

**COMMENTS & RESPONSES TO THE CONSULTATION DRAFT WILTSHIRE GREEN & BLUE INFRASTRUCTURE STRATEGY (SEPTEMBER 2021)**

Respondent	Comment	Council's Response
<p><b>Forestry Commission (South West Area Team)</b></p>	<p>We welcome the Council's concern over the biodiversity and climate crises that as a nation we face, and the desire to reach carbon neutrality and to mitigate the impacts of climate change for the residents of the county be they human, animal or plant. I have identified many areas where additional tree planting could help the strategies achieve these outcomes.</p> <p>Overall, the documents advocate tree planting in the urban realm which we welcome. The plans are much less supportive of planting in rural areas. For example: Theme 4: Woodland and Trees reviews urban tree and is silent on rural woodland, box 4.9 states "in urban areas tree... help improve air quality... preventing pollutant concentration, and by producing oxygen..." Trees deliver these benefits in any location and this sentence seems to imply that <u>only</u> urban trees will deliver these benefits.</p> <p>Whilst woodland creation in the rural setting, where trees are used to create new woodland to expand and connect existing habitats in the wider environment, is briefly mentioned, the plan is not as strong in identifying the role that this can have in helping the county achieve its carbon targets and using trees as a nature-based solution to mitigate the impacts of climate change. As an example Theme 1: Flooding and Water Management is virtually silent on the role that trees play despite this being one of the most helpful of the many nature based solutions trees provide. There is a significant missed opportunity here and I hope that the benefits of new woodland can be better communicated and considered more fully.</p> <p>Fundamental to ensuring high quality appropriate woodland creation in the county will be to have a set of guiding principles, and most counties are working towards a Tree and Woodland Strategy to agree and communicate these. I am pleased to note the reference to a Strategy on page 54 and would offer to help support the creation of this important document ensuring that all woodland stakeholders are able to contribute, including among others: representatives from the forest industry, woodland conservation bodies, protected landscapes, recreation groups as well as those speaking on behalf of the public.</p>	<p>Noted.</p> <p>Reference to rural tree planting has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees (Box 4.9 Carbon Capture and Improving Air Quality)</p> <p>The role of trees in helping to reduce flooding and help manage water quantity, meet carbon zero targets and improve connectivity across the landscape has been strengthened in Section 3.3 (Box 3.7 Priorities for Action); Section 4.2 - Theme 1 Flooding &amp; Water Management; and Theme 4 - Woodland &amp; Trees</p> <p>Noted</p>

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	<p>A Tree Strategy can also determine the "Right Tree Right Place principles" (RTRP) which are referenced within the consultation document but are undefined.</p> <p>I have specific points that I would raise:</p> <p>Green &amp; Blue Infrastructure Strategy</p> <ul style="list-style-type: none"> <li>• Page 12. The list does not include the emerging Tree and Woodland Strategy.</li> <li>• Page 30. Reference to RTRP in box 3.7 only shows that trees provide urban shade. A full list of the benefits of trees could be added to help communicate</li> <li>• Page 33. Mention is made of 'inappropriate... land management' but the term remains undefined and unhelpful. A framework for decision making would help determine what is appropriate; we would strongly advocate that a natural capital approach be used to better understand the 'costs' of existing and 'benefits' of potential alternative land-uses. This approach captures the huge range of benefits that woodland provides to society and makes larger scale creation more palatable.</li> <li>• Page 45. This section has a single mention of tree planting at the end of a list where other actions are explained with the resultant benefits undervalues the role that trees play. This should be expanded to show that: <ul style="list-style-type: none"> <li>- trees catch rainfall to prevent water even reaching the soil and adding to flooding, this can amount to 40% of annual rainfall</li> <li>- Trees increase infiltration of water deep into the soil reducing surface water flows and recharging the ground water, this also helps prevent future drought</li> <li>- Tree roots stabilise soil and prevent erosion</li> <li>- Trees are the most effective landcover to 'slow the flow' by increasing surface roughness helping to decouple surface flows and effectively reduce flooding</li> <li>- Trees are needed to provide material to form the leaky woody dams cited elsewhere and, should beaver reach the Wiltshire rivers, will help create the habitat these animals need to thrive and deliver the water management benefits.</li> </ul> </li> </ul>	<p>"Right Tree Right Place" principle definition has been clarified in Theme 4 - Woodland &amp; Trees</p> <ul style="list-style-type: none"> <li>• Noted – text amended to clarify these are a list of existing strategies</li> <li>• Box 3.7 updated.</li> <li>• Noted – to be considered for inclusion in the Settlement GBI Frameworks</li> <li>• Reference to tree planting benefits has been strengthened in Section 4.2 - Theme 1 Flooding &amp; Water Management</li> </ul>

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	<ul style="list-style-type: none"> <li>- Trees do this as the most cost-effective flood management tool we have yet identified and do this whilst also sequestering carbon, creating habitat and a renewable resource</li> <li>• Page 48. The addition of encouraging farmers to plant trees as part of an agroforestry system will be the single most effective solution to achieving the aims of this Theme. Trees will rapidly improve soil quality as tree roots ameliorate soil compaction, add nutrients and carbon to the soil more quickly and roots will help reduce soil erosion. The trees will also provide fodder, shade and shelter for livestock ensuring they stay healthier and more productive. It is disappointing not to see this reflected in this Theme.</li> <li>• Page 52. We agree that it is crucial to protect the beautiful landscapes of the County it seems that some acknowledgement of the impacts that climate change will have on these would be appropriate. Current expectation is that these landscapes will suffer significant negative change if we do not quickly achieve net zero carbon, so some element of mitigation of these impacts should be included here and the case for positive change outlined. Keeping the landscape unchanged does not seem to be an option available to us at this time.</li> <li>• Page 54. Support for the Great West Community Forest could be made more explicit. The Community Forest has recently been given a significant increase in funding and this comes with the greatest opportunity for woodland creation anywhere in the county. For the Community Forest to only appear this late in the document makes it appear as an afterthought.</li> <li>• Theme 4 – I believe this section needs to be expanded to reflect on the current threats to the existing woodlands such as Ash Dieback, Oak Decline and other potential pests and diseases. The loss of 'ordinary' trees will have large negative consequences and impact on the character of the landscape, some element of the plan to focus on the replacement and enhancement of existing woodland would be prudent</li> </ul>	<ul style="list-style-type: none"> <li>• Reference to benefits of trees has been strengthened in Section 4.2 - Theme 2 Sustainable Farming &amp; Land Management</li> <li>• Noted - protected landscapes such as AONBs have their own management plans through which achieving the objective of net zero carbon should be considered.</li> <li>• Reference to the Great West Community Forest has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees</li> <li>• Noted – threats to trees and woodlands from pest and diseases reflected in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management</li> </ul>

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	<ul style="list-style-type: none"> <li>Principle 2: An Integrated Approach. I welcome the more joined up thinking identified here but would suggest it should not be limited to a Catchment Based Approach which is a geographical approach focussed on the single issue of water. The integration of a Natural Capital Based Approach would be more useful on a county scale where all partners could work to integrate carbon, wildlife, sustainable resource management, recreation, etc and optimise and maximise the outcomes across the entire landscape resulting in much greater integration.</li> </ul>	<ul style="list-style-type: none"> <li>Noted - this will be addressed in other documents such as the Local Nature Recovery Strategy</li> </ul>
<b>Salisbury and Wilton Swift Group</b>	<p>Goal 2 is 'Halting loss of &amp; improving biodiversity', but the Strategy's focus is green spaces/corridors, the importance of tree planting and rivers etc. There is huge opportunity being missed by having no reference to the 'Built Environment' and the need for both preserving and enhancing biodiversity in this ever-growing man-made environment.</p> <p>There are references to the Built Environment in many of the Government's recent publications: NPPF, Natural Environment Guidance, paragraph 023, Reference ID: 8-023-20190721 How can biodiversity net gain be achieved? Provides further guidance stating "...relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat."; Government press release (21/07/19) James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication stated: "For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people." Thus the Government's support for such measures was stated explicitly; "Living With Beauty" (30/01/20) the Government's Building Better Building Beautiful Commission report recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110); National Model Design Code Part 2 Guidance Notes N.3 Biodiversity states: "Biodiversity can be enhanced through facilitating habits and routes for wildlife, for example, incorporating trees, wildflowers, ponds, bat and bird boxes, bee and bird bricks and hedgehog highways."</p>	<p>Noted - reference to the GBI benefits of the built environment are included throughout the document</p> <p>Noted – opportunities for swift bricks and other such ecological enhancement measures in housing and structures are included in the Community Environmental Toolkit, will be considered as part of the emerging Design Guide and will considered for inclusion in the Settlement GBI Frameworks</p>

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	<p>The Built Environment is too easy to over-look. A document as important as the GBIS must refer to the Built Environment with examples of simple, cheap and effective ecological enhancement measures that can be taken to increase biodiversity. Such measures being good for our health &amp; wellbeing, good for wildlife, good for biodiversity and a positive step towards reducing the impact of climate change. Bird, bat and bee bricks, bird and bat boxes, hedgehog highways, reptile refugia, hibernacula etc are examples of ecological measures that should be included where appropriate in all new development as well as being encouraged in existing built-up areas.</p> <p>Some species such as the swift have been recognised by the Environment Agency in their State of the Urban Environment report (23/07/21) which states: "People are increasingly living in urban areas, globally and in the UK. Around 80% of people in England now live in urban areas"..... "Some species are considered 'urban specialists'. For example, swifts, which nest in cavities in the roofs of older buildings. Urban specialist birds are a good biodiversity indicator for urban areas, because good quality, long-term data is available, and much is known about their ecology and some of the pressures affecting them. Urban specialist birds have declined in abundance in the UK since 1994 (figure 2). Factors contributing to some of these species' declines include building demolition, renovation and roof repair." <a href="https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment">https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment</a>.</p> <p>During the public webinar there was a slide headed 'Section 5 The Way Forward' which highlighted the importance of monitoring species and habitats in order to measure improvements. The swift is a particularly good example to quote in the G&amp;BIS as it is listed as a Priority Species on the Wiltshire Biodiversity Action Plan.</p> <p>We are also concerned that the Executive Summary (pg 10) and the full Strategy (pg 15) both show Wiltshire's Biodiversity Action Plan (BAP) as playing a key supporting role. However the BAP was last updated in 2008!! Wiltshire's current website <a href="http://www.wiltshire.gov.uk/article/1102/Biodiversity-and-development">www.wiltshire.gov.uk/article/1102/Biodiversity-and-development</a>, has a heading 'Enhancement', under this heading it states: "Habitat enhancement (as required by the National Planning Policy Framework) should be specifically designed, to help meet targets set out in Wiltshire's Biodiversity Action Plan (BAP), for the latest Biodiversity Delivery Plan for Wiltshire please visit the Link2Nature web page." However Link2Nature is no longer functioning and nothing has been added to the</p>	<p>Reference to examples of ecological enhancement measures within the built environment (including for swifts) have been included in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management.</p> <p>Noted</p> <p>Reference to swifts example included in Section 5.5 Monitoring &amp; Reviewing</p> <p>Goal 2 has been strengthened to emphasise the need to develop a Local Nature Recovery Strategy to help build resilience to climate change and provide opportunities for species and ecosystem recovery (in line with the Environment Act).</p>

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	<p>website since 2014! According to a County Ecologist the BAP is no longer funded by the Government but will be replaced by the Environment Plan which has yet to be rolled out. Without adding a note/reference in the GBIS to the fact that the BAP is to be replaced by the upcoming Environment Bill, the GBIS will be out of date before it is published.</p> <p>Many Local Authorities have Supplementary Planning Documents/Guidance which have detailed planning guidance (see link for example, paragraph 9.28 <a href="https://drive.google.com/file/d/0B4CpCORtOQdTRTNySEnUXdoNTQ/view?resourcekey=0-v9aB6M6WZqJZ4On-qdccCA">https://drive.google.com/file/d/0B4CpCORtOQdTRTNySEnUXdoNTQ/view?resourcekey=0-v9aB6M6WZqJZ4On-qdccCA</a>). Wiltshire does not have such a document, and although we have been told it does recognise the need for one, there is no firm timeframe for one to be produced. Therefore until Wiltshire has such a document it is vitally important that a higher level of detail is captured in the more strategic documents than would normally be necessary.</p> <p>Page 14 of the Executive Summary lists 'key actions', one of which is 'Supporting nature recovery and landscape management', we believe 'including the Built Environment' should be added. The full Strategy document, page 28, states: 'loss of gardens and increases in urban uses often reduce biodiversity'. But there is no mention of using the opportunities the buildings themselves provide; whether they are dwellings or industrial units, ecological enhancements can and should be incorporated. Page 8 of the Executive Summary lists 'assets' but there is no mention of the fact that the Built Environment can also be an 'asset' to a variety of wildlife both in a rural and urban setting. Page 11 refers to 'Biodiversity Sites' and 'Priority Habitats' but all under 'Strategic Green and Blue Infrastructure Sites'. Whilst we appreciate it might not be appropriate to include the Built Environment in every section, it does need to be included somewhere as it is a continually expanding environment which is currently receiving unprecedented government scrutiny and robust policy guidance. Our Wiltshire G&amp;BI Strategy needs to be future-proof and fit for purpose for many years to come. The Local Plan consultation 'Addressing climate change and biodiversity net gain' concentrated almost solely on climate change and did not effectively address and capture the positive moves in biodiversity since the last plan let alone ensure that biodiversity is protected until the next plan which is due 2036.</p>	<p>Noted</p> <p>Reference to examples of ecological enhancement measures within the built environment (including for swifts) have been included in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management.</p>

