

Wiltshire Housing Site Allocations Plan

Sustainability Appraisal Report

Non-Technical Summary

Wiltshire Council

Revised September May 2018

ATKINS

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Document history

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Client signoff

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Non-Technical Summary

Purpose of this report

This **revised** report is the Sustainability Appraisal (SA) Report of the Wiltshire Housing Site Allocations Plan (the Plan). The purpose of this SA Report is to assess and inform the development of the Housing Site Allocations Plan. The report has been produced jointly by WS Atkins Limited (Atkins) and Wiltshire Council.

This section is the non-technical summary of the SA Report, setting out the SA process for the Plan and summarising the key assessment findings and recommendations. Wiltshire Council is preparing the Plan to support the delivery of new housing set out in the Wiltshire Core Strategy (adopted January 2015). The Plan will identify sufficient land (in the form of sites) across Wiltshire to ensure delivery of the Wiltshire Core Strategy housing requirement and maintain a five-year housing land supply up to the end of the plan period to 2026. It will also review settlement boundaries across Wiltshire.

This ~~The July 2018~~ SA Report ~~will be published for submission~~ **was submitted** to the Secretary of State alongside the ~~Final~~ **draft Wiltshire** Housing Site Allocations Plan **and a final, consolidated Schedule of Proposed Changes**. It ~~[the SA] has had~~ been updated following pre-submission consultation on the draft Plan and associated SA Report **that took place** between 14 July 2017 and 22 September 2017.

The submitted version of the SA Report contained a document called “Annex II”, which provided an assessment of the implications for the SA of the Council’s Schedule of Proposed Changes to the draft Plan. Following the submission of documents, it has been identified that the assessment presented in the submitted version of Annex II was based on the Schedule of Proposed Changes as presented to Cabinet in May 2018, together with the implications of the resolution of the July Cabinet¹.

To clearly reflect the full extent of the Schedule of Proposed Changes approved by Cabinet and Council in July 2018 (and subsequently submitted to the Secretary of State), Annex II has been revised. It addresses the up-to-date position the Council has reached in the process of preparing the Wiltshire Housing Site Allocations Plan. When read as a whole, the assessment presented in the revised Annex II, sets out the implications for the SA arising from the Council’s submitted Schedule of Proposed Changes (July 2018) to the draft Plan. Where necessary, in the interests of clarity, changes to the SA have now been made to address the findings of the assessments undertaken and decisions made to date.

All changes that have been made to the SA Report are shown in bold, underlined text and strikethrough in the SA Report, with the exception of the revised Annex II.

The Council is undertaking an additional consultation on the Schedule of Proposed Changes and associated documents including updates to the SA Report.

Comments are therefore invited during this consultation on the changes to the SA Report shown in bold, underlined and strikethrough text throughout the SA Report and on the whole of the revised Annex II.

¹ A draft Schedule of Proposed Changes was presented with the Cabinet Papers in May 2018, but not debated. Cabinet instead resolved to defer a decision, pending the outcome of a focused consultation with Wiltshire Councillors and Parish and Town Councils, on the Schedule of Proposed Changes. As a result of this consultation, further Proposed Changes were debated and endorsed by Cabinet on 3 July and subsequently approved by full Council on 10 July 2018.

Further details of this consultation can be found on the Council's examination webpage for the Plan at <http://www.wiltshire.gov.uk/planning-housing-sites-examination>.

Wiltshire Housing Site Allocations Plan – Purpose and Objectives

Purpose

The purpose of the Plan is twofold:

- revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and
- allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

Objectives

The Plan has three objectives:

Settlement boundary review

- Objective 1: To ensure there is a clear definition to the extent of the built up areas at principal settlements, market towns, local service centres and large villages

Housing site allocations

- Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the National Planning Policy Framework
- Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County

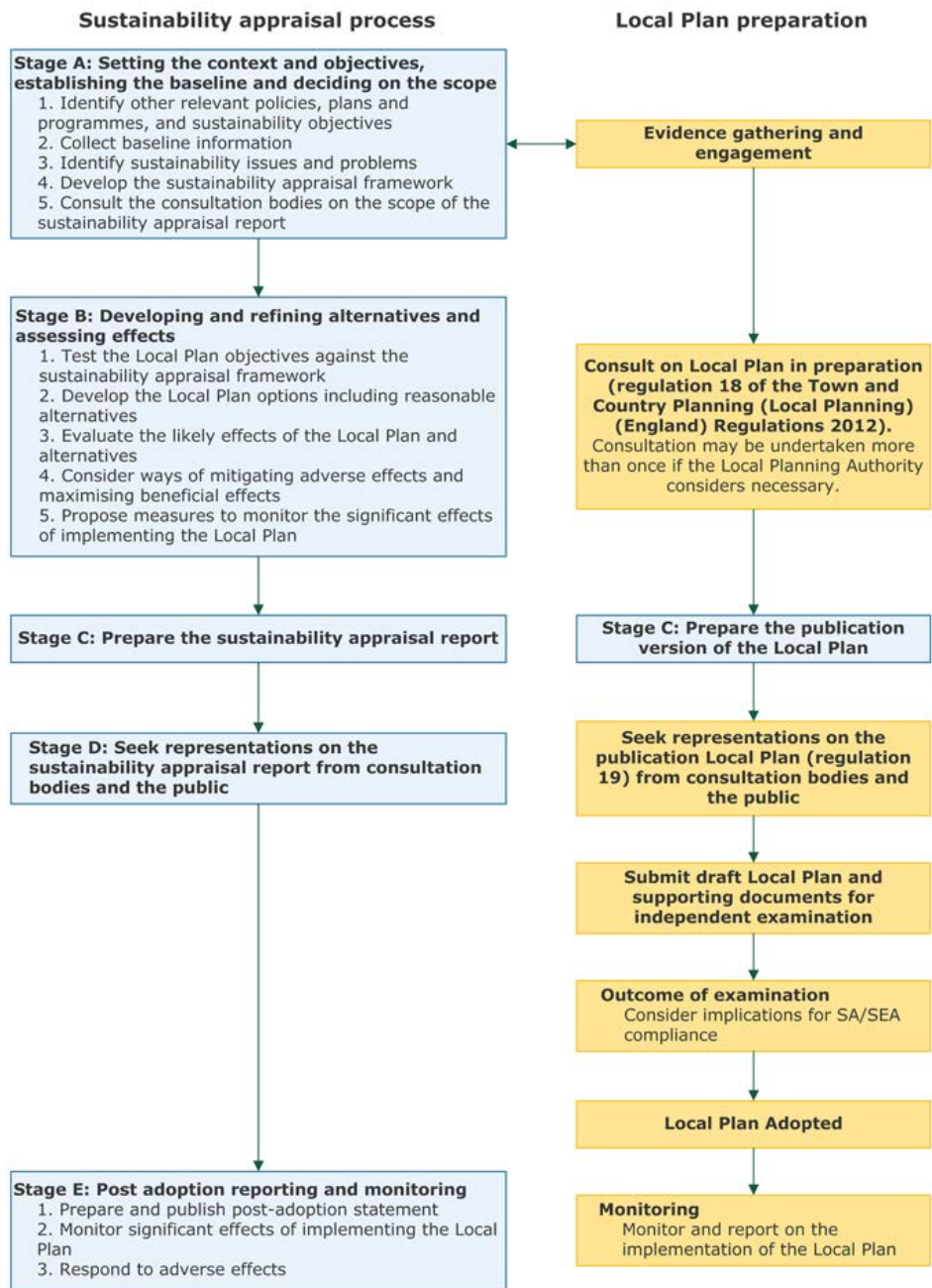
Sustainability Appraisal

SA is required during the preparation of a Local Plan. SA promotes sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This SA Report has been produced in line with national guidance and legislation. It is also in line with the SA Scoping Report which was published for stakeholder consultation in the middle of 2014 which set out how the SA would be undertaken.

The main stages in the SA process are shown below and involve:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on scope;
- Stage B – Developing and refining options and assessing effects;
- Stage C – Preparing the Sustainability Appraisal Report;
- Stage D – Consultation on the Plan and the Sustainability Appraisal Report; and
- Stage E – Monitoring the significant effects of implementing the plan.



This SA Report document forms part of SA Stage C.

