

ADDENDUM TO
'Wiltshire Housing Site Allocations Plan
Pre-Submission Draft (June 2017)
Assessment under the Habitats Regulations'

Date of Addendum: 4 May 2018

Wiltshire Council

1. INTRODUCTION

- 1.1 The Habitat Regulations Assessment (HRA) for the Wiltshire Housing Site Allocations Plan was prepared at the time of the pre-submission document¹. This addendum to the HRA supports the submission document due to be presented to cabinet and Full Council in May 2018 and provides an update on progress with the mitigation strategies made to date.
- 1.2 The approach to mitigation for the River Avon Special Area of Conservation (SAC) has been simplified following advice received from the statutory agencies in March. Annex 2 of the Nutrient Management Plan (NMP) remains at the centre of the approach which is now being progressed in partnership with other authorities in the catchment and the statutory agencies.
- 1.3 Work on the mitigation strategy for the Bath and Bradford on Avon Bats SAC has been contracted to an ecological consultancy with appropriate expertise, and good progress is being made. This Addendum expands on what the strategy aims to deliver and considers the implications for this SAC of the increased housing numbers proposed at four allocations at Trowbridge.
- 1.4 Since the pre-submission HRA was prepared, the 'HRA and Mitigation Strategy for Salisbury Plain SPA' has been revised and two site allocations not previously considered have been included due to revised measurements which show they fall within the zone that generates most visitor pressure. The Addendum explains the implications of this in terms of numbers of additional visitors and consequences for the Special Protection Area (SPA) mitigation strategy.

2. FURTHER INFORMATION AVAILABLE SINCE JUNE 2017

2.1 Salisbury Plain SPA

- 2.1.1 The following changes have occurred since the pre-submission HRA:
 - Closer examination of the allocated sites has identified that two sites not previously included, should be counted towards calculations of residents who will be living within 6.4km of the SPA. These are: Land off the A363 at White Horse Business Park at Trowbridge (H2.2) and, Barter's Farm Nurseries at Chapmanslade (H2.10). These two sites are therefore screened in for likely significant effects, along with the other ten allocations within 6.4km of the SPA boundary.
 - The 'HRA and Mitigation Strategy for Salisbury Plain SPA'² has been revised to take account of the implications of the growth proposed in the Wiltshire Housing Site Allocations Plan submission draft and its distribution.

2.2 River Avon SAC

¹ Wiltshire Housing Site Allocations Plan Submission Draft: Assessment under the Habitats regulations, 21 June 2017 Wiltshire Council

² HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

- 2.2.1 Since the pre-submission HRA was written, the Council has been advised by the Environment Agency (EA) and Natural England that it cannot rely on the River Avon Special Area of Conservation Nutrient Management Plan (NMP) which was published in April 2015. A joint statement advised:

“Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be “phosphate neutral”. We will work with you to help you demonstrate how that can be best achieved.” (Email from EA to Wiltshire Council, New Forest District Council and East Dorset/Christchurch Council, 9th March 2018)

- 2.2.2 The aim of the NMP is to bring phosphate concentrations in the River Avon SAC down to the conservation targets set by Natural England in order to bring the river system into favourable condition as required by the Habitats Regulations. Due to the complex factors influencing phosphate in the Avon, the NMP set interim progress goals which were to be achieved by the end of 2021. The underlying premise of the plan was that increases in sewage derived phosphate would be more than offset by reductions from agricultural sources, such as farming, due to the catchment sensitive farming initiative which is funded through Defra. However, by early 2018, Natural England and the EA reported that catchment sensitive farming was much less effective than projected in the NMP modelling and unlikely to offset increased phosphates from new development.
- 2.2.3 Consequently, the Council has been advised that in order to comply with the Habitats Regulations, it should demonstrate all development is “phosphate neutral” for an interim period until any necessary permanent reductions can be accommodated in the water company’s asset management plan. During this period, the availability of permit headroom cannot be taken into consideration. The relevant parties have agreed to work under a Memorandum of Understanding (MoU) which sets out a method for calculating and offsetting phosphate generated by each new development approved in the interim period and commits to identifying measures that will be delivered to reduce phosphates in the catchment. It is recognised that the conservation targets will only be met in the long term if measures are taken to reduce runoff from agricultural land and discharge concentrations from sewage treatment works. Both these measures are outside the control of local authorities.