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<b>Avon Needs Trees</b>	I'm writing from Avon Needs Trees. We are charity planting new permanent forests currently in Wiltshire but also as part of a wider catchment area. It would be great to have a conversation to look at any scope to work together	Noted
<b>Woodland Trust</b>	<p>Thank you for the opportunity to attend your webinar session on the strategies. They were very informative. As the UK's leading woodland conservation charity, the Woodland Trust welcomes the Council's concern over the biodiversity and climate crises that we face, the ambition to reach carbon neutrality and to mitigate the impacts of climate change and would like to explore options for woodland protection, creation and restoration in Wiltshire with you, which would further the ambition of your environmental strategies. Specifically, I would like to draw your attention to the following points within the GBI strategy with you for further discussion.</p> <p>Overall I agree with points raised by the Forestry Commission, in their feedback that whilst the document makes a good case for tree planting in urban areas, there is a lack of clarity of what could be achieved in more rural areas and for trees outside woodland.</p> <p>The Woodland Trust advocates a Right Tree, Right Place approach which would be relevant when applied to the different landscapes of the north and south of the county. Native broad-leafed woodland has a strong role to play in carbon capture and the Woodland Trust has schemes available for offsetting carbon through woodland creation. I attach an introductory guide. I look forward to the development of the Tree and Woodland Strategy mentioned on page 54 and look forward to working with you on achieving your tree cover targets.</p> <p>My first observation is that the list of documents on page 12 does not include the emerging Tree and Woodland Strategy.</p> <p>We would welcome a strategy that includes the benefits of hedgerows for nature recovery as well as trees outside woods.</p>	<p>Noted</p> <p>Reference to rural tree planting has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees (Box 4.9 Carbon Capture and Improving Air Quality)</p> <p>Noted</p> <p>Noted – text amended to clarify that these are a list of existing strategies and make reference to Diagram 2.2.</p> <p>Reference to hedgerows has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees</p>

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	<p>Further comments:</p> <p>Green and Blue Infrastructure Strategy</p> <p>Page 27: A statement is made regarding the local plan to help achieve the challenge. It would be good for the GBI strategy to expand on this to explain what you would like to see the Local Plan include to do this. Will the plan include allocations which make provisions for nature-based solutions and for woodland protection and creation, as well as allocations for development? Land used for woodland creation requires recognition and protection from development, as we are seeing cases where after a decade, these sites are developed. Young woodland is not valued highly for diversity at that point and therefore the land is not ringfenced. We foresee that woodland creation for Carbon will go some way to remedying this, as this attaches direct revenue to the land and should afford protection for a substantial amount of time. However, this should not detract from the need to create woodland for the benefits of biodiversity as an objective in itself.</p> <p>Page 31: I would like to see woodland included in the first paragraph's description of the Vision for GBI in Wiltshire. It has a complimentary role in the county to the downland landscapes.</p> <p>Page 33: It is good to see the mention made of irreplaceable habitats such as ancient woodlands. This paragraph could be strengthened by a reference to the NPPF provisions for such habitats. The strategy should define ways in which these habitats will be protected from development including, mapping and data, such as the Ancient Tree and Woods inventories, to understand where they are, buffer zones to reduce the impact of development and ring fencing these habitats in the local plan.</p> <p>Page 35: I am pleased to see how you have integrated the themes of the Lawton Report into More GBI, Higher Quality GBI and Better Connected GBI in the strategy</p> <p>Page 38: Trees have a role to play in many of the nature-based examples you have bulleted which is a further reason for increasing tree cover in the county and I would be keen to understand more about your ambitions for planting 180,000 hectares by the end of 2042. The Woodland Trust has schemes in place for supporting local authorities with their tree planting and it would be good to open a</p>	<p>Noted - Biodiversity Net Gain requirements will be mandated as part of the Environment Act and the Local Plan will reflect this in policy changes. The Local Nature Recovery Strategy will consider the benefits of habitat protection and enhancement for biodiversity (including for woodland habitat).</p> <p>Noted – woodland and trees are a key delivery theme of the GBI Strategy</p> <p>Reference to the NPPF mitigation hierarchy has been strengthened in Section 3.2 – Our Vision for GBI in Wiltshire (Box 3.5 Safeguarding the Integrity of the GBI Network)</p> <p>Noted</p> <p>Noted</p>



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	<p>conversation with yourselves about how we can unlock this. The Woodland Trust's Outreach Officer, [REDACTED] has worked with [REDACTED] with planting design and tree delivery with the Chippenham Net Zero project and we are supporting tree supply this coming season. It would be excellent to explore this further to help you to achieve these ambitions.</p> <p>Page 40: I welcome your note on enhancing biosecurity measures. The Woodland Trust advocates for all trees to be UK sourced and grown (UKISG). It would be excellent to see Wiltshire Council adopt this standard for tree procurement. All trees sourced through the Woodland Trust would meet this important benchmark.</p> <p>Page 43 and Theme 3, page 49: We would welcome the opportunity to work with you in delivering landscape scale conservation to achieve a high-quality, well-connected, and multi-functional GBI network through a local nature partnership group.</p> <p>Page 45: More could be made of the valuable role that trees can play in slowing the flow and increasing the resilience of rivers to flooding events. It would be good to describe here some examples of riverbank restoration for example, increasing biodiversity through the removal of invasive species and promotion of riparian woodland.</p> <p>Page 52: I would echo the feedback from the Forestry Commission in their response, that to be more resilient to climate change, many of the landscapes you have described will need to adapt if they are not going to suffer significant adverse impacts. Some elements of mitigation should be included here and the case for positive nature based solutions outlined. It is highly likely that the landscape of the future will be different to that now, and so an unchanged landscape does not seem to be an available option at this time.</p> <p>Page 53: I welcome the inclusion of Theme 4 and would welcome the opportunity to talk through this theme and how the Woodland Trust can support this ambition with your officers and members. It would be good to see a reference made to the backing offered nationally in paragraph 131 of the NPPF which notes the importance of urban trees for the benefits you have outlined: 'Planning policies and decisions should ensure that new streets are tree-lined'.</p>	<p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p> <p>Noted</p> <p>Reference to tree planting benefits has been strengthened in Section 4.2 - Theme 1 Flooding &amp; Water Management</p> <p>Noted - protected landscapes such as AONBs have their own management plans through which achieving the objective of net zero carbon should be considered.</p> <p>Noted – this is reflected in Box 4.10 Urban Trees</p>

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	<p>Page 54: Swindon Council has a significant ambition to increase the size of the town through its local plan. We would urge Wiltshire Council to work with them to ensure that the aims and objectives of the Community Forest continue to be met and biodiversity corridors into Wiltshire are not threatened by such development.</p> <p>Page 55: This theme could be strengthened with some clear examples of how the GBI will deliver more health and wellbeing benefits to the people of Wiltshire, rather than setting the scene as it largely does in its current form. Studies have shown significant benefits to those involved both in creation of habitats and planting and then the clear community benefits from access to that green infrastructure once created.</p> <p>Page 58, and page 67: I would urge caution around biodiversity net gain and the opportunities it offers. Research is showing in the UK that the offer made for 10% increase in biodiversity through the planning system can have unforeseen, inadvertent effects on biodiversity and when measured by other means, biodiversity has often suffered on the whole. I would therefore encourage a statement ensuring that the planning arrangements in Wiltshire will make effective provision for nature by protecting the biodiversity hotspots of the county and making these bigger, better and more connected through a Local Nature Recovery Strategy. I welcome your messages around nature recovery</p> <p>Page 62: I concur with comments made by the Forestry Commission here and that linkages should be strengthened here to the Local Nature Partnership, Local Nature Recovery strategy and not only to Catchment Based Approaches.</p> <p>Page 64: The Woodland Trust can support you in your evidence led approach with a series of publications with policy positions, and research reports. I would urge that you read our State of Woods and Trees Report 2021 report, published earlier in the year which can be used to guide your understanding of the plight of woods and trees.</p> <p>Page 71: The Woodland Trust has been working with Wiltshire Council and we would like to explore opportunities to do this further. Therefore, we would like to be considered as a partner.</p>	<p>Reference to the Great West Community Forest has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees</p> <p>Reference to evidence of health and well-being benefits of GBI has been strengthened in Section 4.2 - Theme 5: Healthy Living and examples can be found in the Evidence Base document.</p> <p>Noted - Biodiversity Net Gain requirements will be mandated as part of the Environment Act and the Local Plan will reflect this in policy changes. The Local Nature Recovery Strategy will consider the benefits of habitat protection and enhancement for biodiversity (including for woodland habitat).</p> <p>Noted - this will be addressed in other documents such as the Local Nature Recovery Strategy</p> <p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p> <p>Noted – Woodland Trust logo added to Diagram 5.1</p>

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	<p>Climate Strategy 2022-2027 I would like to comment on 2 key aspects of the climate strategy. Firstly, I agree with the Forestry Commission's comments that the paragraph including the phrase "An area the size of Wiltshire completely covered with trees could absorb on 1/3 of our county's emissions' is not helpful to include. This paragraph does not seem to recognise the ambition of the GBI strategy for the Right Tree in the Right Place, nor is it an accurate representation of how to reduce carbon emissions. Trees should only be planted to offset carbon when all other measures to reduce emissions have been taken. I believe that the public could be very confused by this statement, and it does not assist with their understanding of this complex issue. This statement could be improved with the wording that it takes four trees, one hundred years to take up four tons of carbon and so we need to reduce our carbon emissions significantly. Secondly, I would like to reiterate that more reference could be made in this document to the Tree and Woodland Strategy. However, this should not all be about planting. I would urge the council to Protect the woodlands it has and make no exceptions to the NPPF's paragraph 180 (C), on irreplaceable habitats in its planning decisions and would welcome more detailed ambitions and targets around woodland creation and increasing canopy cover in Wiltshire.</p> <p>We would welcome the opportunity to work with you on woodland protection and creation and look forward to seeing how your strategy moves forward into clear positive action in Wiltshire for the benefit of Nature, People and mitigating climate change.</p>	<p>Noted – to be considered as part of the Tree &amp; Woodland Strategy and see also responses to Climate Strategy consultation</p> <p>Noted</p>
<b>RSPB</b>	<p>Overall, we are supportive of the vision and goals. The Local Nature Recovery Strategy and proposed Wiltshire Climate and Environmental Forum are integral to delivery and monitoring, we would welcome an opportunity to input into these through key partnerships.</p> <p>We feel opportunities have been missed in relation to biodiversity within the built environment. The Executive Summary document (p8) describes local/urban scale GBI. Buildings assets focuses on GI primarily in relation to water attenuation. Reference should be made here, and elsewhere in the document, when referring to GBI to include the built environment such as provision for cavity nesting species e.g. swifts and bats within buildings.</p>	<p>Noted</p> <p>Reference to examples of ecological enhancement measures within the built environment (including for birds and bats) have been included in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management.</p>