Habitats Regulations Assessment

Alongside the SA process it is also necessary to assess whether the sites contained in the Plan are likely to have a significant effect upon Natura 2000 sites. These comprise designated and candidate Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, which are designated as European sites for their ecological value.

The HRA prepared by Wiltshire Council comprised an early HRA Settlement Level Screening Assessment for the Wiltshire housing sites during the initial development of the Plan. This was used to inform the assessment of the individual site options in Chapter 7 of this report.

A Screening Assessment and Appropriate Assessment of the Plan policies was also undertaken as part of the HRA, which has been used to update the findings of the screening exercise and to inform the assessment of the Plan policies in Chapter 8 of this report.

~~In conclusion,~~ The HRA identified no adverse effects on the integrity of Natura 2000 sites as a result of the Plan, either alone or in combination with other plans and projects, assuming that the mitigation proposed in the HRA is implemented.

Following pre-submission consultation, an Addendum to the HRA was prepared and additional recommendations made in relation to Bath and Bradford on Avon Bats SAC and the River Avon Special Area of Conservation, and this has been taken into account in this revised SA Report.

Key sustainability issues

The SA process involves setting the context and objectives, establishing the baseline and deciding on the scope of issues to assess. This was done by reviewing various relevant plans and programmes and gathering baseline information on current and likely trends.

From this analysis, the key sustainability issues identified for Wiltshire are briefly summarised below:

Biodiversity

There are numerous Natura 2000 sites in Wiltshire. Development has the potential to affect a number of these sites through habitat disturbance, recreational pressure, water abstraction and pollution. There are also approximately 1,550 County Wildlife Sites (CWSs) in Wiltshire covering approximately 21,000ha of semi-natural habitats. The CWS network does not receive any statutory protection and is vulnerable as a result.

Development has the potential to result in long and short term disturbance of the natural environment resulting in a range of effects on species and habitats (both direct and indirect), which, particularly when taken in combination can be significant.

Across Wiltshire there are opportunities to restore major areas of broadleaved woodland, neutral grassland, limestone grassland, chalk downland, river networks and wetland habitats linking to features shown on the South West Nature Map.

Land and Soil Resources

Due to the county's predominantly rural nature, there is low availability of brownfield land meaning development on greenfield sites is necessary. Nevertheless, the economic and other benefits of the best and most versatile agricultural land should be recognised and priority for development should be given to poorer quality land. Future development needs to provide the opportunity to remediate and redevelop Wiltshire's remaining brownfield sites, particularly in town centres.

Water Resources and Flood Risk

Several key locations within the administrative area of Wiltshire Council have been identified as the focus of a Strategic Water Management Plan – Chippenham, Trowbridge and Salisbury. Historically, the majority of reported flooding issues within Trowbridge have been linked with fluvial flooding from the River Biss. Surface water flooding incidents have been limited, with no significant issues identified.

Historically, the majority of reported flooding issues within Salisbury and the surrounding area have been linked with fluvial flooding from the River Avon (Hampshire), River Nadder and River Bourne. However, due to the nature of the underlying bedrock, base flows within these rivers are inherently linked with groundwater levels. During wet periods, surface water infiltration into the underlying aquifer causes groundwater levels to rise causing increases in base flow within river channels. These cause longer duration flood events that are a combination of groundwater and fluvial flows.

The River Avon SAC and ground water sources are particularly vulnerable to the effects of diffuse and point source pollution, in particular to elevated phosphate levels from additional sewage discharges in the catchment. This can be addressed through the introduction of a Nutrient Management Plan (NMP) to reduce phosphate levels.

Nitrogen enrichment of surface waters and groundwater is already regarded as problem in a number of areas. Wiltshire's chalk streams are internationally important for biodiversity, but currently suffer from a number of interacting factors that are having negative impacts.

Groundwater resources need to be protected and managed to ensure sustainable future supplies. There are two key risks to groundwater: pollution / contamination; and over use of groundwater.

Air Quality and Environmental Pollution

Wiltshire Council has declared a number of AQMAs due to exceedances in nitrogen dioxide. Future development has the potential to result in air quality impacts on biodiversity. Development may also affect noise, vibration and light pollution levels.

Climatic Factors

Wiltshire's ecological footprint is significantly greater than the average global ecological footprint. Efforts directed at climate change adaptation and mitigation at the local level such as reducing the use of non-renewable energy and reducing vehicle journeys, will contribute to reducing the county's ecological footprint. In Wiltshire, there is a local need to reduce carbon emissions and deliver an increased level of renewable energy.

Heritage

Within wider Wiltshire district there is a rich and historic landscape which forms part of Wiltshire's rich natural heritage.

Wiltshire has nearly 20,000 archaeological sites ranging from the prehistoric through to Roman and medieval times and the civil war battlefield at Roundway Down. There are also approximately 12,000 listed buildings, 37 historic parks and gardens and more than 200 conservation areas. There is a need to retain/ preserve and where possible enhance designated and non designated heritage assets. Wiltshire's rural settlements and villages include many historic farm buildings.

Opportunities exist to promote the wider contribution of the historic environment to sustainable development.

Landscape

Wiltshire has high quality and valued landscapes. There are 3 AONBs in Wiltshire: Management plans have been prepared for the three AONBs and will need to be considered in proposals for future development.

With regards to Wiltshire Council's Landscape Character Assessment (LCA) and Special Landscape Areas (SLA) 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. Through new development there are opportunities as well as a need to promote sustainable design in Wiltshire that respects and complements the character of the local landscape.

Part of the Western Wiltshire Green Belt falls in Wiltshire including land surrounding Bradford on Avon, Trowbridge and west of 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 on Avon.

Population and Housing

Wiltshire faces a number of challenges including an ageing population, issues in respect to provision of Gypsy and Traveller accommodation and lack of affordable housing.

Efficient use of land in Wiltshire is very important, particularly given the rural nature of the county with low levels of previously developed land. It is essential that design solutions are encouraged which will achieve higher density levels wherever possible. There is the opportunity through new development to significantly increase the affordable housing stock.

Healthy and Inclusive Communities

Wiltshire is not a deprived county however there are three small areas - two in Trowbridge and one in Salisbury - which are in the top 20% of deprived areas nationally; they are home to slightly more than 5,000 people. There are also scattered areas of poverty in rural Wiltshire. The most prevalent form of deprivation in Wiltshire relates to barriers to housing and services.

There are a number of challenges faced by rural areas in Wiltshire. These include lack of affordable housing, an ageing population, rural isolation, and lesser accessibility as well as a decline in basic facilities.

New development should be designed to enhance a sense of community through the provision of public/ community spaces and facilities, with the provision of appropriate levels of good quality affordable housing to meet local need. Development should also be located within easy access of local services so that these can be accessed on foot, by bike or using public transport.

Education and Skills

Wiltshire has a higher than average proportion of young people not in Employment, Education or Training (NEET). Data suggests that many jobs taken by 16-18 year olds are often temporary; either genuinely short contract or seasonal jobs or the young people move between jobs until they settle.

With regards to workplace skills, Wiltshire has been dominated by low value, low skilled manufacturing and service sectors, resulting in the county becoming an attractive place for the higher skilled and higher paid in which to live, but not to work.

The skills base of Wiltshire is relatively polarised with a high proportion of residents with high skills levels, but equally a significant proportion with poor basic skills and, as a result of the recession, increasing unemployment levels.

Policies should seek to match housing allocations to employment opportunities within the county, to assist in reducing trends of out-migration for work. An appropriate level of high quality educational facilities in accessible locations to meet the needs of the community is also required.

Transport

High car ownership is reflective of the rural nature of the county although there are clear geographic differences in the distribution of households without access to cars. The future growth of Wiltshire's largest towns should focus on creating more favourable conditions for people to be less reliant on the car.

There is a need to ensure that employment, education, health, shops, and other essential facilities are accessible to all, and not just those with access to a private car.

There are opportunities to increase the proportion of journeys made on foot as well as increasing the percentage of people cycling to work. Wiltshire's relative affluence and high levels of cycle ownership offer a good opportunity to increase levels of cycling. There is scope for improving walking and cycling facilities in town centres.

Economy and Enterprise

There are discrepancies between average earnings by workplace and average earnings by residence in Wiltshire suggesting that Wiltshire's higher skilled resident workers are unable to secure the higher than average earnings within Wiltshire and therefore commute outside of the county for work.

