been raised as a significant issue by the AONB stakeholders. The draft NPPF does not appear to significantly change the level of protection afforded to AONBs through planning.
- 3.19 Wiltshire's current policy framework for AONBs is clearly variable between the districts, however common weaknesses can be observed. Firstly, the policies clearly do not reflect the themes identified in the current AONB management plans, particularly issues surrounding tranquillity, urban fringe, landscape character, and the distinctiveness of local designs and materials. Each management plan has been through a significant degree of consultation and all relevant environmental appraisals, and therefore carries a substantial degree of legitimacy; however the current policies do not refer directly to these plans (as is also the case for some neighbouring local plans / LDFs), which would help to give them greater weight in planning decisions.
- 3.20 National and local policies deal exclusively with the area within the designated boundary of the AONB and do not address impacts upon views into or out of these areas, which can be quite extensive in very open landscapes. This is clearly raised in the management plans and emerged as a key theme through discussions with key stakeholders from the AONBs and Wiltshire Council's landscape officers, and through the public consultation in August 2011.

### **Habitat Creation / Restoration**

#### **Evidence**

- 3.21 Biodiversity South West has produced the south west Nature Map (see Figure 1)<sup>37</sup>; this goes beyond the protection of special sites and identifies opportunities for habitat restoration and creation to withstand the challenges of climate change and species loss. Crucially it provides a scientifically robust methodology for defining a set of ecologically

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<sup>37</sup> See website for interactive map [http://www.biodiversitysouthwest.org.uk/nm\\_map3dk.html](http://www.biodiversitysouthwest.org.uk/nm_map3dk.html)

functional tracts of land which are large enough, close enough together, and of the right quality to provide for the needs of our native species and the habitats they occupy, in the long term. This was completed by making use of available research, accepted ecological concepts and professional opinion to quantify Strategic Nature Areas (SNAs) for priority habitats in the South West; in Wiltshire this highlights opportunities to restore major areas of broadleaved woodland, neutral grassland, limestone grassland, chalk downland, river networks and wetland habitats and this information is being used as a basis for several landscape scale conservation projects across the region. This approach of opportunity mapping is well established as an important tool for landscape scale conservation and spatial planning is also recognised as an important delivery mechanism<sup>3839</sup>. Indeed when the south west Nature Map was produced, it was intended that it would be linked to emerging LDFs in order to aid delivery<sup>40</sup>, and several of the adopted Core Strategies across the south west do refer to the Nature Map.

- 3.22 Some strategic development which is planned during the plan period will fall within SNAs including the east of Trowbridge extension and the proposed area of growth at Warminster, while extension of other towns including Malmesbury, Tidworth, Ludgershall, Marlborough and Cricklade and development within the wider Community Areas could potentially fall within SNAs.

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<sup>38</sup> RSPB (2010) *Delivering Landscape Scale Habitat Conservation and Restoration Through Spatial Planning* [http://www.rspb.org.uk/Images/Delivering%20landscape%20scale%20conservation%20RSPB%20survey\\_tcm9-260034.pdf](http://www.rspb.org.uk/Images/Delivering%20landscape%20scale%20conservation%20RSPB%20survey_tcm9-260034.pdf)

<sup>39</sup> Catchpole, R (2006) *Planning for biodiversity – opportunity mapping and habitat networks in practice: a technical guide* (English Nature Research Report No.687) <http://naturalengland.etraderstores.com/NaturalEnglandShop/product.aspx?ProductID=a072c7d5-db18-42a8-859f-8f94852b3a81>

<sup>40</sup> Biodiversity South West (2007) *South West nature map – A Planner's Guide. Helping to Shape Spatial Planning for Biodiversity in Local Development Frameworks.*



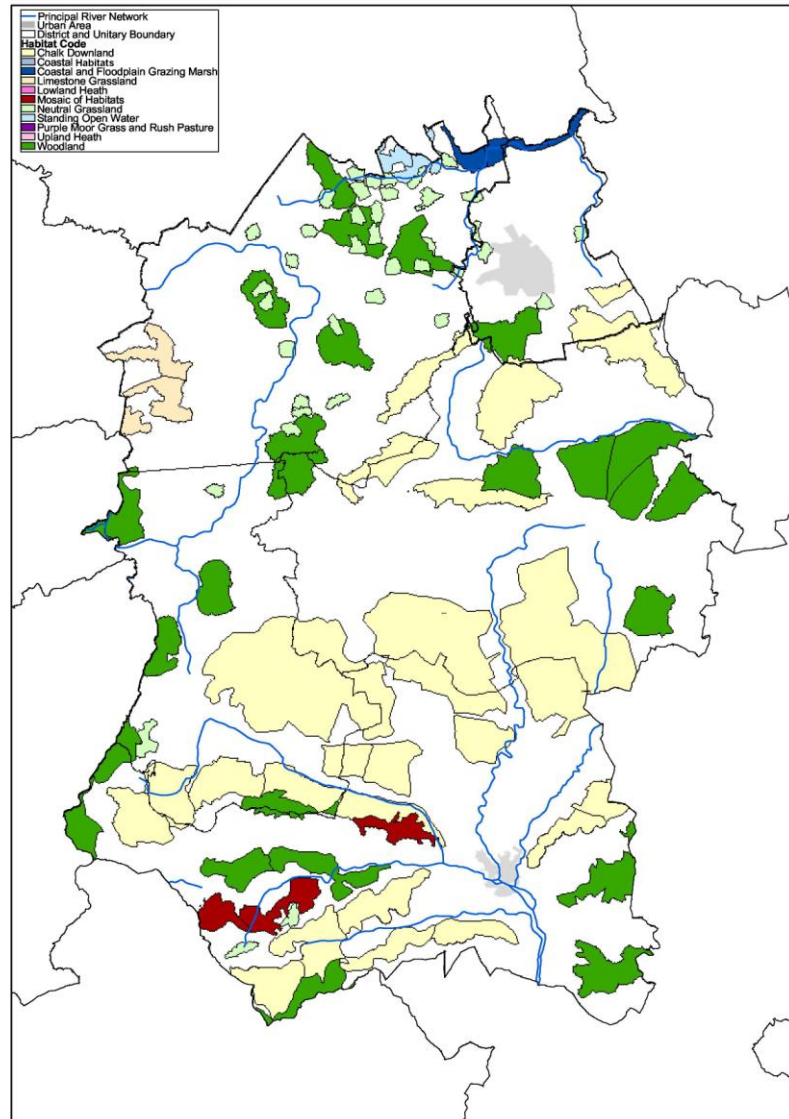


Figure 5 – Showing SNAs for Wiltshire (reproduced from the South West Nature Map<sup>41</sup>)

### Current Wiltshire Policy Framework

3.23 The protection and delivery of SNAs through the planning process was recognised as an important objective for regional spatial planning through the inclusion of Policy ENV4 in the Draft South West Regional Spatial Strategy (RSS). Although the RSS is due to be officially abolished once the Localism Bill receives royal assent, spatial planning still has a role to play at a local level in helping to protect and deliver targets within these areas. Indeed the current government has recognised potential restoration value of land as a material planning consideration in the core planning principles of the draft NPPF:

- *in considering the future use of land, planning policies and decisions should take account of its environmental quality or potential quality regardless of its previous or existing use (Para. 19)*

<sup>41</sup> <http://www.biodiversitysouthwest.org.uk/img/mapWiltshire3.jpg>

- 3.24 It also establishes the role of spatial planning in helping to deliver landscape scale conservation through an additional requirement for planning policies to:
- *take account of the need to plan for biodiversity at a landscape-scale across local authority boundaries;*
  - *identify and map components of the local ecological networks, including: international, national and local sites of importance for biodiversity, and areas identified by local partnerships for habitat restoration or creation; and*
  - *promote the preservation, restoration and re-creation of priority habitats...*(Para. 168).
- 3.25 Professor Sir John Lawton's recent review of England's wildlife sites network '*Making Space for Nature*' clearly identified the need for conservation to operate in a more integrated manner at a landscape scale, and the importance of habitat restoration within these areas; these findings have triggered the changes in national policy observed in the Natural Environment White Paper and England Biodiversity Strategy. As a result, landscape scale projects are now emerging across the country e.g. Nature Improvement Areas, and it is expected that several such areas of opportunity will be identified across Wiltshire in the coming months and years. While the current planning framework is broadly supportive of the principle of habitat restoration, the draft NPPF appears to go further, setting out a clearly purpose for spatial planning to support strategic habitat restoration / creation through landscape scale projects, and in doing so helping to implement other national policies on the natural environment.
- 3.26 Development within landscape scale project areas has the potential to cause further fragmentation and sterilise areas of land from restoration back to the target habitat type, equally however, major development offers the potential to create, restore and enhance target habitat types through informed and sensitive masterplanning and developer contributions.
- 3.27 Given the relatively recent development of SNAs and the currently emerging issue of landscape scale conservation projects, Wiltshire's current suite of local plans does not contain a policy mechanism to protect these areas from development that might prejudice delivery of targets and objectives. Opportunities for masterplans and landscaping schemes to help contribute towards these objectives are also likely to be missed due to poor awareness of these projects and a lack of recognition in the local plans to promote their support, as has been the case with development affecting SNAs.

## **County Wildlife Sites**

### **Evidence**

- 3.28 There are approximately 1,550 County Wildlife Sites (CWSs) in Wiltshire covering approximately 21,000ha of semi-natural habitats including most of our main rivers, ancient woodlands, our best wildflower meadows and the wetlands of the Cotswold Water Park. Although our CWSs are recognised for being of county significance for wildlife, many of them are as rich in wildlife and as valuable as SSSIs; the CWS network is intended to be a comprehensive collection of our best wildlife sites, whereas the SSSI network is only a representative sample of the best examples of certain habitats and species. The CWS network therefore represents an incredibly important resource for Wiltshire's wildlife; however it does not receive any statutory protection and is vulnerable as a result.
- 3.29 The Wiltshire and Swindon Wildlife Sites Project undertakes monitoring of the CWS network and offers advice to private landowners about the special value of their land and how to manage this favourably; despite this work there is estimated to be only 54% of the CWS network under favourable management. The network is also regularly updated as sites are de-notified as they become damaged, destroyed or degraded, but new sites are

also added as they are discovered. Five sites were denotified in 2008-09, four in 2009-10 and 11 in 2010-2011 as a result of degradation and development<sup>42</sup>.

- 3.30 Wiltshire's Protected Road Verges (PRVs) scheme also identifies road verges which are of important nature conservation value due to the presence of rare or notable species, the presence of valuable habitats, functions as a wildlife corridor linking other wildlife sites, geological features or areas of community value. Given their proximity to the local road network, PRVs can be impacted by development where this requires new or upgraded road junctions or any widening of the carriageway.
- 3.31 The *Making Space for Nature* review has identified and stressed the importance of local wildlife sites, but also reports that they are often neglected, poorly managed, damaged or lost. Among his recommendations Professor Lawton advises that planning policy and practice should provide greater protection to local wildlife sites. DEFRA has also stressed the importance of local wildlife sites in providing refuges for wildlife, representing local character and distinctiveness, and playing a significant role in meeting national biodiversity targets, and also recommends that Development Plan Documents should include criteria based policies on the protection of local wildlife sites<sup>43</sup>.

#### Current Wiltshire Policy Framework

- 3.32 CWSs are currently afforded protection in the planning system under PPS9 and local plan policies:
- NE7 - Nature Conservation Sites of Local Importance (North Wiltshire Local Plan)
  - NR3 – Local Sites (Kennet Local Plan)
  - C6 – Protection of Local Sites (West Wiltshire District Plan)
  - C13 & C14 – Wildlife and Natural Features (Salisbury District Local Plan)
- 3.33 These policies aim to protect the CWS network from the adverse effects of development unless the reasons for the proposal outweigh the value of the site, in which case they allow mitigation / compensation measures to be conditioned as part of any permission granted. While these policies tend to protect CWSs from direct damage or loss, there are a number of weaknesses associated with their implementation which have led to the damage or degradation of CWSs:
- Indirect and offsite effects such as trampling, fly-tipping, fires, isolation, pollution and disturbance are not recognised, making it difficult to avoid or control such impacts through conditions or obligations.
  - Restoration potential is not recognised. Some CWSs have become degraded through lack of appropriate management but could be restored through favourable management. These areas are undervalued and as such are often lost to development along with any restoration potential. Development can represent an opportunity to restore CWSs to favourable condition through improved management; however there is currently no driver to do so.
  - Lack of commitment to manage a CWS appropriately can lead to long-term neglect, degradation and damage. The presence of a CWS in or next to a development

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42 Wiltshire Council (2011) NI197 (Improved Biodiversity) Improvement target data assessment for Wiltshire

43 DEFRA (2006) *Local Sites: Guidance on Their Identification, Selection and Management*  
<http://archive.defra.gov.uk/rural/documents/protected/localsites.pdf>

should be seen as a community asset, and a commitment should be made maintain such areas responsibly.

- 3.34 A review of the current local policies also reveals that they do not reflect the requirements of PPS9, particularly the sequential mitigation hierarchy of avoidance (including consideration of alternative sites and layouts), mitigation measures, only then considering compensation measures, and finally *'if significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.'* Any significant harm would need to be weighed against the reasons for the proposal by the planning officer / committee, however the current policies do not require that such reasons should be in the public rather than private interest i.e. Wiltshire's communities must benefit in some way from the degradation of their natural environment in order to ensure that permissions are environmentally just.
- 3.35 Wiltshire Council adopted NI197 as an indicator to measure its performance against the government's national priorities, now replaced by NI160 in the single data list. The indicator is intended to measure the active management of local sites as a measure of movement towards the target of improving biodiversity. Wiltshire Council has achieved its target of increasing the number of sites in favourable management for the past two years; development could provide opportunities to bring further sites into favourable management to deliver these targets.

### **Landscape Character Assessment**

#### Evidence

- 3.36 Landscape Character Assessment (LCA) is an objective method for describing landscape, based on the identification of generic landscape types (e.g. Open Downland) and more specific landscape character areas (e.g. Marlborough Downs). The approach identifies the unique character of different areas of the countryside without making judgments about their relative worth. Landscape character areas are classified based on sense of place, local distinctiveness, characteristic wildlife, natural features and nature of change. LCA can make a valuable contribution to the formation of planning policies, to the allocation of land for development, to development control activities, and to processes such as environmental assessment.
- 3.37 The entire county was subject to a LCA in 2005 (at 1:50,000 scale)<sup>44</sup> following the Countryside Agency's standard methodology<sup>45</sup>, while there have also been several further LCAs of the Districts and specific areas of the county:
- North Wiltshire<sup>46</sup>;
  - South Wiltshire<sup>47</sup>;
  - Kennet<sup>48,49</sup>;

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<sup>44</sup> Land Use Consultants (2005) *Wiltshire Landscape Character Assessment: Final Report*

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/landscapeconservation/wiltshirelcafinalreport.htm>

<sup>45</sup> Countryside Agency and Scottish Natural Heritage (2002) *Landscape Character Assessment Guidance for England and Scotland* [http://www.naturalengland.org.uk/Images/lcaguidance\\_tcm6-7460.pdf](http://www.naturalengland.org.uk/Images/lcaguidance_tcm6-7460.pdf)

<sup>46</sup> White Consultants (2004) *North Wiltshire Landscape Character Assessment*

[http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase/evidencebasenorth.htm#Landscape\\_Character\\_Assessment](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase/evidencebasenorth.htm#Landscape_Character_Assessment)

<sup>47</sup> Chris Blandford Associates (2008) *South Wiltshire Landscape Character Assessment*

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase/southwiltshirecorestrategyevidencebase.htm#SalisburyLandscapeCharacterAssessment>

<sup>48</sup> Atlantic Consultants (1999) *Kennet Landscape Character Assessment*

[http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase/planningpolicyevidencebaseeast.htm#Landscape\\_character\\_assessment](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase/planningpolicyevidencebaseeast.htm#Landscape_character_assessment)

- West Wiltshire<sup>50</sup>
  - North Wessex Downs AONB;
  - Cranborne Chase and West Wiltshire Downs AONB;
  - Cotswolds AONB;
  - New Forest National Park;
  - Salisbury Plain Training Area; and
  - Cotswold Water Park.
- 3.38 This is clearly a substantial evidence base on landscape character, management actions and landscape sensitivities which can aid decision making across the county. However, any development which is likely to have a significant impact upon visual amenity or the local landscape due to its scale, nature or location should also be accompanied by a site specific Landscape and Visual Impact Assessment (LVIA), using the above LCAs as baseline data.
- 3.39 In recent years the government has been strongly promoting the use of LCA as a tool for use in criteria-based policies on landscape within development plans, as can be seen in national policy statements:
- PPS1 - When preparing development plans, “planning authorities should seek to enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character” (Para 27).
  - PPS7 – LCA is recommended as a tool for implementing a carefully drafted, criteria-based policies in Local Development Documents (para 24); and
  - PPS22 - applying LCA at the regional level is recommended to inform strategic planning for renewables (Para 3.33).
- 3.40 In 2004 the Countryside Agency provided funding for three demonstration projects in West Sussex, the High Peak and Shrewsbury and Atcham Borough that link LCA with criteria-based development policies<sup>51</sup>. More recently Natural England has called for all planning policies to be underpinned by LCAs, stressing that all landscapes matter and that we should aim to protect distinctiveness and diversity, manage change, and integrate landscape issues into strategies, policies, processes and actions<sup>52</sup>. This demonstrates a general trend towards the use of criteria based policies in LDFs as a preferred approach to protecting and enhancing all landscapes.
- 3.41 This approach is also clearly consistent with the objectives of the European Landscape Convention, which emphasises the application of a holistic approach, applied to all landscapes, where Landscape Protection is defined as ‘*actions to conserve and maintain the significant or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity*’.

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<sup>49</sup> Planning Services (2005) Kennet landscape Conservation Strategy (2005)

[http://www.wiltshire.gov.uk/kennet\\_landscape\\_conservation\\_strategy\\_2005.pdf](http://www.wiltshire.gov.uk/kennet_landscape_conservation_strategy_2005.pdf)

<sup>50</sup> Chris Blandford Associates (2007) West Wiltshire District landscape Character Assessment

[http://www.wiltshire.gov.uk/west\\_wiltshire\\_landscape\\_character\\_assessment\\_-\\_contents\\_\\_preface\\_and\\_executive\\_summary.pdf](http://www.wiltshire.gov.uk/west_wiltshire_landscape_character_assessment_-_contents__preface_and_executive_summary.pdf)

<sup>51</sup> <http://www.naturalengland.org.uk/ourwork/landscape/englands/character/lcn/resources/lcaresources/criteriabaseddevelopment.aspx>

<sup>52</sup> Natural England (2010) *Natural England Position Statement: All Landscapes Matter*

[http://www.naturalengland.org.uk/Images/ALM-ps\\_tcm6-17120.pdf](http://www.naturalengland.org.uk/Images/ALM-ps_tcm6-17120.pdf)

### **Current Wiltshire Policy Framework**

- 3.42 North Wiltshire Local Plan contains criteria-based policies for landscape character, covering:
- The setting of, and relationship between, settlement and buildings and the landscape;
  - The pattern of woodland, trees, field boundaries, other vegetation and features;
  - The special qualities of watercourses and water bodies and their surroundings such as river valleys; and
  - The topography of the area avoiding sensitive skylines, hills and not detracting from important views.
- 3.43 This policy represents Wiltshire's best example of a criteria-based landscape policy, however a review of other LDFs and consultation with stakeholders and Wiltshire Council officers has identified an number of other criteria that could be included to strengthen such a policy; these include:
- tranquillity;
  - historical and cultural character;
  - geological features; and
  - visual amenity.
- 3.44 Kennet Local Plan and Salisbury District Local Plan refer to landscape character, but do not use any criteria to help define this. West Wiltshire District Plan does not refer specifically to landscape character, although it does refer to the quality and variety of the countryside. The Structure Plan does not refer to LCAs.
- 3.45 None of the local plans refer directly to the relevant LCAs or the process as an approach to identify, maintain and enhance the characteristics and distinctiveness of the local landscape. Although several LCAs covering parts of the County have been carried out, the current suite of LCAs would need to be rationalised, updated and consolidated into a Wiltshire-wide Landscape Strategy and guidance note if this evidence base were to be applied effectively as a planning tool on a Wiltshire wide basis. There is also currently no strong policy driver for site based LCA to be used to inform the design rationale for development schemes, representing a missed opportunity for development to make a positive contribution towards local landscape character.

### **Special Landscape Areas**

#### Evidence

- 3.46 Special Landscape Areas (SLAs) are a local landscape designation applied to areas considered to be locally important areas of high landscape quality sufficiently attractive to justify adoption of particular development control policies or other safeguarding measures. They were initially identified and designated in the 1981 Structure Plan<sup>53</sup>, and are largely based upon the Areas of Great Landscape Value identified in the previous County Plan.