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	<p>Principle 6 – Planning Principles (p67) within the strategy documents outlines the Councils plans to “seek to secure biodiversity and wider environmental net gains for our natural capital from new development by encouraging applicants for major development proposals to take into account the GBI principles” as highlighted. We would suggest that this principle applies to all scales of development which should seek to integrate biodiversity as standard, swift boxes for example can be incorporated relatively easily and inexpensively when considered early in the build design.</p> <p>There should be detail and clarity around the Councils expectations from developers at the outset, a Supplementary Planning Document outlining build/development design would be invaluable to ensure GBI is fully incorporated in the early phases.</p>	<p>Reference to major development proposals removed in Section 4.2 - Theme 6: Planning Principles.</p> <p>Noted – opportunities for ecological enhancement measures in housing and structures are included in the Community Environmental Toolkit, and are to be considered as part of the emerging Design Guide and the Settlement GBI Frameworks.</p>
<p><b>Positive Nature</b></p>	<p>This is to register my interest in being involved in future action partnerships and steering groups relating to your green and blue infrastructure strategy for Wiltshire. I’m organising a panel talk on sustainable food and farming next March set against the backdrop of the climate change, biodiversity and health crises in particular stimulating debate around future land use, agroecology, health and local food with an interesting line up of speakers. I’m also involved in nature conservation and other sustainability issues.</p> <p>I’m the founder of Positive Nature, a modest not-for-profit organisation celebrating the wonder of the natural world and promoting sustainable living and wellbeing [REDACTED] I organise talks and other activities and also work in partnership with other organisations on projects of mutual interest. Recent projects include a best practice resource for accommodation providers in wilderness areas in India and Nepal for TOFTigers based around their sustainability standard recognised by the UN-backed Global Sustainable Tourism Council.</p> <p>It’s positive to read the Council’s climate and green and blue infrastructure strategies. I would welcome an opportunity to discuss the talk on food and farming with you and your colleagues.</p>	<p>Noted</p>

Respondent	Comment	Council's Response
<b>Private individual</b>	In the green/blue infrastructure [strategy] there is too much emphasis on economic growth. However any examination of the problem indicates that economics needs to evolve beyond the strategies first put in place in economics 101 nearly 100 years ago. Abandon the emphasis on economic growth and look to more forward thinking strategies such as Doughnut Economics as implemented in Amsterdam, Barcelona, and my own business. The circular economy is part of the solution, and the focus on the sustainable development goals is excellent. Doughnut economics brings all of these elements together under one umbrella	Noted – the natural capital approach to assessing and valuing the economic importance of the ecosystem services provided by GBI is highlighted in Section 4.2 - Theme 6: Economic Recovery & Valuing Natural Capital
<b>Cranbourne Chase AONB</b>	<p>1. The Cranborne Chase Area of Outstanding Natural Beauty Partnership welcomes Wiltshire Council's Green and Blue Infrastructure Strategy. The make up of this AONB partnership and the status of this AONB are set out in Annexes A and B respectively.</p> <p>2. You may already be aware that AONB Management Plans, not just for this AONB but also for the North Wessex Downs and Cotswolds, are key strategy documents that have been adopted by Wiltshire Council. They constitute Wiltshire Council's policies for the management of these AONBs. Cranborne Chase AONB Partnership therefore recommends that the AONBs should be more readily visible throughout the strategy.</p> <p>3. AONBs are, in reality, mega green and blue resources. Local nature recovery strategies need to mesh with the established AONB management plans. However, the AONBs are not identified on diagram 1.2, GBI Networks, and this seems to be a significant omission. Clearly the AONBs are the largest identifiable landscape scale elements of green blue infrastructure in the county.</p> <p>4. Whilst I see that the New Forest National Park is identified on map 1.1 which sets out the location and context of the county, the AONBs, which are nationally equally important landscapes as those of the National Parks, are not shown. This AONB Partnership recommends they should be shown on map 1.1.</p> <p>5. Whilst section 2.2 helpfully puts forward an outline of Wiltshire's landscape context the strategic GBI sites in section 2.3 are identified as either 'natural assets' of three types of wildlife site or one historic environment designation. There is no mention of landscapes in relation to sites. Similarly, the strategic GBI corridors are</p>	<p>Noted</p> <p>References to AONBs, and AONB Management Plans, strengthened throughout the document where appropriate.</p> <p>Noted - the Local Nature Recovery Strategy will be developed in partnership with the AONBs and other key stakeholders, environmental groups and the community. AONBs added to Diagram 1.2.</p> <p>AONBs added to Map 1.1.</p> <p>Reference to evidence base for further details added</p>

Respondent	Comment	Council's Response
	<p>identified separately and their relationships with the national landscapes are not identified. International Dark Sky Reserve 2019</p> <p>6. Whilst it is helpful to identify the AONBs as sub regional strategic GBI there seems to be a bit of confusion in relation to the cross cutting nature of GBI. The AONBs and National Parks already cover many of these issues at a strategic level. Where GBI usefully gets into greater detail is in relation to amenity green spaces, allotments and school grounds and sports fields. Many of these have less rich biodiversity than the AONBs and clearly they present opportunities to enhance these aspects.</p> <p>7. It may be the way the document is laid out online but it appears that map 2.1, the Strategic GBI Network, does not have a key to identify the various elements.</p> <p>8. The maps 2.2 through to 2.13 helpfully identify some of the overlapping aspects of the elements included within the scope of GBI. However, section 2.4, defining strategic GBI Priorities and Opportunities, does not cross reference to AONB Management Plans or identify the AONBs as areas where partnerships already exist for the encouragement and facilitation of GBI actions.</p> <p>9. Section 3 helpfully identifies three overarching themes, namely climate change, biodiversity, and health and well-being. These are addressed in our AONB Management Plan so, again, there could be greater cross referencing.</p> <p>10. It appears that the local GBI settlement frameworks identified in map 2.16 mean that the Salisbury and Warminster frameworks could impact on this AONB but there appears to be little by way of further guidance on what the frameworks could or should include.</p> <p>11. Government has been clear that it has had intentions of moving forward the implementation of its strategic 25 Year Environment Plan and that the special landscapes of the Areas of Outstanding Natural Beauty and National Parks would get special attention. The Farming in Protected Landscapes scheme announced in the summer applies directly to the AONBs and National Parks to take forward projects that are tailored to the local landscape character and further the themes of improving soils and ensuring the countryside is teeming with wildlife. The conservation and enhancement of landscapes is, of course, inherent within this</p>	<p>Noted – GBI opportunities at a local scale are to be considered in the Settlement GBI Frameworks.</p> <p>Elements on Map 2.1 keyed out in the text.</p> <p>Reference to evidence base for further details added</p> <p>Noted</p> <p>References to the purpose of the Settlement GBI Frameworks strengthened throughout the document where appropriate.</p> <p>Reference to the Farming in Protected Landscapes scheme included in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management</p>

Respondent	Comment	Council's Response
	<p>project, focusing as it does on the nation's finest designated landscapes. This AONB Partnership does, therefore, recommend that the Green Blue Infrastructure Strategy identifies this externally funded initiative which utilises the relationships the national landscapes have built up with their local farming communities and also engages with Local Assessment Panels to evaluate the projects, the scope of which seems to be entirely within the ambit of the Green Blue Infrastructure Strategy.</p> <p>12. Whilst acknowledging that setting out the background and context for the GBI Strategy is important, the document seems to take quite a time to progress to setting out a vision. That vision clearly echoes Sir John Lawton's report from a decade ago seeking more, high quality, and better connected. Whilst the Vision, diagram 3.1, builds on the three themes of biodiversity, climate change, and health and well-being, many of the elements seem to relate somewhat aspirationally just to bigger, better and more. Nevertheless, the AONB fully supports the three goals of</p> <ol style="list-style-type: none"> <li>1) adaptation and resilience to climate change,</li> <li>2) halting loss and improving biodiversity,</li> <li>3) contributing to health and well-being.</li> </ol> <p>The five Priorities for Action in box 3.7 are more precise in relation to the rather generalised earlier statements. With the exception of creating more and better green spaces in towns, the other four priorities all fall within the compass of AONB Management Plans. As I have just mentioned, the encouraging of environmentally sensitive farming is being specifically actioned in the AONBs and National Parks at the moment.</p> <p>13. Of the six delivery themes, section 4.2, flooding and water management appears to be the least engaged with AONB Management Plans, however this AONB does have a current active project on the River Ebble, A Crystal Clear Ebble, and that could serve as an exemplar scheme.</p> <p>14. I have already referred to the sustainable farming schemes in this AONB and this AONB has pioneered farm clusters for the farming communities to initiate their own ways of achieving nature recovery and sustainable farming. See Farming in Cranborne Chase. This AONB has, for many years, had a very active conservation advisor.</p>	<p>Noted</p> <p>Noted – to be considered in the Settlement GBI Frameworks.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>15. The dual aim of valuing natural capital and economic recovery is finely balanced as economic returns and business projects are not necessarily those that are most sensitive to the natural environment. The AONB sector contributes to those aims through the planning consultation processes at both policy and planning application levels. Seeking environmental net gain and the capture and utilisation of renewable energy are but two ways of seeking to achieve effective development that minimises adverse impacts on the environment and encourages environmental enhancements. Many of this AONB's activities are based around healthy living and encouraging outdoor activities even though we have less high profile projects than some of our fellow AONBs.</p>	Noted
	<p>16. We have a significant history of working with our woodlands and trees, recognising that not all of our landscapes are typified by trees and woodlands. We are concerned that additional tree planting should not impact adversely on landscape character and historic sites. We have, therefore, recently produced Right Tree Right Place Guidance to assist with delivering more trees in the right place in the landscape so that iconic views and characteristic open landscapes are not prejudiced.</p>	Noted
	<p>17. The case studies that are in the delivery themes are helpful, and they bring to life what could appear to be a fairly standardised approach.</p>	Noted
	<p>18. The Delivery Principles set out in section 4.3 echo those in our adopted AONB Management Plan. It is noted that on page 66 reference is made to a Wiltshire Landscape Strategy and hopefully the authors of that will engage with the AONBs; they already have overarching landscape management documents and policies in their adopted AONB Management Plans. Whilst the proposal a Wiltshire Climate and Environment Forum is welcomed it does seem that this is a Local Nature Partnership under another name. The general thrust of the Green Blue Infrastructure Strategy seems to embrace much wider environmental issues and the Cranborne Chase AONB Partnership strongly advises that such a forum should have a substantial landscape component covering not just the protected landscapes but also the relevant professions.</p>	Noted



Respondent	Comment	Council's Response
	<p>19. The Cranborne Chase AONB Partnership welcomes the Green Blue Infrastructure Strategy and observes that the document as currently presented has a number of useful and enlightening case studies, but it does take quite a lot of space to get over the messages. It seems that the need for green blue elements within existing and proposed settlements requires considerable attention to detail whereas the broader strategic aims across the rural parts of the county can be dealt with in more flexible and aspirational ways. In the latter situation the AONBs and National Park cover a substantial part of the County and with partnership working much can be achieved. A focus on Green Blue features and facilities near to the settlements and places where people live should, perhaps, be the catalyst for additional coordinated action.</p> <p>20. This AONB is the 14th International Dark Sky Reserve in the world and we are, therefore, very conscious of the need to prevent light pollution, avoid the adverse impacts of light pollution on human health and wildlife, and facilitate the appreciation of the night skies. This does seem to be a topic that is relevant to the Green Blue Infrastructure Strategy and therefore this AONB recommends that it is included. The AONB would, of course, be happy to help with that aspect.</p> <p>I hope these comments are helpful to you, and, as you will have gathered, the AONB Partnership would be happy to join in taking the concept of Green Blue Infrastructure forward.</p>	<p>Noted – to be considered in the Settlement GBI Frameworks.</p> <p>Reference to the appreciation of the wellbeing benefits provided by dark skies included in Section 4.2 - Theme 3: Nature Recovery &amp; Landscape Management (in addition to existing reference to the International Dark Sky Reserve in Box 4.8).</p>
<p><b>Wiltshire Climate Alliance</b></p>	<p>Wiltshire Climate Alliance is an umbrella organisation for groups and individuals to campaign for a Carbon Neutral Wiltshire. Its vision is a net zero carbon Wiltshire by 2030, including all sectors of society, government, and the economy. We are motivated by the global climate emergency, which was recognised by Wiltshire Council in a February 2019 resolution. Our members generally are also concerned with the global and local ecological or biodiversity emergency, seeing links with global heating and climate change as well as pollution. Many of us also see aspects of public health and social exclusion as having emergency status. WCA are very excited that Wiltshire County Council is developing this high-level strategy in anticipation of the Environment Bill becoming law and in recognition of the importance of protecting, conserving and restoring nature across the county. The understanding in Section 3, Our Shared Vision on the links between climate change and nature is important and welcome.</p>	<p>Noted</p>