Housing development should be located in proximity to employment sites in order to reduce out-commuting and promote travel to work using sustainable modes of transport.

Chippenham, Salisbury and Trowbridge should be the focus of both housing and employment development in the future.

The Sustainability Appraisal Framework

The SA Framework is a key component in undertaking the SA by creating a systematic and easily understood tool that allows the prediction and assessment of effects considered likely to arise from the implementation of the Plan.

The SA objectives are as follows:

1. Protect and enhance all biodiversity and geological features and avoid irreversible losses
2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings.
3. Use and manage water resources in a sustainable manner.
4. Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
- 5a. Minimise our impacts on climate change – through reducing greenhouse gas emissions.
- 5b. Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects.
6. Protect, maintain and enhance the historic environment
7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
8. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
9. Reduce poverty and deprivation and promote more inclusive and self-contained communities.
10. Reduce the need to travel and promote more sustainable transport choices.
11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
12. Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce.

Assessment of effects

The Plan has been subject to the SA to predict and evaluate the nature and scale of sustainability effects. The sites and related policies were assessed in two main stages:

- Assessment of a range of reasonable alternative sites using the SA Framework; and
- Assessment of policies for allocation of sites, building on the existing sites assessments, using an assessment rationale derived from the SA Framework of objectives.

An SA assessment scale was used for both assessments, as shown below; further details are provided in Chapter 2.

Generic Assessment Scale

| | |
|--------------------------------|--|
| Major adverse effect (- - -) | Option likely to have a major adverse effect on the objective with no satisfactory mitigation possible. Option may be inappropriate for housing development. |
| Moderate adverse effect (- -) | Option likely to have a moderate adverse effect on the objective. Mitigation likely to be difficult or problematic. |
| Minor adverse effect (-) | Option likely to have a minor adverse effect on the objective. Mitigation measures are readily achievable. |
| Neutral or no effect (0) | On balance option likely to have a neutral effect on the objective or no effect on the objective. |
| Minor positive effect (+) | Option likely to have a minor positive effect on the objective as enhancement of existing conditions may result. |
| Moderate positive effect (+ +) | Option likely to have a moderate positive effect on the objective as it would help resolve an existing issue. |
| Major positive effect (+ + +) | Option likely to have a major positive effect on the objective as it would help maximise opportunities. |

Assessment of sites

Reasonable alternative site options for assessment in the SA were identified by the Council using the Housing Site Selection Process Methodology. Potential housing sites in areas of search which did not progress to the stage of SA have not been considered as ‘reasonable alternatives’. The Council’s Topic Paper 2 ‘Site Selection Process Methodology’ which accompanies the Plan, explains why housing site allocations in these areas have not been sought.

Reasonable alternatives that were identified through this process were, however, then subject to SA. These reasonable alternative site options were assessed against this scoring system, the results of which were used to identify whether a site was ‘more sustainable’, ‘less sustainable’, or not to be considered further, in order to inform the sites to be taken forward by Wiltshire Council to Stage 4 (the selection of preferred sites stage).

Following pre-submission consultation, a number of additional sites were identified that required SA: and these have been incorporated into Chapter 7 of the SA Report.

In terms of identification of ‘more sustainable’ site options, prediction of minor adverse effects indicate that mitigation is possible and resulting effects are likely be minor (not significant) and thus not a cause of concern. The same is true for site options with neutral or no effects. Thus site options exhibiting the most number of this type of effect across SA objectives were considered ‘more sustainable’.

Moderate adverse effects, on the other hand, indicate that mitigation is problematic, potentially resulting in the occurrence of undesirable significant adverse effects. On this basis, the least number of moderate adverse effects a site option presents, the more preferred it becomes from a sustainability perspective as the risks involved are less.

As a general rule of thumb, site options with five or more moderate adverse effects result in a site being considered ‘less sustainable’; and site options with four or less moderate adverse effects are considered ‘more sustainable’.

It should be noted that less sustainable sites might nonetheless be taken forward by the Council to Stage 4 if more sustainable options have become undeliverable for various reasons, or where a site presents

significant beneficial effects, or if there are other reasons for considering these sites beyond the criteria of the SA.

Major adverse effects indicate that mitigation of effects is not considered possible for a particular site option, and therefore that site should not be considered further.

The following sites were assessed in the SA as either 'more sustainable', 'less sustainable', or not to be considered further; **additional sites that have been considered and any changes to existing sites are identified in BOLD, underlined and strikethrough:**

| Area of search | Site | SA assessment conclusion |
|--|--|--------------------------------|
| Amesbury Community Area Remainder | | |
| Shrewton | S146 Land to the west of Tanner's Lane and south of the Hollow, Shrewton | Not to be considered further |
| | S150 Land north of the A360, Shrewton | Not to be considered further |
| | S151 Land South of Nettley Farm, Shrewton | Not to be considered further |
| | S152 Land at Rollestone Manor Farm, Shrewton | Not to be considered further |
| | S154 Land to the south of London Road, Shrewton | Not to be considered further |
| | S1067 Land off Maddington Street, Shrewton | Not to be considered further |
| The Winterbournes | S90 Land between Winterbourne Earls Village School and the Railway Line, The Winterbournes | Not to be considered further |
| | S91 Land by Summerlug Estate and Railway, The Winterbournes | Not to be considered further |
| | S92 Land by Railway Line and Vicarage, The Winterbournes | Not to be considered further |
| | 3528 Land adjacent and including Winterbourne Motors, The Winterbournes | Not to be considered further |
| Amesbury (including Bulford and Durrington) | | |
| Durrington | S98 Land to Rear of Durrington Manor, Durrington | Less sustainable |
| | 3154 Piece Meadow, Durrington | More sustainable |
| | 3179 Land to the south of Larkhill Road, Durrington | More sustainable |
| Amesbury | 3379 Land north of London Road, Amesbury | Less sustainable |
| Chippenham Community Area Remainder | | |
| Hullavington | 689 Land directly behind Gardeners Drive | More sustainable |
| | 690 The Street – Hullavington | More sustainable |
| | 1112 Land to rear of Newton | More sustainable |
| | 3162 Rear of Darley House, The Street | More sustainable |
| | 3377 Land at Green Lane | More sustainable |
| | <u>3129 The Street, Hullavington</u> | <u>More sustainable</u> |
| | <u>OM011 Land at Hullavington airfield, Hullavington</u> | <u>Less sustainable</u> |
| Kington St Michael | 797 Manor Farm | Not to be considered further |
| Yatton Keynell | 474b Land adjacent to The Old Forge, The Street | More sustainable |

| Area of search | Site | SA assessment conclusion |
|---|---|---|
| | 482 Land East of Farrells Field | More sustainable |
| | 643 Land at Littlemead Farm | Not to be considered further |
| | <u>OM015 Land east of Yatton Keynell off B4039, Yatton Keynell</u> | <u>Less sustainable</u> |
| Devizes Community Area Remainder | | |
| Market Lavington | 529 Land at Southcliffe Road | More sustainable |
| | 530 Fiddington Hill | More sustainable |
| | 374 R/O 37 White Street | More sustainable |
| | 3268 Land at the Spring | Not to be considered further <u>More sustainable</u> |
| | 1089 Southcliffe | More sustainable |
| | 2055 Underhill Nursery | More sustainable |
| | 3443 Land to the east of Lavington School | More sustainable |
| Malmesbury Community Area Remainder | | |
| Crudwell | 3233 Land at Ridgeway Farm | More sustainable |
| | <u>Site OM014 - Land at Tuners Lane, Crudwell</u> | <u>More sustainable</u> |
| Oaksey | 3128 Land off Wick Road | More sustainable |
| Salisbury Principal Settlement (including Wilton Town) | | |
| Salisbury | S61 Land at Hilltop Way | More sustainable |
| | S80 Land to the north of Old Sarum | Less sustainable |
| | S159 Land to the north of Downton Rd | Less sustainable |
| | S178 Land to the south of Roman Road, Old Sarum | Not to be considered further |
| | S1027 North of Netherhampton Rd | More sustainable |
| | S1028 Land at Netherhampton Rd | More sustainable |
| | 3187 Land at Harnham Business Park | Not to be considered further |
| | 3272 Land at Rowbarrow, Odstock Rd | More sustainable |
| | 3421 Land adjacent to A354, Harnham | Less sustainable |
| | 3554a Land to west of Milford Care Home, Salisbury | Not to be considered further |
| | <u>Site 3435 – Land off Britford Lane</u> | <u>Less sustainable</u> |
| | <u>Site OM002 - Land north of A3094</u> | <u>Less sustainable</u> |
| | <u>Site OM003 - The Yard, Hampton Park</u> | <u>More sustainable</u> |
| Wilton | S1057 Land rear of Bulbridge Rd | More sustainable |
| Tidworth and Ludgershall Market Town | | |
| Ludgershall | 553 Land at Empress Way | More sustainable |
| Tisbury Community Area Remainder | | |
| | 3449 Badges View | Not to be considered further |