2.3 Bath and Bradford on Avon Bats SAC

- 2.3.1 Changes which have occurred since the pre-submission HRA are as follows:
- 2.3.2 Natural England has responded to the pre-submission consultation in a letter dated 28 September 2017 raising several limitations of the plan. It queries whether bat survey evidence is adequate to support the housing numbers proposed at Trowbridge and asks for clarification on how bat habitat will be mitigated on-site. These matters are picked up in the discussion below.

2.3.3 In terms of addressing in-combination effects, Natural England agrees that a strategic approach is capable of addressing residual effects. With regard to this, significant progress is being made with the Trowbridge Recreation Management Mitigation Strategy, now confirmed as the **Trowbridge Bat Mitigation Strategy** (TBMS). A specialist consultancy has been engaged and is working to progress the following:

- A map showing zones where development would have a high or medium risk of adverse effects for features of the bats SAC (i.e. greater horseshoe, lesser horseshoe and Bechstein's bats) and where recreational pressure is likely to lead to in-combination effects
- Standards for assessing developer proposals to retain, protect, buffer and maintain key bat habitats within application sites
- Principles for mitigating loss of habitat on greenfield sites, including an offsetting metric to determine size and quality of offset habitats to be created within allocations, and if necessary offsite
- Measures for offsetting effects of recreational pressure, taking into consideration latent capacity at existing non-woodland recreational sites and standards for new open spaces created within allocations
- An implementation plan for long term management and oversight arrangements for measures being implemented off site

2.3.4 The strategy will be sufficiently advanced during the examination to allow the Council to demonstrate that the plan is sound and will have no adverse effects on the SAC.

2.3.5 In light of submissions from prospective developers to increase housing density and the government's ambition to make the best use of development land, the Council has tested the capacity of the allocations to accept further housing. As a result, housing at the following allocations in Trowbridge has been increased.

Table 1: Proposed capacity at site allocations

Site Ref	Site Name	Current proposed capacity	Proposed capacity Approximate number of dwellings
H2.1	Elm Grove Farm, Trowbridge	200	250
H2.2	Land off A363 at White Horse Business Park, Trowbridge	150	225
H2.3	Elizabeth way, Trowbridge	205	355
H2.5	Upper Studley, Trowbridge	20	45

- 2.3.6 The Council is working with Natural England and other local authorities in the West of England to develop a Local Bat Conservation Plan which would underpin planning guidance for the bat SACs in this area. This would lend weight to the individual approaches each authority is taking, ensure that the same basic principles were applied throughout and ensure that functional linkages between the SACs are recognised in the HRAs undertaken by these competent authorities. The urgency of this work, which is being driven by Natural England's aim to reduce the burden of regulation for developers and authorities alike, was emphasised by competent authorities at a meeting on 25 April 2018.
- 2.3.7 The Guidance for the North Somerset and Mendip Bats Special Area of Conservation (SAC)³ was adopted by North Somerset Council in January 2018. This document brings together a considerable body of research in relation to lesser and greater horseshoe bats which are features of this SAC and to that extent is also relevant to the Bath and Bradford on Avon Bats SAC.

3. DISCUSSION

3.1 Salisbury Plain SPA – Recreational Pressure

Effects alone

- 3.1.1 As a consequence of the 2015 visitor survey⁴, the radius for 75% of visitors accessing the plain was revised to 6.4km and the percentage of residents visiting the plain was revised to 1%. Although Land off the A363 at White Horse Business Park at Trowbridge (H2.2) and Barter's Farm Nurseries at Chapmanslade (H2.10) were screened out of the pre-submission appropriate assessment, closer examination shows these sites are within this radius and therefore they are now screened into it.
- 3.1.2 The inclusion of White Horse Business Park and Barters Farm Nurseries increases the number of estimated visits to the plain from 14.4 visits per day to 20.2 visits per day.
- 3.1.3 Within the overall context of the scale of growth proposed by the Core Strategy this small additional increase does not lead to the Plan to causing effects on the SPA alone.

Effects in-combination

- 3.1.4 The effects of in-combination growth arising from the Core Strategy are dealt with in the 'HRA and Mitigation Strategy for Salisbury Plain SPA'. In 2012⁵ this document concluded that the in-combination levels of growth proposed in the Core Strategy had the potential to lead to adverse effects on stone curlew due the fact this ground nesting bird was vulnerable to walkers, particularly dog-walkers. The document went

³ North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document. Adopted January 2018. North Somerset Council

⁴ Panter, C., & Liley, D. (2015) Salisbury Plain Visitor Survey 2015. Unpublished report by Footprint Ecology for Wiltshire Council

⁵ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from redevelopment). Wiltshire Council March 2012

on to provide details of the proposed mitigation strategy to deal with in-combination effects.