Respondent	Comment	Council's Response
	<p>We specifically like the important statement that the strategy is “a rigid document that sets down a clear path to ensure that opportunities are not lost,” (p.3) and welcome the three goals.</p> <p>However, there is consensus in our Steering Group that mitigation of climate change should be mentioned first as it is the most urgent, and that this should be a separate additional goal, a “Goal 0” perhaps, to highlight its significance. WCA’s current petition, with nearly 500 signatures and counting, states, <i>“We the undersigned petition the council to Immediately make carbon reduction the top priority in every council policy, plan and decision, and agree, by end 2021, comprehensive carbon reduction actions with annual targets, to deliver a carbon-neutral county by 2030.”</i> As the council’s Climate emergency webpage points out, carbon reduction is the context for “Developing a Green and Blue Infrastructure Strategy and enabling communities to promote biodiversity in their areas via a new Community Environmental Toolkit.”</p> <p>Wiltshire needs to use every tool it can to reduce carbon and one of those is sequestration. Natural carbon sequestration is a vital ‘net zero’ counter-balance to shortfalls in reduction of emissions. As sequestration is about the land, flora and wetland acting for the planet to reduce carbon, it is appropriate that it sits within GBI. While mentioned, almost in passing, in several areas of the strategy, it is not addressed as a specific action. And as it is so cross cutting of all of the GBI areas it deserves its own place. This will enable it to be on the agenda in any GBI focus area. The ‘Goal zero’ text should mention the 2030 carbon neutral Wiltshire goal from the relevant February 2019 Council Resolution. Appendix X suggests draft wording for this Goal.</p> <p>The key messages from section 1, Setting the Scene mirrors Wiltshire Intelligence view <a href="https://www.wiltshireintelligence.org.uk/key-issues/environment/">https://www.wiltshireintelligence.org.uk/key-issues/environment/</a> and are summarised on p.28 “in recent decades biodiversity in the area has been decreasing.” In Section 3, Our Shared Vision the recognition of the poor natural state of much of the country’s farmed environment, the cumulative and multiple effects of the seemingly innocuous loss of individual front gardens, and the over abstraction of rivers and water, is important.</p>	<p>Noted</p> <p>Goal 1 has been strengthened to emphasise support for reducing carbon emissions and achieving net zero targets through sustaining a health natural environment and nature-based solutions.</p> <p>References to carbon storage/sequestration strengthened throughout the document where appropriate.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>The vision on page 4 of a multi-functional network of “high quality, biodiverse and accessible green and blue infrastructure”, of “multi-functional ecosystem services”, and of these supporting community, health and other social, economic and environmental aims is most welcome.</p> <p>The GBI does not set out the scale of ambition or measurable targets for different actions based on clear assessments of their role and potential if backed with proper allocation of resources, skills and follow through. We do understand that this is because it is intended as an overview high-level strategy but would like to set down that the tests will be quality of actions, proper implementation and follow through management and stewardship. The quality of action matters because the wrong actions even if taken in good faith can be as harmful as inaction:</p> <ul style="list-style-type: none"> <li>• Proper implementation matters because the decline of nature and ecosystems is not new and has been allowed to happen by successive administrations despite clear evidence and warnings;</li> <li>• The failure to properly implement action remains the main reason why nature, from Sites of Special Scientific Interest to urban streets, is in poor and potentially deteriorating condition; and,</li> <li>• Follow through and ongoing care matters because failure to do so results in good ideas and money being wasted, and will mean that opportunities to build skills and competence in decision making and the practical know-how needed to manage and maintain natural features from open country to town centre (as shown on page 11) are likely to be missed.</li> </ul> <p>Finally, in general there are several mentions of future generations, but the format and manner in which this consultation has been carried out demonstrates that there is a broader issue that adults do not -or do not know how to - work with/ consult with young people. This suggests that stronger links need to be formed with schools who should be identified, supported and invested in as delivery partners.</p> <p>Thoughts for discussion:</p> <ol style="list-style-type: none"> <li>1. Mapping: The strategic GBI areas on the maps appear not to be all of Wiltshire. Are there non-strategic GBI sites? Are we missing out farmers who could be key to maximising sequestration?</li> </ol>	<p>Noted</p> <p>Noted – the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p> <p>Noted - further engagement with young people will be picked up in implementation plans and through a community engagement strategy.</p> <p>Non-strategic GBI assets are to be considered as part of the Settlement GBI Frameworks.</p>

Respondent	Comment	Council's Response
	<p>2. Local Plans harmonising with GBI: The GBI's stated aim in Box 3.5 on page 33 to avoid "inappropriate development or land management" is welcome as is the recognition that ancient woodlands are irreplaceable and that existing nature and features should be retained within new development. However, that will require developers and their planners, architects, designers, landscape architects and contractors to change how they view and layout sites, conduct ecological surveys and put in place credible and lasting management plans based on nature and carried out by people trained in nature. How are the GBI team going to work with other WC departments to ensure this happens?</p> <p>3. Forum: Will the new Wiltshire Climate and Environment Forum only operate in relation to Settlement Framework plans or will it be Wiltshire wide and connected to other Community Environment Plans? Do you think it needs to be inclusive and take community and specifically farmer engagement into account?</p> <p>4. Resources: What staff resource do WC have allocated to the roll out of the GBI strategy and related implementation plans and actions?</p> <p>5. Funding: Does there need to be a long term (cross party) agreement in council that the plans set will be carried through administrations, with frequent checks on progress and direction? What staffing resource to you have for funding, chasing grants and soft loans, managing budgets, providing community funding support etc.?</p> <p>6. Monitoring and Reporting: How will Wiltshire Cabinet oversee and monitor progress of the 3 GBI goals?</p> <p>7. Cross Border: Climate and GBI have no borders. Do you know how your colleagues in the same departments in other councils (albeit named differently) are approaching this work? Are you working closely with them and sharing best practice?</p> <p>8. Baselines: When will the public have access to all the baseline assessment of the condition of Wiltshire habitats, features and natural assets (Section 2 Shaping the Vision) as known? ( as noted on the answers <a href="https://www.wiltshire.gov.uk/green-economy-climate-strategy-consultation-qa">https://www.wiltshire.gov.uk/green-economy-climate-strategy-consultation-qa</a>) Obviously these will support communities / parishes / towns to plan, both to inform actions and decisions and to measure against for progress.</p>	<p>Noted – to be considered in the new Local Plan.</p> <p>The Forum would support stakeholder engagement in shaping GBI delivery priorities at both the strategic and local scales.</p> <p>Under review by the Council.</p> <p>Under review by the Council.</p> <p>Section 5.5 Monitoring &amp; Review updated to confirm the Council will develop a plan and indicators for monitoring implementation of the GBI Strategy.</p> <p>The GBI Strategy has been shaped through engagement with neighbouring authorities and the Council will continue to engage with them through implementation of the Strategy as appropriate.</p> <p>Yes – see Principle 4 Evidence-led</p>

Respondent	Comment	Council's Response
	<p>9. When can the public have better access to the maps please and are we able to zoom into our respective communities / parishes in order to begin drafting CETs?</p> <p>10. Settlement Frameworks: Please can you share your vision in relation to Settlement Frameworks? Will members of the town and parish councils and members of the public be invited to contribute to these? How do you envisage them being further developed through Neighbourhood plans and Community Environmental Plans (page 35)?</p> <p>11. Please can you share your vision in relation to Community Environment Toolkits including:</p> <ul style="list-style-type: none"> <li>• Which communities / parishes have already completed one?</li> <li>• Are there any communities / parishes who have worked with neighbouring parishes to collate 2-3 CETs at one time?</li> <li>• Are there any plans to run workshops to support communities / parish / town councils on how they work and how to complete?</li> <li>• Do WC have any capacity to provide any geographical information support – specifically the production of an interactive PDF map that could include layers for the relevant areas of interest such as habitats / species / farmers / landowners already in agri-environment schemes or specifically working in green / blue spaces.</li> </ul> <p>Responses to Themes</p> <p><u>Theme 1: Flooding &amp; Water Management -</u></p> <p>The strategy contains a number of excellent aims but does not suggest how those aims will be positively driven through and managed. Our concerns are that without concrete planning, delivery and resources these will simply remain aims.</p> <p>It proposes that the strategy “will be used as a starting point for planning developments...”. This suggests that it will have weight in planning decisions. Will this be the case and if so, who will be the moderator in the review of any development or mitigation proposals?</p>	<p>Roll out of interactive GIS mapping under review by the Council.</p> <p>References to the purpose of the Settlement GBI Frameworks strengthened throughout the document where appropriate.</p> <p>Roll out of Community Environmental Plans (developed by Town/Parish Councils and local stakeholders using the Community Environmental Toolkit) under review by the Council.</p> <p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p>

Respondent	Comment	Council's Response
	<p>Box 4.1 states that Flood Risk Management, which is essential if the county is to address climate impacts, "involves implementing measures...". This assumes that forward planning has delivered an action plan that can be implemented. How will this plan be developed and to what timescale?</p> <p>Is there a "Working with Natural Processes" (WWNP) evidence base for Wiltshire and how will it be used "to protect, restore and enhance natural flood mitigation measures"?</p> <p>The promotion of natural flood management solutions to reducing flood risk is, again, a laudable aim which we totally agree with, but the strategy does not say how this will be mandated.</p> <p>Examples of use within Wiltshire are not given and the Somerset levels was a project driven out of desperate necessity rather than long term thinking. It actually demonstrates the need for detailed forward planning on a county wide basis, with execution of those plans for mitigation to a sensible timescale to avoid this in Wiltshire.</p> <p>SuD's is not mandated on developments and is certainly not adopted on all developments. Will this now be mandatory in planning as part of the GBI Strategy?</p> <p>How will WC "work together with" the various authorities to enforce high water flow attenuation from existing and new developments?</p> <p>Who will manage and maintain installed SuD's systems?</p>	<p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p> <p>This a national evidence base applicable to Wiltshire.</p> <p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p> <p>Noted</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>Working with partners such as the Environment Agency and catchment partnerships via the Catchment-based Approach.</p> <p>As a high level strategy document management and maintenance is not be dealt with in detail.</p>

Respondent	Comment	Council's Response
	<p>Management of water abstraction and the potential for over abstraction is a critical element of supporting the citizens of Wiltshire and is rightly highlighted along with the use of GBI management to support and maintain supply. You state that WC will "take action to support a strong catchment focus...". This statement also suggests enforcement to protect. How will WC manage this?</p> <p>You also suggest that new infrastructure schemes will be needed to support. Is there a long term plan being developed for this now and if so, how will the GBI team and local communities be involved?</p> <p>There is no mention in the documents about watercourse maintenance and management, a major part of blue infrastructure. This is a critical issue in a number of areas of the county and failure to maintain increases flood risk. How will this be addressed by the GBI team?</p> <p><u>Theme 2: Sustainable Farming &amp; Land Management</u></p> <p>WCA welcomes the emphasis on sustainable farming and the improvement of soil health and landscape wide projects. However, given the mapping provided it is unclear whether the 'landscape' referred to is the entirety of our landscapes, that is a broad brush across the entire county or is being targeted on the coloured areas of the maps. This begs the question of how much of the county is covered by the strategy - everywhere or a percentage represented by the colour on the maps? If there are very important sites, for example SSSIs then are any buffer zones envisaged?</p> <p>It is not clear whether the maps provided for Green and Blue are 'live' that is open to expansion or contraction or intended to be fixed which may be an invitation to development on areas not specifically covered. How can groups or individuals add to the mapping in the future? Is the aim to have a joined up swathe across the county? Please can you clarify your vision and goals in this theme?</p>	<p>Working with partners such as the Environment Agency and catchment partnerships via the Catchment-based Approach. The Environment Agency is responsible for catchment abstraction enforcement matters.</p> <p>Working with partners such as the Environment Agency and catchment partnerships via the Catchment-based Approach.</p> <p>As a high level strategy document management and maintenance is not be dealt with in detail.</p> <p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas.</p>

Respondent	Comment	Council's Response
	<p>Farming</p> <p>We cannot find any indication of how the Council sees its role in practical terms in promoting and supporting sustainable food production so that local supply chains can be accessed by the public. Local farmers will be facing unprecedented change in their subsidy arrangements and it is vital that there is a specific team/figurehead at the council to promote local produce so that small local market gardeners, horticulturalists and farmers have support as well as larger landowners who can be in clusters of substantial land holdings.</p> <p>While we appreciate the limitations on the council's resources, showcasing what we produce (as well as the landscape that produces it) is a viable role. For example, a 'Wiltshire Produce' logo/label could be developed. The Sustainable Food Trust suggests that we ask: <i>Where has the food come from?</i> and <i>How was it grown?</i> We suggest the Council with its access to residents and involvement in local markets could play a role in answering these questions to the benefit of our farmers and Wiltshire residents who want to source local food.</p> <p>The Council needs to be mindful that if the strategy is to be productive, younger farmers need to have opportunities. The Council is in a position to promote opportunities for new farmers as a landowner itself. There is also no mention of issues vital to farmers (and animal welfare conscious consumers) such as the accessibility of local abattoirs. Will planning priority be given to infrastructure that supports sustainable farming?</p> <p>The document also omits mention of items which are controversial such as wind turbines and solar farms. New farming methods may involve the construction of large structures to house, for example hydroponic production units. Realistically some farmers will not be engaged by the new financial programmes seeing them as constricting and bureaucratic. This does not seem to have been envisaged. Very intensive farming systems (particularly as to livestock) may be in conflict with the Council's goals if such farms are within sensitive landscape areas. Has the Council any plans for dealing with this?</p>	<p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas.</p>