| Area of search | Site | SA assessment conclusion |
|---|--|--|
| Fovant | 3450 Land at Pembroke Farm | Not to be considered further |
| Trowbridge Principal Settlement | | |
| Trowbridge | 613 Elm Grove Farm/Land off A363 at White Horse Business Park, Drynham Lane (now incorporates Site: 248) | More sustainable |
| | 261 Land at Lower Biss Farm | Not to be considered further |
| | 262 Land west of Yarnbrook Road (A350) | Not to be considered further |
| | 256 Land south of Green Lane, Trowbridge | Not to be considered further |
| | 292 Land north of Green Lane | Not to be considered further |
| | 297 Elizabeth Way | More sustainable |
| | 263 Elizabeth Way | More sustainable |
| | 293 Land to the east of Elizabeth Way | Less sustainable |
| | 1021 Church Lane | More sustainable |
| | 3260 Upper Studley | More sustainable |
| | 298 Land off A363 at White Horse Business Park | More sustainable |
| | 3565 Land east of the A361 at Southwick Court | Less sustainable |
| Warminster Community Area Remainder | | |
| Chapmanslade | 316 Barbers Farm | More sustainable |
| | 1022 Green Farm Industrial Estate and adjacent land | Not to be considered further |
| | 3203 Land at North West Chapmanslade | More sustainable |
| Codford | 612 Chitterne Road | Not to be considered further |
| | 3397 Bury Farmyard, Green Lane | Not to be considered further |
| | 3491 Mayflower Farm | Not to be considered further |
| | 3506 Manor House Grounds | Not to be considered further |
| Heytesbury | 3486 Heytesbury Park | Not to be considered further |
| | <u>Site OM004 Land west of Heytesbury, adjacent to Greenlands, Heytesbury</u> | <u>Not to be considered further</u> |
| Warminster Market Town | | |
| Warminster Market Town | 302 Land at Bradley Road | More sustainable |
| | 603 Land east of The Dene | Less sustainable |
| | 793 Westbury Road | Not to be considered further |
| | 1032 Bore Hill Farm | Less sustainable |
| | 3242 Land adjacent to Fanshaw Way | Not to be considered further |
| | 304 Land at Boreham Road | More sustainable |
| | <u>Site OM005 Land at Brick Hill</u> | <u>Less sustainable</u> |
| | <u>Site OM006 Land to the south of Boreham Road</u> | <u>Not to be considered further</u> |
| <u>Site 1030 – 44 & 45 Bath Road</u> | <u>More sustainable</u> | |

| Area of search | Site | SA assessment conclusion |
|--|--|--------------------------------|
| | <u>Site 239 – Land on Upper Marsh Road</u> | <u>Less sustainable</u> |
| | <u>Site 2091 – Land between Bath Road and A36</u> | <u>Less sustainable</u> |
| Westbury Community Area Remainder | | |
| Bratton | 321 Land off B3098 adjacent to Court Orchard/Cassways, Bratton | More sustainable |
| | <u>Site 738 – Land south of Westbury Road, Bratton</u> | <u>More sustainable</u> |

Assessment of policies

The Plan pre-submission document proposes three policies relating to the Housing Market Areas of Wiltshire and a number of other policies and site allocations for individual sites as set out in the table below. **As a result of the pre-submission consultation Submitted Schedule of Proposed Changes (July 2018) to the pre-submission Plan, a few amendments have been made to the number of dwellings (and some site areas) proposed at sites; sites at Market Lavington and Crudwell have been removed from the Plan; and one further site has been included for allocation; these changes are noted in the table below.**

Sites proposed for housing development within the submitted Plan pre-submission document:

| Policy | Community Area | Policy/site allocation | Site Name | No. of Dwellings |
|--|----------------|------------------------------------|---|---|
| H1 East Wiltshire Housing Market Area | Tidworth | Policy H1.1 | Empress Way, Ludgershall | 270 |
| | Devizes | Site allocation H1.2 | Underhill Nursery, Market Lavington | 50 |
| | | Site allocation H1.3 | Southcliffe, Market Lavington | 45 |
| | | Site allocation H1.4 | East of Lavington School, Market Lavington | 45 |
| H2 North and West Wiltshire Housing Market Area | Trowbridge | Policy H2.1 | Elm Grove Farm, Trowbridge | 200 250 |
| | | Site allocation H2.2 | Land off A363 at White Horse Business Park, Trowbridge | 150 225 175 |
| | | Site allocation H2.3 | Elizabeth Way, Trowbridge | 205 355 |
| | | Site allocation H2.4 | Church Lane, Trowbridge | 45 |
| | | Site allocation H2.5 | Upper Studley, Trowbridge | 20 45 |
| | | Site allocation H2.6 | Southwick Court, Trowbridge | 180 |
| | Warminster | Policy H2.7 | East of the Dene, Warminster | 100 |
| | | Site allocation H2.8 | Bore Hill Farm, Warminster | 70 |
| | | Site allocation H2.9 | Boreham Road, Warminster | 30 |
| | | Site allocation H2.10 | Barters Farm Nurseries, Chapmanslade | 35 |
| | Chippenham | Policy H2.11 | The Street, Hullavington | 50 |
| | | Site allocation H2.12 | East of Farrells Field, Yatton Keynell | 30 |
| | Malmesbury | Site allocation H2.13 | Ridgeway Farm, Crudwell | 50 |
| | Westbury | Site allocation H2.13 4 | Off B3098 adjacent to Court Orchard / Cassways, Bratton | 40 35 |

| Policy | Community Area | Policy/site allocation | Site Name | No. of Dwellings |
|---|----------------|--|---|--------------------------------|
| H3 South Wiltshire Housing Market Area | Salisbury | Policy H3.1 | Netherhampton Road, Salisbury | 640 |
| | | Site allocation H3.2 | Hilltop Way, Salisbury | 10 |
| | | Site allocation H3.3 | North of Netherhampton Road, Salisbury | 100 |
| | | Site allocation H3.4 | Land at Rowbarrow, Salisbury | 100 |
| | | <u>New site allocation Site allocation H3.5</u> | <u>OM003 The Yard, Hampton Park, Salisbury</u> | <u>14</u> |
| | Amesbury | Site allocation H3.56 | Clover Lane, Durrington (comprising sites S98 and 3154) | 30 <u>45</u> |
| | | Site allocation H3.67 | Larkhill Road, Durrington | 15 |

The three Housing Market Area policy options were reviewed taking into account the combination of the site allocations, individual sites making up the Policy and the mitigation measures proposed in the Plan for that Policy. Each Housing Market Area Policy was then assessed using the generic assessment scale identified above. A summary table of the overall sustainability effects of the three Housing Market Area policies is presented below. The assessment takes into account the mitigation measures proposed within the Plan, which to a large part covers the issues identified in the SA of the individual sites; as such, the overall score of the Policies against certain SA Objectives may be more positive than the sum of individual site assessment scores, as appropriate mitigation has been proposed within the Policy. ~~It also presents~~ **This table also presents updates to the scores taking into account the proposed Plan modifications** **Schedule of Proposed Changes and where these strengthen the Plan in relation to the SA Objectives.**

For some SA Objectives, both positive and negative effects have been identified for the Housing Market Area Policy; this reflects that either sufficient mitigation has been included in the policy or site allocation within the Policy, but for others further mitigation is recommended; and/or that both positive and negative effects can be anticipated as a result of the Policy e.g. adverse effects on biodiversity due to the loss of existing habitats, however the potential for longer term benefits through improved planting and landscaping on site leading to biodiversity gain.