Seven SLAs are currently identified in Wiltshire:

1. The majority of Salisbury Plain excluding two areas around Netheravon, Larkhill, Bulford and Amesbury, and Ludgershall and Tidworth;

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<sup>53</sup> Wiltshire County Council (1981) *Wiltshire Landscape Local Plan* (Adopted Written Statement)

2. Areas of to the north and east of the Cranborne Chase and West Wiltshire Downs AONB, excluding an area around Salisbury and Wilton;
  3. The Blackmore Vale from Zeals to Sedgehill, and a small area to the east of Shaftesbury;
  4. The Chapsmanslade Greensand Ridge;
  5. The higher land of the Spye and Bowood Parklands;
  6. The River Frome valley at Vaggs Hill; and
  7. The southern fringes of the Cotswolds outside the AONB.
- 3.47 No descriptions of the special landscape characteristics of these individual areas or the reason for each individual designation are known or available at the current time.
- 3.48 The criteria used in drawing the detailed boundaries of these areas were:
- Major breaks in slope and any important foreground setting to a change in slope; and
  - Change in landscape character.
- 3.49 To facilitate the practical identification of the boundaries for administration purposes, fixed lines such as roads, tracks, streams and rivers were used, avoiding the use of more transient features where possible. In the case of settlements, no line was drawn around them to exclude built up areas with the exception of Salisbury and Wilton, and Amesbury and Durrington.

### **Current Wiltshire Policy Framework**

- 3.50 Since 1986, SLAs have been retained in subsequent revisions to the Structure Plan and the relevant District Council Local Plans. The current Structure Plan includes a policy requiring proposals to have regard for SLAs, although the Structure Plan is to be abolished alongside the RSS. West Wiltshire District Plan includes a policy requiring development to conserve or enhance the landscape character of these areas. Salisbury District Local Plan includes a policy requiring the careful control of development to conserve the character of the SLA. Kennet District did not save their policy on SLAs due to the requirements of PPS7 (discussed below).
- 3.51 There has been considerable debate over the use of Local Landscape Designations (LLDs) such as SLAs as a tool for planning policy in recent years, with a strong argument emerging for their replacement with criteria-based policies based on LCA. Support for this approach has been largely driven by the government's PPS7, which advocates removal of LLDs in favour of an LCA approach:
- 'carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas'* (para 24).'
- 3.52 A recent review of LLDs identified a number of pros and cons of both approaches at that time (2006)<sup>54</sup>. Arguments in favour of retaining LLDs included:
- Valued and understood by members;
  - Easy to use for planners, without the need for specialist advice;

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<sup>54</sup> Chris Blanford Associates (2006) *Review of Local Landscape Designation: Main Findings of the Study* [http://www.naturalengland.org.uk/Images/LLD-review\\_tcm6-23661.pdf](http://www.naturalengland.org.uk/Images/LLD-review_tcm6-23661.pdf)

- Generally perceived as useful in protecting landscapes; and
  - Uncertainty surrounding the proven utility of criteria based policies.
- 3.52 However problems associated with LLDs include:
- Do not typically facilitate appropriate development or actively promote the enhancement of local character and distinctiveness;
  - A lack of policy guidance on securing opportunities for conservation and enhancement benefits in the wider or 'everyday' landscapes outside of LLDs, and in focusing on the 'best landscapes' can exclude degraded landscapes;
  - Not fully justified by a robust evidence base; and
  - PPS7 has reduced the weighting that can be afforded to LLDs in planning decisions.
- 3.53 In relation to criteria based landscape policies based on LCA, the review did identify constraints to their use, as they are:
- more complex to apply than LLDs, especially where no in-house landscape expertise is available; and
  - requires the availability of a comprehensive LCA to provide a robust evidence base to underpin plan policies and decisions
- 3.54 This issue will require significant consideration to identify the most appropriate option for landscape policies in the LDF, particularly as PPS7 requires that '*local planning authorities should rigorously consider the justification for retaining existing local landscape designations*'. *LLDs should state what it is that requires extra protection, and why.*' A problem with retaining this local designation in the Local Development Framework is therefore an apparent lack of evidence to support its elevated status as a 'special' landscape i.e. the characteristics which make these landscapes special. The current evidence base does not justify retention of the current suite of SLAs, however evidence is emerging that the special characteristics of certain SLAs, or parts thereof, may not be fully captured by the LCA approach. Wellhead Valley near Westbury is an example of such an area, where a recent study has helped to define the key characteristics of the area, and suggested that the available LCAs for that area do not accurately reflect its particular character or its essential qualities<sup>55</sup>.
- 3.55 Where SLAs, or parts thereof, have unique characteristics which are not accurately identified or differentiated by the LCA methodology, this may justify the retention of SLAs. However a further work will be required to demonstrate the special characteristics of these areas and provide a clear rationale for their boundaries, if policies relating to the protection of SLAs are to be assessed as compliant with PPS7. If the SLA designation is to be included within the emerging Local Development Framework for Wiltshire it will need to be applied in a much more evidence based and targeted manner, it is therefore likely to cover a considerably restricted area relative to extent of the current seven SLAs.
- 3.56 A sound evidence base will be essential for any local policy on SLAs to meet the requirements of PPS7: '*local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection.*' The current lack of such evidence is a major constraint to adoption of policy on SLAs; this lack of evidence in support of SLAs has previously led to inspector's recommendations for deletions of relevant policies for other local plans and LDFs<sup>5657</sup>. There are however also examples where the continued use of

<sup>55</sup> James, A. (2011) *Wellhead Valley Landscape Character Assessment – Report to the White Horse Alliance*

<sup>56</sup> Planning Inspectorate (2004) *Report of a Public Inquiry into Objections to the Revised Deposit Draft of the Brentwood Replacement Local Plan* [http://www.brentwood.gov.uk/pdf/pdf\\_650.pdf](http://www.brentwood.gov.uk/pdf/pdf_650.pdf)



local designations has been found sound through scrutiny by the Planning Inspectorate including the Borough of Sutton<sup>58</sup> and Harrogate<sup>59</sup>. Examination of these examples demonstrate that any continued use of LLDs must be supported by a sound evidence base to demonstrate their unique characteristics and must also be complemented by adequate policy to protect and enhance all non-designated landscapes.

- 3.57 It is clear that there is not currently enough evidence available to include a 'sound' SLA policy within the Core Strategy, there is also evidence e.g. the Wellhead Valley study, that the unique characteristics of some areas of the county may not be fully protected through the use of criteria based policies alone. An objective and robust study will be required to address this issue, which would be best undertaken as part of the forthcoming Wiltshire Landscape Strategy, while SLA policies from the local plans could be saved in the interim.

### Green Belt and Rural Buffers

#### Evidence

- 3.58 Green belt policy has been in place nationally (outside London) for over 50 years and applies to 14 green belts covering approximately 12% of England. Their main purpose is to restrict urban sprawl, prevent neighbouring towns from coalescing, preserve the setting of towns, encourage urban regeneration and reuse of derelict land, and to maintain the openness of the surrounding countryside. However other benefits which have been reported include improved access to the countryside for recreation, improving health and wellbeing, and the protection of wildlife<sup>60</sup>. Green belts have a higher concentration of public rights of way, broad-leaf and mixed woodland, Country Parks, Local Nature Reserves, and Registered (or historic) Parks and Gardens, than land that does not have Green Belt designation<sup>61</sup>. Use of land in green belts should play a positive role to play in fulfilling the following objectives:
- provide opportunities for access to the open countryside for the urban population;
  - provide opportunities for outdoor sport and outdoor recreation near urban areas;
  - retain attractive landscapes, and enhance landscapes, near to where people live;
  - improve damaged and derelict land around towns;
  - secure nature conservation interest; and
  - retain land in agricultural, forestry and related uses.
- 3.59 Wiltshire includes part of the Avon Green Belt which surrounds the wider Bath and Bristol areas. 58% of the Avon Green Belt is classed as 'neglected' or 'weakened' in landscape terms and 33% 'maintained' or sustained (data is not available for the remaining 9%). The current condition of both agricultural land and field boundaries such as hedgerows are the main concerns, but the condition of woodland is good. 14,549 ha (22%) of the Avon Green Belt coincides with land designated as an Area of Outstanding Natural Beauty (AONB). 1,512 ha are registered as Sites of Special Scientific Interest (SSSI) or wildlife sites of at least national importance, representing 2.3% of the Avon Green Belt, while there are a further 264ha of Local Nature Reserves.

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<sup>57</sup> Planning Inspectorate (2007) *Report on the Examination into the Core Strategy Development Plan Document*  
[http://www.tmbc.gov.uk/assets/planning\\_policy/LDF/Examination/LDF\\_CS\\_report\\_final.pdf](http://www.tmbc.gov.uk/assets/planning_policy/LDF/Examination/LDF_CS_report_final.pdf)

<sup>58</sup> Planning Inspectorate (2009) *Report on the examination into the London Borough of Sutton Core Planning Strategy DPD*  
<http://www.sutton.gov.uk/CHttpHandler.ashx?id=6905&p=0>

<sup>59</sup> Planning Inspectorate (2009) *Report on the examination into the Harrogate District Core Planning Strategy DPD*  
[http://www.harrogate.gov.uk/Documents/DS-P-LDF-CS\\_InspectorsReport.pdf](http://www.harrogate.gov.uk/Documents/DS-P-LDF-CS_InspectorsReport.pdf)

<sup>60</sup> CPRE (2005) *Green Belts: If They Didn't Exist We've Have to Invent Them*

<sup>61</sup> CPRE and Natural England (2010) *Green Belts: a Greener Future*

- 3.40 Asked what Green Belt activities they would like to undertake in the next twelve months, the public in the south west most commonly chose visiting the Green Belt<sup>62</sup>:
- on a day out with friends/family
  - to get peace and quiet
  - to see wildlife or bird watching.
- 3.41 When asked what they would like to see more of in the Green Belt, the public in the south west were keen to see:
- woodland walks;
  - nature reserves; and
  - community food growing (e.g. allotments and pick-your-own farms).
- 3.42 85% of the public in the south west agreed that they would buy food known to have been grown or produced by farmers in the Green Belt local to them rather than buy food produced elsewhere.
- 3.43 The boundaries of Green Belts are determined by the local planning authority and kept up to date and made publicly available in local plans; in Wiltshire this currently includes the North Wiltshire Local Plan and the West Wiltshire District Plan. Those parts of Wiltshire included in the Avon Green Belt include land surrounding Bradford on Avon, and areas west of Trowbridge and Corsham. The particular objectives of the Western Wiltshire Green Belt are to maintain the open character of undeveloped land adjacent to Bath, Trowbridge and Bradford on Avon, to limit the spread of development along the A4 between Batheaston and Corsham and to protect the historic character and setting of Bradford upon Avon.
- 3.44 Rural buffers are a local designation included originally in the Wiltshire and Swindon Structure Plan and North Wiltshire Local Plan. These included a large buffer west of Swindon and some smaller areas between Chippenham and surrounding villages. The aim of these designations in the local plan was to protect towns and villages from coalescence by restricting development and land use in these areas, in a similar way to Green Belts.

### **Current Wiltshire Policy Framework**

- 3.45 The development control policy for Green Belts in the West Wiltshire District Plan (GB2) was not saved by Secretary of State and expired in 2007; this was not saved as it replicated national policy set out in PPG2. However, Secretary of State did save Policy GB1 which establishes the boundary of the Green Belt, as this is in accordance with PPG2, which requires local development plans to include Green Belt boundaries.
- 3.46 The Green Belt policy in the North Wiltshire Local Plan (NE1) has been saved as it sets the boundary of the Green Belt in north Wiltshire; however development control elements of this policy are not likely to be necessary as they appear to largely duplicate elements of PPG2. The draft NPPF retains the same level of protection for Green Belt land as PPG2.
- 3.47 The Swindon Rural Buffer (NE2) and Local Rural Buffer (NE3) policies of the North Wiltshire Local Plan were removed from these plans by the Secretary of State in 2007 as they conflict with national policy in PPS7 on local land designations:

*Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and*

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<sup>62</sup> CPRE and Natural England (2010) *Green Belts: Key Facts – Avon Green Belt*

*why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations.*

- 3.48 PPS7 calls into question ‘the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.’, and includes policy restricting development in the open countryside, focussing development in or adjacent to existing settlements. The draft NPPF does not make provision for the use of local landscape designations such as rural buffers.

### **Local Geological Sites**

#### Evidence

- 3.49 Local Geological Sites (LGSs) are currently the most important places for geology and geomorphology outside of geological SSSIs. LGSs (formerly Regional Sites of Geological Importance or RIGS) are selected in a different way to earth science SSSIs, which are chosen by Natural England on a national basis, while LGSs are selected on a local or regional basis using four nationally agreed criteria:
- The value of the site for educational purposes in life long learning;
  - The value of the site for study by both professional and amateur earth scientists;
  - The historical value of the site in terms of important advances in earth science knowledge, events or human exploitation; and
  - The aesthetic value of a site in the landscape, particularly in relation to promoting public awareness and appreciation of earth sciences.
- 3.50 The concept of RIGS was first initiated by the Nature Conservancy Councils (NCC) in 1990<sup>63</sup>. RIGS sites started life as SSSIs which were de-notified after the Geological Conservation Review (1997-1990), however the statutory agencies wished to secure their conservation in another form. RIGS sites are those which, whilst not benefiting from national statutory protection, are nevertheless regionally or locally representative sites where "... consideration of their importance becomes integral to the planning process".
- 3.51 There are currently 54 LGSs in Wiltshire which include exposures of limestone, chalk, sand, gravel, sandstone and clay. Wiltshire Geology Group is currently undertaking a project to monitor the condition of all of these sites, which has revealed that almost all of them are in declining condition, and indeed five sites were lost and de-notified during the period 2009-10, highlighting their importance for conservation. LGSs are likely to be significantly under recorded, and there are likely to be many more important sites within Wiltshire which have not yet been discovered.
- 3.52 LGSs can be affected by a wide range of development through covering or damaging exposures or contributing to the encroachment of vegetation through landscape management practices, however the greatest threats tend to be posed by mineral and waste developments. At the same time, development can provide opportunities to re-expose sites in poor condition, identifying previously unknown but significant features during environmental assessments, and making a contribution to accessibility and long-term management of such sites.

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<sup>63</sup> Nature Conservancy Council (1990) *Earth Science Conservation in Great Britain – A Strategy*. NCC, Peterborough

### Current Wiltshire Policy Framework

- 3.53 PPS9 states that an objective of planning is to conserve, enhance and restore the diversity of England's geology by sustaining, and where possible improving, the quality and extent of geological and geomorphological sites, and that development plan policies should aim to maintain, and enhance, restore or add to geological conservation interests. It also includes a direct requirement to establish criteria based policies against which proposals for any development on, or affecting, LGSs should be judged.
- 3.54 Each of the local plans and the Structure Plan offers a degree of protection to RIGS / LGS through inclusion of policies on local sites such as County Wildlife Sites. There are no known instances where development proposals have resulted in the damage or loss of geological features, and it is not therefore possible to comment on the effectiveness of these policies. However it is worth noting that while the policies afford protection from damage through development, they do not include any driver for positive management or access which might enhance and secure our known geodiversity for the future.

### Wiltshire Biodiversity Action Plan

#### Evidence

- 3.55 The UK BAP was produced in 1994 as a response to the CBD, and identified a list of habitats and species which were known to be in decline nationally. It has since been regularly updated and provides a framework for many local BAPs, which identify local priorities for conservation, set out actions to halt or reverse declines, and set targets for those actions. Wiltshire's current BAP was produced in 2008 by the Wiltshire BAP Steering Group, made up of representatives from Wiltshire Wildlife Trust, Wiltshire Council, Natural England, Biodiversity South West, Wiltshire and Swindon Biological Records Centre, and the Cotswold Water Park Society. It includes action plans for ten habitats, and although there is only one action plan for a species group (bats), 260 local BAP species are listed<sup>64</sup>; actions for these species are generally covered by their relevant habitat action plan and / or a UK BAP action plan. These habitats and species are included in the BAP due to significant declines within Wiltshire, as shown in Table 5.
- 3.56 Professor Lawton's report has stressed the importance of BAP habitats in acting as core areas, 'stepping stones' and connections of ecological networks, and recommends that planning policy should provide greater protection to priority habitats.
- 3.57 Section 40 of the Natural Environment and Rural Communities Act (2006) places the 'Biodiversity Duty' on all planning authorities:
- 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'*
- 3.58 And that 'conserving biodiversity' includes, ...'in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.' Section 41 of the Act clarifies that for the purposes of the Act, BAP habitats and species are those of principal importance for the purpose of conserving biodiversity.
- 3.59 Table 5 highlights that Wiltshire holds a huge proportion of the national resource for several of these habitat types e.g. calcareous grassland, parkland and neutral meadows; we therefore have a duty to act as responsible stewards of this resource on behalf of the UK. At the same time we have lost almost all of some other habitat types in Wiltshire e.g.

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<sup>64</sup> For a full list of Wiltshire BAP species please see <http://www.biodiversitywiltshire.org.uk/images/2009/10/WiltshireBAP200.pdf>

traditional orchards, and we must protect these remaining fragments to ensure that we do not lose what we have left.

<b>BAP Habitat</b>	<b>Reason for BAP status</b>
Woodland	Ancient woodland is a finite resource in that it cannot be recreated, and supports a range of rare wildlife which rely entirely on it for survival. Since the 1930s approximately 50% of ancient woodland has been lost or damaged. Wiltshire only has approximately 7% woodland cover remaining, significantly less than the national average of 12%.
Wood-pasture / Parkland	The characteristic ancient trees of this habitat are irreplaceable and support a wide range of rare fungi, lichens, liverworts invertebrates, mosses. Estimates of Wiltshire's resource vary widely (3,200 – 8,400 ha) but it is understood to support a substantial proportion of the UK's estimated remaining total (10-20,000ha), due to a large number of medieval parks.
Species-rich Hedgerows	It is estimated that between 1984 and 1990, 23% of English hedges were lost. There is still an estimated net annual rate of loss of approximately 5%. Ancient hedgerows support the greatest biodiversity, and often date back to the Enclosures Acts 1720 – 1840. Hedgerow networks support a wide range of farmland species and provide connectivity for wildlife through an increasingly hostile landscape.
Traditional Orchards	The area of orchard has declined by 57% in England since 1950. Of 134ha of orchard remaining in Wiltshire, only a small proportion of this is traditional orchard; most traditional orchards are small fragments, often neglected. Traditional orchards support rare traditional cultivars of fruit trees, and wide range of flora and fauna including notable vascular plants, lichens, fungi, invertebrates, birds and mammals.
Farmland Habitats	Arable flora is the most threatened group of plants in Britain today; 54 species are considered rare or threatened, while seven are extinct in an arable context; south Wiltshire is in Plantlife's list of the 15 richest areas for arable plants. Farmland birds have shown continued decline, while abundance of butterflies on farmland sites has fallen by nearly a fifth over the last 16 years, with specialist species declining to a low point of 29% in 2001.
Calcareous Grassland	This habitat type has seen sharp declines over the past 50 years, however largely due to its geology and military presence Wiltshire still supports 24,000ha of calcareous grassland, representing 50% of the UK resource. This habitat type supports a high botanical diversity including some very rare plants, which also support a wide range of butterflies.
Unimproved Neutral Meadows	There has been an estimated 97% loss in UK in 50 years, with less than 8,500ha remaining in England. There has also been a significant decline in plant diversity of around 10% on neutral grassland between 1990 and 1998. There is estimated to be 500ha remaining in Wiltshire - approximately 9% of the UK resource. Hay meadows support a great diversity of wildflowers and rare fauna such as the marsh fritillary butterfly.
Rivers and Streams	Much of the Salisbury Avon and River Kennet are nationally and internationally important for wildlife, however all of our rivers form important wildlife corridors across our county. Many have suffered canalisation and degraded water quality over the years; however this is now beginning to be reversed, although climate change and increasing populations are likely to put new pressures on our rivers.
Standing Open Water	It is estimated that over a million ponds were lost in the UK over the last century. Standing water is a relatively scarce resource in Wiltshire estimated at 600ha, predominately in north Wiltshire and the Cotswolds Water Park. A survey of the

BAP Habitat	Reason for BAP status
	Salisbury area in 1994 estimated that over the last 100 years, 43% of ponds had been lost. Ponds are an important freshwater habitat, supporting least two thirds of Britain's freshwater species.
Built Environment	Canals, roadside verges and railway embankments provide habitat and wildlife corridors for wildlife when designed and managed properly. Allotments, gardens, parks and cemeteries can support a range of urban species. Derelict brownfield land often supports specialist species including rare weeds, invertebrates, bats and black redstarts.