Respondent	Comment	Council's Response
	<p>Gardens and streets</p> <p>It is widely recognised that in many areas, gardens have greater diversity than surrounding farmland. The Council is well placed to encourage all residents to become 'green' land managers in whatever home they have or green space they use. While the strategy talks of engaging communities the Council also has the ability to contact and engage individuals. Not everyone wants to be in an activist group or join something. Many want to access local food and do the right thing in their own backyard or road verge.</p> <p>Trees</p> <p>WCA suggests management must include urgent action on urban trees in view of expected heat events and that each town and community must conduct an audit where people can access shade and drinking water in a heat event. Opportunities for infilling trees in street lines to provide shade are a priority in town land management. This should be in addition to larger tree planting proposals and promotion of other land uses that are 'carbon sinks' such as meadows and grassland.</p> <p>Development</p> <p>It is clear that the mapping of the infrastructure does not imply restrictions on development in the blue/green areas. It is unclear whether the GB strategy will in practice have a substantial influence on decisions on development. It will be extremely counterproductive and undermining of trust if local people see much loved green areas swallowed by development even though they have been identified by the mapping. There is no mention of any mapping of brown field sites or encouragement of the reuse/repurposing of agricultural buildings instead of demolition.</p>	<p>In support of this theme, Community Environmental Plans (developed by Town/Parish Councils and local stakeholders using the Community Environmental Toolkit) will set out actions for delivery of settlement-scale GBI projects to support local priorities.</p> <p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p>

Respondent	Comment	Council's Response
	<p>Ministry of Defence</p> <p>The MOD and similar defence related establishments have large landholdings in the county. These have special biodiversity value and the plan should include a commitment to maintain that, for example, in the event of land sales that threaten these special areas.</p> <p>Enforcement</p> <p>There is no mention of how the Council can promote necessary and rapid enforcement of environmental standards to protect the Green and Blue infrastructure. Acute incidents of pollution can be reported but involved residents are best placed to monitor their local patches over time. Any plan must include provision for action to maintain and protect the areas and for local residents to be involved in monitoring any deterioration or damage to the infrastructure.</p> <p><u>Theme 3: Nature Recovery &amp; Land Management</u></p> <p>Things we welcome</p> <ul style="list-style-type: none"> <li>• Acknowledgment of a biodiversity crisis</li> <li>• Recognition of the importance of ecosystem connectivity</li> <li>• Ambition to support landscape scale rewinding projects, including the re-introduction of native species</li> <li>• Interest in using natural capital accounting tools to shape priorities for economic development</li> <li>• Recognition p33 that ancient woodland is irreplaceable</li> <li>• Support for change to verge management</li> </ul> <p>Concerns</p> <ul style="list-style-type: none"> <li>• We struggle to find actual actions to arise from this strategy other than general statements of working with partners on what they are already doing. Vague and lacks a sense of leadership and plan for delivery. Lots of emphasis on partnerships and use of words like "encourage" "promote" "consider opportunities" with nothing mandated.</li> </ul>	<p>Noted</p> <p>Noted. The Environment Agency is responsible for environmental pollution enforcement matters.</p> <p>Noted</p> <p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p>

Respondent	Comment	Council's Response
	<ul style="list-style-type: none"> <li>• No indication of a plan to address the conflict of resistance to change from the public/landowners/businesses whose activities and or complaints to Wilts Council cut across GBI strategy intentions. E.g. complaints about uncut verges being untidy</li> <li>• It lacks policy for making the GBI strategy the priority in decision making e.g. Page 67 merely states "We will seek to ensure biodiversity and wide environmental net gains for our natural capital from new development by encouraging applicants for major development proposals to take account of the GBI planning principles listed in Box 4.22. Development proposals should also consider opportunities for engaging local communities .... "</li> <li>• How will net biodiversity gain decisions be handled. Who decides the worth of what is being lost and what is needed to "replace?" Will ancient woodland indeed be off limits as recognized as irreplaceable.</li> <li>• Developer Biodiversity Net Gain (BNG) contributions are described "as an important potential source of funding for green and blue infrastructure in the future to deliver on site biodiversity improvements as well as off-site enhancements". Over reliance on funding from this route could undermine the aims of the strategy and become a loophole facilitating development at the expense of GBI principals</li> <li>• Details of the Settlement Frameworks and Planning Principals will be crucial to the delivery of the stated objectives in this GBI strategy but Consultation on the overall GBI strategy ends 17th October, before these are available.</li> <li>• Change to verge management, whilst welcomed does not comply with Plantlife Guidelines. Continued use of pesticides</li> </ul> <p>Ideas we can support</p> <ul style="list-style-type: none"> <li>• Implementation of Buglife b-lines</li> <li>• P73 "Empowering Communities to take ownership and responsibility for managing local GBO assets." Involving volunteers and creating the culture</li> </ul>	<p>Under review by the Council.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>The Settlement GBI Frameworks will inform Community Environmental Plans developed by Town/Parish Councils and local stakeholders.</p> <p>Noted</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>change to support e.g. verge management for pollinators is best done locally. But transfer of assets needs transfer of funding to work</p> <ul style="list-style-type: none"> <li>• Provision of high quality accessible green space close to where people live.</li> <li>• Involvement of communities in the early stages of development planning</li> <li>• Close working with the Council to achieve the aims of the strategy</li> </ul> <p><u>Theme 4: Woodland &amp; Trees</u></p> <p>WCA welcome the 4<sup>th</sup> delivery theme of the GBI and looks forward to the Tree and Woodland Strategy, which will establish targets and advice on planting the right tree in the right place (p24 WC CE Strategy). We would very much like to know the timescales for delivery on this strategy as our concern is that we have no time to lose. We also hope that the strategy includes counteractive measures to the number of trees Wiltshire is likely to lose to Ash DieBack (<i>Hymenoschyphus fraxineus</i>) and that the number of trees felled continues to be recorded so we can compare Wiltshire against other council areas.</p> <p>Evidence from Friends of the Earth/Take Climate Action shows that Wiltshire has 10.3% of existing woodland. (<a href="https://takeclimateaction.uk/woodland-opportunity-mapping-england">https://takeclimateaction.uk/woodland-opportunity-mapping-england</a>) There is 7.1% future opportunity for planting more trees, giving Wiltshire a combined amount of 17.4%, which is 23014 hectares of land that is suitable for new woodlands. The highest per cent in similar local authorities is 26%. The Forestry Commission and other organisations recommend a minimum of 20%, even for densely populated urban areas as noted on page 54. Bristol City Council is one council that has committed to doubling its tree cover. WCA believe WC can double tree cover too and should aim to do so whilst ensuring existing trees and woodlands are properly protected in order to store carbon, improve soil health, support nature, aid flood protection and deliver health and well being benefits.</p> <p>Hedgerows are also expected to become even more important as highways for wildlife as they move in response to environmental change and are a vital source for mammals, birds and insect species and therefore need to be included in this section. They also reduce the likelihood of flooding downstream, suck nutrients and pollutants out of water and reduce soil erosion.</p>	<p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p> <p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p> <p>Reference to hedgerows has been strengthened in Section 4.2 - Theme 4: Woodland &amp; Trees</p>

Respondent	Comment	Council's Response
	<p>A report from the Woodlands Trust on the State of the UK's Woods and Trees 2021 <a href="https://www.woodlandtrust.org.uk/state-of-uk-woods-and-trees/">https://www.woodlandtrust.org.uk/state-of-uk-woods-and-trees/</a> states that Woodland cover is gradually increasing but woodland wildlife is decreasing; Woods and trees are vital for a healthy, happy society; Woods and trees are subject to a barrage of coinciding threats and Not nearly enough is being done. The report recommends the following priority actions:</p> <ol style="list-style-type: none"> <li>1. Expand wood and tree cover.</li> <li>2. Enhancing and protect existing woods and trees.</li> <li>3. Improving the evidence by completing regular baseline inventories, undertaking regular assessments and filling data gaps, such as levels of soil carbon in ancient woodland, assessing the impact of landscape-scale flood risk reduction, or mapping invasive species to direct much needed investment at significant scale.</li> <li>4. Invest in the future.</li> </ol> <p>WCA would like to work in partnership with WC on mapping and protecting existing trees and woodland areas, identifying areas suitable for new woodlands, including hedgerows (!) and urban tree planting and assisting in assessing and monitoring woodland, tree and wildlife sites. We have a wide network of volunteer members who are already involved in local environment groups and organisations and /or who sit on local parish or town councils. These members are poised to support WC with delivery of the GBI, Wiltshire's Local Nature Recovery Strategy (once completed) and on a more local level with Settlement Frameworks &amp; Planning Guidelines, Neighbourhood Plans and Community Environment Toolkits. We look to WC for leadership in regards to exploring opportunities and partnership working so we can have clear direction, goals and ways of working and can be of service in the decade we have left to confront the climate emergency.</p> <p>Theme 5: Healthy Living</p>	<p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p> <p>Noted – to be considered as part of the Tree &amp; Woodland Strategy</p>

Respondent	Comment	Council's Response
	<p>It is to be welcomed that the document has embedded health and well-being with every aspect of the policy. It cites as part of the vision the importance of green and blue corridors and networks as central to providing people with access to nature, beautiful places and opportunities for healthy lifestyles. It is good to see that access to these spaces is acknowledged as crucial for everyone – and that for those living in towns this must be provided within the towns as well as giving access to the surrounding countryside.</p> <p>Throughout the document we feel the “what” is needed is very good but my main concern is about how many of the objectives can be achieved. There are also gaps in acknowledging some of the key issues that would affect health and well-being objectives being achieved.</p> <p>Green spaces within towns: While acknowledging that these are managed by a range of parties saying they will work with other parties does not address the significant issues with this. Policy needs to cite some specifics in this e.g. it should be a requirement that an assessment of all shared and community green spaces is carried out in order to ensure they provide a link in terms of ecology and different types of activities.</p> <p>In towns there are some areas with inadequate green spaces. Sadly, there is an assumption that brownfield sites should always be first building places – even if this makes housing density too great. This assumption isn't questioned. Tree planting is promoted as being important within towns for well-being. Guidelines should make it mandatory for blocks of flats to have adequate access to safe and well maintained green space. Also as a part of any development including blocks of flats etc. tree planting for the future should be mandatory – if no suitable site immediately available then nearby sites could be used. No mention of this being implemented immediately is made.</p> <p>In villages guidelines make it hard to build affordable housing at a slightly higher density. Surely with better access to green spaces around the area these are better places for small areas of higher density housing.</p>	<p>Noted</p> <p>In support of this theme, the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p>

Respondent	Comment	Council's Response
	<p>The section Box 3.3 (Page 29) states the national policy framework. We wonder, would planning applications actually be turned down to achieve these objectives? In discussing design of new buildings (Page 29) the document states there is a history of good design. This is not reflected in a lot of housing in Calne where streets are entirely paved and given over to cars with no planting at all in front of many dwellings. Not only does this limit biodiversity within those spaces, the lack of green can be depressing and also nothing to absorb car fumes and CO2. Strategy talks about Active Travel but accepts increase of vehicle use up by 28% b 2025. (page 53) Surely current actions need to prevent this happening. Only action is to suggest planting more trees – this is often impossible within town centres. This is unhealthy for both those travelling through and particularly for those living alongside the major roads.</p> <p>Nothing about rights of way being up graded to be more accessible for all. Very few places where people with limited mobility can walk/wheel into the countryside safely for more than a short distance. Older people with limited stability and disabled people don't want to be confined parks as their only green spaces.</p> <p>Box 4.14 on Green Infrastructure standards on page 56 refers to the Natural England's standards. It should be noted that NE's GI and Access to Green Space standards (ANGSt) have been in place since 2010 and many places currently do not meet the standards. They are also merely voluntary and do not have to be followed although if Wiltshire and other local authorities make these part of their Local Plans they will carry weight. Is this something WC are considering?</p> <p>In order to access much of the countryside in Wiltshire people need to use the network of lanes that criss-cross the county. If we want to discourage people from using cars those lanes need to be safer for cyclists and pedestrians. There is a complete lack of willingness to take action to change the priority of use along these lanes. No mention anywhere of this as an issue or the fact that specific measures like a strict speed limit will be needed and a public information campaign about the change in priorities that are coming in the highway code.</p> <p>Theme 6: Economic Recovery &amp; Valuing Natural Capital</p>	<p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered by the Wiltshire Countryside Access Improvement Plan.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered by the Wiltshire Local Transport Plan.</p>