The specific details for each score are presented in the SA Report at Table 8.5.

Summary effects of Housing Market Area policies

| SA Objective | | Policy H1 | Policy H2 | Policy H3 |
|--------------|--|-----------|-----------|-----------|
| 1 | Protect and enhance all biodiversity and geological features and avoid irreversible losses | ±+ / - | ±+ / - | ±+ / - |
| 2 | Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings | + / - | + / -- | + / -- |
| 3 | Use and manage water resources in a sustainable manner | ±+ / - | ±+ / - | ±+ / - |
| 4 | Improve air quality throughout Wiltshire and minimise all sources of environmental pollution | + / - | + / - | + / - |
| 5a | Minimise our impacts on climate change – through reducing greenhouse gas emissions | ±+ / - | ±+ / - | ±+ / - |
| 5b | Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects | ±+ / - | ±+ / - | ±+ / - |

| SA Objective | | Policy H1 | Policy H2 | Policy H3 |
|--------------|--|-----------|-----------|-----------|
| 6 | Protect, maintain and enhance the historic environment | ± / - | ± / - | ± / - |
| 7 | Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place | + / - | + / - | + / - |
| 8 | Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures | ++ | +++ | ++ |
| 9 | Reduce poverty and deprivation and promote more inclusive and self-contained communities | + | ±+ / - | + / - |
| 10 | Reduce the need to travel and promote more sustainable transport choices | + / - | + / - | + / - |
| 11 | Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth | + | ++ | +++ |
| 12 | Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local business and a changing workforce | + | + | + |

The three Housing Market Area policies which relate to specific sites have been assessed both individually, in-combination with one another and cumulatively with other plans. The results are as follows:

Policy H1

Policy H1 allocates land in the East Wiltshire Housing Market Area, in Tidworth and Devizes Community Areas. The policy will deliver ~~350~~ **270** dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of enhancement measures. ~~The HRA has identified no LSE in relation to these sites. The Proposed Plan modifications~~ **Schedule of Proposed Changes support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land (SA Obj. 2). There are potential negative effects on surface water management, however the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through** ~~proposed Plan modifications~~ **Schedule of Proposed Changes** (SA Obj. 3 and 5b).

Minor negative effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though, the allocation of ~~a number of~~ **this** sites will result in an increase in the number of private car journeys **due its size** (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however ~~at some sites~~ this could result in increased pressure on local school and health care facility capacity; ~~however~~, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions (SA Obj. 9).

The allocation is likely to provide significant social and economic benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Policy H2

Policy H2 allocates land in the North and West Wiltshire Housing Market Area, in Trowbridge, Warminster, Chippenham, ~~Malmesbury~~ and Westbury Community Areas. The policy will deliver ~~4205~~ **1400** dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of enhancement measures. ~~The HRA has identified no LSE in relation to these sites Proposed Plan modifications~~ **The Schedule of Proposed Changes support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land, with sites identified within this policy as containing best and most versatile land, as well as one site containing a landfill (SA Obj. 2).

There are potential negative effects on surface water management, however the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through the Schedule of Proposed Changes** ~~Proposed Plan modifications~~ (SA Obj. 3 and 5b).

Minor negative effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however at some sites this could result in increased pressure on local school and health care facility capacity; however, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions. **Furthermore, the Plan is strengthened in relation to this objective through the Proposed Plan modifications Schedule of Proposed Changes** (SA Obj. 9).

The allocation is likely to provide social and economic significant benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Policy H3

Policy H3 allocates land in the South Wiltshire Housing Market Area, in Salisbury and Amesbury Community Areas. The policy will deliver ~~895~~ **924** dwellings.

Mixed effects (**moderate**/minor positive and minor negative) and minor adverse are predicted in relation to a number of objectives. Negative effects may occur on biodiversity as a result of construction due to the removal for example of hedgerows, however positive effects may occur in the long term as a result of

enhancement measures. ~~Whilst the HRA has identified no LSE in relation to these sites on the River Avon SAC, recommendations have been made in the HRA and incorporated into the Policy Proposed Plan modifications~~ **The Schedule of Proposed Changes support and strengthen requirements in relation to HRA and protection of Natura 2000 sites** (SA Obj. 1). There are potential negative effects on surface water management, however the policy identifies the need for further assessment of drainage and flood risk assessments **and is further strengthened through Proposed Plan modifications the Schedule of Proposed Changes** (SA Obj. 3 and 5b).

Development of the proposed sites will result in the inevitable loss of greenfield/ agricultural land (SA Obj. 2). Minor effects are identified in relation to air quality and the policy identifies general mitigation to this effect, though some of the wording could be strengthened. Ultimately, though the allocation of a number of sites will result in an increase in the number of private car journeys (SA Obj. 4).

Though the proposed policy requires that new development adheres to high quality design and construction standards and that for more substantial sites, a Sustainable Energy Strategy will be required, the development of the sites is likely to result in an inevitable increase in the carbon footprint of Wiltshire (SA Obj. 5a).

Localised effects may occur on cultural heritage and archaeology, although the policy within the cross-cutting themes provides for the requirement of heritage impact assessments where appropriate (SA Obj. 6).

Impacts on the landscape will be inevitable and result in the increased urbanisation of Wiltshire villages and towns, however the policy provides for the requirement for appropriate landscaping, planting and screening (SA Obj. 7).

The policy will promote more inclusive and self-contained communities, however at some sites this could result in increased pressure on local school and health care facility capacity; however, given the overall quantum of development, these issues are addressed directly through the provision of a school as part of the policy or through infrastructure contributions (SA Obj. 9).

The allocation is likely to provide social and economic significant benefits such as providing good quality, affordable housing and varied housing (SA Obj. 8) and contributing positively to the growth of the local economy and to the provision of jobs (SA Objs. 11 and 12).

Combined effects

When considering cumulative effects across the three Housing Market Area policies, there are likely to be elevated effects, both beneficial and adverse.

The main significant adverse cumulative effects relate to environmental issues, predominantly as the policies allocate sites on greenfield land. Significant adverse effects also arise from the scale of housing and associated development proposed.

The elevated adverse effects that are likely to arise from the combination of policies H1, H2 and H3 include:

- The total loss of best and most versatile land (SA Obj. 2);
- Effects on air quality, noise and light pollution (SA Obj. 4) – the overall scale of development and provision of new roads is likely to increase air, noise and light significantly for new and existing sensitive receptors.
- ~~Effects on the use and management of water resources in a sustainable manner (SA Obj. 3) due to existing issues related to surface water management, drainage and flood risk that extend beyond the localised area.~~
- Effects on climate change as a result of greenhouse gas emissions (SA Obj. 5a) – the scale of development is likely to see a significant increase in the number of private car journeys, which may for example affect greenhouse gas emissions.
- ~~Effects on climate change (vulnerability to future climate change effects) (SA Obj. 5b) similar to SA Obj. 3, whereby existing issues related to surface water management, drainage and flood risk extend beyond the localised area.~~

- Effects on transport and travel (SA Obj. 10) – the scale of development is likely to see a considerable increase in the number of private car journeys.

A number of significant beneficial effects will also arise, related to social and economic considerations. The combination of the policies will result in a substantial contribution to the provision of, and the opportunity to live in, good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures (SA Obj. 8) and contribute significantly to the local economy and enterprise (SA Objs. 11 and 12).

Cumulative effects

Cumulative effects have been considered in terms of the Wiltshire Housing Site Allocations Plan and the Core Strategy strategic sites at Amesbury, Trowbridge, Tidworth and Ludgershall, Warminster and Salisbury, the Chippenham Site Allocations Plan and the Army Basing Programme.

There may be cumulative effects as a result of Policy H1 with land identified for housing development at Drummond Park (MSA) Depot, Ludgershall in the Core Strategy; as a result of Policy H2 with land identified to the south east of the town at Ashton Park, Trowbridge in the Core Strategy; and land identified to the west of Warminster for strategic growth in the Core Strategy; and housing development identified in the Chippenham Site Allocations; and as a result of Policy H3 with strategic sites proposed at Salisbury and Amesbury in the Core Strategy. There may also be cumulative effects at Durrington associated with the Army Basing Programme and Policy H3.