**Table 6 – Wiltshire BAP Habitats<sup>65</sup>**

- 3.60 National government policy has directed development pressure onto brownfield land, which often conflicts with biodiversity interest at these sites. Such biodiversity is often overlooked when planning the redevelopment of brownfield sites, partially due to a lack of recognition in the local plan policies, despite specific reference to brownfield biodiversity in PPS9 (para 13). Such wildlife can often be incorporated into development schemes through well informed and sensitive design. The draft NPPF lacks specific policy protection for brownfield habitats, however it is still afforded policy protection through its inclusion on the UK BAP in 2007.
- 3.70 At the same time, Wiltshire's paucity of brownfield land pushes a lot of development onto Greenfield sites where it comes into conflict with other BAP habitats particularly hedgerows, calcareous grassland, neutral grassland, and rivers and streams. BAP species are also frequently present on development sites, as these are still relatively common in the landscape despite significant declines.
- 3.71 The government's recent Natural Environment White Paper and England Biodiversity Strategy have stressed the importance of a more spatial approach to biodiversity conservation, which should be applied at a landscape scale. This represents a step change in the way we approach biodiversity conservation at a local level; away from generic targets and actions for species / habitats at a county scale, to having a clear set of priorities for coherent and defined landscape areas, with the aim of targeting funding and effort more effectively for certain habitats / species in areas with the greatest opportunity. We are likely to see a significant change in the structure and function of the Wiltshire BAP in the coming months as it undergoes an extensive review to make it more spatial.
- 3.72 In planning, the BAP currently has two main functions:
1. Protection – the BAP includes a list of habitats and species which are a material consideration in planning.
  2. Restoration / enhancement – BAP habitats / species should provide a shopping list of features which developers should be aiming to provide within development / landscape / restoration schemes in order to demonstrate no net loss of biodiversity.
- 3.73 The protection of the BAP works well, as it provides a clear list of habitats / species which must be protected within a development where possible, or otherwise mitigation / compensation should be provided. It is important that this function of the BAP is not weakened or lost, a clear up to date list based on a sound evidence base is crucial to protect biodiversity in planning.
- 3.74 The enhancement / restoration function has always of limited value, as developers / urban designers / landscape architects do not find it user friendly for this purpose, largely due to

<sup>65</sup> Data taken from the Wiltshire BAP

the hundreds of targets and actions, many of which are not relevant to them. A lack of spatial relevance to a particular place also makes it difficult to apply to a landscape / restoration scheme. A move to a more spatially relevant and targeted BAP should make it more relevant to those designing development schemes with biodiversity in mind.

### **Current Wiltshire Policy Framework**

- 3.75 Existing local plans refer to Areas of High Ecological Value (AHEVs) shown on proposals maps. AHEVs were identified to highlight areas which, on the basis of landscape characteristics, were likely to contain species and habitats of conservation importance. Local plan policies emphasised the need to ensure development avoided harm to ecological interests within these areas. AHEVs have been superseded by the Wiltshire BAP and there is no need therefore to have policy to protect them.
- 3.76 At present only the North Wiltshire Local Plan has a specific policy on BAP habitats / species (NE11 – Conserving Biodiversity). Other plans briefly mention BAPs within other policy areas (Kennet), or refer to specific habitat types (West Wiltshire) or *'the diversity of flora and fauna'* (south Wiltshire). These policies do not reflect the direct requirement set out in PPS9 for local plans to include policies to protect and conserve BAP habitats / species, and to identify opportunities to enhance to them. As a result, it is a struggle to adequately protect BAP habitats / species from inappropriate development, or to secure measures to enhance them; cumulatively this is likely to have contributed to continued declines for these habitats / species.
- 3.77 The draft NPPF lacks some of the more specific references to BAP, however it does still require planning policies to:
- 'promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species populations, linked to national and local targets'* (Para. 168)

### **Best and Most Versatile Agricultural Land**

#### Evidence

- 3.78 Productive agricultural land which can consistently provide good crop yields is a valuable resource, which is likely to become increasingly important in the future as demand for food increases and lower quality soils fail to yield crops as the effects of climate change are experienced. The importance of high quality agricultural land has long been recognised, hence the UK has been mapped using the Agricultural Land Classification (ALC), which grades land on a scale 1-5. Grades 1-3a are termed Best and Most Versatile (BMV) agricultural land as the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass and fibres<sup>66</sup>.
- 3.79 Development has the potential to remove BMV land from production, and such losses can be a material consideration in planning, as recognised in PPS7 which requires that BMV land be taken into consideration alongside other sustainability criteria, and where the loss of agricultural land is unavoidable, that this be directed towards lower ALC grades. Natural England requires consultation for applications involving the loss of 20ha or more BMV land. Soil protection is also mentioned in PPS1 and its associated supplement for climate change, and as an element of the environment requiring assessment in the both SEA and EIA Directives.

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<sup>66</sup> Natural England (2009) *Agricultural land Classification: Best and Most Versatile Agricultural Land*  
<http://naturalengland.etraderstores.com/NaturalEnglandShop/product.aspx?ProductID=88ff926a-3177-4090-ae6c-00e6c9030b29>



### Current Wiltshire Policy Framework

- 3.80 All of the local plans and the Structure Plan contain policies on the protection of BMV land, however these largely repeat the policy contained in PPS7 and the draft NPPF; an approach which could be contrary to the requirements of PPS12 in relation to duplicating national policy. PPS7 requires that local plans identify any major areas of BVM land that are planned for development, and this has been carried out through the Sustainability Appraisal process in identifying and selecting sites for housing and employment allocations. Given the low availability of brownfield land for development in Wiltshire, many of the allocations are likely to fall to Greenfield sites; however BMV land has been given appropriate weighting in the site selection process. Windfall development is likely to be generally small in nature and unlikely to result in major losses of BMV land during the plan period, however the requirements of PPS7 will be applied to applications on BMV land.
- 3.81 The Planning (Grade 1 Agricultural Land Protection) Bill is currently before Parliament<sup>67</sup>; if this was to come into force it would prohibit local authorities from granting planning permission involving the development of Grade 1 agricultural land other than in exceptional circumstances, or for connected purposes. This would provide a legislative mechanism to protect Grade 1 agricultural land without the need to reflect this in local plan policies.

### Natural Processes

#### Evidence

- 3.82 Research highlighting the importance of healthy functional ecosystems has gathered increasing attention in the literature recently, particularly within planning and policy arenas. PPS9 includes several references to conserving natural physical processes and healthy functional ecosystems, and stresses the importance of networks of habitats as a valuable resource to link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal of species. It also recommends that local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans; this is in direct response to Regulation 39 of the Habitats Regulations, which requires that Local Development Documents include policies:

*'...encouraging the management of features of the landscape...which are of major importance for wild fauna and flora which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems of marking field boundaries) or their function as "stepping stones" (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.'*

- 3.83 A key theme to emerge from the Making Space for Nature review was the importance of ecological connectivity for creating and maintaining a coherent and resilient ecological network, through both stepping stones and wildlife corridors. The review goes on to stress the important role that local authorities can play in ensuring that ecological networks are maintained, restored and enhanced, particularly through the planning system. Several of the recommendations are also relevant to ecological corridors in the built environment:

- *Recommendation 7 – Responsible authorities should take greater steps to reconnect people to nature by enhancing ecological networks within urban environments,*

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<sup>67</sup> Please see UK Parliament website for details <http://services.parliament.uk/bills/2010-11/planninggrade1agriculturalallandprotection.html>

*including wildlife-friendly management of green spaces, and by embedding biodiversity considerations in the need to adapt to climate change.*

- *Recommendation 21 – Public bodies and other authorities responsible for canals, railways, roads, cycle ways and other linear features in the landscape, should ensure that they better achieve their potential to be wildlife corridors, thereby enhancing the connectivity of ecological networks, and improving opportunities for people to enjoy wildlife.*

- 3.84 This revival in the concept of ecological networks has gathered momentum as recent research continues to demonstrate the gravity of the emerging threats posed by climate change. Evidence demonstrates that our natural environment is already showing signs of the effects of climate change as animals emerge from hibernation too early to find food, and species ranges shift. More mobile species may be able to adapt to changing environmental conditions by moving, but only if the landscape is sufficiently permeable to allow them to do so; wildlife corridors and stepping stones will therefore become increasingly important for these mobile species. However, other less mobile species will be unable to migrate and will be more susceptible to localised extinctions during extreme weather events; sufficiently large habitat patches and populations will be important to these species in order to maintain sufficiently resilient populations which can withstand local extinction events. Establishing and maintaining a coherent and resilient ecological network will therefore help our wildlife to adapt to a changing climate.
- 3.85 DEFRA has also stressed the importance of establishing an ecological network, particularly in fragmented landscapes where species are vulnerable within small isolated patches<sup>68</sup>. Natural England has set out the role of the spatial planning system in facilitating the adaptation of biodiversity to climate change<sup>69</sup>; recommendations include incorporating biodiversity adaptation focussed policies into core strategies, which seek to protect and enhance ecological networks, and avoid creating barriers to connectivity or fragmenting habitats.
- 3.86 The multiple benefits of a healthy functioning ecosystem have also recently been highlighted through a numerous studies into 'ecosystem services', the most significant of which is the National Ecosystems Assessment<sup>70</sup>. This approach focuses on the value of the natural environment, not just for nature conservation and wildlife, but for the benefits it provides to people. Our environment has always supported our needs and as a result we have taken this for granted and undervalued it in policy decisions; the ecosystems services approach aims to put a value on these environment services, including:
- Provisioning – provision of crops, fish production, supporting livestock, timber production, water supply;
  - Cultural – a sense of place, local character and identity, distinctive landscapes, tranquillity;
  - Regulating – pollution control, climate regulation, flood alleviation; and
  - Supporting – decomposition, nutrient recycling.
- 3.87 This research demonstrates that it is more cost-effective to conserve and invest in our natural environment now than continue to damage it and pay the costs of repair or alternative means of delivering our essential services. Recent research has also shown that different biodiversity groups contribute to these services, as shown in Figure 2 below, and that the economic value can be substantial:

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<sup>68</sup> DEFRA (2007) *Conserving Biodiversity in a Changing Climate*

<sup>69</sup> Natural England (2009) *Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System*

<sup>70</sup> UK National Ecosystem Assessment (2011) *The UK National Ecosystem Assessment: Technical Report*. UNEP-WCMC, Cambridge. <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

- If biodiversity and ecosystem losses continue at their current rates, the annual cost of the resulting loss in services could be up to \$14 trillion per year globally and \$1 trillion in Europe by 2050<sup>71</sup>;
- In Europe, wetlands are estimated to provide a value of 6 EUR billion per year<sup>72</sup>;
- The worldwide economic value of the pollination service provided by insect pollinators, bees mainly, was €153 billion in 2005 for the main crops that feed the world<sup>73</sup>; and
- Forestry and primary wood processing was worth £2.05 billion in 2007, while the social (e.g. landscape and recreational visits) and environmental benefits of UK woodlands were valued at more than £1 billion in 2002.

Service Group	Final ecosystem services	Biodiversity Groups																
		Micro-organisms		Fungi		Lower Plants			Higher Plants		Invertebrates		Fish		Amphibian	Reptiles	Birds	Mammals
		Terrestrial	Marine	Non-lichens	Lichens	Phytoplankt	Macroalgae	Bryophytes	Seagrasses	Land plants	Terrestrial	Marine	Freshwater	Marine				
Provisioning	Crops, plants, livestock, fish																	
	Trees, standing vegetation & peat																	
	Water supply																	
	Wild species diversity																	
Cultural	Meaningful places																	
	Social valued land and waterscapes																	
Regulating	Climate regulation																	
	Hazard regulation																	
	Waste breakdown & detoxification																	
	Purification																	
	Disease & pest regulation																	

Importance is colour coded: high (green), medium (amber), low (brown), unimportant on the basis of available evidence (blank). The intensity of each colour is used to illustrate the level of uncertainty in the available evidence, ranging from dark (high levels of agreement across a large body of evidence) to pale (little agreement relating to limited evidence).

**Figure 6 - The Importance of Different Biodiversity Groups for the Delivery of Different Final Ecosystem Services (taken from Watson and Albon, 2010).**

3.88 Recent research carried out by the government think tank Foresight<sup>74</sup>, has highlighted the new and existing pressures on land use predicted to increase throughout the 21<sup>st</sup> Century, particularly demographic change, economic growth, climate change, new technologies, social preference and the policy / regulatory environment. In response to these

<sup>71</sup> Barrat, L and ten Brink, P. (2008) *The Cost of Policy Inaction: The Case of not Meeting the 2010 Biodiversity Target*. [http://www.ieep.eu/publications/pdfs/2008/copi\\_summary\\_jun.pdf](http://www.ieep.eu/publications/pdfs/2008/copi_summary_jun.pdf)

<sup>72</sup> Brander L.M., Florax R.J.G.M. and Vermaat J.E (2006). The empirics of wetland valuation: a comprehensive summary and a meta-analysis of the literature. *Environmental Resource Economics* 33:223-250

<sup>73</sup> Gallai, G, Salles, J.M, Settele, J, Vaissière, B.E. (2008) *Economic valuation of the vulnerability of world agriculture confronted with pollinator decline*. <http://www.pgpe.cnr.fr/documents/paper385.pdf>

<sup>74</sup> Foresight (2010) *Land Use Futures: Making the Most of Land in the 21<sup>st</sup> Century*

challenges it highlighted the need for greater integration of policy areas and the requirement for multi-functionality of land, including nature conservation and landscape functions. It also highlights the importance of well connected landscapes for climate change adaptation and the importance of an ecosystems services approach in land use planning and policy making.

- 3.89 As a result of this recent research, DEFRA has made strong commitments to incorporate an ecosystem services approach into a broad range of government policy areas including those relating to planning through close working with the Department for Communities and Local Government<sup>75</sup>. The current government has also shown a renewed commitment to this approach through the commitments set out in its recent White Paper, which will embed the value of natural capital into all areas of government and business through an ecosystem services approach.

### **Current Wiltshire Policy Framework**

- 3.90 Only North Wiltshire Local Plan includes Policy NE10 (Management of Nature Conservation Features) which aims to protect landscape features of major importance for flora and fauna (in accordance with the requirements of the Habitats Regulations), although 'major importance' can be difficult to define. Other plans mention specific features which are likely to be of value as wildlife corridors (rivers, hedgerows etc), however these are too prescriptive and do not protect the much wider requirement for connectivity, functionality (e.g. foraging, shelter, rest etc), or natural processes. As a result it can be difficult to protect natural processes where these are not directly addressed by the current policy framework.
- 3.91 The River Biss Public Realm Design Guide Supplementary Planning Document has been adopted as part of the LDF and includes measures to protect and enhance this river corridor through regeneration of Trowbridge town centre, helping to reverse several decades of canalisation and inappropriate development along its banks.

### **Tranquillity**

#### **Evidence**

- 3.92 Tranquillity is raised as an important element of the AONBs in their management plans, and it is also cited in national policy documents as being an important characteristic of a landscape<sup>76,77</sup>. In 2001 a poll for DEFRA of 3,700 adults in England found that the most mentioned enjoyable or positive aspect of the countryside was tranquillity, mentioned by 58 per cent<sup>78</sup>. Indeed it can help to relieve stress, improve emotional well-being and even improve health.
- 3.93 Despite its perceived importance the concept of tranquillity is poorly defined and understood. The problem is that it is an extremely subjective and experiential quality of landscapes, but an important one nonetheless which is seen as an indicator of environmental quality. It is this perceived difficulty in defining tranquillity that often leads to it being overlooked in planning decisions and environmental assessments. However, it has recently been shown<sup>79,80,81,82</sup> that major contributors to tranquil landscapes are:

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<sup>75</sup> DEFRA (2007) Securing a Healthy Natural Environment: An Action Plan for Embedding an Ecosystems Approach <http://archive.defra.gov.uk/environment/policy/natural-environ/documents/eco-actionplan.pdf>

<sup>76</sup> DETR (2000) *Our Countryside: The Future. A Fair Deal for Rural England* <http://archive.defra.gov.uk/rural/documents/policy/ruralwp/rural.pdf>

<sup>77</sup> DEFRA (2004) *Rural Strategy 2004* [http://archive.defra.gov.uk/rural/documents/policy/strategy/rural\\_strategy\\_2004.pdf](http://archive.defra.gov.uk/rural/documents/policy/strategy/rural_strategy_2004.pdf)

<sup>78</sup> National Statistics and Department of Environment Food and Rural Affairs (2002) *Survey of Public Attitudes to Quality of Life and to the Environment*

<sup>79</sup> Fuller, D (2005) *Chilterns Tranquillity Study—Report on the Participatory Appraisal Consultations in the Chilterns AONB*, Countryside Agency (LAR), Cheltenham

seeing a natural landscape; hearing birdsong; hearing peace and quiet; seeing natural looking woodland, seeing the stars at night; seeing water, and hearing natural sounds. Things that do not contribute to tranquillity are: hearing constant noise from cars, lorries or motorbikes; seeing lots of people; seeing urban development; seeing overhead light pollution at night time; hearing lots of people; seeing and hearing low flying aircraft; seeing power lines; and seeing towns and cities. These studies have improved our understanding of tranquillity and helped to develop a methodology to assess tranquillity and potential impacts upon it, using the characteristics identified in the research.

- 3.94 Over the years various attempts have been made to assess and map tranquillity; however the most significant recent study was commissioned by the Campaign to Protect for Rural England (CPRE) in 2006, and involved mapping the relative tranquillity of the entire country<sup>83</sup>. The study has been particularly significant as it has provided a more widely accepted, standard methodology for assessing and mapping tranquillity, and has given rise to a number of smaller scale, higher resolution studies, including Cranborne Chase and West Wiltshire Downs AONB which undertook an investigation based on the CPRE data in 2008 using GIS<sup>84</sup>; by ground-truthing this data.
- 3.95 Our understanding of tranquillity and ability to capture its quality and value are clearly improving, while the evidence base is also increasing.

### **Current Wiltshire Policy Framework**

- 3.96 Given the lack of understanding and evidence to support the concept tranquillity until relatively recently, none of the local plans or the Structure Plan currently includes policy on tranquillity.
- 3.97 Following discussions with Landscape Officers it has been suggested that it may be possible to incorporate tranquillity as an aspect of LCA; while the existing LCAs for the county do not include detailed evidence on tranquillity as part of the assessment, this could form part of any site specific assessment for a development proposal. Tranquillity could therefore easily be incorporated into the Core Strategy as part of a criteria based policy for LCA using this approach.

### **Sustainable Design**

#### **Evidence**

- 3.98 In recent years there has been a realisation that features of the natural environment should be incorporated into design schemes, not only to reduce the impacts of development upon biodiversity, but also to provide legibility, retain local character, create a sense of place, and allow people to connect with nature, while natural green spaces within developments can also provide 'ecosystem services' (see Section 3.6 above), encourage healthy lifestyles and increase the value of nearby properties (see Green Infrastructure topic paper for more details). It is often possible to incorporate elements of the existing ecological network such as hedgerows, ditches, ponds, meadows, trees etc into design schemes, and there are numerous examples of best practice available to

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<sup>80</sup> Jackson, S., Fuller, D., Dunsford, H., Mowbray, R., Hext, S., MacFarlane R., Haggett, C., (2008) *Tranquillity Mapping: developing a robust methodology for planning support*, Report to the Campaign to Protect Rural England. Centre for Environmental & Spatial Analysis, Northumbria University, Bluespace Environments and the University of Newcastle upon Tyne.

<sup>81</sup> R. MacFarlane, C. Haggett and D. Fuller, (2004) *Mapping Tranquillity—Defining and Assessing a Valuable Resource*. Summary Report, Campaign to Protect Rural England, London

<sup>82</sup> Swanwick, C. (2009) *Society's Attitude to and Preference for Land and Landscape* Land Use Policy Vol. 26 (Supplement 1), pp62-75

<sup>83</sup> CPRE (2006) *Mapping Tranquillity: Defining and Assessing a valuable Resource* [www.cpre.org.uk/filegrab/mapping-tranquillity.pdf](http://www.cpre.org.uk/filegrab/mapping-tranquillity.pdf)

<sup>84</sup> Bell, H. and Burden R. (2008) *Cranborne Chase and West Wiltshire Downs AONB Tranquillity Mapping – Investigative Study*. <http://www.ccwdaonb.org.uk/docs/TranquillityReport.pdf>

demonstrate how this has been successfully achieved in sustainable developments such as Sherford in Devon.