Respondent	Comment	Council's Response
	<p>While the broad themes of placing a monetary value on retaining and enhancing natural environment are welcomed, there is a concern over the route to economic recovery as a whole. The GBI almost exclusively refers to the role of the LEP for this portion of the strategy. The section reads as though the intention is to grow the LEP to support Wiltshire Council's GBI goals, and vice versa. While both of these organisations may be large employers in Wiltshire it's not clear in this document that there is any strategy for engaging with the private sector, other than the LEP "promoting our natural environment to inward investors and potential residents". Nevertheless, to enable the SWLEP to better support local economic prosperity, more emphasis could be given to its positioning to offer appropriate mentorship. This would include increasing the number of people within the SWLEP itself who have run their own businesses. By definition, such mentors are better placed to appreciate economic constraints and opportunities, sympathise with challenges and barriers to a sustainable supply chain and work through commercially viable solutions with entrepreneurs.</p> <p>Under Principle 1: Partnership Working almost all partnerships listed are either government funded or voluntary roles. Enterprise and developers (presumably private) are listed as collaborators in two places, but in order to realise significant economic recovery and the delivery of a financially attractive area of investment in GBI we would urge a substantially more profound and integrated approach towards engagement with the private sector.</p> <p>Clearly reducing the scope of the SWLEP and Wiltshire Council's involvement in economic recovery represents a conflict of interest for the SWLEP and Wiltshire Council, but would be in line with national trends to reduce government as identified in the SWLEP's report <a href="https://swlep.co.uk/docs/default-source/strategy/economic-priorities/economic-assessment-2018/chapter-3-business-and-enterprise-may-2018.pdf">https://swlep.co.uk/docs/default-source/strategy/economic-priorities/economic-assessment-2018/chapter-3-business-and-enterprise-may-2018.pdf</a></p>	<p>Noted</p> <p>Noted - reference to greater collaboration with businesses strengthened in the text.</p> <p>Noted</p>



Respondent	Comment	Council's Response
<p><b>Wessex Water</b></p>	<p>We welcome the scope and emphasis placed on Blue Infrastructure within the Green and Blue Infrastructure Strategy. Despite the inclusion of BI throughout the document however this has not translated into a key priority for action. We would welcome a focus on ensuring that more developments implement sustainable drainage arrangements.</p> <p>Urban street trees are mentioned throughout the document and in the priorities. Whilst we support the inclusion of street trees in development, these must be planned and located to as to avoid any future impact to buried utility services, including water supply and sewerage pipes.</p> <p>The strategy does not mention the issue of nutrients (and other pollutants) from agricultural practices and their impact on the water environment. We believe this represents a missed opportunity to link nutrient reduction practices with wider biodiversity/Natural Flood Management opportunities to deliver multifunctional solutions. The potential for nature based solutions to tackle the issue of nutrient neutrality from developments is not acknowledged.</p>	<p>Embedding GBI into development and place-making to include nature-based solutions such as implementing sustainable drainage systems, green roofs and living walls added as a new priority for action in Box 3.7.</p> <p>Noted</p> <p>Reference to nutrients and reduction practices has been strengthened in Section 4.2 - Theme 1 Flooding &amp; Water Management.</p>
<p><b>Vistry Group</b></p>	<p>We congratulate the Council on the progress that it is making with regard to these issues as part of the acknowledged Climate Emergency. I have submitted a response to surveys on both documents but note that the format of the feedback is such that you do not provide copies of the comments provided. I wanted to reiterate Vistry Group's interest in these topics as a major developer with both live construction sites, committed allocated sites and additional strategic land interests in Wiltshire. We look forward to continued engagement with the Council in respect of these topics. I have previously submitted representations in respect of the Addressing Climate Change and Biodiversity Net Gain through the Local Plan consultation (March 2021). We welcome the acknowledgement in the current consultation documents of the relationship between the emerging strategies and the Local Plan Review. We agree that the Local Plan Review is the appropriate process through which new policies/standards should be considered and their feasibility/deliverability tested. We support the Council's aspiration for the Local Plan review to be an opportunity to plan for the introduction of zero carbon standards. We consider that new policy requirements should be in step with, and not in advance of, the Government's Future Homes Standard and Future Buildings Standard - to ensure that the development industry has the materials, technology and skills to deliver much-needed private and affordable homes to the requisite</p>	<p>Noted</p>

Respondent	Comment	Council's Response
	<p>standards. Vistry Group is working collaboratively with a variety of stakeholders across the housebuilding-industry (The Future Homes Task Force) to ensure that a roadmap towards net zero development can be implemented. This is proposed as follows:</p> <ol style="list-style-type: none"> <li>1. Zero Carbon 'Ready' by 2025: This will be the Future Homes Standard of 75-80% reduction in carbon emission (from 2013 Part L baseline);</li> <li>2. Net Zero Carbon Homes (in-use) by 2030: The designed carbon emission rate is 'zero' for regulated energy with grid decarbonisation for unregulated energy; and</li> <li>3. Net Zero Carbon Homes (Construction) from 2040: Carbon emissions associated with building homes are zero, including the emissions from the building's products and construction operations.</li> </ol> <p>We suggest that this is a realistic and deliverable approach, and one which should be reflected in the emerging Local Plan Review. Whilst we recognise that local authorities across the country may wish to demonstrate leadership in addressing the climate emergency by introducing higher standards more quickly, the practical implications of this must be considered alongside an area's housing requirement and in particular the need for delivery of affordable homes.</p> <p>We note references in the current consultation documents to Wiltshire being carbon neutral by 2030, and the definition of this should be clearly defined in order to provide all stakeholders with certainty around targets.</p> <p>A further observation on the current consultation documents relates to the scale of some of the mapping provided. At county-wide level it makes it difficult to clearly identify the status of land uses or designations at a local scale. If the Councils is to use these plans as part of their evidence base or to make decisions about land uses, it would be helpful if they could be reviewed at a more localised scale.</p> <p>Finally, as a supplementary comment to the online feedback provided in respect of the GBI Strategy, it should be noted that whilst the emerging Local Plan period looks to 2036, decisions in respect of GBI should avoid a 'short term' mentality which could adversely affect, or sterilise, the longer term delivery of sustainable development sites, particularly those on the edge of major settlements.</p>	<p>Noted</p> <p>More localised GBI assets mapping will be provided as part of the Settlement GBI Frameworks.</p> <p>Noted</p>

Respondent	Comment	Council's Response
<b>Corsham Town Council</b>	<p>The Strategy presents a long document which is more difficult to read and understand than the Climate Strategy, making it less accessible to the general public. A condensed version may be more appropriate as it would engage a wider audience.</p> <p>The explanation of what green and blue infrastructure is and why it is important is well presented. There is also a good explanation of what ecosystem services are and the importance of the natural environment to humans. This helps re-enforce the need for protection and enhancement of green and blue infrastructure in Wiltshire. Three clear goals and five key priorities for action are set out in the Green and Blue Infrastructure Strategy, which makes this Strategy seem much more achievable than the Climate Strategy.</p>	<p>A summary version of the Consultation Draft was produced.</p> <p>Noted</p>
<b>Sustainable Warminster</b>	<p>Sustainable Warminster comments on the Green Blue Infrastructure Strategy for Wiltshire:</p> <ol style="list-style-type: none"> <li>1. The links in the Strategy document not work.</li> <li>2. The GBI evidence base did not seem to be available until the last two weeks of the consultation.</li> <li>3. P. 4 'The GBI.... Will deliver tangible benefits for people and nature'. Would 'measurable benefits' be better?</li> <li>4. Has there been a baseline assessment of the state of biodiversity in the County from which progress can be measured from now on?</li> <li>5. P.14 Diagram 2.1 'Halt biodiversity loss'. Could this be 'ensure 10% biodiversity net gain'? No mention of Wiltshire Core Policy 50 and 51. (Biodiversity and Landscape)</li> <li>6. P.15 County Wildlife sites are not included. Is there a management plan for them?</li> <li>7. P.64 Evidence base and natural capital. Very often developers do not access the WSBRC or NBN biological records when assessing the environmental impact of development and as the Council's planners do not insist on it, the environmental impact assessments submitted by developers is often inaccurate and not always written by ecologists of sufficient experience.</li> <li>8. In the GBI Evidence base document p.7 Box 1.4 states: "In line with the mitigation hierarchy, priority must be given to enhancing biodiversity on site or nearby if necessary. If this is not possible, developers will be able to pay a standardised offsetting fee, which will be used to create biodiverse places elsewhere</li> </ol>	<ol style="list-style-type: none"> <li>1. Hyperlinks in the document now work</li> <li>2. Noted</li> <li>3. N/A - consultation introduction removed</li> <li>4. To be included in the Local Nature Recovery Strategy</li> <li>5. N/A</li> <li>6. Site-specific management plans for wildlife sites are referred to under Section 1.3</li> <li>7. Noted</li> <li>8. Box 1.4 in the Evidence Base to be updated to reflect Environment Act 2021 and emerging Defra/Natural England guidance</li> </ol>

Respondent	Comment	Council's Response
	<p>in the local plan area." Should it be made clearer that offsetting is the last resort in the mitigation hierarchy? How will such off setting be monitored for its effectiveness?</p> <p>9. GBI Evidence – there is no mention of how the GBI will relate to safeguarding habitat for protected species of wildlife. Surely a GBI strategy should include a strategy to require separate protected species assessments and biological survey following CIEEM guidelines in order to match up habitat and species protection?</p> <p>10. GBI evidence Map 2.1 does not seem to have incorporated the Special Landscape Area which extends into the southern edge of Warminster town and which is a West Wiltshire Council saved policy C3.</p> <p>11. GBI evidence Map 2.6 River Avon (Wylve) Special Area of Conservation is not marked.</p> <p>12. GBI evidence Map 2.12 The River Wylve is not labelled.</p>	<p>9. To be considered as part of the Local Nature Recovery Strategy</p> <p>10. Special Landscape Areas are not mapped as a strategic GBI assets in line with GBI definition</p> <p>11. All SACs in Wiltshire are shown on Map 2.6</p> <p>12. The River Wylve has been labelled on Map 2.12</p>
<p><b>Ministry of Defence</b></p>	<p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Ministry for Housing, Communities &amp; Local Government (MHCLG) in accordance with the provisions of that Direction. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above. The county of Wiltshire contains a number of MOD sites, along with all or part of Safeguarding zones designated to protect airfields, explosives storage sites, and technical sites which may be affected by new development.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>Having reviewed the supporting documentation in respect of Wiltshire County Council and their Climate Strategy and Natural Environment Plan there are two areas of interest for the MOD.</p> <p>Firstly, within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate birdstrike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments as well as the creation of new waterbodies. Sustainable Urban Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.</p> <p>Secondly, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.</p>	<p>To be considered as part of the Local Nature Recovery Strategy and Settlement GBI Frameworks.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>In summary, the MOD request that developers are made aware, through policy provisions, that development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused. Additionally, in order to provide a more broad representation of MOD interests, and to ensure developers are made aware of the implications of developing within an area containing MOD safeguarded zones, policy provision is provided that applications for development that would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported.</p>	Noted
<p><b>National Farming Union</b></p>	<p>I have completed my response to the Green &amp; Blue Infrastructure strategy and as directed in Q7, am dropping you a line to let you know that I would like to be involved in future discussions or partnerships etc. related to this and the Councils work– please do add me to your list.</p> <p>I was pleased to see the NFU referenced in Section 4 of the Strategy and agree that partnership working with the farming community will be essential – to ensure that both food production and environment production are managed in harmony across the county. As you know from the example of the incredibly successful farmer-led Marlborough Downs project, this can be achieved for maximum benefit all round. I would like to invite you and a few colleagues from the Councils climate team to have a chat with us about how we can support each other in these aims – informally to begin with if that's ok?</p>	<p>Noted</p> <p>Noted</p>
<p><b>Future Chippenham (Wiltshire Council)</b></p>	<p>Future Chippenham is broadly supportive of the Blue and Green Infrastructure strategy.</p> <p>The Future Chippenham Programme is seeking to deliver an infrastructure-led sustainable and well connected urban extension to the south of Chippenham to deliver new homes for the community of Chippenham. Within the context of a masterplanned development, the Programme will seek to protect and enhance blue and green infrastructure in line with prevailing local and national policy. Future Chippenham is promoting its plans through the Local Plan process and will be the subject of a masterplan and planning applications to be consulted on with the community and other relevant stakeholders.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>We note that in particular the key priorities for action within the strategy are:</p> <ol style="list-style-type: none"> <li>1. Creating more and better green spaces in our towns to help prevent flooding and attract people to live, work and invest in the area.</li> <li>2. Planting the right trees in the right places to provide vital shade during heatwaves, encourage wildlife and improve air quality.</li> <li>3. Supporting walking and cycling to reduce congestion, improve our health and wellbeing, and connect us to nature.</li> <li>4. Encouraging environmentally sensitive farming in ways that enhance soil quality and encourage wildlife, produce food and provide employment.</li> <li>5. Supporting a green economic recovery from the COVID-19 coronavirus pandemic.</li> <li>6. Supporting nature recovery and landscape management.</li> </ol> <p>It is noted that the detail of where and when will be set out in other more fluid short-term documents that will focus on implementation and local delivery including through a settlement framework and planning guidelines document that will give guidance for GBI around the main settlements and through a Local Nature Recovery Strategy to define where GBI protection and investment should be prioritized.</p> <p>The Future Chippenham programme supports the above objectives and notes the production of the shorter term documents and would welcome the opportunity to input into these additional documents to ensure that the Future Chippenham proposals can contribute and align with the relevant strategies put forward.</p>	<p>Noted</p>
<p><b>Climate Friendly Bradford on Avon</b></p>	<p>We welcome the Green Blue Infrastructure document. We see it as a chance to improve Wiltshire's natural biodiverse assets. Wiltshire is a rural county and as such should aim to reach good if not outstanding ecological status.</p> <p>This document is a response to the ecological emergency that is happening worldwide. It is only by each area playing its part that our wildlife can be restored. A recent 'red list' report from Birdlife International states that there has been a 25% decline in swifts over the last 3 generations, a sharp decline in rooks since 2015 and a worrying decline in snipe. All of which can at the moment be seen in Wiltshire. And, what of plants and other species? Do the authors of this document know? I have not seen any reference in the evidence base.</p>	<p>Noted</p> <p>To be considered as part of the Local Nature Recovery Strategy.</p>