In general, cumulative effects are likely to occur due to the additional scale of development potentially leading to elevated effects, which will generally be beneficial in social and economic terms and adverse in environmental terms within the general area (rather than site specific cumulative effects given the general distribution of the developments in relation to each other). Where environmental adverse effects are likely, these are capable of being mitigated in line with the policies set in the Chippenham Site Allocations Plan and the emerging masterplans for the strategic sites together with the SA recommendations made for the Wiltshire Housing Site Allocations Plan.

In most cases these adverse effects are the same as the combined effects for Policies H1, H2 and H3, however elevated effects may occur in relation to:

- SA Obj. 5a. Minimise our impacts on climate change – through reducing greenhouse gas emissions. The various Plans are likely to see an increase in the amount of development and associated infrastructure such as roads, which is likely to lead to increased greenhouse gas emissions both during construction and operation. Overall, there will be an increase in the carbon footprint.
- SA Obj 7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place. Overall, there will be increased urbanisation, in particular at Warminster, Trowbridge and Chippenham. There may also be similar adverse cumulative effects in relation to the Policy H3 in Salisbury with strategic sites in the Core Strategy. Overall, landscaping should help to reduce adverse effects.
- SA Obj 9. Healthy and inclusive communities, SA Obj. 11 Economy and enterprise and SA Obj. 12 Economy and enterprise. Overall the cumulative beneficial effects should be considerable, as the all new developments proposed across the Wiltshire Housing Site Allocations and the Core Strategy Strategic Sites will assist in the support of viable local shops and services as well as generate direct and indirect construction employment, and will help stimulate the local economy once built.

Assessment of settlement boundaries

The Council has developed an updated methodology to review its settlement boundaries as part of the Plan. Settlement boundaries (or 'limits of development') define the built form of a settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.

This revised methodology (refer to the Council's Topic Paper 1) consists of six themes, as follows:

- Theme 1 'Physical features on the ground' lists specific land uses and their physical relationship to the existing settlement;

- Theme 2 ‘Different types of Development’ covers specific land uses and their physical relationship to the existing settlement;
- Theme 3 ‘Planning Permissions’ explores which kind of planning permissions should be brought forward within the revised settlement boundary;
- Theme 4 ‘Sites allocated for development in the local plan’ identifies whether planning allocations should be included within the revised settlement boundary of Wiltshire Council;
- Theme 5 ‘The curtilage of properties, including large gardens’ covers the type of back garden to be included within the settlement boundary based on their capacity to extend the built form and their location in regards the existing settlement; and
- Theme 6 ‘Recreational or amenity space at the edge of settlements’ covers whether to include recreational and amenity spaces within the revised settlement boundary of Wiltshire Council based on their size and location.

From an SA perspective, the review of settlement boundaries is welcomed, however it is not the purpose of the SA to decide on the revised settlement boundary methodology as part of the Wiltshire Housing Site Allocations Plan. This is the role of Wiltshire Council who will have to make decisions about what physical elements to include within its revised boundaries.

Mitigation measures

A number of recommendations have been made in order to mitigate adverse effects that have been identified. These are both a mix of improvements to the policies in terms of wording and requirements, and further assessment. Measures are proposed in Chapter 8, and summarised in the table below, together with the Council’s response to the recommendations:

| Plan policy | Recommendations | Council Response | Plan amendment |
|---|---|---|---|
| Cross-cutting themes in Chapter 5 of the Plan | As all sites will require ecological assessment, it is recommended that paragraph 5.4 is amended as follows (proposed addition in bold): <i>“An ecological assessment will be required for all sites. The development will protect and improve opportunities for biodiversity and wildlife corridors within and adjoining the site in accordance with Core Policy 50 (Biodiversity and Geodiversity)”</i> . | Plan allocations involve greenfield sites. The suggested text provides useful further clarification. | Add to paragraph 5.4 <i>“An ecological assessment will be required for all sites. The development will...”</i> |
| | In paragraph 5.7, the policy could be strengthened by requiring that some of the new housing meets the specific needs of vulnerable and older people. | Further material would replicate measures already included in the development plan, in Core Policy 46. | No change |
| | It is recommended that the following sentence (in bold) is added to paragraph 5.11: <i>“As appropriate, additional evidence will need to be prepared at a level of detail to support a planning application. In many cases, particularly important items are referred to for each allocation. Such evidence may include, but is not limited to a Landscape and Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Transport Statement. This should include a Construction Environmental Management Plan (CEMP) to capture the management measures proposed by individual assessments. Such new evidence can be used as a material consideration when considering a specific planning application.”</i> | Further material would replicate measures already provided as standing advice. Measures would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
|--|---|---|--|
| | It is recommended that the following sentence is added in after paragraph 5.11: <i>“Depending on the size of the site and likely impacts, as appropriate, a statutory Environmental Impact Assessment (EIA) may be required”.</i> | Additional text replicates measures already included in the planning system. All planning applications are screened for the likelihood of significant environmental effects in accordance with regulations. | No change |
| | It is recommended that the following requirements are also included: <i>“Development will consider opportunities for integrated surface water management and pollution prevention measures such as Sustainable Drainage Systems (SuDS); Surface water management should achieve equivalent or less than current Greenfield rates of run-off so there will be no deterioration of current run-off conditions”.</i> <i>“Where applicable, development will consider school and healthcare facility capacity and ensure that a sustainable solution is provided”.</i> <i>“Wherever possible, development will provide for sustainable modes of travel, including safe access for vulnerable road users (pedestrians, cyclists) and incorporate footpaths and cycle lanes”.</i> <i>“Developments will seek to protect air quality and ensure that noise impact is properly considered during the construction and operational phases.”</i> <i>“Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil’s quality).”</i> | Further text replicates measures or objectives already included in the development plan or elsewhere: <ul style="list-style-type: none">regarding surface water management, in Core Policy 67regarding air quality, in Core Policy 55regarding sustainable modes of travel in Core Policy 61 Individual Plan allocations identify where additional school or healthcare capacity is necessary to enable development to go ahead. Individual Plan allocations identify where additional measures may be required to protect against noise pollution. Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and Re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change <u>Requirements for Flood Risk Assessment and Drainage Strategies has been included in the Schedule of Proposed Changes.</u> |
| Policy H1 East Wiltshire Housing Market Area | | | |
| Individual site policy/site allocation within Policy H1 | | | |
| Site allocation H1.2 Underhill Nursery, Market Lavington | It is recommended that this site allocation could be strengthened by identifying the need for further cultural heritage assessment given that potential effects on SA Objective 6 are identified as moderate adverse at this site. | Medieval remains have been found on or adjacent to the site and further investigation and appraisal would be required. Reference is already made to the need for assessment so is already included. | No change |
| | The reference in the Plan to the site being within Groundwater Source Protection Zone 2 should be deleted because the SA states that the site is not within a Groundwater Source Protection Zone. | A portion of the site is subject to this protection. | No change |
| | It is recommended that the requirement for a noise impact assessment is included within the text of this site allocation. | Neighbouring uses are residential and low key business. Any need for an assessment will be | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
|---|---|---|----------------|
| | | considered through a planning application process. | |
| Site allocation H1.3 Southcliffe, Market Lavington | It is recommended that the requirement for the retention of priority habitat on site, a noise impact assessment and an archaeological assessment be included within the text of site allocation H1.3. | Further text would replicate measures or objectives already included in the development plan or elsewhere: <ul style="list-style-type: none"> regarding biodiversity, in Core Policy 50 regarding heritage assets, in Core Policy 58 Neighbouring uses are residential and low key business. Any need for an assessment will be considered through a planning application process | No change |
| Site allocation H1.4 East of Lavington School, Market Lavington | It is recommended that the requirement for a noise impact assessment and an archaeological assessment should be included within the text of the site allocation H1.4. | Further text would replicate measures or objectives already included in the development plan or elsewhere: <ul style="list-style-type: none"> regarding biodiversity, in Core Policy 50 regarding heritage assets, in Core Policy 58 Neighbouring uses are residential and low key business. Any need for an assessment will be considered through a planning application process | No change |
| Policy H2 North and West Wiltshire Housing Market Area | | | |
| Policy H2 North and West Wiltshire Housing Market Area | It is recommended that the supporting text for Policy H2 in relation to Trowbridge is amended as follows: Paragraph 5.45: <i>“Despite the need to identify sites for additional housing at the town, there are significant ecological (protected species and potential impacts upon the Bath and Bradford on Avon Bats SAC) (e.g. protected bat species), landscape (Green Belt) and infrastructure (i.e. e.g. education and health facility capacity) constraints that limit the choice of available sites. “</i> The reference to mitigation for landscape and cultural heritage should be added to site allocation H2.4 – see the section on H2.4 below. | Paragraph 5.45 does not provide an exhaustive list of constraints that affect the town. Additional text referring to site specific mitigation measures is already included. | No change |
| | In addition to the Priority Biodiversity Action Plan habitats, reference should be made at paragraph 5.45 to the HRA recommendations: <i>“Habitats Regulations Assessment: Potential impacts upon the Bath and Bradford on Avon Bats SAC through habitat loss and disturbance have been identified in the HRA for sites in Trowbridge, and</i> | Reference is made in paragraph 5.46. The HRA concludes that Plan allocations will not be likely to have significant adverse effects on the integrity of the River Avon SAC. | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
|---|---|--|---|
| | <i>the HRA identifies mitigation that is required for specific sites. These measures are identified under relevant site allocation supporting text”.</i> | | |
| | Whilst no LSE on the River Avon SAC and phosphate loading has been identified in the HRA, it is recommended that, when available, Annex 2 of the River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus is reviewed for any additional mitigation measures that may be proposed. | Any implications arising from review of the Nutrient Management Plan will be addressed as Plan preparation progresses. | No change <u>The Schedule of Proposed Changes includes the following: For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.”</u> |
| Individual site policy/site allocation within Policy H2 | | | |
| Policy H2.1 Elm Grove Farm, Trowbridge | It is recommended that the requirement for potential statutory easements, as the existing foul sewerage infrastructure crosses the site, and a Noise Impact Assessment should be included within the text of the Policy H2.1. | The treatment of statutory easements is a common feature of detailed design and layout that will be considered as part of the master plan process. Small parts of the site could potentially be affected by noise from a main road and railway, so additional text would be useful clarification. | Add to paragraph 5.53: “...In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse. Measures may also be necessary to prevent potential noise pollution from the existing main road and railway.” |
| Site allocation H2.2 Land off A363 at White Horse Business Park | Given the original size of development, moderate adverse effects regarding loss of Best and Most Versatile agricultural land were identified in the site assessment in Chapter 7; due to the reduction in the site size this effect has been mitigated to some degree though a moderate adverse effect is still possible. Should the site be developed, the cross-cutting theme in relation to soil retention on site should be applied to the site allocation supporting text: “Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be | Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
|--|--|--|---|
| | mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)." | | |
| | Due to the size of the site, development would potentially lead to increased car-based movements and hence impact on the local highway network, even with the reduction in the number of dwellings proposed. The requirement for a Transport Assessment for this site should be identified in the site allocation. | Further text would replicate measures or objectives already included in the development plan regarding travel in Core Policy 61. | No change |
| Site allocation H2.3 Elizabeth Way | Approximately three quarters of the land within Site 263 appears to be underlain by Grade 3a Best and Most Versatile agricultural land; the reduction in site capacity will reduce some of the negative effects; however, the site is still of a significant size and therefore all effects cannot be mitigated totally. It is recommended that should the site be developed, the following text is added to this site allocation: <i>"Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)."</i> | Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change |
| Site allocation H2.5 Upper Studley | It is recommended that the following text is added to this site allocation: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i> | The scale of development and its impact is not considered to be of a scale that contributions could be justified as fairly and reasonably related or necessary to enable it to go ahead. | No change |
| Policy H2.7 East of the Dene, Warminster | It is recommended that the Policy text identifies the need to reduce the loss of best and most versatile agricultural land where possible. It is recommended that should the site be developed, the following text is added to this Policy: <i>"Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil's quality)."</i> | Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change |
| | It is recommended that the following text is added to this Policy: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to</i> | The additional text provides useful clarification. | Additional text after paragraph 5.89: <i>"In order to facilitate development, appropriate contributions would</i> |