- 3.99 The key step in achieving sustainable design is to identify important elements of the natural environment within and surrounding the site, and establish the local landscape character at an early stage in order to understand the context of the site and incorporate this into the design rationale<sup>85</sup>. This includes all of the above elements from international designations down to individual features such as mature trees and hedgerows, particularly functional features such as wildlife corridors or foraging areas for protected or BAP species. This should help to inform the design scheme, with the objective of conserving and enhancing the natural and built environment, protecting local distinctiveness and minimising habitat fragmentation<sup>86</sup>. Retaining such features can also provide opportunities to restore them to favourable condition, for example to open up a previously canalised watercourse, lay hedgerows or manage neglected areas of wildflower meadow, helping to enhance the natural environment and contribute to BAP and SNA targets, although consideration must also be given to how these features will be used and maintained in the long-term.
- 3.100 Sustainable development can also provide opportunities to create habitats and improve the local environment, particularly on sites of low ecological interest or in degraded landscapes. Landscape schemes can create areas of wildflower-rich grassland, native scrub, hedgerows and woodland and other landscape features, while the inclusion of sustainable drainage systems (SuDS) can create a network of ponds, swales and wet grassland; such features can be particularly valuable for biodiversity where they form connections with elements of the surrounding ecological network, although long-term management and maintenance of such features must also be addressed.
- 3.101 At a smaller scale the built environment itself can also provide opportunities for wildlife by incorporating bird and bat boxes into buildings, or including street trees, while use of local materials and designs can help to reinforce local character. There has also recently been significant interest in the use of green roofs and walls, which can provide a wealth of habitats for rare invertebrates and birds, while also reducing run-off rates and helping to cool buildings in summer and provide insulation in winter.
- 3.102 The recent Land Use Futures report has highlighted the importance of better integration of land uses and the importance of multi-functionality as a response to the increasing challenges and pressures on land use which we will face in the 21<sup>st</sup> Century.

### **Current Wiltshire Policy Framework**

- 3.103 A key principle of PPS9 is that *'Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.'* The associated best practice guide<sup>87</sup> also recommends that core strategies should include policies *'promoting sustainable design standards for the construction and management of development which includes features beneficial to biodiversity or geological conservation.'* This approach is similarly currently supported by PPS1, which recommends that development plan policies take account of environmental issues such as *'the need to improve the built and natural environment in and around urban areas and rural settlements'* and that good design should *'consider the direct and indirect impacts upon the natural environment'*. The draft NPPF provides a slightly broader objective that *'opportunities to incorporate biodiversity in and around developments should be encouraged'*.

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<sup>85</sup> English Partnerships (2000) *Urban Design Compendium*

<sup>86</sup> Town and Country Planning Association (2004) *Biodiversity by Design*

<sup>87</sup> ODPM (2006) *Planning for Biodiversity and Geological Conservation: A Guide to Good Practice*



- 3.104 The North Wiltshire and Kennet Local Plans include policies which require that ecological features be incorporated within design schemes where possible, although they do not provide any incentive to restore existing features or otherwise improve the natural environment through design. West Wiltshire District Plan similarly supports the protection of certain features within development, but does not promote biodiversity gain through design, although the River Biss Public Realm Design Guide SPD does advocate specific habitat enhancements for the river as part of the redevelopment of the river corridor.
- 3.105 Design schemes are regularly submitted to the planning department with a 'clean sheet' approach to development, where natural features are not considered in the design rationale resulting in their removal, damage or degradation, often in situations where they could be retained. Wiltshire Councils often struggle for retention and maintenance of these features, requiring extensive consultations and changes to the design schemes which are both time consuming and expensive for developers, and could be avoided through a strong steer from policy. Opportunities for enhancement are often completely overlooked in design / landscape schemes and it is difficult to justify amendments in the absence of a strong policy driver; opportunities for good quality sustainable development are therefore often missed.

## Disturbance

### Evidence

- 3.106 Development has the potential to cause direct disturbance of the natural environment within the site itself, however such effects can also occur at significant distances from the development site. Such disturbances can range from short-term or one-off events to long-term, permanent effects. Examples include:
- Damage to habitats through trampling<sup>88</sup>, mountain biking<sup>89</sup>, fires, fly-tipping<sup>90</sup>, litter, dog fouling etc;
  - Disturbance of wildlife during construction through noise and vibration<sup>91</sup>;
  - Predation of domestic cats upon wildlife such as nesting birds and water vole<sup>92</sup>;
  - Recreational disturbance of sensitive fauna, particularly by dog walkers;
  - Pollution and siltation of waterbodies / courses from run-off;
  - Disturbance of nocturnal fauna through the use of artificial lighting<sup>93</sup>;
  - Visual disturbance and mortality from wild farms<sup>94,95</sup>; and
  - Mortality caused by increased traffic or new roads.
- 3.107 Although such effects can be significant especially in combination, they are often overlooked in environmental assessments, and can often be reduced through the use of

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<sup>88</sup> Burden, R.F. and Randerson, P.F. (1972) *Quantitative Studies of the Effects of Trampling on Vegetation as an Aid to Management of Semi-natural Areas*. Journal of Applied Ecology Vol. 9(2), pp439-453

<sup>89</sup> Thurston, E. and Reader, R.J (2001) *Impacts of Experimentally Applied Mountain Biking and Hiking on Vegetation and Soil of a Deciduous Forest* Environmental Management 27(3), pp397-409

<sup>90</sup> Webb, B., Marshall, B., Czarnomski, S. and Tilley, N (2006) *Fly-tipping: Causes, Incentives and Solutions*. University College, London.

<sup>91</sup> Hockin, D., Ounsted, M., Gorman, M., Hill, D., Keller, V. and Barker, M.A. (1992) *Examination of the Effects of Disturbance on Birds with Reference to its Importance in Ecological Assessments* Journal of Environmental Management Vol. 36(4), pp253-286.

<sup>92</sup> Woods, M., McDonald, R.A and Harris, S. (2003) *Predation of Wildlife by Domestic Cats in Great Britain* Mammal Review Vol. 33(2), pp174-188.

<sup>93</sup> Rich, C and Longcore, T (2006) *The Ecological Consequences of Artificial Night Lighting*. Island, Washington

<sup>94</sup> Convention on the Conservation of European Wildlife and Natural Habitats (2003) *Windfarms and Birds: An analysis of the effects of windfarms on birds, and guidance on environmental assessment criteria and site selection issues*

<sup>95</sup> Jones, G., Hooper-Bohannon, R., Barlow, K. and Parsons, K. (2009) *Determining the Potential Impact of wind Turbines on Bat Populations in Britain*

method statements, design / landscape schemes and planning obligations. A certain level of disturbance effects are likely to be an inherent part of some changes of land use and cannot be fully overcome, however such impacts should be made clear in the proposals, in order that they can be weighed against the benefits of development during the decision-making process.

- 3.108 The Habitats Regulations Assessment (HRA) for the Wiltshire 2026 consultation document carried out in 2009 identified the potential impacts of anticipated development upon the Salisbury Plain and New Forest SPAs<sup>96</sup>. Research has shown that stone curlew is very sensitive to recreational disturbance, particularly from dog walkers<sup>97</sup>, and that the vast majority of regular visitors live within 15km of the plain<sup>98</sup>. The HRA therefore concluded that proposed housing within this 15km radius of the plain could potentially impact upon stone curlew breeding success through increased recreational disturbance. Recreational disturbance has also been confirmed as having a significant effect upon the breeding success of the Dartford warbler<sup>99</sup> and nightjar<sup>100</sup>, and development in the south of the county could potentially increase recreational disturbance on these species in the New Forest. Potential mitigation measures have been identified to reduce and offset this recreational pressure through:
- Habitat mitigation / enhancement measures to increase the number of suitable nest sites;
  - Provision of Suitable Alternative Natural Green Spaces (SANGS); and
  - Securing management measures including access control.
- 3.109 Delivery of these measures would need to be secured through partnership working with organisations such as the New Forest National Park Authority, Defence Infrastructure Organisation and the Wessex Stone Curlew Project, and funded by developer contributions.

### **Current Wiltshire Policy Framework**

- 3.110 The current suite of local plans includes policies on the protection of legally protected species, some of which address the disturbance of such species. This legislation and policy protects only a very limited range of species from relatively narrowly defined deliberate disturbance and does not cover the wider range of biodiversity or address the potential indirect effects listed above which should be sufficiently significant as to be considered a material consideration in planning decisions. The impacts of disturbance on wildlife are overlooked in environmental assessments, and it is difficult to secure mitigation measures which would reduce such impacts, particularly where impacts are long-term or offsite.
- 3.111 There is currently no local policy on disturbance of breeding birds associated with the Salisbury Plain and New Forest SPAs specifically however there is a comprehensive GI policy included within the south Wiltshire core strategy that addresses site habitat management measures and visitor access management measures at or around N2K sites, especially the New Forest and

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<sup>96</sup> WSP Environmental (2009) *Wiltshire Core Strategy – Assessment of the Core Strategy Options Under the Habitats Regulations*

<sup>97</sup> Taylor, E.C. (2007) Stone curlews *Burhinus oedicnemus* and human disturbance: effects on behaviour, distribution and breeding success. PhD Thesis. University of Cambridge

<sup>98</sup> Liley, D, Payne, K and Peat, J (2007) *Access Patterns on Salisbury Plain*

<sup>99</sup> Murison, G., Bullock, J.M., Underhill-Day, J., Langston, R., Brown, A.F. and Sutherland, W.J. (2007) Habitat type determines the effects of disturbance on the breeding productivity of the Dartford Warbler *Ibis* Vol. 149(S1), pp16-26

<sup>100</sup> Liley, D. and Clarke, R.T. (2003) The Impact of Urban Development and Human Disturbance on the Numbers of Nightjar *Caprimulgus europaeus* on Heathlands in Dorset, England *Biological Conservation* Vol. 114(2), pp219-230



Salisbury Plain which meet the requirements of the habitats directive for south Wiltshire. The Wiltshire LDF a policy response in order to meet the requirements of the habitats directive. A local policy is also likely to be required in order to justify the collection of any developer contributions require to deliver mitigation measures for individual developments.

## **Biodiversity Offsetting**

### Evidence

- 3.112 'Biodiversity offsetting', also known as 'conservation credits', 'habitat banking' and 'bio-banking', is a system whereby the unavoidable ecological impacts of development are compensated or offset by providing biodiversity enhancements elsewhere. The Business and Biodiversity Offsets Programme<sup>101</sup> defines biodiversity offsets as:
- "measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development and persisting after appropriate prevention and mitigation measures have been implemented".*
- 3.113 This approach has already been used sparingly on a case by case basis in the UK, with variable levels of success. These offsite compensation measures may be secured either through a developer contribution to a delivery partner e.g. a local Wildlife Trust, or delivered in kind on land within the developer's control. Common problems associated with the offsite compensation approach are a lack of responsibility and resources for long-term management and monitoring, low degrees of success in establishing / recreating some habitat types, and the long period required for some habitat types to become fully established.
- 3.114 Some other countries including USA and Australia operate a widespread system of biodiversity offsetting whereby habitats are created / restored in advance of any loss or damage, and are 'banked' by an offset provider. If a development proposal will result in an unavoidable loss of biodiversity, this is calculated using a standard methodology and the developer purchases an equivalent number of 'credits' from the offset provider to demonstrate no net loss of biodiversity from the proposals. This system has the advantage that in most cases the habitats has already been established, and the long-term management and maintenance of those habitats has been secured through a legal agreement. It is also possible to gain synergistic benefits from pooling offsets from several small impacts to deliver large scale habitat creation / restoration projects in strategically important areas e.g. to form wildlife corridors / stepping stones, thereby providing biodiversity gains.
- 3.115 International interest in biodiversity offsetting has been growing in recent years and DEFRA commissioned a scoping study into the opportunities for an English scheme which reported in 2009<sup>102</sup>. That study identified considerable opportunities to develop an English biodiversity offsetting system which would help to achieve 'no net loss' of biodiversity, streamline the planning system and reduce uncertainties for developers, however it also highlighted the need for considerable further work to develop a suitable system.

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<sup>101</sup> [www.bbop.forest-trends.org/](http://www.bbop.forest-trends.org/)

<sup>102</sup> *Scoping study for the design and use of biodiversity offsets in an English Context*  
<http://archive.defra.gov.uk/evidence/economics/foodfarm/reports/documents/BiodiversityOffsets12May2009.pdf>

- 3.116 DEFRA has subsequently carried out considerable work investigating the development and application of a biodiversity offsets system<sup>103104105106107</sup>, however this is not discussed here in great detail. It is also launching a series of voluntary pilots in April 2012; these pilots will run for two years and DEFRA will report its findings in 2014.

### **Current Wiltshire Policy Framework**

- 3.117 Given that this is an emerging issue, there is no local policy framework to address biodiversity offsetting at the current time. At a national level the conservative party made a commitment in their manifesto to pioneer a 'conservation credits' scheme in the UK, and this commitment has been reiterated in the recent Natural Environment White Paper and the England Biodiversity Strategy. At the current time there is no solid commitment to implement a national biodiversity offsetting scheme, however it is likely that the UK government will roll out a national scheme once the DEFRA pilots report in 2014. This will require changes to national policy and legislation, and may also require the establishment of a new regulatory body.
- 3.118 Once this framework is established, it will be necessary for local planning authorities to lead on developing a local biodiversity offsetting strategy to:
- Establish where and what impacts are likely as a result of projected growth;
  - Identify suitable opportunities to deliver biodiversity offsets in partnership with local land owners, offset providers;
  - Set rules on when and where offsets can be charged and spent; and
  - Consult all relevant stakeholders and local communities on the most appropriate local approach to offsetting.
- 3.119 A local biodiversity offsetting strategy is likely to have the function of a planning policy document. It would be premature to establish a local planning policy on this issue at the current time, in advance of the findings of the DEFRA pilots and any national policy / legislative changes. A local biodiversity offsetting strategy is likely to be required in the lifetime of this Core Strategy and Wiltshire Council will be investigating potential issues and options in the coming years.

### **Phosphate Levels in the River Avon SAC**

#### Evidence

- 3.120 It is recognised that increased freshwater phosphate concentration can have detrimental effects on the ecology and biodiversity of river systems. Negative effects include increased growth rate and abundance of individual plant species (algae and higher plants), which can lead to eutrophication. Changes in the competitive balance of plant communities have potential knock-on effects for the associated animal life populations, as well as altering the chemical and physical properties of the water.

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<sup>103</sup> *Guiding principles for biodiversity offsetting* <http://archive.defra.gov.uk/environment/biodiversity/offsetting/documents/110714offsetting-guiding-principles.pdf>

<sup>104</sup> DEFRA (2011) *Technical paper: proposed metric for the biodiversity offsetting pilot in England* <http://archive.defra.gov.uk/environment/biodiversity/offsetting/documents/110714offsetting-technical-metric.pdf>

<sup>105</sup> DEFRA (2011) *Biodiversity Offsetting: Discussion Material* <http://archive.defra.gov.uk/environment/biodiversity/offsetting/documents/110714offsetting-discussion.pdf>

<sup>106</sup> DEFRA (2011) *Planning Policy and Biodiversity Offsetting* <http://archive.defra.gov.uk/environment/biodiversity/offsetting/documents/110714offsetting-research-summary.pdf>

<sup>107</sup> GHK (2011) *Costing potential actions to offset the impact of development on biodiversity – Final Report* <http://archive.defra.gov.uk/environment/biodiversity/offsetting/documents/110714offsetting-technical-costing-potential.pdf>

- 3.121 Guideline phosphate standards for SAC rivers were agreed between the Environment Agency, Natural England and Countryside Council for Wales<sup>108</sup> based on catchment geology and river size. These guideline standards are not statutory but are agreed thresholds derived to assist judging the ecological condition of the river. Natural England has adopted the standards as one of the conservation objectives for the River Avon SAC<sup>109</sup>, and therefore considers that the site is currently in unfavourable condition due to the exceedance of the P guideline standard.
- 3.122 It is difficult to identify all sources of P in the catchment and determine their proportional contribution, however in 2008 Sewage Treatment Works (STW) were estimated to contribute approximately 25% of P loading, with the remaining P coming from diffuse sources including agriculture, septic tanks and unconsented discharges. The STW's in the catchment are water company discharges and were identified for improvement schemes as part of the Asset Management Program (AMP), driven by known Urban Waste Water Treatment Directive and Habitats Directive requirements. For these consents, phosphate stripping to Best Available Technology (BAT) has been secured at all STWs through the AMP.
- 3.123 In 2010 the Environment Agency carried out a comprehensive review of all discharge consents in the River Avon<sup>110</sup> in line with the requirements of Regulation 63 of the Habitats Regulations (2010), which is effectively a retrospective appropriate assessment. For 14 of the 17 STWs assessed, installation of new treatment technology to BAT resulted in modelled improvements equal to or in excess of those required to remove the individual discharge's proportional contribution to the adverse effect. A conclusion of no adverse effect on the integrity of the site was reached for these discharges alone and in combination. For two of the three remaining licences (Salisbury STW and Pewsey STW) treating to BAT moved a significant way to removing the individual discharges proportional contribution but did not remove it completely. Nonetheless, the EA concluded that non-compliance for these discharges was within the bounds of uncertainty of the modelling and a conclusion of no adverse effect on integrity was been reached for these discharges.
- 3.124 At Warminster STW the proportional contribution was not met, even after the AMP improvement works were carried out, and the EA considered further options to address this consent. These included revoking the consent, reducing headroom, and transferring the discharge to other STWs within and outside the catchment. None of these options were feasible in practice, however a fourth option of addressing other (diffuse) sources of phosphate in the catchment through the implementation of a Phosphate Management Plan was also assessed and considered to be a suitable measure to offset excessive P loading from the Warminster STW; the EA therefore concluded no adverse effect upon site integrity, subject to implementation of this Phosphate Management Plan. EA monitoring of the river has confirmed no loss of biological elements within the river and DEFRA has confirmed that it is acceptable to conclude no adverse effect upon site integrity in such situations where biological evidence does not indicate any adverse effects<sup>111</sup>.
- 3.125 The EA are currently developing a Nutrient Management Plan (aka Phosphate Management Plan) for the River Avon catchment which will address P loading across the catchment from all sources (including excessive P loading from Warminster STW) in order to bring the river back into favourable conservation status and in line with the guideline standards for P. This will assess all options for reducing P loading across the catchment

<sup>108</sup> WQTAG048b Guideline Phosphate Standards for SAC Rivers (WQTAG, 2002)

<sup>109</sup> English Nature (2002) *River Avon SSSI / cSAC – Conservation Objectives for European Interest on the SSSI*

<sup>110</sup> Environment Agency (2010) *River Avon SAC – Site Action Plan*

<sup>111</sup> Letter from Chris Ryder, DEFRA head of water quality to John Fraser, EA Head of water quality (27 August 2007).

and identify the most cost effective suite of measures to achieve the necessary reductions. It is anticipated that this plan will be complete in early 2012.

- 3.126 Natural England has expressed considerable concern over the potential impacts of housing numbers within the catchment proposed by the emerging Wiltshire and South Wiltshire Core Strategies. Wiltshire Council has taken these concerns very seriously, particularly in light of its statutory responsibilities as a 'competent authority' and requirements to carry out a Habitats Regulations Assessment to fulfil Regulation 61 of the Habitats Regulations before it may legally adopt a development plan. Since 2009 there has been considerable correspondence between all interested parties including Wiltshire Council, Natural England, Environment Agency and Wessex Water to resolve this issue and ensure that any impacts upon the SAC are avoided or mitigated fully.

### **Current Wiltshire Policy Framework**

- 3.127 Given that this is an emerging issue, there is currently no adopted policy framework to address this issue, however it is clear that this will require a policy response within the Wiltshire Core Strategy in order to ensure that it is Habitats Regulations compliant. Considerable progress was made during the South Wiltshire Core Strategy and a draft policy (CP20), which has now been found sound by the secretary of state, was agreed between Wiltshire Council, Natural England and the inspector at the Examination in Public. This policy will be used as the basis for a similar policy within the Wiltshire Core Strategy.
- 3.128 At the current time a general agreement has been reached between Wiltshire Council / NE / EA that where new housing would increase P levels at a STW which the EA has confirmed would require implementation of a NMP to offset residual P loading e.g. Warminster, then mitigating the effects of increased housing on the river as a result of increased sewage discharges and associated P loading would be a legitimate expectation of that development. A suitable means of mitigating these effects could be a reasonable and proportionate contribution to the implementation of the NMP; it is imperative that any such contributions would only be used to offset any impacts of additional housing rather than to address existing problems in the wider catchment. The cost of any contribution would be based on the projected levels of P to be discharged from the development, and calculated based on the cost / kg of P established in the NMP. Onsite mitigation measures such as P input reductions associated with the removal of land from agricultural production or onsite sewage treatment options may also be considered in calculating the level of P offsetting required. This policy would be triggered on the basis of monitoring evidence collected by the EA and confirmation whether individual STWs are Habitats Regulations compliant. Therefore where development would discharge to a STW which the EA has confirmed as being Habitats Regulations compliant, no mitigation measures would be necessary.
- 3.129 The interaction of the planning and environmental permitting regime can be complex, however this has been clarified through national planning guidance, appeals and case law. The key principle in guiding local policies and planning decisions is set out in PPS23:
- 'The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not seek to duplicate it.'*
- 3.130 It is therefore important that this policy only applies to circumstances where the EA confirms that the application pollution control regime (Environmental Permitting Regulations) would not adequately control pollution from development proposals, and as

such development at that location may not be an acceptable use of the land unless in the absence of additional mitigation measures which may can be secured through planning. Where developer contributions or Community Infrastructure Levy (CIL) are to be charged on a development as a result of this policy, it will also be necessary to demonstrate that this meets the requirements of Circular 05/05 or the CIL Regulations as appropriate.