Respondent	Comment	Council's Response
	<p>Wildlife corridors could be an initial priority starting point, allowing what wildlife there is to move and establish in other areas. These should be hedges and watercourses, hedges fit for dormice and watercourses free from pollutants. Hedges would help to improve soil structure and reduce soil erosion. Plantlife are promoting grasslands for wildlife and for carbon capture. Wiltshire is blessed with chalk grassland an important and rare habitat worldwide, which has a rich biodiversity of plants and pollinators. Farmers should be encouraged to improve their soil, so much agricultural land seems unable to cope with wetter weather conditions and adaptation seems key.</p> <p>Access to nature for human wellbeing is good in Wiltshire, but it needs to be access that includes nature, trees and wildflower areas and protection from pesticide spray.</p> <p>In April 2021 the Tree Warden scheme was closed. There have been 12 years of ongoing cuts to biodiversity posts and grants to promote biodiversity interest. New posts need to be created to take improvements and increase in biodiversity forward. It cannot be left to volunteers. Experts are the people to push this forward.</p> <p>Wiltshire owned farms are an ideal place to promote soil regeneration. The chair of the National Farmers' Union (NFU), farms and lives in Wiltshire. They are promoting soil regeneration as is the Soil Association. Carbon stores are formed through photosynthesis and microbe activity in the soil. Conditions need to be in place for this to happen!</p> <p>Climate Friendly Bradford-on-Avon Biodiversity Group are interested in being part of taking the Green Blue Infrastructure forward</p>	<p>To be considered as part of the Local Nature Recovery Strategy.</p> <p>To be considered as part of the Local Nature Recovery Strategy.</p> <p>Noted</p> <p>To be considered as part of the Local Nature Recovery Strategy.</p> <p>Noted</p>
<p><b>Corsley Parish Council</b></p>	<p>The Corsley Parish Council recognise the climate emergency and support Wiltshire's efforts to combat it. We recognise that Wiltshire emissions chiefly come from Transport, Homes and agriculture.</p> <p>As a community we are not on mains gas or sewage and therefore emissions from homes will be higher than average. We support with retrofitting to low energy solutions, such as heat pumps and solar would be welcomed. We would also like to see more monitoring of water courses to ensure there is no pollution. This should</p>	<p>Noted</p> <p>Noted</p>



Respondent	Comment	Council's Response
	<p>include support for listed buildings where there is a strong desire to reduce emissions and believe that this will be blocked by the Council.</p> <p>We would welcome the council issuing a statement that confirms a presumption of approval for improving the environmental performance of listed buildings rather than leaving them with the poor performance of the past. With regard to planning we feel that these should only be approved if they meet highest standards and are considered carbon neutral. This would mean that planning submissions would include environmental performance on the application.</p> <p>With regard to transport; as a spread out village with multiple hamlets and a main road (A362) running through the middle we support a zero carbon transport target. We have a single bus service running from Warminster to Frome and would welcome better connectivity. The reduction of heavy vehicles and speed through the village will significantly reduce emissions and we would ask that Wiltshire deliver both to improve emissions. We are fully in support of travel without using carbon vehicles. Specifically, we would like to see the upgrading of bridle paths and tracks that allow safe travel for bikes, horses and walkers between Corsley and Warminster and other Wiltshire villages as well as Frome. We believe that improving this infrastructure will significantly reduce car journeys. We would also like to see charging points across the village to support electric vehicles such as at the pubs or village triangle.</p> <p>With regard to the natural environment:</p> <ul style="list-style-type: none"> <li>• The better use of green space to absorb carbon should be a priority including improving soil, bringing woodland into management and planting of additional trees to address losses in ash and other species as well as the benefits in water management etc. Within Corsley we are actively bringing hedgerows back into management for example. Widespread planting of disease resistant elm should also be encouraged.</li> <li>• We recognise the NFU's commitment to net zero and are encouraging our farming community to have farms audited to improve their environmental performance as soon as possible.</li> </ul>	<p>Noted</p> <p>To be considered as part to the Settlement GBI Frameworks as appropriate.</p> <p>To be considered as part to the Settlement GBI Framework as appropriate.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<ul style="list-style-type: none"> <li>We would also like to see improved guidance for horse owners as this is taking up increasing amounts of land.</li> <li>Finally, with regard to waste, we see significant differences in the amount of waste generated per household, there should be more training for communities on how to reduce waste and recycle more to support a move to a circular economy.</li> </ul>	<p>Noted</p> <p>Noted</p>
<b>Salisbury Civic Society</b>	<p>I am writing on behalf of the Salisbury Civic Society Development Committee (SCSDC). [REDACTED], a fellow member of the Committee, provided your email address.</p> <p>The SCSDC fully supports and endorses the comments made by [REDACTED] in her return for the Salisbury Area Greenspace Partnership (SAGP). Additionally, the SCSDC offer the following comments:</p> <ul style="list-style-type: none"> <li>The SCSDC welcomes the introduction of both these complex, well developed strategies which are coherent and well presented</li> <li>Both documents emphasise the need to engage with people and businesses to make the strategies work. However, there are no sections in either document that set out a strategy for this activity.</li> <li>Both documents are light on what success will look like and how success will be measured.</li> </ul> <p>The SCSSDC wishes to encourage the Wiltshire Council to be bold and to try to implement the various action plans with haste.</p>	<p>Noted – the Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p>
<b>Private Consultant</b>	<p>The multiple benefits provided by Floodplain meadows, and their role as an effective nature based solution to floods, drought and diffuse pollution, is evidenced in this publication on the natural capital value of floodplain habitats <a href="https://valuing-nature.net/sites/default/files/documents/Synthesis_reports/VNP09-NatCapSynthesisReport-Floodplains-A4-16pp-144dpi.pdf">https://valuing-nature.net/sites/default/files/documents/Synthesis_reports/VNP09-NatCapSynthesisReport-Floodplains-A4-16pp-144dpi.pdf</a></p> <p>And there is much more information on their role in carbon storage, their cultural and historical values on this website <a href="https://www.floodplainmeadows.org.uk/">https://www.floodplainmeadows.org.uk/</a></p>	<p>Noted</p>

Respondent	Comment	Council's Response
	<p>Also, re green/blue infrastructure strategy consultation, there wasn't enough space in the response form to include all the comments I wanted to make. Is there any way to send my views in a more complete form?</p> <p>For example, the document refers several times to planted trees and woodlands, when it is widely accepted that natural regeneration is a much more sustainable and cost effective way to establish woodland.</p> <p>There needs to be recognition in the document that ancient grasslands, especially floodplain meadows, have the potential to lock up more significant amounts of carbon in their deep soils far more securely than trees and woodlands, and the restoration of flower-rich floodplain meadows should be seen as a priority for a significant landscape scale initiative that will bring about multiple benefits.</p> <p>Re Principle 6 - biodiversity net gain should be a requirement for ALL significant development proposals, not just all "major" proposals.</p> <p>And whilst it is all very well empowering communities to take ownership/ responsibility for GBI, it MUST be recognised they will need support, expert advice AND access to financial resources to do so. And a fundamental requirement of the LNRS will be support from the Council for the County Biological Record Centre.</p> <p>I also disagree with the statement about County Highways and road verges.....they have merely suspended verge cutting over the past couple of years, which is NOT beneficial to plant communities.....they are just encouraging the growth of coarse grasses, docks, nettles and thistles.</p>	<p>Noted</p> <p>Reference to expanding woodland through natural regeneration and succession added to Theme 4 Woodland &amp; Trees.</p> <p>Reference to potential of floodplain meadows to lock up carbon added to Theme 1 Flooding &amp; Water Management.</p> <p>Reference to major development proposals removed in Section 4.2 - Theme 6: Planning Principles.</p> <p>Noted</p> <p>This is not the case for the protected road verge scheme where significant increases of species diversity has been recorded.</p>
<p><b>Chippenham green Party</b> (Chippenham Devizes and North Wiltshire Green Party)</p>	<p>We've submitted responses to Wiltshire Council's Climate Strategy and Green &amp; Blue Infrastructure surveys, and we would be interested in helping Wiltshire Council to formulate policy for Wiltshire on these topics in whatever way we can.</p>	<p>Noted</p>

Respondent	Comment	Council's Response
<p><b>Melksham Without</b></p>	<p>Wildflower Management (page with Box 4.6). "Wiltshire Council's Highways and Streetscene team are also supporting wildflower growth in road verges by amending management regimes throughout the county". The parish council would question the management regimes in place, and would like to see more proactive management of the public open spaces and roadside verges being undertaken. What seems to have happened to date is just less cuts.</p> <p>There are some examples, such as the large public open space behind Wellington Drive in Bowerhill in the parish that is ex farmland that never had wildflowers and so they are unlikely to return as not there is the first place. There are large strips of land in the parish that have not been cut as regularly this year but would need some wildflower seeding to jump start the process, and then a managed cut after the seeds have dispersed. In other areas, there was a much-admired roundabout on the A350 full of ox eye daisies that were then cut whilst in flower and so no seed produced for future years. A managed approach is required.</p> <p>Box 4.10 Urban Trees - The Parish Council recognises the need for more trees but would not support trees being planted in footways/pavements, given the tendency for roots to cause uneven surfaces. There are several tree lined footways in the parish, particularly Bowerhill, where the pavements are virtually unusable, given their uneven nature.</p> <p>Box 4.13 Mental Health &amp; Wellbeing Benefits of Access to Nature - The Parish Council recognises the importance accessibility to green spaces is to health and wellbeing and encourage developers of large housing developments to include circular walks in their schemes, in order to enhance the lives of residents. From anecdotal evidence from new developments, and those that are existing, residents want to go for a "circular" walk, with some benches (and bins) along the way; whether they are running, strolling with a pushchair, or walking a dog.</p> <p>Box 4.1 The Working with Natural Processes Approach to reducing Flood Risk - The Parish Council recognises the importance of natural flood management and can evidence good practice in the parish undertaken by Bristol Avon Rivers Trust (BART) on a scheme on the South Brook catchment area, which includes tributaries through Whitley, Shaw, Shurnhold and Beanacre, to slow the flow of surface water during peak rainfall events. <a href="https://bristolavonriverstrust.org/nature-based-">https://bristolavonriverstrust.org/nature-based-</a></p>	<p>For the protected road verge scheme significant increases of species diversity has been recorded.</p> <p>To be considered as part of the Local Nature Recovery Strategy and Settlement GBI Framework as appropriate.</p> <p>To be considered as part of the Trees &amp; Woodland Strategy.</p> <p>To be considered as part of the Settlement GBI Framework as appropriate.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p><a href="#">solutions-in-south-brook-2</a> The Joint Melksham Neighbourhood Plan has included a policy on Flood Risk and Natural Flood Management (Policy 3)  <a href="https://8e84f94a-3875-44b6-81c4427b900c1ee9.filesusr.com/ugd/fcc864_d62a247950cc423abaa28eedd803eba4.pdf">https://8e84f94a-3875-44b6-81c4427b900c1ee9.filesusr.com/ugd/fcc864_d62a247950cc423abaa28eedd803eba4.pdf</a></p> <p>Box 4.17 Case Study: the economic benefits of the Kennet and Avon Canal Restoration - Parish Council representatives attended the recent Melksham Town Council Priority for People workshop (8th October) where there was a presentation by Steve Wilson of the Highways Major Project team about the proposed Melksham A350 Bypass and that in terms of additional works to be included in the Business Case presentation, that a costed proposal for improving the cycle and pedestrian connectivity of Melksham to Lacock was not being included. This scheme involved adaptations of the existing A350 that would be bypassed. The parish council clerk informed of the proposed scheme by the Wilts &amp; Berks Canal Trust to install a pedestrian/cycle way to Lacock from Melksham, effectively putting in the tow path before the canal is restored on this route, and members at the event also suggested that this scheme be researched for possible inclusion in the bypass business case due to the economic benefits of the connection of the town to this tourist hot spot. The project is known as "Destination Lacock" and would be great to see it being incorporated as part of the Bypass Business Case, to see some tangible benefits from the Strategy documents actually taking place on the ground.  <a href="http://melkshamnews.com/2020/10/14/melksham-canal-plans-to-finally-move-forward/">http://melkshamnews.com/2020/10/14/melksham-canal-plans-to-finally-move-forward/</a></p>	Noted
<p><b>West Wiltshire Ramblers Group</b></p>	<p>I completed my entry for the GBI survey yesterday, but would like to add further comments in view of my experience over the last ten years, as a member of the Ramblers, as Footpaths Secretary of the West Wilts Ramblers Group (WWR) for seven years till Nov 2018 and subsequently as a still involved member of WWR. During this time I always worked closely with the Council's Countryside &amp; Rights of Way Department and it became very clear that they were seriously under resourced in every way to carry out their duties. This still seems to be the case. Two years ago, I wrote on this subject to [REDACTED], then the responsible Cabinet member, the letter I quote below. The situation seems only to have got worse, with further budget cuts required continuously year by year.</p>	Noted