- 3.1.5 Since the pre-submission HRA was completed, the 'HRA and Mitigation Strategy for Salisbury Plain SPA' has been revised⁶. The revision examines the effectiveness of mitigation measures to date and assesses the impact of additional housing which is coming forward under the Core Strategy as well as in-combination growth from other plans and projects including the Army Basing Project. A HRA for the latter project concluded no likely significant effect on the basis of a bespoke package of measures agreed with Natural England.
- 3.1.6 The review recognises that since 2002 there has been a steady increase in breeding success of stone curlew, measured as numbers of breeding pairs and young fledged per nest and the period 2012-2017 also reflects this trend. The conservation target for the SPA is to maintain the breeding population at or above 15 pairs. Over the last ten years the number of pairs has remained fairly stable at around 25 and it can therefore be concluded that the SPA is in favourable condition in respect of this target. Although not a target, the productivity figure of 0.61 birds per pair is used as an indication of whether the population is maintaining itself. In 2017 the productivity on the SPA was 0.65 after a period of 5 years when the figure was about 0.55. It appears that breeding on agricultural land outside the SPA where the productivity is higher is helping to support the SPA population and this has been recognised for a number of years. Overall the revised 'HRA and Mitigation Strategy for Salisbury Plain SPA'⁷ concludes that the SPA remains in favourable condition and there is no evidence that increased visitor numbers are having an impact.

Mitigation

- 3.1.7 The current mitigation strategy funds an ornithologist to survey breeding stone curlew on Salisbury Plain up to a 2km outside the SPA boundary; provide advice to landowners on the timing of land management activities, and; collate data on breeding success. The review demonstrates that following delivery of almost half the growth proposed by the Core Strategy, the stone curlew population remains in favourable condition. The review therefore proposes the mitigation strategy continues to be funded at the same level to ensure the response of the stone curlew population to remaining growth is monitored. This approach is considered acceptable given that conservation measures to restore stone curlew are well understood and therefore the prospect of being able to reverse a decline if this is detected is good.

Implications for integrity test

- 3.1.8 The review of the 'HRA and Mitigation Strategy for Salisbury Plain HRA' demonstrates that a total of 17,375 dwellings are currently expected to be delivered within the visitor catchment during the period 2006 and 2026 as a result of planned growth in the core strategy and the Wiltshire Housing Site Allocations Plan. This

⁶ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

⁷ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreation pressure from residential development). Wiltshire Council May 2018

compares with 16,130 dwellings if the 2012 housing figures are reassessed using the latest visitor survey data. The review estimates that current planned growth will result in an additional 2,826 residents within the visitor catchment over and above those which would have resulted from the 2012 housing figures. Approximately 1% of these residents can be expected to visit the plain regularly, representing an additional 28 visits per day over and above those which would have resulted from the 2012 housing figures. To put this in context, planned growth would result in an estimated additional 1% of visitors over the plan period, compared to the 2012 housing figures.

- 3.1.9 The review concludes that planned growth as a result of the Core Strategy, the Wiltshire Housing Site Allocations Plan and Army Basing Project will not have an adverse effect on the integrity of the Salisbury plain SPA, either alone or in-combination there with other plans and projects.

Recommendation: Salisbury Plain SPA Recreational Pressure

There are no recommendations for changes to policies or supporting text in the Plan as a result of this addendum. The Council has updated the 'HRA and Mitigations Strategy for Salisbury Plain SPA' to take account of the latest visitor survey results and stone curlew monitoring. Natural England, the RSPB and MoD will be consulted on this revision.

3.2 River Avon SAC - Phosphate

Effects alone and in-combination

- 3.2.1 The pre-submission HRA identified that the Lower Avon and Upper Wylfe (headwaters) sub-catchments were high risk, i.e. development within the headroom of sewage treatment works could compromise the delivery of the interim progress goals as there was a risk that increased growth would not be offset by reductions in diffuse agricultural phosphate.