## **Water Framework Directive**

### Evidence

- 3.131 The Water Framework Directive (WFD) was adopted by the European Union in 2000 and transposed into UK law in 2003. It is designed to improve and integrate the way water bodies are managed throughout Europe. In England, much of the implementation work will be undertaken by the EA as the competent authority. Member States must aim to reach good chemical and ecological status in inland and coastal waters by 2015 subject to certain limited exceptions. It is designed to:
- enhance the status and prevent further deterioration of aquatic ecosystems and associated wetlands which depend on the aquatic ecosystems;
  - promote the sustainable use of water;
  - reduce pollution of water, especially by 'priority' and 'priority hazardous' substances; and
  - ensure progressive reduction of groundwater pollution.
- 3.132 The WFD establishes a strategic framework for managing the water environment. It requires a management plan for each river basin to be developed every six years. The plans are based on a detailed analysis of the impacts of human activity on the water environment and incorporate a programme of measures to improve water bodies where required.
- 3.133 Wiltshire predominately within the South West River Basin District (Hampshire Avon), although the north west of the county (the Bristol Avon catchment) falls within the Severn River Basin District and small areas also fall within the Thames River Basin District (Upper Kennet and Upper Thames). These River Basin Management Plans (RBMPs) identify a number of pressures on the water environment relevant to planning:
- Physical modification of rivers and lakes;
  - Increasing discharges from sewage treatment works; and
  - Increasing demand for water resources.
- 3.134 Both RBMPs also identify the opportunity for planning and development to help improve the quality of water bodies. Local governments are also identified as having a major role to play in implementing the RBMPs, and a number of relevant actions include:
- Ensure that planning policies and spatial planning documents take into account the objectives of the River Basin Management Plans;
  - Promote the use of sustainable drainage systems in new urban and rural developments where appropriate;
  - Promote sustainable water management best practice through pre-application discussions with developers;
  - Include strong water efficiency policies in Spatial Strategies and Local Development Plans/Frameworks; and

- Implement surface water management plans, increasing resilience to surface water flooding and ensuring water quality is considered on a catchment basis.
- 3.135 The EA's recent document '*Ground water protection: policy and practice (GP3)*'<sup>112</sup> sets out their expectations in relation to planning and a number of industries which could impact upon groundwater sources and includes a number of policy statements relevant to planning.
- 3.136 The EA has mapped the UKs most significant aquifers in line with the requirements of the WFD as follows:
- Principle aquifers - These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer;
  - Secondary A - permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers;
  - Secondary B - predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of the former non-aquifers; and
  - Secondary Undifferentiated - has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.
- 3.137 Within aquifers, the EA has adopted a tiered, risk-based approach to protection of groundwater abstractions involving:
- A general level of protection for all drinking water sources through the use of Source Protection Zones (SPZs).
  - Safeguard zones (SgZs) are identified around sources at high risk. These are locations where there are known problems with deteriorating water quality where existing measures should be strictly enforced for particular pollutants and activities and additional new voluntary measures can be focused.
  - Water Protection Zones (WPZs) are established around sources identified as being at high risk, and are used as a 'last resort' where other mechanisms have failed or are unlikely to prevent failure of WFD objectives. The EA may apply specific statutory measures, over and above existing statutory measures, to manage or prohibit activities that cause or could cause damage or pollution of water.
- 3.138 SPZs form the first tier of protection and generally have three sub-divisions as follows:
- SPZ1 – Inner protection zone - defined as the 50 day travel time from any point below the water table to the abstraction source. This zone has a minimum radius of 50 metres.
  - SPZ2 – Outer protection zone - defined by a 400 day travel time from a point below the water table. This zone has a minimum radius of 250 or 500 metres around the abstraction source, depending on the size of the abstraction.

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<sup>112</sup> <http://publications.environment-agency.gov.uk/PDF/GEHO0708BOGU-E-E.pdf>

- SPZ3 – Source catchment protection zone - defined as the area around an abstraction source within which all groundwater recharge is presumed to be discharged at the abstraction source.
- 3.139 EA advocate a risk based approach to the protection of groundwater sources on the basis of the variable vulnerability these different zones and aquifers, and on the type of development proposed.
- 3.140 Water resources are also constrained in several areas of the county due to increasing abstraction pressures, particularly for agriculture and public consumption. Catchment Abstraction Management Strategies undertaken by the EA have confirmed that within Wiltshire almost all of the Hampshire Avon is either over abstracted (where existing abstraction is causing unacceptable environmental impact at low/medium flows) or over licensed (current actual abstraction is resulting in no water available at low flows, with potential to cause unacceptable environmental impact at low/medium flows)<sup>113</sup>, while the upper Kennet is also over abstracted<sup>114</sup>. In the Bristol Avon the situation is more variable, however there is no water available at all surface water and some groundwater resources (defined as no water available for further licensing at low flows although water may be available at higher flows with appropriate restrictions). Some groundwater resources are also over licensed, while resources around Malmesbury are over abstracted<sup>115</sup>. This highlights that there are clearly substantial pressures on the water environment from over abstraction which are likely to become greater in the future through increased demand upon water resources from additional development proposed by the Core Strategy, compounded by the effects of climate change.

### **Current Wiltshire Policy Framework**

- 3.141 A number of local policies relate to groundwater protection areas including:
- U4 – Groundwater Source Protection Areas (West Wiltshire District Plan);
  - NE22 – Surface Water Run-off (North Wiltshire Local Plan);
  - NR14 – Protection of Water Quality and Resources (Kennet Local Plan);
  - NR15 – Water Supply (Kennet Local Plan);
  - NR16 – Protection of Water Resources (Kennet Local Plan);
  - G8 – Water Environment (Salisbury District Local Plan) (
- 3.142 Wiltshire and Swindon Structure Plan also includes policy C5, which relates to the protection of the water environment including surface and groundwater quality and resources. However, given that the WFD has been implemented in the UK relatively recently and RBMPs were not completed until 2009, none of the adopted local plans include policies directly relate to the objectives of the WFD, the policies of GP3 or the relevant local RBMPs. These policies also do not support the risk based approach to protection of groundwater resources.
- 3.143 The draft south Wiltshire Core Strategy includes Core Policy 19 which requires high levels of water efficiency for residential and non-residential development in the Hampshire Avon catchment.
- 3.144 Neither the national series of PPSs nor the draft NPPF addresses the requirements of the WFD.

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<sup>113</sup> <http://publications.environment-agency.gov.uk/PDF/GESW0206BKHY-E-E.pdf>

<sup>114</sup> <http://publications.environment-agency.gov.uk/PDF/GETH0404BHXH-E-E.pdf>

<sup>115</sup> [http://www.environment-agency.gov.uk/static/documents/Research/ba\\_cams\\_2\\_1038362.pdf](http://www.environment-agency.gov.uk/static/documents/Research/ba_cams_2_1038362.pdf)

## **4 Collaborative Working**

### **Internal Consultation**

- 4.1 Officers from the following disciplines within Wiltshire Council have been consulted during in the preparation of this paper and policy development:
- Landscape
  - Ecology
  - Urban Design
  - Development Control (North, West, Kennet and Salisbury hubs)

### **External Consultation**

- 4.2 A targeted external consultation was also carried out, inviting the following organisations to comment and contribute during the preparation of this paper and policy development:
- Natural England
  - Wiltshire Wildlife Trust
  - Defence Estates
  - Environment Agency
  - North Wessex Downs Area of Outstanding natural Beauty (AONB)
  - Cotswolds AONB
  - Cranourne Chase AONB
  - Royal Society for the Protection of Birds
  - Campaign for the Protection of Rural England
- 4.3 Consultation responses were received and recorded through a number of stakeholder events and e-mail correspondence during February / March 2011.
- 4.4 A draft of the Core Strategy document was also published as part of a wider public consultation was carried out in August 2011, which attracted several thousand responses from the stakeholders and the public.



## 5 Links to other strategies

### Wiltshire Green Infrastructure Strategy

- 5.1 Green Infrastructure (GI) is defined as ‘a strategic network of multi-functional green space, both new and existing, both rural and urban, which supports natural and ecological processes and is integral to the health and quality of life in sustainable communities. It delivers a broad range of functions and provides vital socio-economic and cultural benefits which underpin individual and community health and wellbeing. These functions include: conserving and enhancing the natural environment; providing wildlife corridors; reducing noise and air pollution; and helping communities to adapt to a changing climate through water and carbon management. In urban areas, functions include providing routes (e.g. footpaths and cycleways) which link areas of open space within settlements; providing sustainable drainage, flood storage and urban cooling; and providing a wide range of opportunities for engagement and active citizenship, relaxation and quiet contemplation, sport, recreation and children’s play.’<sup>116</sup>
- 5.2 Wiltshire is currently preparing a GI strategy for the county which will help to identify and plan strategic GI projects, several of which will be delivered through the planning process. The Wiltshire Core Strategy Consultation Document includes two proposed policies relating specifically to Green Infrastructure, and the proposed natural environment policies will also be complementary to the aims of GI strategy, particularly in relation to the creation and enhancement of ecological networks, and improving the quality of public open green spaces in developments.

### Energy, Change and Opportunities Strategy (2011-2020)

- 5.3 This strategy sets out how Wiltshire as a council and a community can act on climate change. It is a framework document that will be linked to related council strategies (including the Core Strategy) to ensure objectives are embedded across the entire organisation. It will be supplemented by detailed action plans to set out more specifically how we are going to deliver our climate change ambitions. These will allow detailed targets to be developed, specific actions to allow the targets to be met and also outline a suitable monitoring framework. As this is the first time that a climate change strategy has been prepared, it is expected that the strategy will be reviewed and refined as further work is carried out on the action plans.
- 5.4 In relation to planning and the natural environment, it sets out some specific aims which the Core Strategy can help to deliver:
- assessing the impact of proposed development schemes on the natural environment, particularly in relation to climate change;
  - seeking biodiversity and landscape enhancement through sustainable development, mitigation and compensation;
  - formulating best practice natural environment and green infrastructure policies for the council’s Development Plan; and
  - developing the understanding of making planning decisions.

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<sup>116</sup> DCLG (2010) Planning Policy Statement: Planning for a Healthy Natural Environment

### **Cotswold Water Park Master Plan**

- 5.5 This strategic review and implementation plan aims to guide the future development of the Cotswold Water Park (CWP). Biodiversity is identified as core driver for the development of the CWP, with planning identified as an enabling driver which is fundamental to its development. It includes a number of objectives in relation to sustainable recreation and tourism development within the park, which balances the potential economic and social benefits with the potential impacts upon the significant biodiversity interests, particularly in respect of disturbance.
- 5.6 The Master Plan is a landscape scale project in an area likely to see further significant changes during the plan period which will include new development to facilitate the recreation and tourism opportunities in the area. Given the rapid and large-scale changes which have occurred and will continue in the future it is therefore proposed to produce a Landscape Strategy which will help to facilitate appropriate landscape design changes to effectively create a new landscape character for the park; this Landscape Strategy will be vital to guide development in a coherent manner across the park area.

### **River Basin Management Plans**

- 5.7 These plans focus on the protection, improvement and sustainable use of the water environment. Many organisations and individuals help to protect and improve the water environment for the benefit of people and wildlife. River basin management is the approach the Environment Agency is using to ensure our combined efforts achieve the improvement needed across England. River basin management is a continuous process of planning and delivery. The WFD introduces a formal series of 6 year cycles. The first cycle will end in 2015 when, following further planning and consultation, this plan will be updated and re-issued.
- 5.8 The relevant RBMPs for Wiltshire are South West (Hampshire Avon), Severn (Bristol Avon) and Thames (Upper Kennet and Upper Thames), which includes a number of actions relevant to planning and the Core Strategy, as set out in Section 3.18 (above).

### **North Wessex Downs AONB Management Plan**

- 5.9 The Council of Partners of the North Wessex Downs AONB advises its Local Authority members how best to discharge their statutory responsibility for conserving and enhancing that landscape, for increasing everyone's understanding and enjoyment of it, and for encouraging the social and economic well-being of those who live within it. The Management Plan describes how that responsibility will be discharged, and has been adopted by Wiltshire Council. Following the introduction of the Countryside and Rights of Way Act (2000), the government confirmed that the landscape qualities of National Parks and AONBs are equivalent. The protection given by the land use planning system to natural beauty in both types of area should therefore be equivalent.
- 5.10 Relevant objectives for biodiversity and landscape in relation to development and planning include:
- To ensure that the characteristic habitats and species of the North Wessex Downs are conserved and enhanced
  - To ensure that the formulation and implementation of planning policies across the North Wessex Downs takes full account of the purposes of designation and the character and quality of the AONB and its setting
- 5.11 With a more specific action to:

*'Ensure that 'green infrastructure' (new or enhanced biodiversity assets) is incorporated within the area of all medium or large-scale developments, both within and near the AONB.'*

### **Cranborne Chase AONB Management Plan**

- 5.12 This document is the statutory Management Plan for the nationally designated and protected landscape of the Cranborne Chase and West Wiltshire Downs AONB, as required under the Countryside and Rights of Way Act 2000; this has been adopted by Wiltshire Council. It is a plan for all those that have a responsibility for maintaining that landscape, including the local planning authorities. The plan sets out objectives and policies for AONB partners (including Wiltshire Council) that are believed to be realistic and achievable in the five year period 2009-15.
- 5.13 Key objectives relevant to the Core Strategy policies include:
- The landscape character, tranquillity and special qualities of the AONB and its settings are conserved and enhanced
  - The landscape character and special qualities of the AONB are fully understood, informing and incorporated within effective landscape management and planning
  - Characteristic habitats and species are conserved and enhanced at a landscape scale;
  - Encourage the conservation and enhancement of habitats and species by extending and improving ecological connections between habitats at an appropriate landscape scale
  - The AONB inputs effectively to national, regional and local strategies, policies and plans

### **Cotswolds AONB Management Plan**

- 5.14 This sets a vision for the future management of the AONB, together with clear objectives and policies to guide the partnership in exercising its responsibilities and taking actions, to ensure the future of the Cotswolds AONB. The plan will operate alongside other statutory plans and programmes, especially community strategies, development plans and transport plans, and a considerable range of other initiatives. The plan provides the Board's vision over the next 20 – 25 years, with an immediate five year time frame of 2008 – 2013.
- 5.15 The plan identifies many of the same issues set out in Section 4 above and a number of actions to counteract them including:
- Encourage and support action during the plan period to prevent any further loss and enhance where possible designated areas and other areas known to contain priority Biodiversity Action Plan habitats and species when identified within, and adjoining the AONB
  - Encourage the improvement of priority habitat and species conservation by extending and improving ecological connections between habitats at an appropriate landscape scale
  - Rigorously assess development proposals that would have major implications for the Cotswold landscape, both individually and cumulatively, and/or would set an important precedent for future proposals that would adversely affect the special qualities, geology or tranquillity of the AONB
  - Encourage the use of published landscape and land management guidance which interprets and applies landscape character assessments

5.16 It also includes specific policies relevant to the spatial planning process:

*‘That all Local Development Framework documents and planning decision-making processes will use the following criteria to determine the acceptability of a proposed development in the Cotswolds AONB. Development will:*

- *be compatible with the distinctive character of the location as described by the relevant landscape character assessment, strategy and guidelines*
- *incorporate designs and landscaping consistent with the above, respecting the local settlement pattern and building style*
- *be designed to respect local building styles and materials*
- *incorporate appropriate sustainability elements and designs*
- *maintain or improve the existing level of tranquillity*
- *not have an adverse impact on the local community amenities and services and access to these*
- *protect, or where possible enhance, biodiversity*
- *be in accordance with a more sustainable pattern of development, reducing dependence on car travel’*

5.17 A position statement by the Cotswold Conservation Board<sup>117</sup> also encourages local planning authorities to set out in Local Development Documents clear objectives and policies for landscape scale habitat restoration and creation. It also advises that local authorities should use the South West Nature Map to identify areas and sites for the restoration and creation of priority habitats and inform the use of appropriate policies in their LDFs.

### **UK / Wiltshire BAP**

5.18 The UK BAP is the UK Government’s response to the CBD (see Table 1) which called for the development and enforcement of national strategies and associated action plans to identify, conserve and protect existing biological diversity, and to enhance it wherever possible. The UKBAP describes the biological resources of the UK and provides detailed plans for conservation of these resources, at national and devolved levels. Action plans for the most threatened species and habitats have been set out to aid recovery, and reporting rounds show how the UKBAP has contributed to the UK’s progress towards the significant reduction of biodiversity loss called for by the CBD.

5.19 Within the framework of the UK BAP, the Wiltshire BAP identifies local priorities for conservation most relevant to Wiltshire and sets out actions and targets for their conservation; it is produced and implemented by a partnership of organisations including Natural England, Wiltshire Wildlife Trust, Environment Agency, Forestry Commission, Wiltshire and Swindon Biological Records Centre, Cotswold Water Park and many others including Wiltshire Council as a lead partner on many plans. Local BAPs are the UK’s mechanism to deliver it’s responsibilities under the CBD.

5.20 The Wiltshire BAP also includes a number of targets directly relevant to the planning system:

- *GAPT2 - No planning permission is granted where it is likely that there will be a net loss of biodiversity (includes all habitats/species in new BAP) NB: All CWS are covered by this.*

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<sup>117</sup> Cotswold Conservation Board position Statement: Biodiversity Planning (undated)

- *GAPT3 - New major developments deliver biodiversity gain through the provision of new features (such as bat and bird boxes etc.) and where possible integrated green infrastructure (also including improvement of existing green infrastructure)*
- *GAPT4 - New developments contribute to biodiversity gain via planning gain*
- *GAPT5 - LAs to develop SPD/pre-application guidance to address how relevant aspects of the BAP will be implemented through the LDF*

5.21 Many actions for the protection and enhancement of woodland, rivers, brownfield habitats and bats are also directly relevant to planning system. The Wiltshire BAP is due for a major revision in light of the recent changes to national biodiversity policy and the move to a 'landscape scale' approach.

### **Wessex Stone Curlew Project**

- 5.22 The historical change in agricultural practices has resulted in the decline of suitable habitat, such as grazed chalk grassland and fallow areas, favoured by the stone-curlew for breeding. Subsequently, their numbers have dwindled since the late 1800s, with an all time low in the mid-1980s. The use of Salisbury Plain for military training has ensured that the stone-curlew breeding population has persisted and these areas provide the catalyst for the RSPB's recovery project in Wessex.
- 5.23 The RSPB has worked closely with farmers and landowners, along with partner organisations such as the MoD, Defra and Natural England, to create more habitat that is suitable for breeding stone-curlews. Nesting plots for stone-curlews have been created by farmers under agri-environment schemes and have underpinned a significant increase in breeding stone-curlews across the region (around two thirds of stone-curlew nesting attempts in Wessex in 2009 were made on specially created plots). The project also works with farmers to find and protect stone-curlew nesting attempts in arable crops and provide advice.
- 5.24 The project objectives are:
- To produce a self-sustaining population of stone-curlews in Wessex
  - To promote the creation of safe breeding habitat for stone-curlews on farmland through government agri-environment schemes
  - To offer advice and support to landowners within and around the current breeding range of stone-curlews
- 5.25 The Wessex Stone Curlew Project is a partnership project which could potentially help to deliver and necessary mitigation measures for residential development projects in south and east Wiltshire through developer contributions.

### **Interaction with Other Policy Areas within the LDF**

- Green Infrastructure – there are lots of potential synergies between the Green Infrastructure and Natural Environment policies. However proposed land use changes or increased recreational pressure could also cause impacts for sensitive wildlife while insensitive landscape scheme could affect local landscape character.
- Housing – increased housing will have a number of direct affects on local ecology and landscape character. Offsite and indirect impacts such as recreation pressure upon SPAs will be particularly significant for housing development in the east and south of the County.