| Plan policy | Recommendations | Council Response | Plan amendment |
|-------------------------------------|---|---|--|
| | <i>increase capacity at local GP surgeries and dentistry at the town."</i> | | <i>be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i> |
| Site allocation H2.8 Bore Hill Farm | It is recommended that further consideration is required within the Plan to the extent of development at this site to reduce the impact on BMV. | The benefits of proposals outweigh harm from any loss of BMV. Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and the re-use of soil would be sought as a part of the planning application process and may be conditioned as part of planning permission. | No change |
| | It is recommended that the following text is added to this site allocation: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i> | The additional text provides useful clarification. | Additional text after paragraph 5.92: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i> |
| | Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H2.8. | Parts of the site could potentially be affected by noise, so additional text would be useful clarification. | Add to paragraph 5.92: <i>"... located between the operational bio-digester and proposed residential development, to provide separation between these uses. A noise assessment would form part of the planning application process and to inform detailed design and</i> |

| Plan policy | Recommendations | Council Response | Plan amendment |
|--|--|---|--|
| | | | <i>layout. Future development..."</i> |
| Site allocation H2.9 Boreham Road | It is recommended that appropriate mitigation for the landfill / rubble within this site should be identified within the site allocation supporting text. | Soil condition would be considered as a part of the application process and/or conditioned as part of planning permission. | No change |
| | The moderate adverse effect on education and health facility capacity is not addressed in the supporting text for Warminster or the site allocation. It is recommended that the following text is added to this site allocation. <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town."</i> | The additional text provides useful clarification. | Additional text after paragraph 5.98: <i>"In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries at the town."</i> |
| Site allocation H2.10 Barthers Farm Nurseries, Chapmanslade | It is recommended that the site allocation text specifically identifies the need for detailed ecological assessment at this site. | Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 50. | No change |
| Policy H2.11 The Street, Hullavington | It is recommended that the Policy text specifically identifies the need for detailed ecological assessment at this site. Furthermore, it is recommended that the requirement for a Heritage Impact Assessment is specifically identified in the Policy text. | Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 50, and Heritage Impact Assessment in Core Policy 58. | No change <u>The requirement for site-specific Heritage Impact Assessment has been strengthened in the Schedule of Proposed Changes.</u> |
| Site allocation H2.12 East of Farrells Field, Yatton Keynell | Site allocation H2.12 and its supporting text does not specifically address the moderate adverse effects related to the limited supply capacity in local distribution mains, the potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. It is recommended that these issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3. | No change <u>The Schedule of Proposed Changes requires a Flood Risk assessment and comprehensive drainage strategy for this site.</u> |
| | Given the medium potential for archaeology at this site, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation text. | Further text would replicate measures or objectives already included in the development plan regarding biodiversity, in Core Policy 58. | No change <u>This is addressed generically in Section 5.5 of the Plan. No</u> |