- 3.2.2 This risk was extended to the whole catchment when the EA and NE issued a joint interim position statement that said:

"Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be "phosphate neutral". We will work with you to help you demonstrate how that can be best achieved." (Email from EA to WC, NFDC and East Dorset/Christchurch Council, 9th March 2018)

- 3.2.3 As a consequence, any development within the River Avon (Hampshire) catchment has the potential to give rise to impacts alone and in-combination with other developments on the River Avon SAC. Allocations at Warminster, Salisbury and

Durrington must therefore demonstrate that they will be phosphate neutral in order to demonstrate there will be no adverse effect from development.

Implications for integrity test

- 3.2.4 The Council, Natural England (NE), the EA, Wessex Water PLC, New Forest District Council, New Forest National Park Authority and Christchurch and East Dorset Council are making constructive progress, and developing a Memorandum of Understanding (MoU) which will be available to support submission of the Plan. It will describe how each local planning authority will ensure that development is 'phosphate neutral', and will define 'phosphate neutral'.
- 3.2.5 The MoU will cover an interim period until the end of the financial year of the next Water Industry Asset Management Plan (AMP) 2025-2030. After this date it is likely measures can be replaced by those secured through the next Periodic Review (PR24) process and implemented under Wessex Water's Asset Management Plan (AMP). The period may end sooner as a result of new evidence, an early start on implementing PR24 measures in the AMP or an alternative approach (such as measures secured through a revised NMP for the catchment).
- 3.2.6 A main component of the approach is agreement on the nature, extent and delivery means for measures that will help to off-set the additional phosphorous load arising from development. These will be set out in an annex to the NMP (Annex 2).
- 3.2.7 Both EA and NE take the view that the approach and commitments contained in the MoU provide greater certainty with respect to nutrient management, sufficient for the Council to conclude that the Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC. This staged approach has been taken on their advice and recognises the need to maintain rates of housing delivery where there is a good prospect that environmental constraints will be overcome. The MoU will commit the parties to delivering phosphate neutral development. It is anticipated that this will include:
- Imposing a condition on all planning permissions for new dwellings requiring construction to the Building Regulations optional requirement for a maximum water use of 110 litres per person per day.
 - To have a draft Annex 2 within three months of the MoU being signed.
 - To use appropriate developer contributions to secure measures identified in Annex 2 sufficient to ensure that all development permitted up to 2025 is phosphate neutral. Thereafter it is expected that Wessex Water will have agreed measures to reduce phosphate as part of its asset management plan for 2025-2030, as water customers, rather than developers, are the more appropriate funders of water treatment in the long term.
- 3.2.8 The Wiltshire Council Community Infrastructure Levy (CIL) Regulation 123 list expressly includes an item to support the 'Nutrient Management Plan – to address the level of phosphate in the River Avon.' Annex 4 to the NMP already provides some estimates of costs for off-setting measures and it is clear that together local planning authorities in the catchment are capable of funding off-setting measures for

as long as they are needed. The MoU will list the measures currently under consideration.

Recommendation: River Avon SAC - phosphate

An agreed form of wording with the EA and NE should be inserted into the Plan to provide greater certainty over the need to provide for phosphate neutral development. The MoU should be finalised as a matter of priority before submission to support this HRA addendum.

3.3 Bath and Bradford on Avon Bats SAC - habitat loss / deterioration

Effects alone

- 3.3.1 In its consultation response, Natural England has questioned whether the housing numbers in the Plan are deliverable, as in the absence of bat surveys and mitigation standards the capacity of the allocations is uncertain. Alternatively, in order to achieve housing numbers, key habitats might be lost thus leading to impacts alone.
- 3.3.2 Developers will be required to undertake bat surveys to support applications at Trowbridge but it must be recognised that due to the difficulties with detecting horseshoe and Bechstein's bats, a precautionary approach will need to be taken in determining what constitutes key bat habitat. Habitats such as hedgerows, tree planting and streams will be assumed to be of key importance to bats within the consultation zones⁸ and also outside them where strategic routes may link important roosts. Specific habitats have been identified for each site at Trowbridge in the Plan. Other habitats at allocation sites may also be of significance as identified in evidence gathered for the North Somerset and Mendip Bats SAC and that guidance will be referred to in assessing the overall impact of development at the allocation sites.
- 3.3.3 Increasing the housing numbers at four allocations in Trowbridge would take the number of dwellings proposed at Trowbridge from 800 to 1100 on greenfield sites. The implications of increases at each site are as follows:
- a. At Elm Grove (H2.1) the allocation boundary has been extended to include open space adjacent to Elm Grove Farm resulting in greater green field land take to accommodate the additional 50 dwellings proposed.
 - b. Land off the A363 at White Horse Business Park (H2.2) has potential significance as a strategic link for bats moving east-west between woodland breeding sites in the south and the SAC to the north. For a strategic link to be maintained, it is likely that hedgerows would need to be maintained within a field matrix rather than an urbanised development. This may reduce the scope to increase the urban footprint when increasing the layout from 150 to 225 dwellings.
 - c. The allocation at Elizabeth Way (H2.3) has been increased from 205 to 355 dwellings. Below Middle Lane the allocation lies within the consultation area for