- Built environment (design quality) – There are clearly strong links with the ‘sustainable design’ and ‘landscape character’ elements of the natural environment policies which could be strengthened.
  - Climate change (adaptation) – there are synergies between many of the potential adaptation measures and other policy areas such as the Natural Environment and Green Infrastructure which should be strengthened.
  - Renewable energy – renewable schemes are likely to have a visual impact upon local landscapes and visual amenity, and this link should be made clear with guidance as to what would be acceptable.
  - Water (SUDS) – SuDS are potentially highly multi-functional features which can provide a wide range of benefits for local environments and these many connections should be highlighted in the Core Strategy to encourage the delivery of multiple benefits.
  - Reuse of military land – several military sites are in the open countryside and as such redevelopment of these sites could have particularly strong impacts upon local landscapes, while also providing opportunities to enhance landscape character.
- 5.26 Interactions between these policy areas are recognised in the relevant supporting / policy text, and where possible cross references made between these policy areas and the Natural Environment policies to provide a much stronger and more integrated Core Strategy document.

## 6 Identifying priorities at a community level

### Public Consultation

- 6.1 Previous public consultation responses for other local plan documents at a district level and in response to the Wiltshire 2026 consultation (October 2009) were first reviewed for comments in relation to the natural environment in order to gather an initial opinion of local concerns and priorities, and help with drafting initial policy text. This was followed up by a further public consultation of the draft policies in August 2011, which has been used to help refine the policies further (a summary of the relevant issues raised by the public during the August 2011 consultation is provided in Appendix B). These public consultations revealed a strong desire from Wiltshire's communities to protect their local wildlife sites, with concerns raised for some specific sites in relation to development proposals, while opportunities to protect others were also recognised.
- 6.2 A wider concern that wildlife habitats and species are conserved and protected was also raised, ensuring that development takes place in a manner that enhances rather than degrades a community's natural environment, particularly through the careful location and layout of development sites. This was further supported by a desire for greater recognition of the positive role that development can play in protecting and enhancing the natural environment.
- 6.3 Another key theme was the importance of wildlife corridors and the potential to create and enhance such features, with particular reference made to river corridors such as the River Avon and River Biss, and canal projects such as the Kennet and Avon and the proposed Cricklade Country Way project. Concerns were also raised for the implications of habitat fragmentation, with particular reference to climate change adaptation.
- 6.4 Consultation responses also included a desire to maintain green buffers between towns particularly surrounding Swindon, Trowbridge (Hilpertons Gap) and Devizes and the need for a rural buffers policy. Encroachment of the Green Belt was specifically mentioned and in West Wiltshire a consultation paper posed the question "Are there any exceptional circumstances that would justify changes to the Green Belt boundaries"? 58% of respondents answered 'no' to this question; however, a significant minority (42%) did suggest situations where such changes could be considered.
- 6.5 In the same consultation 59% of respondents supported the existing landscape policy giving enhanced protection only to AONBs and to Special Landscape Areas, and wider concerns about AONBs were also raised elsewhere in the county.
- 6.6 In the August 2011 consultation several representations were made in relation to over abstraction from the River Kennet and the potential for this to be exacerbated by the additional housing proposed.

### Community Plans / Strategies

- 6.7 The Wiltshire Community Plan (2011-2026)<sup>118</sup> focuses on people, places and promises, setting out a vision, priorities and objectives for the next 15 years. It acts as an 'umbrella' for a hierarchy of plans which will both influence the community plan and be influenced by it. The plan includes an objective to:

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<sup>118</sup> <http://www.wiltshire.gov.uk/consultation-wiltshire-community-plan.pdf>

*Create a series of living landscapes across the county to help local people, communities and businesses to have opportunities for environmental learning, whilst also protecting wildlife from the changes to the climate, agriculture and industry.*

- 6.8 A total of 22 Community Plans across Wiltshire have been reviewed. These plans have generally been produced in close consultation with the communities they represent, highlighting the issues identified locally and proposing actions to address these concerns. Not all of these are directly related to planning, however they do provide an indication of the general concerns and priorities of communities across Wiltshire. Communities generally appear to value their local environments strongly, and are both keen to find out more about them, and concerned for wildlife and local sites in almost all of the community areas.
- 6.9 The following aspirations and views were common across many of the plans reviewed:
- Appreciation of the countryside and the natural beauty of the area
  - Desire to protect local wildlife (species and habitats)
  - Desire to maintain 'green buffers' between towns and outlying villages, to prevent Green Belt encroachment, and to avoid development on green field sites
  - Desire to maintain the character of the Areas of Outstanding Natural Beauty (AONBs)
  - Concern over loss of trees and woodland, and desire for more trees (particularly native trees) and/or flowers to be planted and to protect existing trees and hedges
  - Appreciation of and desire to maintain 'dark skies'
  - Appreciation of and desire to preserve and enhance peace and tranquillity
  - Desire to conserve the landscape and local landscape character
- 6.10 A number of other aspirations and views were only raised in one or a few community plans, but nonetheless concern issues which are not specific to certain places. These include:
- The need to enable wildlife to adapt to climate change, and the need to provide long term and viable habitats for a diversity of wildlife
  - Desire to maintain and enhance stream and river quality
  - Desire to enhance/create wildlife habitats in public open spaces
  - Desire to protect designated sites
  - Need to ensure that development takes place in a manner which enhances rather than spoils the environment / ensuring environmental gain with development
  - Desire to promote tourism (particularly related to wildlife, the locally distinctive environment and 'green' tourism)
  - Need to protect the environment within the New Forest National Park
  - Need to conserve the landscape setting in and around the towns and villages



## **7 What are the challenges and opportunities that the evidence highlights?**

### **Wiltshire Wide Issues**

#### Landscape Scale Conservation Projects

- 7.1 Recent research has shown the importance of landscape scale conservation projects in order to create a resilient landscape which can withstand the increasing pressures of climate change in combination with the long-term trends of habitat loss and fragmentation. The south west region benefits from an extensive study which provides a scientific evidence base to identify priorities for landscape scale restoration of habitats across the region known as SNAs; these areas will form the basis for conservation projects throughout the plan period, indeed many are already proposed across the county. The reviewed Wiltshire BAP will also take a more spatial approach in line with national biodiversity, and it is important that natural environment policies integrate with this approach.
- 7.2 The Wiltshire Community Plan also sets out a main objective to create a series of 'living landscapes', which would be commensurate to the landscape scale approach.
- 7.3 Major development within these landscape scale projects could sterilise some areas with potential for habitat restoration, however at the same time landscape schemes and new public open spaces could create opportunities for such habitat restoration and creation. The current policy framework does not refer to landscape scale projects and provides no driver to avoid conflicts or deliver benefits through development; the new policy framework provides an opportunity to influence major development in a manner that will contribute towards rather than conflict with the objectives of landscape scale conservation for the region.

### **Local Sites**

- 7.4 Professor John Lawton and DEFRA have shown that CWSs are an invaluable resource for our natural environment and our local databases demonstrate that they are a vital component of Wiltshire's ecological network. There is a general slow trend towards the loss and degradation of CWSs and although there is an existing policy framework which protects CWSs in the planning process, there have been continued losses as a result of development, indicating that these existing policies are deficient. Community consultations and documents have revealed that our communities are concerned about local wildlife and are keen to see it protected and enhanced where possible. In particular they are keen to see local wildlife sites brought into favourable management. Development in certain areas may provide opportunities to enhance some CWSs either by introducing favourable management or providing complementary habitats or improved connectivity.
- 7.5 Although our CWS network may face increased pressure from development in the future, a stronger policy framework will help to avoid inappropriate development affecting these sites. New policy could also maximise opportunities to manage and enhance CWSs favourably and improve Wiltshire's ecological network.
- 7.6 Specific CWSs which may be at risk from known development pressures associated with allocations can also be addressed through development briefs (see Section 7.4 below).

### **Landscape Character Assessment / Special Landscape Areas**

- 7.7 LCA is a valuable and widely accepted tool which allows the unique characteristics of all landscapes to be captured to inform development proposals. The use of criteria based policies using LCA has become dominant in local plans across the country as it replaces former local landscape designations; this change has been driven by national guidance and research. The Core Strategy should include a criteria based policy for all landscapes in Wiltshire; this should be informed by the extensive LCA evidence base available for the county, which should be consolidated and made available as SPD in order to provide clarity for planners, developers and designers, and greatly improve of the application of such a policy.
- 7.8 In Wiltshire, the current series of SLAs have been in place for over 25 years and appear to be poorly defined and understood, indicating that they should be replaced by a criteria based LCA policy approach. However, evidence is also emerging that the special characteristics of certain SLAs (e.g. Wellhead Valley) may not be fully captured by LCA, and would warrant protection by retention of the SLA designation. Retention of the SLA designation and policy would only be permitted under PPS7 as an 'exceptional circumstance'. Previous examinations in public have shown that without substantial evidence to support such local landscape designations, they are likely to be removed by an inspector as unnecessary and contrary to PPS7.
- 7.9 The SLA network will need to be reviewed to identify any areas with unique characteristics that would not be adequately protected by an LCA approach. An SLA policy should only be included in the Local Development Framework for Wiltshire if sufficient evidence can be presented to demonstrate the unique characteristics of these areas and define their boundaries; any such policy would only apply to those unique areas. There may be an opportunity to identify those truly unique areas of Wiltshire and protect them for the future, while also avoiding unnecessarily rigid local designations which restrict opportunities for sustainable development.
- 7.10 Given that there is a considerable level of work required to resolve this issue, local policies on SLAs will be saved temporarily until an objective study provide the necessary evidence base required to justify the removal / retention / amendment of the current SLA network. This would be undertaken as part of a Wiltshire-wide landscape strategy, while would included amended policy, as necessary, and be adopted as SPD.

### **Biodiversity Action Plan Habitats and Species**

- 7.11 Local BAPs are the main delivery mechanism for biodiversity conservation in the UK, representing our most diverse habitat types and declining species as priorities for conservation. The NERC Act places a statutory duty on local authorities to ensure that BAP habitats and species are protected and where possible enhanced through the exercise of their functions and the LDF represents an important mechanism to do so. Wiltshire's communities have shown a strong desire to see our flora and fauna protected and enhanced. Wiltshire Council is also a lead partner on many of the Wiltshire BAP's action plans, some of which relate directly to the planning system, and is committed to delivering those targets.
- 7.12 The existing policy framework has been shown to be weak, only providing partial protection and failing to encompass some of the principles set out in PPS9 or harness opportunities for biodiversity gain. The LDF presents an opportunity to improve the existing policy framework for BAP habitats and species in order to offer them better protection through the planning system, in line with the mitigation hierarchy, while also providing a stronger driver to maximise for biodiversity gain through development, particularly for major schemes.

### **Natural Processes**

- 7.13 Much of the recent research and guidance on nature conservation stresses the need to allow the natural environment to adapt to climate change. For biodiversity, one of the key approaches to facilitate climate change adaptation is to maintain and create a highly permeable landscape for wildlife to move through, ensuring that species can migrate to areas of more suitable environmental conditions, colonise new areas as they become suitable, and re-colonise following localised extinctions as a result of stochastic events. Habitat fragmentation is already one of the greatest challenges to biodiversity, however this will be amplified in the future by climate change. Wiltshire's local communities have also raised concerns about this issue in recent consultations on the Wiltshire 2026 document.
- 7.14 DEFRA / Natural England have published guidance on the role which spatial planning can play in climate change adaptation for biodiversity, and it is a requirement of the Habitats Regulations that LDFs include policies to protect wildlife corridors and stepping stone habitats to facilitate the movement of flora and fauna.
- 7.15 Functionality is closely linked to connectivity, which is generally a requirement of a healthy functional ecosystem. The importance of ecosystem functions has also recently received a lot of attention in research and policy for the natural environment, particularly their importance to human health and wellbeing; 'ecosystem services' have traditionally been taken for granted and undervalued in policy decision making and there is currently a strong promotion of an ecosystems approach in national policy development. Research into the growing pressures on land use in the UK has highlighted the need to integrate greater multi-functionality into land use planning.
- 7.16 The current policy framework does not reflect recent research and local policy and is not sufficient to secure a healthy and resilient natural environment in the face of increasing pressures on land use compounded with the effects of climate change; a policy response is required to ensure that the importance of connectivity and functionality is recognised in planning decisions. Spatial planning can contribute to adaptation of the natural environment through the protection of existing wildlife corridors and landscape features, and creation of new features through landscaping schemes and public open spaces, however a policy driver will be required to achieve these opportunities.

### **Tranquillity**

- 7.17 Tranquillity is a vital component of our landscapes, particularly in Wiltshire. Although it is highly valued by people, it has often been neglected in environmental assessments and planning decisions due to its extremely subjective and experiential qualities. However, recent advances in research have improved the way we can assess tranquillity and potential impacts upon it. Community plans have also highlighted an appreciation of and desire to preserve and enhance peace and tranquillity. The Core Strategy represents an opportunity to capture and value this important landscape characteristic in planning decisions.

### **Sustainable Design**

- 7.18 Numerous design guidelines stress the importance of incorporating natural landscape features into the built environment through good design in order to protect wildlife and retain local landscape character and distinctiveness. Indeed this is increasingly important in light of the challenges of climate change and the need maintain and encourage natural processes (see above). Development can also provide opportunities to enhance the natural environment through good quality design, particularly where existing features are incorporated and restored or new habitats and landscape features are created through

masterplanning and landscape design. However, experience has shown that the natural environment is generally underrepresented in design rationales, leading to conflicts with biodiversity and landscape character, delays to the planning process, and missed opportunities to enhance the environment of new and existing communities. Indeed, previous consultations have highlighted a public desire to see development which enhances rather than spoils the environment.

- 7.19 The current policy framework does not provide an adequate driver to ensure that features and characteristics of the natural environment are given sufficient consideration in design schemes or to incorporate opportunities to enhance biodiversity in line with PPS9 and reinforce local character; a stronger policy framework would help to provide better quality environments for Wiltshire's wildlife and its communities..

### **Disturbance**

- 7.20 Research has shown that development can cause significant disturbance to wildlife throughout the construction and operational phases of development, particularly associated with residential development; indeed the effects of disturbance can be seen at some of our recent developments. Some of this disturbance must be accepted as an unavoidable symptom of the land use change required to support the growth and development of Wiltshire's communities, however there are steps which should be taken to manage and reduce this disturbance as a part of the planning process. There is currently little recognition of the effects of disturbance in planning applications, and it is difficult to secure avoidance measures due to a lack of support from the current policy framework. Inclusion of policy wording on disturbance would provide a mechanism to manage disturbance resulting from development and reduce its cumulative effects on Wiltshire's wildlife.

### **Water Framework Directive**

- 7.21 There have been some significant changes to the way we protect our water environment since the previous local plans were developed, not least due to the Water Framework Directive. This Directive has established a more integrated approach to the protection and enhancement of our water environment at a catchment scale to be delivered and across a wide range of public and private organisations. It also establishes a range of ambitious new targets for the enhancement of our waterbodies and the UK government is under pressure to ensure that we meet these targets. The EA is the lead authority in delivering these targets, however the relevant RBMPs identify local authorities as key partners, particularly through statutory functions including planning. Water resources are already under significant pressures from over abstraction which are likely to increase in the future due to increased demand from a growing population and the effects of climate change.
- 7.22 The Local Development Framework represents an opportunity to provide stronger links to the WFD and its objectives, particularly through reference to documents such as the relevant RBMPs, GP3 and groundwater vulnerability mapping. Local policies could also be updated to reduce the pressures of additional development upon our natural environment by providing a stronger incentive for new development to be more water efficient.

## **Issues Relating to a Discreet Place**

### **Areas of Outstanding Natural Beauty**

- 7.23 AONBs include some of the nation's finest landscapes and Wiltshire has been charged with responsibility for three of these areas, covering a substantial proportion of the county. AONBs are already afforded policy protection, however experience has shown that this does not adequately protect views into or out of these areas, potentially risking degradation of their landscape setting. The Core Strategy offers an opportunity to improve our protection of our AONBs by including consideration of 'setting' in planning decisions.
- 7.24 The current policy framework also does not refer directly to the relevant management plan for each of the AONBs. These management plans provide a well informed framework of the issues and priorities in each AONB, and a policy hook to these documents from the Core Strategy could significantly help define sustainable development principles for each unique area.

### **Salisbury Plain SPA and New Forest National Park SPA**

- 7.25 Research has shown that rare bird species breeding within these areas are very sensitive to recreational disturbance, particularly dog walkers, and specific concerns have been raised by Natural England and the RSPB in relation to proposed development close to these areas that could increase recreational pressures, particularly the housing allocations proposed in the LDF. Mitigation measures have been identified within the South Wiltshire Core Strategy and supporting HRA. However a policy response to this issue will be continue to be required in order to make the Core Strategy compliant with the Habitats Regulations.

### *River Avon SAC*

- 7.26 The Hampshire Avon catchment incorporates a large proportion of the county, and development along the river and its tributaries has the potential to impact upon its special interests. Given the large number of developments which could potentially affect the river, the River Avon Planning Forum has adopted a screening procedure to identify any development likely to have an adverse effect; any such development is generally subject to appropriate planning controls to ensure that any potential impacts are avoided, otherwise the application is subject to a full appropriate assessment in consultation with Natural England. Where there are likely significant effects, developers are generally required to submit a Construction Environmental Method Statement in support of their application, and while this system would continue to operate in the interim, it is intended that the River Avon SAC procedure and developer guidance would form part of a wider Biodiversity guidance. This procedure is considered to be an effective means to protect the ecological interest of the river from potentially damaging development and no further policy response is considered necessary at this time.
- 7.27 Natural England has also raised concerns about phosphate levels in the River Avon which have remained above national targets for a considerable period, and particularly the contribution from additional development in the catchment and associated flows from Sewage Treatment Works (STWs). This has prompted significant infrastructure improvements at STWs across the catchment which have significantly lowered phosphate discharges and improved water quality of the river, although phosphate levels are still likely to remain above target levels due to contributions from diffuse sources. It is understood that Natural England and the Environment Agency are currently undertaking a joint Nutrient Management Plan for the River Avon catchment which will aim to address

these diffuse sources of phosphate in the catchment in addition to any further improvements to point sources where possible.

- 7.28 As the regulator responsible for all discharges into the river (including those to groundwater), Environment Agency and has recently carried out a review of all discharges in the catchment with the aim of modifying these where necessary to ensure that they will not affect the integrity of the SAC; the review concluded that the majority of licensed discharges would not affect site integrity and no further upgrades to the sewage infrastructure would be necessary. However at Warminster STW the EA could not conclude 'no likely significant effects', even following infrastructure improvements and therefore concluded that delivery of the Nutrient Management Plan would be required to address outputs from this STW. Given that additional development at Warminster will contribute to the need for phosphate offsetting through a Nutrient Management Plan, it is considered appropriate for development to make a proportionate contribution to that plan, otherwise it is likely that it would not pass an appropriate assessment.

### **Bath and Bradford Bats SAC**

- 7.29 This designation comprises a network of several component sites over a wide area used by the bats for roosting, foraging and commuting. Planning applications in this area with potential to affect the SAC are regularly identified, and generally amended to avoid any significant impacts; however there is currently no procedure for screening applications in this area. Development pressures are relatively low in this area, however cumulative impacts could be significant, particularly when considered in combination with impacts from development in the Bath and North East Somerset (BNES) administrative area and from minerals development affecting underground sites in the area. The Core Strategy does not allocate any significant development within this area which would be likely to have significant effects upon the SAC, and no policy response is considered necessary within the Core Strategy; however ongoing cumulative effects could be significant.
- 7.30 Wiltshire Council is therefore working on guidelines for developers and planners in the area (including the BNES administrative area) to improve the detection of applications with potentially adverse effects and ensure that such impacts are identified and addressed at an early stage. It is also intended to keep a register of planning applications affecting the qualifying species and work more closely with the BNES local authority ecologists to improve our understanding of cumulative effects of development on this site.

### **Housing Allocations**

- 7.31 Certain housing allocations have been identified as having potential effects upon important features of the natural environment, including:
- Trowbridge – River Biss corridor, Green Lane and Biss Woods CWSs, Bechstein's bats associated with the Bath and Bradford Bats SAC
  - Bradford on Avon – Bath and Bradford Bats SAC
  - Chippenham – River Avon CWS and Bird's Marsh Wood CWS
  - Luggershall – Salisbury Plain SPA
  - Warminster – Cranborne Chase and West Wiltshire Downs AONB and Coldharbour Meadows CWS
- 7.32 While these developments could potentially affect features of local, national and international importance, impacts will be largely mitigated through the use of site allocation templates to ensure that development is delivered in a sustainable manner. These site allocation templates will clearly set out potential ecological / landscape

constraints to these sites and mitigation measures, and will be used in association with the Green Infrastructure Strategy to help deliver opportunities for biodiversity gain through development at these sites.