| Plan policy | Recommendations | Council Response | Plan amendment |
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| | | | further action required. |
| Site allocation H2.13 Ridgeway Farm, Crudwell | Site allocation H2.13 and its supporting text does not address the moderate adverse effect related to the fact that the site is within Groundwater Source Protection Zone 1 and potential significant effects on water quality could arise from development. Any discharge into the local watercourses would need to be at a controlled rate, however surface water systems are already at capacity in this location. It is recommended that these issues are identified in the site allocation supporting text, and the need for further assessment is required. | A hydrological/ hydrogeological risk assessment may be required in order to support development proposals. This would form part of detailed design and consideration as part of the planning application process in accordance with Core Policy 67. | No change |
| | Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment as well as a Heritage Impact Assessment as this site is near Crudwell Conservation Area is specifically identified in the site allocation text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58. | No change |
| Site allocation H2.134 Court Orchard / Cassways Bratton | Site allocation H2.134 and its supporting text does not address the moderate adverse effect related to the fact that there are water pressure problems associated with the supply of water in Bratton and therefore a long offsite connection to mains water would be needed to provide capacity. Various infrastructure upgrades would be required for foul and surface water connections. It is recommended that these issues are identified in the site allocation supporting text, and the need for a foul flow capacity assessment is identified in the supporting text. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3. | No change <u>The Schedule of Proposed Changes requires a Flood Risk assessment and comprehensive drainage strategy for this site.</u> |
| | Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58. | No change <u>This is addressed generically in Section 5.5 of the Plan. No further action required.</u> |
| Policy H3 South Wiltshire Housing Market Area | | | |
| Individual site policy/site allocation within Policy H3 | | | |
| Policy H3.1 Netherhampton Road, Salisbury | It is recommended that the Policy text identifies the need to reduce the loss of best and most versatile agricultural land where possible. It is recommended that should the site be developed, the following text is added to this Policy: <i>“Development will seek to reduce the overall loss of best and most versatile agricultural land wherever possible. The loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an after use appropriate to the soil’s quality).”</i> | Minimising the loss of best and most versatile agricultural land, in accordance with national policy, and re-use of soil along these lines would be sought as a part of the master planning process and/or conditioned as part of planning permission. | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
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| | Given the high potential for archaeology, it is recommended that the requirement for an archaeological assessment and a noise impact assessment are specifically identified in the Policy text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58. | No change <u>This is addressed generically in Section 5.5 of the Plan. No further action required.</u> |
| Site allocation H3.2 Hilltop Way | Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement for a noise impact assessment is included within the text of site allocation H3.2. | Any need for an assessment will be considered through a planning application process. | No change |
| Site allocation H3.3 North of Netherhampton Road | Site allocation H3.3 and its supporting text addresses the moderate adverse effect in relation to flood risk, however does not specifically identify the limited capacity in local sewers; it would need to be confirmed whether any network reinforcement is necessary to maintain satisfactory service levels. It is recommended that this is identified in the site allocation supporting text and the need for further assessment identified. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3. | No change |
| | Given the medium potential for archaeology, it is recommended that the requirement for an archaeological assessment is specifically identified in the site allocation supporting text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58 | No change <u>This is addressed generically in Section 5.5 of the Plan. No further action required.</u> |
| Site allocation H3.4 Land at Rowbarrow | Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H3.4. | Neighbouring uses are generally low key. Any need for an assessment will be considered through a planning application process. | No change |
| Site allocation H3.56 Clover Lane, Durrington | Site allocation H3.56 and its supporting text addresses the moderate adverse effects in relation to cultural heritage and school and health facility capacity. However, the potential exacerbation of flood risk and difficulty in mitigating due to ground conditions and capacity of drainage is not identified in this site allocation and is not fully covered by the Amesbury, Bulford and Durrington supporting text. It is recommended that additional text should be added to this site allocation to address the requirement for further assessment. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policies 3 and 67. | No change <u>The Schedule of Proposed Changes requires a Flood Risk assessment and comprehensive drainage strategy for this site.</u> |
| | It is recommended that the HRA proposed wording is added to site allocation H3.56, or that general wording is added to Policy H3 that identifies that upgrades [by others] may need to be completed before development at this site can commence. | The HRA concludes that Plan allocations will not have an adverse effect on the integrity of the River Avon SAC. Paragraph 5.147 alludes to this possibility. Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is also a matter for detailed design and consideration as part | No change <u>The Schedule of Proposed Changes includes the following: For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined</u> |

| Plan policy | Recommendations | Council Response | Plan amendment |
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| | | of the planning application process in accordance with Core Policy 3. | <u>in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.”</u> |
| | The supporting text for Amesbury, Bulford and Durrington identifies the need for potential upgrades to the local water supply network; however, the supporting text does not identify that this site is within a Groundwater Source Protection Zone 2. It is recommended that the site allocation supporting text is strengthened by identifying this and the need for further assessment. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policies 3 and 67. The protection of groundwater resources is a matter of detailed design that accords with the Environment Agency’s (EA) standing policy advice. Further text would replicate this position. | No change |
| | Although only minor adverse effects, to ensure that the full suite of measures identified for this site are covered, it is recommended that the requirement a noise impact assessment is included within the text of site allocation H3.56. | Neighbouring uses are generally low key. Any need for an assessment will be considered through a planning application process. | No change |
| | It is recommended that the requirement for a Heritage Impact Assessment is included in the site allocation supporting text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58. | No change |
| Site allocation H3.67 Larkhill Road | The supporting text for Amesbury, Bulford and Durrington identifies the need for potential upgrades to the local water supply network; however, site allocation H3.67 and its supporting text does not identify that this site is within a Groundwater Source Protection Zone 1. It is recommended that the site allocation supporting text is strengthened by identifying this and the need for further assessment. | Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company. This is a matter for detailed design and consideration as part of the planning application process in accordance with Core Policies 3 and 67. The protection of groundwater resources is a matter of detailed design that accords with the Environment Agency’s (EA) standing policy advice. Further text would replicate this position. | No change <u>The Schedule of Proposed Changes requires a Flood Risk assessment and comprehensive drainage strategy for this site.</u> |
| | It is recommended that the HRA proposed wording is added to site allocation H3.5, or that general wording is added to Policy H3 that identifies that | Paragraph 5.147 alludes to this possibility. Infrastructure upgrades may be required and | No change |

| Plan policy | Recommendations | Council Response | Plan amendment |
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| | upgrades [by others] may need to be completed before development at this site can commence. | agreed through dialogue with the relevant water utilities company. This is also a matter for detailed design and consideration as part of the planning application process in accordance with Core Policy 3. | <u>The Schedule of Proposed Changes includes the following: For an interim period, developments within the River Avon SAC catchment should be phosphate neutral, which will be defined in a Memorandum of Understanding with Natural England and Environment Agency. Measures will therefore need to be in place to ensure that developments do not contribute to a net increase in phosphates for the River Avon SAC.</u> |
| | It is recommended that the requirement for a Heritage Impact Assessment is included in the site allocation supporting text. | Further text would replicate measures or objectives already included in the development plan regarding heritage assets, in Core Policy 58. | No change <u>The requirement for site-specific Heritage Impact Assessment has been strengthened in the Schedule of Proposed Changes.</u> |

One additional mitigation measure was identified following SA of the modifications proposed in the Plan Schedule of Proposed Changes, in relation to the new site allocation at The Yard, Hampton Park, Salisbury (as reported in Section 8.4). The moderate adverse effect identified for this site against SA Objective 3 is not fully covered in the proposed supporting text; it is recommended that, in line with other recommendations from the Environment Agency, that the following text is added:

“Any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.”

Monitoring

The Wiltshire Monitoring Framework has been published alongside the Core Strategy, and will be used to check on the effectiveness of the Core Policies and whether they are delivering sustainable development. The Monitoring Framework will be used to ask whether the policy is working, whether it is delivering the underlying objectives of the policy, and what the significant effects of this are. It sets out objectives and targets for each policy, and identifies the indicators which will be used to assess progress against these.

Potential indicators for monitoring the likely significant effects of the Plan have been identified as part of this appraisal and are listed under the relevant objective in the SA Framework. The monitoring framework proposed in this SA Report complements the Wiltshire Monitoring Framework.

Identified significant effects against which monitoring should be undertaken are:

- SA Objective 2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
- SA Objective 3: Use and manage water resources in a sustainable manner
- SA Objective 4: Improve air quality throughout Wiltshire and minimise all sources of environmental pollution
- SA Objective 5a: Minimise our impacts on climate change – through reducing greenhouse gas emissions
- SA Objective 5b: Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects
- SA Objective 8: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
- SA Objective 10: Reduce the need to travel and promote more sustainable transport choices
- SA Objective 11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth
- SA Objective 12: Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce

No additional monitoring was considered necessary following a review of the modifications to the Plan Schedule of Proposed Changes.

In order to reach a final framework of indicators for the Annual Monitoring Report (AMR) for the Housing Site Allocations Plan, the Council will need to consider the indicators proposed in the SA to identify those which can be most effectively used to monitor the sustainability effects. This will need to be undertaken in dialogue with statutory consultees and other bodies, as in many cases the monitoring information may need to be provided by outside bodies.

Conclusions

From this sustainability assessment, it is clear that many of the significant beneficial effects relate to social and economic considerations. The main significant adverse effects that have been identified relate to environmental issues, due in part to policies allocating sites on greenfield land but also due to the general effects of housing development and population growth.

Overall, it is concluded that the ~~Draft~~ Housing Site Allocations Plan is broadly compatible with sustainability objectives; adverse effects identified are capable of being mitigated and significant social and economic sustainability benefits are likely. However, further requirements to reduce adverse effects could be added to the Plan to strengthen the overall sustainability of the policies and site allocations.

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