⁸ Bat Special Areas of Conservation (SAC): Planning Guidance for Wiltshire. Issue 3.0, 10 September 2015, Wiltshire Council

Bechstein's bats and it seems that an increase of this scale could require this area to become partly urbanised.

- d. At Upper Studley (H2.4) the increase from 20 to 45 dwellings could bring dwellings closer to the mature trees along the Lambrok stream. The wooded stream is likely to be a historical commuting and foraging route and could be of potential strategic importance for SAC bats. Increased development could extend the effects of urban lighting towards this habitat and in due course, retaining the habitat could conflict with the amenity and health and safety concerns of residents.

Effects in-combination

- 3.3.4 In-combination effects would occur where there is loss of habitat which at a site level is of low significance but which cumulatively could lead to impacts at a landscape scale. Such habitats could include grassland and arable habitats. The effects of such habitat loss could occur in combination with the residual effects after mitigation of development at Ashton Park and to a much lesser extent with windfall development which will be constrained to brownfield sites within the settlement boundary. In addition, development at Drynham Lane which forms the final part of the strategic allocation for Trowbridge may give rise to in-combination effects. That development is currently at the application stage and can only be permitted if it can be concluded there will be no effects alone and in-combination with other plans and projects.

Mitigation

- 3.3.5 The Trowbridge Bat Mitigation Strategy is being prepared by a specialist consultancy and phase 1 will be available to support the Plan through the examination. NE has been involved in its scoping and is supportive of the Council's approach. The work being undertaken is complex and requires iterative consultation with bat experts and planners to test the deliverability of proposals. The overall approach will be to safeguard key habitat features on site and offset the loss of others by creating new habitat according to a metric. This type of approach is being pursued by NE in relation to other protected species and underpins the Local Bat Conservation Plan for the West of England.
- 3.3.6 The Council recognises that delivering habitat offsetting through local authorities is still in its infancy. In order to de-risk phase 1 of the strategy, the Council anticipates that the majority of habitat offsetting for the Wiltshire Housing Site Allocations Plan will occur within the allocations sites themselves and only to a limited extent will developers rely on offsite provision. The second phase of the TBMS will support development beyond the current Core Strategy using lessons learned from phase 1 to expand offsetting in line with the NE approach as appropriate.
- 3.3.7 In relation to habitat loss/deterioration, Phase 1 of the TBMS will:
 - Identify two zones of potential habitat impact. A high risk zone will be based on evidence gained from in depth studies of Bechstein's bats at Trowbridge and elsewhere. Only development of a very minor nature would be permitted in this zone and any allocations which could have encroached into it have already been

screened out through the pre-submission HRA. A medium risk zone will identify areas which can only be developed where habitat offsetting is provided either on or offsite. The metric for offsetting will be defined in the TBMS.

- Define the parameters to be used in designing schemes which retain, protect, buffer and maintain potential bat habitat already existing within the allocation sites. The parameters will include for example, stand-off widths, the degree to which breaches for access roads may be acceptable and lighting standards.
- Develop a metric and offsetting strategy to allow lost habitats such as grassland and arable habitats to be offset by the creation of new habitats either within or outside the allocation site. Strategic locations will be identified for each SAC species where any offsite habitat creation would be located in order to have maximum ecological benefit. Funding will be required for long term management and ongoing oversight and this could be secured through S106 or potentially CIL if TBMS projects are added to the CIL regulation 123 list.
- Undertake sensitivity testing to understand the effects of different scales of windfall development for recreational pressure on the woodlands.