## 8 Learning from experience and best practice

### Adopted Core Strategies

- 8.1 A review of recent Core Strategies which have been assessed as sound at Examination in Public and adopted by rural authorities reveals a range of approaches to biodiversity and landscape policy<sup>119,120</sup>. Common themes within these policies are the need to protect local sites and BAPs, and the importance of connectivity in the face of climate change. The best examples also include a presumption in favour of retaining important features of the natural environment unless this is outweighed by requirements of the development which would deliver benefits in the public interest.
- 8.2 Most LDF's adopted a broad approach in their Core Strategy, setting the principles for development in relation to biodiversity, which is supported by more detailed policies in other DPDs e.g. development management DPD, and the use of biodiversity SPDs. The best examples integrate protection and enhancement of the natural environment into a wide range of policy areas likely to interact such as sustainable urban design, noise, lighting, tourism, open spaces, climate change, renewable energy, use of agricultural buildings, flood protection, landscape, SUDS, transport and housing. Integrating biodiversity policy throughout the Core Strategy should have the effect of improving awareness of the challenges faced, helping to resolve potential conflicts and rationalise competing land uses, and ensure that these potentially adverse effects are addressed in applications.
- 8.3 A strong theme in these Core Strategies is the character and distinctiveness of local landscapes, with particular reference to LCA as a tool, and most refer to a specific LCA study of their administrative area or an SPD. Landscape is also generally well integrated into other policy areas including environmental quality, bio / geodiversity, cultural heritage, environmental heritage, and sustainability. The importance of landscape character is particularly incorporated in policies on design quality.
- 8.4 Tranquillity is also mentioned in several Core Strategies including emerging LDFs in neighbouring authorities including Cotswold District Council and West Berkshire. The importance of tranquillity is emphasised, often as an element of landscape character.
- 8.5 Policies on Green Belt are generally restricted to defining the boundaries and avoid repetition of national policy, only setting out exceptional circumstances where development shall be allowed to accommodate local needs. Policies on local buffers were not identified, and indeed it is worth noting that an inspector required the removal of a policy on 'Local Gaps' (equivalent to local rural buffers) from the New Forest District Core Strategy, as there was no evidence that its aims would not be achieved through the application of general countryside protection policies and the definition of robust settlement boundaries.
- 8.6 Local landscape designations are rarely included in Core Strategies, and where these are accepted by inspectors they are supported by an evidence base to demonstrate the distinctive qualities of these areas which cannot be protected through LCA. However, it is worth noting that the New Forest District Core Strategy includes a commitment to '*review Areas of Special Character and landscape features through subsequent Local Development Framework Documents*'; this approach has been accepted by an inspector at EiP (para 3.52).

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<sup>119</sup> Land Use Consultants (2010) *Local Landscape Policy: A Best Practice Summary*

<sup>120</sup> Wiltshire Council (2010) *Biodiversity Policy Review*



- 8.7 AONBs are generally mentioned as part of a wider landscape policy with the aim of protecting these areas and their setting, although there is a tendency to avoid repeating PPS7. Where they are included in policy the relevant management plans are also referred to in the policy or supporting text. Specific allocations which are in or close to AONBs also often refer to the need to protect these areas where necessary.

### **Stakeholder Consultation**

- 8.8 A wide range of topics were discussed during stakeholder consultations, and most of these viewpoints have been incorporated into the discussion above. However, a number of other issues were also discussed which were not considered to be main opportunities or threats; these are briefly touched on below.
- 8.9 During the stakeholder consultation, the possibility that the Core Strategy could adopt a more spatial approach to protection of the natural environment at a landscape scale was discussed; this would involve identifying all important landscape features on plans and adopting specific policies for certain types of features. This approach has been given consideration in the policy options, however a number of weaknesses to this approach have been identified, namely:
- Many of the suggested areas (SACs, SSSIs etc) are already covered by national guidance and legislation, leading to potential conflicts with the requirements of PPS12.
  - Our incomplete knowledge of the natural environment. Important natural features are still being discovered however the LDF plans could not be regularly and rapidly updated.
  - The particular consideration of certain 'special' areas is likely to discount the importance of areas outside the line, leaving these areas more susceptible to degradation.
  - Communities within particularly rich natural environments may experience planning blight from the landscape scale application of strict planning policies.
- 8.10 A more spatially specific approach such as this may be more appropriately adopted in a detailed biodiversity / landscape guidance document, rather than with a Core Strategy document.
- 8.11 The emerging concept of 'conservation credits' was also discussed with stakeholders. Conservation credits involve developers paying for damaged caused by development through planning contributions, which are then used to fund conservation projects to replace or restore biodiversity elsewhere. The Conservative manifesto includes a pledge to adopt conservation credits, indicating that this is likely to become part of national policy in the future. However this approach was generally unpopular with stakeholders and council officers due to concerns about:
- The long-term management of offset areas
  - The loss of ecosystem functions which are not captured by the calculations
  - The success of habitat creation
  - Issues of environmental justice associated with degrading one communities natural environment to pay for enhancement of another communities environment
  - Competition issues of charging developers in Wiltshire, which may encourage development to move into neighbouring (non-charging) administrative areas
  - Conflicts with Wiltshire's emerging Green Infrastructure Strategy

- 8.12 Professor Lawton has suggested that there may be potential benefits of a well regulated and managed scheme, however he also notes a number of potential risks. These benefits and risks reflect recent research undertaken into developing a conservation credits system in England<sup>121</sup> and across Europe<sup>122</sup>. In light of the risks raised in stakeholder discussions and through the research, it is considered that it would be premature to adopt policy in relation to conservation credits at the current time. In the event that the national planning policy framework changes, this position will be reviewed in the future if necessary.
- 8.13 The option of introducing new Green Belt areas was discussed, particularly around Devizes and Swindon, however PPG2 requires that any amendment to the Green Belt should only be proposed in exceptional circumstances. Introducing entirely new Green Belt areas would be a major change and at present there is no evidence or justification for such measures.
- 8.14 The requirement not to duplicate national policy (as required by PPS12) was also questioned, as national policy could potentially change before the Core Strategy is adopted, when PPSs are replaced by the NPPF. However, while the draft NPPF is still just draft and must currently be given limited weight relative to that of the PPSs, it does set out the governments direction of travel in national policy – this will be taken into consideration in the development of Core Policies.

### **Best Practice Guidance**

- 8.15 Guidance produced by David Tyldesley Associates<sup>123</sup> recommends integrating biodiversity into a number of cross cutting topics which affect biodiversity including sustainable development, climate change, green infrastructure, and sustainable design and construction. It also recommends biodiversity specific policies within Core Strategies on environmental assets, and biodiversity and geological conservation; these relate to BAPs, designated sites and the wider countryside, acknowledging that statutory sites and protected species benefits from legal protection which does not require repetition in local policies.
- 8.16 The Association of Local Government Ecologists guidance on integrating biodiversity into LDFs<sup>124</sup> recommends that Core Strategies should include policy for the conservation, restoration and enhancement of important BAP habitats and species. Policies should also propose an improvement in the quality and extent of natural habitats, the physical processes on which they depend, and the populations of naturally occurring species that they support. There should also be policy on the way that the distribution of nationally or regionally significant species and habitats may alter with climate change, and its effects on biodiversity and nationally or internationally designated sites.
- 8.17 Recent guidance by Natural England focuses on the role of spatial planning in biodiversity adaptation to climate change<sup>125</sup>, recommending that Core Strategies should address biodiversity matters for the plan area, and in doing so should highlight climate change pressures and land-use measures for facilitating improved species adaptation, including for example, identification of broad areas for habitat re-connection. It also encourages policies to protect habitats and species which are locally important, particularly local BAPs, protect the wider environment, maintain and enhance natural processes, particularly flood plains and rivers, restore habitats and reverse degradation, secure net

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<sup>121</sup> DEFRA (2009) *Scoping Study for the Design and Use of Biodiversity Offsets in an English Context*

<sup>122</sup> EFTEC (2010) *The Use of Market based Instruments for Biodiversity Protection – The Case of Habitat Banking*

<sup>123</sup> David Tyldesley Associates (2008) *Biodiversity Policies for Local Development Frameworks in Hampshire*

<sup>124</sup> ALGE (2005) *Framework for Biodiversity: Integrating Biodiversity into Local Development Frameworks*  
[http://www.alge.org.uk/publications/files/Biodiversity\\_Framework.pdf](http://www.alge.org.uk/publications/files/Biodiversity_Framework.pdf)

<sup>125</sup> Natural England (2008) *Climate Change and Biodiversity Adaption: The Role of Spatial Planning*  
<http://naturalengland.etraderstores.com/naturalenglandshop/NECR004>

gain for biodiversity, protecting and enhancing structure and functionality, reduce fragmentation / isolation, support strategic habitat networks and based on a sound evidence base. It also recommends adopting the 'no regrets' policy framework, allowing for an approach which should be ecologically and landscape beneficial regardless of the actual extent of climate change impacts experienced within the plan area.

8.18 A summary of best practice produced by Land Use Consultants<sup>126</sup> following a review of adopted DPDs highlights common types of policy that address or affect landscape protection and management:

- General Development Criteria - provide a tool to ensure new development is located appropriately and of a scale and design to benefit landscape character.
- Natural and Built Environment - should recognise the importance of protecting and enhancing the quality and character of all landscapes, particularly features that contribute to local urban or rural landscape character.
- Landscape-specific - establish generic protection for all landscapes, emphasise protection for designated landscapes, and/or focus on landscape character and quality.
- Designated Landscapes - should not reiterate general protection of nationally designated landscapes, but should provide policy relevant to local issues, reflective of the local context, to complement rather than reiterate national policy.
- Setting - should refer to the relevant management plan, requiring development to respect the guidelines and objectives therein, and may draw on the LCA for protecting qualities/features outside of a designated landscape.
- Development in the Countryside - control development in the countryside to protect the open and rural character. Also highlight linkages between landscape and the rural economy, including agriculture and tourism.
- Design Quality - establish the need for new development to respect and enhance local townscape and landscape character, referring to character appraisals or detailed design guidance as appropriate.
- Local Landscape Designations should be informed by a landscape character assessment to provide a robust evidence base, and should be complemented by policy on other, non-designated landscapes.
- Historic Landscape Characterisation - should reflect the findings of national and local studies in the protection of heritage assets and the management of landscape change.

8.19 Several best practice principles also emerge from this review:

- Positive planning - the value of landscape policies being framed in positive terms, recognising that landscapes continually change, and the potential for development to contribute positively to landscape character and local distinctiveness.
- All landscapes - best practice policy avoids reiterating protection of nationally designated landscape, and establishes guidance for all landscapes, reflecting the European Landscape Convention.
- Character - the use of a character-based approach to guide landscape change, establishing policy that is informed by and references a suitable Landscape Character Assessment.

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<sup>126</sup> Land Use Consultants (2010) *Local Landscape Planning Policy: A Summary of Best Practice*

- Holistic approach - best practice policy recognises and incorporates the many components and features that contribute to landscape, and recognises the value of a landscape-scale approach to guide the management of these features.

### **Identifying and Testing Options for Addressing the Challenges**

8.20 Policy options have been proposed to achieve the strategic objective to *'Protect and enhance the natural environment'*. The effectiveness of these policy options has been assessed against a number of criteria, as shown in Tables 6 and 7 below.

**Policy options: Biodiversity**

Biodiversity Option	SA Outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p><u>A. Do nothing</u> Save existing policies:</p> <p><i>Kennet District Local Plan</i> – NR3 (Local Sites) &amp; NR4 (Nature Conservation Features)</p> <p><i>North Wiltshire Local Plan</i> – NE7 (Local Sites), NE10 (Nature Conservation Features), NE11 (BAPs), NE14 (Nature Conservation Features)</p> <p><i>West Wiltshire District Plan</i> – C6 (Local Sites), C6a</p>	<p>No significant effects identified.</p> <p>Minor adverse effects identified across several environmental objectives.</p> <p>No benefit for social / economic objectives.</p>	<p>No. HRA requires policy response on recreational disturbance.</p>	<p>Delivered through development control as currently.</p> <p>Previous experience has demonstrated that existing policies are weak and lead to damage / neglect / isolation of CWSSs, loss of BAP habitats / species, poor design which does not respect the natural environment, and missed opportunities for enhancement of the natural environment through the development process.</p>	<p>No.</p> <p>Provides only partial protection for local sites and BAPs - fails to deliver community aspirations or protect community assets.</p> <p>Reduced quality of natural environment for new and existing communities.</p> <p>Does not address local concerns over linear features, CC adaptation and fragmentation / isolation.</p> <p>Does not address concerns about the impacts of increased public access on wildlife.</p>	<p>Lawton has shown that local sites are under protected – this fails to remedy the situation.</p> <p>Small cumulative effects likely to continue to be significant over plan period.</p> <p>Does not address new challenges of climate change.</p> <p>Missed opportunities to provide biodiversity gain through improved design quality and local environments in accordance with sustainable design guidance - DETR and CABE (2000), English Partnerships (2000 &amp; 2007), TCPA (2009).</p>	<p>Not preferred.</p> <p>Provides partial protection, but continues the generally negative trend and cumulative impacts upon biodiversity, particularly in relation to climate change.</p> <p>Fails to deliver the strategic objective.</p>

<b>Biodiversity Option</b>	<b>SA Outcome</b>	<b>Conformity with national and regional policy and/or regulations</b>	<b>Deliverability</b>	<b>Community aspirations met</b>	<b>Other</b>	<b>Conclusion</b>
<p>(Nature Conservation Features)</p> <p><i>Salisbury District Local Plan – C11</i> (Nature Conservation), C13 (Wildlife Habitats), C15, C17, C18 (Nature Conservation)</p> <p>No disturbance policy</p>						

<b>Biodiversity Option</b>	<b>SA Outcome</b>	<b>Conformity with national and regional policy and/or regulations</b>	<b>Deliverability</b>	<b>Community aspirations met</b>	<b>Other</b>	<b>Conclusion</b>
<p><u>B. Spatial Approach</u></p> <p>More ecologically valuable areas should be clearly shown on a map e.g. Natura 2000, SSSIs, rivers and floodplains, AONBs, local sites, SNAs.</p> <p>Stronger, more aspirational policies should be applied to these areas at a landscape scale.</p>	<p>Some minor positive effects.</p> <p>Potential negative effects on socio-economic receptors.</p>	<p>Most features already covered under statutory regime – contrary to PPS12.</p>	<p>Dozens of maps required to cover the entire county at a meaningful scale.</p> <p>Regular updates required e.g. local sites – not practical.</p> <p>Implemented through development control under advice of Principal Ecologist.</p>	<p>Strong protection of the natural environment of some communities at the cost of planning blight.</p> <p>Discount the value of the natural environment of those communities ‘outside the line’.</p>	<p>Maps would be based on incomplete knowledge at the current time.</p> <p>It would not be possible to update the CS plans regularly as knowledge changes.</p> <p>Much of the county’s biodiversity would be ‘outside the line’ but would be discounted and more difficult to defend.</p>	<p>Difficult to implement, never comprehensive coverage.</p> <p>Better to protect features on the basis of their ecological value and function based on up to date knowledge rather than their geographical location and limited knowledge at a point in time.</p>

Biodiversity Option	SA Outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p><u>C. Preferred</u></p> <p>Strong implementation of the mitigation hierarchy.</p> <p>Stronger protection of CWSs.</p> <p>Use of ecological buffers.</p> <p>Inclusion of ecology in design rational (D&amp;AS).</p> <p>Recognise importance of connectivity / functionality.</p> <p>Stronger protection for BAPs.</p> <p>Major development to include measures to restore and enhance natural environment.</p> <p>Development to reduce effects of</p>	<p>Generally positive effects, significant for biodiversity, air quality and landscape.</p>	<p>Yes – suitable mitigation measures for SPAs included to address requirements of HRA.</p>	<p>Delivered through development control following advice of Principle Ecologists.</p> <p>Delivery of mitigation measures for SPAs will require partnership working with RSPB, DE, NFNPA etc.</p>	<p>Yes.</p> <p>Improved protection of existing community assets and improved quality of natural environment for new communities.</p> <p>Addresses concerns over linear features, CC adaptation, fragmentation / isolation and the effects of public access on wildlife.</p>	<p>Complies with recommendations of DEFRA and Lawton in relation to local sites, connectivity / functionality and ecological networks.</p> <p>Contributes to local and national BAP targets.</p> <p>Maintains and creates resilient ecosystems which can adapt to climate change.</p> <p>Promotes better quality environments through sustainable design and development.</p>	<p>Preferred Option</p> <p>Meets statutory, policy and community needs without conflicting significantly with economic growth.</p>



<b>Biodiversity Option</b>	<b>SA Outcome</b>	<b>Conformity with national and regional policy and/or regulations</b>	<b>Deliverability</b>	<b>Community aspirations met</b>	<b>Other</b>	<b>Conclusion</b>
disturbance, with particular reference to SPAs.						

<b>Biodiversity Option</b>	<b>SA Outcome</b>	<b>Conformity with national and regional policy and/or regulations</b>	<b>Deliverability</b>	<b>Community aspirations met</b>	<b>Other</b>	<b>Conclusion</b>
<p><u>D. Aspirational</u></p> <p>No damage to CWSs.</p> <p>No loss of BAP habitat.</p> <p>No loss of ecological functionality / connectivity.</p> <p>No disturbance of wildlife.</p>	<p>Positive environmental effects.</p> <p>Negative socio-economic effects, significant for the economy.</p>	<p>Unlikely to meet the requirements of 'sustainable development' – PPS1.</p>	<p>Likely to cause conflicts where development cannot be located elsewhere and / or there are strong socio-economic needs.</p> <p>Many sites could become economically unviable.</p>	<p>Yes for biodiversity.</p> <p>However, this would be likely to impinge heavily on property rights and people's use of their own land.</p> <p>Could also restrict necessary sustainable development and growth of some communities.</p>	<p>Likely to conflict significantly with delivery of other strategic objectives.</p> <p>Could have other environmental impacts e.g. lowering densities – more sprawl, CO<sub>2</sub> etc.</p>	<p>Not preferred.</p> <p>Unlikely to be deliverable.</p> <p>Potential conflicts with other policy areas and aspirations.</p>

**Table 7 – Biodiversity Policy Options**

**Policy Options: Landscape**

Option	SA outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p>A. Criteria-based policy to be included in the core strategy seeking to protect, conserve and enhance landscape character. Include reference to the existing Landscape Character Assessments and to landscape setting of towns and villages. Include specific reference to AONB Management Plans, and also refer to the 'setting' of AONBs. Include specific reference to the need to protect tranquillity. Do not refer to Green Belt, rural buffers, or best and most versatile agricultural land in the policy.</p> <p>Further work needed to establish whether or not there is sufficient</p>	<p>Significant positive effects for biodiversity, and also potentially for landscapes (score is ++/?). Negative effects for housing and employment. Uncertain effects for health and economy (both score +/-).</p>	<p>Yes. Using a criteria-based approach is in line with PPS 7.</p> <p>The approach to AONBs would be consistent with PPS12, providing that the policy contains greater detail than that set out in PPS 7. This could be achieved through reference to the AONB Management Plans and the setting of the AONBs (neither of which are mentioned in PPS 7). The authority would need to have sound evidence that the approach would be justified by local circumstances.</p> <p>No specific need to address tranquillity according to national</p>	<p>Through the development management process and particularly through site specific landscape and visual impact assessments.</p> <p>The level of 'tranquillity' of an area is difficult to measure. However, it may be possible to use CPRE tranquillity mapping to establish a baseline.</p>	<p>Yes. Local level plans and responses to Wiltshire 2026 indicate a desire to protect local landscape character. Policy could also help to protect landscape setting in and around towns and villages.</p> <p>There are community aspirations to protect AONBs. This approach could assist in meeting this aspiration, particularly through reference to the AONB Management Plans and the 'setting' of the AONBs.</p> <p>Local level plans indicate a desire to maintain dark skies and tranquillity.</p> <p>Would meet community aspirations</p>	<p>Responds to specific local circumstances as 44% of Wiltshire's land falls within an AONB. Responds to concerns raised by AONB officers (in response to Wiltshire 2026 consultation) that AONB issues should be clearly identified with reference to AONB Management Plans.</p> <p>Addresses aspirations in the CC&amp;WWD and North Wessex Downs AONB Management Plans that local planning policy should fully recognise the</p>	<p>Suggested preferred option. This approach is highly consistent with PPS 7 and would assist in meeting community aspirations to conserve local landscape character.</p> <p>Community aspirations to protect the green belt would be met through national planning policy.</p> <p>Specific rural buffers would not be identified by the policy, but the policy would include reference to the 'separate identity' and 'landscape</p>

<p>justification to maintain Special Landscape Areas (or parts thereof).</p>		<p>policy and regulations. PPS 12 indicates that there may be local reasons for having greater detail than national policy provides for.</p> <p>Avoids repetition of national policy relating to Green Belts.</p> <p>Not including a reference to rural buffers would be in accordance with PPS 7 which indicates that local planning policy should not include “rigid local [landscape] designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas”.</p> <p>Not mentioning protection of the best and most versatile agricultural land would avoid repetition of national policy and</p>		<p>to protect the green belt since this is protected through PPG 2.</p> <p>Community aspirations to protect rural buffers / green spaces between settlements could be achieved through more general policies relating to development in the open countryside, and through reference to the ‘separate identity’ and ‘landscape settings’ of settlements in the landscape policy.</p> <p>Responses to Wiltshire 2026 were varied in relation to retention of a rural buffer to the west of Swindon, with some supporting a buffer and others stating that this would be contrary to national policy and may hinder development.</p> <p>No specific community aspirations identified</p>	<p>purposes of the AONB designation. Addresses aspiration in the Cotswolds AONB Management Plan that the conservation and enhancement of the AONB and its special qualities should be fully taken into account in plans to address development in the AONB. Also addresses aspirations relating to setting.</p> <p>Wiltshire is ranked 10<sup>th</sup> out of 87 local authorities in terms of tranquillity (CPRE, 2006).</p> <p>Campaign for Better Transport indicated that there should be a policy on tranquillity and noise in the countryside in response to</p>	<p>settings’ of settlements.</p> <p>The approach to AONBs would be consistent with national policy since it would go beyond the guidance set out in PPS7. Would address the aspiration amongst the AONBs for the Management Plans to be fully taken into account and for setting of the AONBs to be considered.</p> <p>Local level plans and the CPRE tranquillity maps indicate that tranquillity is one of Wiltshire’s strengths. Therefore local circumstances justify inclusion of policy text in the core strategy, in order to protect and enhance this</p>
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		therefore conforms to PPS 12.		relating to the protection of agricultural land. Environment Agency concern about specific site in Warminster will be addressed through the site selection process.	Wiltshire 2026. The three AONB Management Plans all highlight the importance of tranquillity and dark night skies in the AONBs.	aspect of Wiltshire's natural environment.
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Option	SA outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p>B. Include a specific policy in the Core Strategy relating to the Green Belt and seeking to protect specific rural buffers. Also mention the need to protect best and most versatile agricultural land. (This would be in addition to a criteria-based landscape policy, as described in option A above).</p>	<p>Significant positive effects for biodiversity, land and soil, air quality, and landscapes. Significant negative effects for housing and employment, and possibly for economy (score is +/-). Negative effect for education. Uncertain effect for health (score is +/-).</p>	<p>No. Inconsistent with PPS 12. No need to provide additional local detail relating to the Green Belt, and any policy would therefore just repeat national guidance in PPG 2.</p> <p>Designation of specific rural buffers would be inconsistent with PPS 7.</p> <p>Inclusion of a specific policy to protect the best and most versatile agricultural land would be inconsistent with PPS 12. No evidence to suggest that there are local reasons for having</p>	<p>Through development management process.</p>	<p>Yes. Would protect Green Belt and specific rural buffers.</p>		<p>Not recommended. Approach is not consistent with national policy.</p>

		greater detail than that provided in PPS 7.				
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Option	SA outcome	Conformity with national and regional policy and/or regulations	Deliverability	Community aspirations met	Other	Conclusion
<p>C. Do not include a policy on local landscape character in the Core Strategy. Instead rely on saved local plan policies relating to landscape protection in general. Do not include specific reference to AONBs or tranquillity. There is no specific reference to tranquillity in the current Local/District Plans, so this option would mean that there would be no reference to tranquillity in local planning policy (although the West Wiltshire District Plan does include policy C35 on light pollution).</p>	<p>No significant positive or significant negative effects. Negative effects for biodiversity, land and soil, water, flood risk, air quality, climatic, heritage, and landscapes. Uncertain effects for health and economy (both score +/-).</p>	<p>Does not follow the approach advocated by PPS7 to use “carefully drafted, criteria-based policies ... utilising tools such as landscape character assessment”. North Wiltshire Local Plan currently includes criteria-based policies for landscape character, but does not refer directly to landscape character assessment. Kennet Local Plan and Salisbury District Local Plan refer to landscape character, but do not use any criteria to help define this. West Wiltshire District Plan does not refer specifically to landscape character, although it does refer to the quality and variety of the countryside.</p> <p>Avoids repetition of national policy in relation to AONBs and therefore conforms to PPS 12. However, PPS 7 indicates that the conservation of the natural beauty of the landscape and countryside in AONBs should be given great</p>	<p>Through development management process</p> <p>Risk that lack of overarching policy would lead to erosion of peace, tranquillity and dark skies in Wiltshire.</p>	<p>No. Inconsistent approach across Wiltshire with regards to protection of local landscape character.</p> <p>Community aspirations to protect AONBs could still be met through national planning policy, which indicates that the natural beauty of the landscape and countryside should be given great weight in development control decisions in AONBs. Saved local plan policies would also provide protection, although there would be an inconsistent approach across Wiltshire. The Kennet Local Plan policy on AONBs has not been saved.</p> <p>Risk that peace and</p>		<p>Not recommended. National policy in PPS 7 indicates that criteria-based policies should be used to protect areas of landscape that are highly valued locally.</p> <p>This approach would be consistent with PPS 12 but would not address the particular local circumstances in Wiltshire, where 44% of the area is within an AONB. This approach would lead to a lack of a single, overarching policy emphasising the importance of the AONBs in Wiltshire.</p>



		weight in planning policies. No specific mention of tranquillity in national planning policy.		tranquillity could be eroded in the absence of policy text covering this issue.		
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**Table 8 – Core Strategy Landscape Policy Options**

## 9 Conclusion

- 9.1 The preferred options to achieve the objective of '*Protect and enhance the natural environment*' in the most sustainable and practical manner are:
- Biodiversity – replace the existing policy framework with a pragmatic approach (Option 3)
  - Landscape – include a criteria based policy in the core strategy seeking to protect, conserve and enhance landscape character (Option A)
- 9.2 Existing biodiversity policies on CWSs and BAPs would be replaced by more proactive policy wording to protect and enhance these features, helping to reverse historically negative trends. New policy wording would be included to emphasise the importance of ecological connectivity, functionality and natural processes in response to the impacts of habitat fragmentation / isolation as amplified by the effects of climate change, and the importance of incorporating these processes into sustainable design. Policies on disturbance would be introduced, specifically ensuring that Natura 2000 sites are protected from recreational disturbance, but also that disturbance of wildlife and habitats associated with development more widely across the county is reduced where possible.
- 9.3 Generic policies on statutory protected sites and species would not be included as these are fully protected under national policy (PPS), procedures (Circular 06/05) and legislation (Habitats Regulations and Wildlife and Countryside Act); policy on these features would therefore duplicate national policy / legislation and inclusion in the LDF would be contrary to the advice of PPS12.
- 9.4 The landscape policy would adopt a criteria based LCA approach to protecting and enhancing all landscapes. However, it is not yet clear whether this approach would completely replace SLAs, or whether a policy may be retained to protect a rationalised and clearly justified suite of SLAs. No specific policy on AONBs would be proposed due to their protection under national policy, however the landscape policy would address their setting and make clear and direct links to the relevant Management Plans. The Core Strategy would not contain a specific policy on Green Belt as this is covered by PPG2, and the boundaries of the Green Belt would remain unaltered from the previous local plans. There would be no policy on rural buffers as these have been shown to be unnecessary by the removal of policies NE2 and NE3 from the North Wiltshire Local Plan, and any such policy is likely to be contrary to PPS7. There would be no policy on BMV agricultural land as this is sufficiently addressed by PPS7 without the need to duplicate this.
- 9.5 In order to improve policy implementation it is recommended that policy wording for the natural environment is incorporated throughout the LDF, particularly within non-environmental policy areas. This approach is consistent with current best practice guidelines (see Section 8.3).

## 10 Glossary

**Area of Outstanding Natural Beauty (AONB)** – A designation under the National Parks and Access to the Countryside Act (1949) with the primary purpose of conserving and enhancing the natural beauty of the landscape, with two secondary aims: meeting the need for quiet enjoyment of the countryside and having regard for the interests of those who live and work there.

**Biodiversity Action Plan (BAP)** - an internationally recognized program addressing threatened species and habitat and is designed to protect and restore biological systems. The original impetus for these plans derives from the 1992 Convention on Biological Diversity (see below). In the UK plans apply to habitats and individual species, generally identifying threats, actions, targets and delivery partners.

**Best and Most Versatile Agricultural Land (BMV Land)** - The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use. Land is graded 1-5 depending on its agricultural value, with grades 1-3a classified as BMV land.

**Convention on Biological Diversity (CBD)** – An international legally binding treaty signed by the UK at the Earth Summit in Rio de Janeiro in 1992. The Convention has three main goals, namely the conservation of biological diversity, sustainable use of its components, and fair and equitable sharing of benefits arising from genetic resources.

**Core Strategy** – the key compulsory element of a Local Development Framework required under the Planning and Compulsory Purchase Act (2004) and PPS12. The Core Strategy sets the principles upon which other Local Development Documents should build.

**County Wildlife Sites (CWSs)** - Non-statutory sites identified as having high nature conservation value of significance to the County. The Wildlife Sites Project is a partnership project which identifies, notifies, monitors and denotifies sites on an ongoing basis.

**Department for Environment Farming and Rural Affairs (DEFRA)** - the government department responsible for environmental protection, food production and standards, agriculture, fisheries, and rural communities in the UK. It is responsible for the arms-length organisations Natural England and the Environment Agency (see below).

**Environment Agency (EA)** – the Agency's stated purpose is, "to protect or enhance the environment, taken as a whole" *so as to promote "the objective of achieving sustainable development"* (taken from the Environment Act 1995). Protection of the environment relates to threats such as flooding and pollution throughout England and Wales. The vision of the Agency is of *"a rich, healthy and diverse environment for present and future generations"*.

**Ecosystem Services** - The benefits people obtain from ecosystems. These include provisioning services such as food and water; regulating services such as flood and disease control; cultural services such as spiritual, recreational, and cultural benefits; and supporting services such as nutrient cycling that maintain the conditions for life on Earth.

**Green Belt** – A land use designation surrounding urban areas for the purpose of preventing coalescence of neighbouring towns, safeguarding the countryside from encroachment, preserving the setting and special character of historic towns, and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.

**Habitats Regulations Assessment (HRA)** – An assessment of the impacts of a plan or project upon the integrity of a Natura 2000 site (see below), either alone or in combination with other plans or projects, as required under Regulation 61 of the Habitats Regulations (2010).

**Landscape Character Assessment (LCA)** - a technique used to develop a consistent and comprehensive understanding of what gives England's landscape its character. It uses statistical analysis and application of structured landscape assessment techniques.

**Local Development Document (LDD)** - a set of documents required under the Planning and Compulsory Purchase Act (2004) which a Local Planning Authority creates to describe their strategy for development and use of land in their area of authority. Collectively LDDs form the Local Development Framework for an area (see below). LDDs are optional with the exception of the Core Strategy (see above).

**Local Development Framework (LDF)** - a new portfolio of documents (Local Development Documents, see above) that can be tailored to suit the different needs of a particular area, forming the spatial planning strategy required under the Planning and Compulsory Purchase Act (2004) and PPS12.

**Local Geological Sites (LGSs)** - sites that highlight important local geodiversity and heritage in order to protect and manage such interest and, where possible, provide educational opportunities. Sites are generally chosen on the basis of one, some, or all of geological or geomorphological features.

**Local Planning Authority (LPA)** – the local authority empowered by law to carry out planning functions for a set administrative area. For the county of Wiltshire (except Swindon) this is Wiltshire Council.

**Natura 2000** – a European network of sites designed to protect Europe's most seriously threatened habitats and species. The network comprises SACs and SPAs designated under the Habitats and Birds Directives respectively. All plans or projects which could affect a Natura 2000 site must be subject to a Habitats Regulations Assessment under Regulation 61 of the Habitats Regulations (2010).

**Natural England** – the government's advisor on the natural environment within DEFRA. It is responsible for agri-environment schemes, statutory designations including SSSIs / SACs / SPAs / Ramsar / AONBs and is a statutory consultee for planning in respect of such sites.

**Nature Map** – a strategic map identifying opportunities for habitat restoration and creation to withstand the challenges of climate change and species loss. Produced using a scientifically robust methodology for defining a set of ecologically functional tracts of land to provide for the needs of our native species and the habitats they occupy, in the long term.

**Planning Policy Statement (PPS)** - statements of the British government's national policy and principles towards planning. They form a statutory component of the development framework under the 2004 Planning and Compulsory Purchase Act, and Local Planning Authorities are required to have regard to their policies in preparing development plans. Planning Policy Statements may be treated as material considerations in the determination of planning applications.

**Special Area of Conservation (SACs)** – areas designated under the Habitats Directive (92/43/EEC) as being of European importance for habitats listed in Annex I and species listed in Annex II of the Directive. SACs form part of the Natura 2000 network (see above).

**National Indicator** – a list of national indicators (NIs) is used to monitor government performance on a range of priorities. These include the former NI197, which will become NI160 to monitor local sites and biodiversity.

**Ramsar** – an international network of important wetland sites designated in order to fulfil the legal obligations of the Ramsar Convention which requires national action and international cooperation for the conservation and wise use of wetlands and their resources.

**Sites of Special Scientific Interest (SSSIs)** – areas designated under the Wildlife and Countryside Act (1981) for their national importance for biodiversity and geodiversity. Some SSSIs are also designated as SACs and SPAs.

**Special Landscape Areas (SLAs)** - a local landscape designation applied to areas considered to be locally important areas of high landscape quality sufficiently attractive to justify adoption of particular development control policies or other safeguarding measures.

**Special Protection Areas (SPAs)** – areas identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. SPAs are designated under the Birds Directive (79/409/EEC) and form part of the Natura 2000 network (see above).

**Strategic Environmental Assessment (SEA)** – the Strategic Environmental Assessment Directive (2001/42/EC) requires all Member States to carry out a SEA to determine whether the plans/programmes are likely to have significant environmental effects; applies to all land use plans.

**Strategic Nature Areas (SNAs)** – areas of opportunity for restoring substantial parcels of semi-natural habitat as part of a strategic regional network of sites to allow species and habitats to adapt to climate change.

**APPENDIX A – AUDIT OF EXISTING AND PROPOSED DRAFT NATIONAL PLANNING  
POLICY FRAMEWORK**



**APPENDIX B – SUMMARY OF ISSUES RAISED IN RELATION TO THE NATURAL ENVIRONMENT BY THE PUBLIC CONSULTATION TO THE DRAFT WILTSHIRE CORE STRATEGY (AUGUST 2011)**



Public Consultation			
No	Theme <sup>127</sup>	Issues	Action <sup>128</sup>
1	Green Infrastructure	<ol style="list-style-type: none"> <li>1. No mention of the Country Parks as part of the network</li> <li>2. Wiltshire Green Infrastructure Standards need to be incorporated in the Core Strategy for consultation</li> <li>3. CP35 should establish a conceptual basis for GI rather than a list of assets</li> <li>4. Wording should be amended slightly to ensure that suitable links to the GI network are provided and maintained to ensure maximum accessibility and usage, not just the network itself.</li> </ol>	<ol style="list-style-type: none"> <li>1. References to Country Parks to be added</li> <li>2. Standards to be include in the Core Strategy as an appendix</li> <li>3. Review / revise CP35</li> <li>4. Amend text to include reference to links to the GI network and maximising accessibility.</li> </ol>
2	Canals	<ol style="list-style-type: none"> <li>1. More robust policy statement to protect the alignment of Wilts &amp; Berks Canal</li> <li>2. The Melksham Link should be protected</li> <li>3. Restoration and enhancement of the canal network should be supported by Core Strategy to enable funding from CIL</li> <li>4. Policy to ensure that the long-term development of the K&amp;A canal is does not damage the environment and is sensitive to the West Wilts Green Belt and the Cotswold AONB e.g. Policy HG14A adopted by B&amp;NES.</li> </ol>	<b>The issues shall be addressed in a specific canals policy</b>
3	Cotswold Water Park	<ol style="list-style-type: none"> <li>1. Need to recognise cross boundary issues in CWP</li> <li>2. Need to protect biodiversity in the CWP</li> <li>3. Need to recognise CWP masterplan and BAP</li> </ol>	<b>CWP issues to be address in a new specific Core Policy</b>
4	Rural buffers	<ol style="list-style-type: none"> <li>1. Suggesting rural buffers around Hilperton,</li> </ol>	<b>1. Speak to Conservation about the need to</b>

<sup>127</sup> Green – CP35 and CP36 (Green Infrastructure), Red – CP34 (Landscape), Blue CP33 (Biodiversity).

<sup>128</sup> **Bold** indicates further work, evidence or discussions required before required amendments can be made. All other amendments can be made in the subsequent edition of the Core Strategy document.

		<p>Southwick, North Bradley, and west of Swindon</p> <ol style="list-style-type: none"> <li>Need to protect open countryside and urban fringes</li> </ol>	<p><b>protect historic villages and review North Wilts study on rural buffers</b></p> <ol style="list-style-type: none"> <li><b>Review national framework on development in the open countryside in light of draft NPPF</b></li> </ol>
5	AONBs	<ol style="list-style-type: none"> <li>Reference to AONBs and their Management Plans in Community Area policies</li> <li>Strengthen reference to Management Plans</li> <li>Para 6.5.10 add in 'national' in front of 'significance' in the first sentence</li> <li>Paragraph 6.5.11 - include landscape sensitivity and tranquillity studies in the examples listed</li> <li>Define / clarify 'setting'</li> <li>The Cotswold AONB Management Plan 2009-2014 is dated 2008-2013.</li> </ol>	<ol style="list-style-type: none"> <li>Reference to AONBs to be added to relevant CA sections</li> <li>Change to '<u>shall</u> have regard to'</li> <li>Agreed</li> <li>Add 'landscape sensitivity and tranquillity studies'.</li> <li>Text on setting to be added to document based on PPS5</li> <li>Correct error</li> </ol>
6	World Heritage Site	<ol style="list-style-type: none"> <li>CP34 needs cross reference to WHS</li> </ol>	<ol style="list-style-type: none"> <li>Add cross reference to WHS</li> </ol>
7	Landscape	<ol style="list-style-type: none"> <li>CP34 add reference to landscape functions, such as provision of open spaces, woodlands, fields, places to live and work, and to refresh the spirit.</li> <li>Add reference to ELC</li> <li>Add reference to NFNP alongside AONBs.</li> <li>Planting schemes should be related to landscape character</li> </ol>	<ol style="list-style-type: none"> <li>Agreed</li> <li>Agreed</li> <li>Agreed</li> <li>Add '(i) The distinctive pattern <u>and species composition</u> of natural features...'</li> </ol>
8	Water Framework Directive	<ol style="list-style-type: none"> <li>WFD should be listed as part of the legislative framework of this Topic Paper</li> </ol>	<ol style="list-style-type: none"> <li>Accepted</li> </ol>
9	Biodiversity loss	<ol style="list-style-type: none"> <li>CP33 too subjective e.g. use of 'reasonably'</li> <li>Definitions of words and terms required</li> </ol>	<ol style="list-style-type: none"> <li>Review wording</li> <li>Provide further definitions in the supporting text</li> </ol>

		<ul style="list-style-type: none"> <li>3. CP33 second para. reword to " development proposals affecting local sites must fairly and reasonably contribute to their favourable management in the long-term "</li> <li>4. Local sites - Add 'and' and the end of point iii)</li> </ul>	<ul style="list-style-type: none"> <li>3. <b>Discuss this change with the working group</b></li> <li>4. Agreed</li> </ul>
10	HRA	<ul style="list-style-type: none"> <li>1. No work has been undertaken to establish whether SANGS will deliver adequate mitigation / avoidance for the New Forest – evidence required</li> </ul>	<ul style="list-style-type: none"> <li>1. <b>To be addressed through further discussion with NFNPA and addressed in the HRA</b></li> </ul>
11	Water abstraction	<ul style="list-style-type: none"> <li>1. Over abstraction is causing a problem in our rivers, particularly the Kennet</li> </ul>	<ul style="list-style-type: none"> <li>1. <b>Discuss with EA</b></li> </ul>
12	Bats	<ul style="list-style-type: none"> <li>1. Potential impacts upon SAC roosts have not been fully addressed</li> </ul>	<ul style="list-style-type: none"> <li>1. <b>Developer guidance for this area to be produced in consultation with NE / BNES</b></li> </ul>
13	Special Landscape Areas (SLAs)	<ul style="list-style-type: none"> <li>1. Support for retaining SLAs</li> <li>2. Support for movement to a criteria based policy such as CP34</li> </ul>	<p><b>The evidence base on SLAs to be reviewed and updated before deciding whether to retain / remove these designations.</b></p>