Implications for the Integrity Test

3.3.8 The capacity of housing allocations has been calculated on the basis of 30 dph and excludes parts of the sites that are undevelopable due to environmental and heritage constraints. In principle, the density of development at each site could be increased without leading to impacts alone as long as it can be demonstrated that:

- The principles in the TBMS for protecting key bat habitat on site can be met
- The landscape remains porous to bat movements to the same extent after development as it was prior to development

3.3.9 As outlined above, adverse effects may arise from increasing scales of development envisaged on each allocation. However, these have each been reviewed in the light of the possible effects that have been identified and it has been concluded that likely individual effects can be mitigated. Original estimates in the pre-submission draft Plan were based on a low density and there will be only marginal or no change to the footprint of development and the extent to which it may impinge upon habitat areas. The TBMS will guide design and layout so that effects are mitigated, if necessary offsite, and no additional safeguards need to be incorporated into the Plan.

3.3.10 In view of the fact that the bats response to development is likely to be delayed and difficult to ascertain with confidence, this could suggest a need for phasing further development over and above the current draft and adopted allocation that might arise from the Local Plan Review. Otherwise there would be a risk that the capacity of the area to support the internationally important population of Bechstein's bats may be exceeded and as a result have significant adverse effects on the integrity of the SAC. However, this would be a matter for the Review to resolve and is not necessary to progress in this Plan.

3.3.11 In conclusion, the amendments to the Plan can be accommodated by the TBMS and it is therefore possible to conclude there will be no loss of integrity to the SAC.

3.4 Bath and Bradford on Avon Bats SAC – Recreational Pressure

Effects Alone

3.4.1 A detailed examination was made of the risks of locating development within easy walking distance of the woodlands in the pre-submission HRA. As a result, the closest allocations were removed at the screening stage such that none of the allocations is expected to give risk to significant recreational impacts alone.

Effects in-combination

3.4.2 A detailed discussion was provided in the pre-submission HRA of developments which could have in combination effects with the Plan. The main in-combination project will be Ashton Park, which was resolved to approve at committee in April 2018. This will deliver 2500 new homes over the next 15 years and is required to implement a complex and wide reaching mitigation strategy which focuses on intensive wardening at the woodlands and extensive provision of new habitats to provide an alternative to visiting the woodlands and to offset loss of bat habitat. The application went through a lengthy HRA process which concluded there would be no adverse effects. Nevertheless, the potential for residual effects could not be discounted.

Mitigation

3.4.3 Phase 1 of the TBMS will address in combination recreational effects of the Plan and residual effects arising from the Core Strategy allocation comprising Ashton Park and, in due course, any permission which is granted at Drynham Lane.

3.4.4 In relation to recreational pressure Phase 1 of the TBMS will:

- Use data from the 2017 visitor survey of open spaces in Trowbridge⁹ to identify two zones of potential recreational impact. A high risk zone will be identified where recreational impacts may lead to impacts alone or in-combination and only development of a very minor nature would be permitted. A medium risk zone will identify where contributions will be made to offsite recreational mitigation measures and / or provision will be made within allocation sites over and above the standard open space requirements.
- Identify a number of projects which will be funded by contributions towards offsite recreational mitigation. These would represent new provision at existing sites rather than maintenance of existing facilities. The latent capacity at existing non-woodland recreational sites will be assessed with a view to identifying how contributions from smaller schemes could be used to increase their capacity and attractiveness.
- Identify the criteria by which new recreational provision on allocation sites will be assessed as being adequate to offset recreational pressure on the woodlands.
- Put forward an implementation plan, including a long term management plan and funding and oversight arrangements for measures being implemented offsite.

Implications for integrity Test

⁹ Panter, C., Lake, S. & Liley, D. (2107). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council

- 3.4.5 The increased housing numbers at four sites in combination with windfall applications will have some effect on the extent to which recreational pressure can be absorbed. At this stage, these increases are unlikely to have significant additional effects although this will need to be tested through the TBMS Phase 1.
- 3.4.6 The development of Ashton Park generates a specific in-combination effect. Phase two of the TBMS will explore how further phases of development beyond 2026 will not lead to adverse effects on the SAC in-combination. Detailed delivery of further housing will need to be preceded by a review of the effectiveness of the TBMS Phase 1 and the Ashton Park mitigation strategy.
- 3.4.7 In conclusion, the amendments to the plan can be accommodated by the TBMS and it is therefore possible to conclude there will be no loss of integrity to this SAC.

Recommendation: Bath and Bradford on Avon Bat SAC – Habitat loss / deterioration and Recreational Pressure

There are no recommendations for changes to policies or supporting text in the Plan as a result of this addendum.