Respondent	Comment	Council's Response
	<p>A properly implemented GBI policy, particularly Goal 3, P13, and Key Priority, P14, of the Executive Summary will need a Countryside &amp; Rights of Way Dept that is fully functional. It is really important, in my opinion, that Wiltshire Council realises this and take steps to correct the situation.</p> <p>This what I wrote on Wed 15th Jan 2020:</p> <p><i>Quote</i></p> <p><i>To: Councillor [REDACTED], Cabinet Member for Highways, Transport &amp; Waste</i></p> <p><i>Cc: [REDACTED], MP for Chippenham</i></p> <p><i>Cc: [REDACTED], Chair, West Wilts Ramblers Group</i></p> <p><i>Cc: [REDACTED], Footpaths Secretary, West Wilts Ramblers Group</i></p> <p><i>Cc: [REDACTED], Ramblers Wiltshire Area Footpaths Secretary</i></p> <p><i>Cc: [REDACTED], Head of Service, Rights of Way &amp; Countryside, Wiltshire Council</i></p> <p><i>Cc: [REDACTED], Team Leader, Rights of Way &amp; Countryside, Wiltshire Council</i></p> <p><i>Cc: [REDACTED], Countryside Access Officer Central Wiltshire</i></p> <p><i>Dear [REDACTED]</i></p> <p><i>As a Ramblers activist for the last nine years, and as a member of West Wilts Ramblers Group's Tuesday morning working party for even longer, I know the enormous value of our Wiltshire public rights of way network. I have got to know members of the Rights of Way &amp; Countryside Department very well and to appreciate how hard they work to carry out their statutory duties, and to maintain and improve the network.</i></p> <p><i>During the recent election campaign a lot of support was pledged to improving the health of the nation, and to reduce levels of carbon emission. Indeed Wiltshire Council has already pledged to do their part. However, this does not appear consistent with the current state of finances at the Council. Austerity has not gone away, and the Rights of Way &amp; Countryside Dept are having to make further savings this financial year and also in 2020/21. If the Council is really to do its part, this Department needs to be up-graded. It currently works largely by re-acting to events. It needs to become one that is out in front, taking initiatives. This will take a lot more money.</i></p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p><i>At West Wilts Ramblers we would argue that the Rights of Way &amp; Countryside Dept need the resources to</i></p> <ul style="list-style-type: none"> <li><i>-Research and propose new and/or upgraded cycle and footpath routes, so that Councillors can feel they are leading from the front in implementing policy.</i></li> <li><i>-Persuade and overcome nimbyism in implementing new and upgraded RoW for cycle and footpath routes.</i></li> <li><i>-Supervise legalities of upgrading RoWs.</i></li> <li><i>-To input positively and in depth into plans for new housing and industrial estates so that walkers and cyclists needs are taken into account.</i></li> <li><i>-To positively assist in finding and registering historic paths.</i></li> <li><i>-To rationalise where appropriate the current RoW network.</i></li> </ul> <p><i>The work load for all the above will of course be high, much higher than is currently possible. We do understand that current staffing levels are quite insufficient to do all that is suggested.</i></p> <p><i>The first and most important problem appears to be, that in spite of 'Austerity' being over, the Council is having to make something like £7 million pounds worth of cuts in the current financial year and is being required to make a further cuts of £15 million next year.</i></p> <p><i>Wiltshire Council needs to find this money, to have the infrastructure, to meet Health and Climate Emergency measures to which the Country and the Council is committed.</i></p> <p><i>Please advise how all this is to be done. What approaches are being made to Government? Are the rates to be increased? Is the Govt contribution to Wiltshire Council's costs going to be increased? Promises have been made during the election that need to be honoured, but they do not appear to be based on the reality of the current financial situation at the Council.</i></p> <p><i>For your assistance, I attach a copy of the Ramblers Manifesto that was circulated before the election. It sets out in detail where the Ramblers Association considers action is necessary.</i></p>	

Respondent	Comment	Council's Response
<p><b>Drews Pond Wood Project</b></p>	<p>Space for detailed, meaningful contribution is lacking on the survey. Personal circumstances mean that I was unable to join any virtual or actual consultation sessions so I would like to make the following points.</p> <p>It is essential that PROTECTION is given due weight in this strategy. The strategy needs to reflect International Habitats Directive, NPPF, Core Strategy Objective 5, Policy 50 and 52, that all put protection as the first action. Mitigation and compensation are only to be considered if there is no alternative. This document assumes that protection is happening and jumps straight to enhancement, giving the false impression that it is acceptable to damage biodiversity so long as there is an attempt at mitigation. It needs to be made clear that protection must be the first consideration to ensure that 'net gain' doesn't become a license to damage.</p> <p>Natural England's comments to the Local Plan consultation regarding GBI also raised that PROTECTION should come before mitigation. The comments that this statutory body made about Green Blue infrastructure don't appear to have been taken on board in the production of this GBI strategy. In their response to Policy Theme 2- Enhancing Green/Blue infrastructure and biodiversity NE state:</p> <ul style="list-style-type: none"> <li>• 'The plans approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF ensuring that loss of priority habitat is where possible avoided. The policy should also ensure that biodiversity net gain is not applied to irreplaceable habitats and should make clear that any mitigation/compensation requirements for European sites should be dealt with separately from biodiversity net gain provision'</li> <li>• 'Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring....Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts'.</li> </ul> <p>THE STRATEGY DOCUMENT REQUIRES ADDITIONS TO COVER PROTECTION IN GOALS, PRIORITIES AND THEMES:</p> <p>Goal 2 PROTECTING biodiversity needs to be the first priority to reflect international, national and county policy. Bullet point 3 should come before bullet point 1 and 2. This bullet point needs to make reference to protecting habitat as well as species. Putting this point first and strengthening it would make it clear that protection of species and habitat is the first consideration. Assuming that enough is</p>	<p>Noted</p> <p>Reference to the NPPF mitigation hierarchy has been strengthened in Box 3.5 Safeguarding the Integrity of the GBI Network</p> <p>Reference to the NPPF mitigation hierarchy has been strengthened in Box 3.5 Safeguarding the Integrity of the GBI Network</p> <p>N/A – this not a prioritised list and all bullet points are equally important. Note this is a high level strategy document rather than a set of detailed planning guidelines.</p>



Respondent	Comment	Council's Response
	<p>currently done to protect designated sites/priority habitat and species does not reflect what actually happens in reality and jumping straight to dealing with creating/restoring gives the wrong impression. A habitat/species cannot be restored or enhanced if it has been destroyed by development. As part of Goal 2 it is essential to urgently gain better information through ecological survey, to be able to identify 'priority habitats' and 'threatened species' that may be important to the protected site network even if they are outside it's physical boundaries. Ecology is complex, and does not stick to fenced off nature reserves. The functional link that Trowbridge has to the Bath &amp; Bradford on Avon bat SAC is an example of this. In recent years Devizes has also been found to have a functional link to this Bat SAC. More information is urgently needed to inform planning decisions on land close to towns where there is development pressure. We risk loss of habitat supporting species that will have an impact on internationally important sites before we even know the true extent of what is present or how functional links are working.</p> <p>Goal 3 This goal does not account for the fact that some important wildlife sites near settlements will be unacceptably damaged if access to green infrastructure close to towns is indiscriminately encouraged. Not all important wildlife sites are remote from populations and care must be taken not to impact on the biodiversity of sensitive wildlife sites near settlements. Trowbridge and Devizes woodlands that have a functional link to SAC are examples of this problem. Access to high quality green space should not be encouraged at the expense of wildlife and the concept of capacity must be acknowledged. The pursuit of recreation must be balanced against the need to conserve biodiversity/tranquility. As the group that manages Drews Pond Wood Local Nature Reserve it has been our experience that the sites ability to provide beautiful, serene, natural surroundings, close to urban areas is under increasing demand and threat – especially since Covid 19. The local community stands to lose the very thing that they seek due to recreational pressure. The LNR needs to be valued as a precious, finite resource and conserved for future generations. The LNR has been overwhelmed by housing developments in the vicinity in recent years. Housing continues to be proposed, adding to pressure of use despite the discovery of a functional link to the Bath &amp; Bradford on Avon SAC that has highlighted this sites importance for conservation. Conservation value must not be ignored in favour of providing recreation.</p> <p>Priorities for Action (Box 3.7) Protection of natural assets and biodiversity needs to be the first priority and should not be assumed.</p>	<p>To be considered as part of the Settlement GBI Framework as appropriate.</p> <p>N/A – this is a high level strategy document rather than a set of detailed planning guidelines.</p>

Respondent	Comment	Council's Response
	<p>Add new Theme 1 - The first theme needs to be to PROTECT biodiversity. It is an oversight not to include protection in the themes. Add new Theme that deals with Sustainable Planning. There is a theme that covers sustainable agriculture and land management, but nothing to cover development planning which has a huge impact on biodiversity. Protecting biodiversity from development must be included in this additional theme rather than merely dealing with mitigation.</p> <p>Theme 2 - Include protection of High Grade Agricultural Land. This occurs around settlements and is threatened by development. It is important to retain this finite, irreplaceable resource to secure the ability for local food production. Contrary to policy the presence of High Grade Agricultural Land is ignored and is lost to development. I have witnessed this on various occasions. The strategy needs to highlight the importance of protecting and retaining healthier soil that already exists in the form of the 'best and most versatile' land.</p> <p>Theme 3 – (See comments for Goal 3 above). Developing strategies to provide high quality accessible green space close to where people live to disperse recreation away from sensitive sites does not account for the fact that important and sensitive habitat is not always in remote locations, but can be next to settlements. It is important to distinguish between green infrastructure that can cope with increased use and more sensitive wildlife sites where additional pressure from recreation would be unacceptably damaging.</p> <p>Theme 5 - Include Local Green Space Designation The production of guidance for Local Green Space designation would allow identification and protection of green infrastructure that is important to local communities NPPF 99, 100 &amp; 101. WC should follow the lead of other LA's that have prepared documents setting out a methodology for designating areas of land as LGS This designation provides opportunities for consideration of the best approach to managing these areas in a coordinated way that is beneficial to wildlife and people, and accounts for the sensitivity of sites.</p>	<p>N/A – reference to the need to protect Wiltshire's biodiversity has been added to Theme 3 Nature Recovery &amp; Landscape Management. Note – this is a high level strategy document rather than a set of detailed planning guidelines.</p> <p>To be considered as part of Settlement GBI Frameworks as appropriate.</p> <p>To be considered as part of Settlement GBI Frameworks as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p>

Respondent	Comment	Council's Response
	<p>Principle 6: Planning Principles There is nothing in this principle to ensure that protection is the first consideration or to reflect the mitigation hierarchy. The initial GBI principle in Box 4.22 must require development to protect habitat and species as the first consideration where possible otherwise this strategy will become a license to destroy.</p> <p>Monitoring and Review. Urgent action is needed to gain adequate baseline information on habitats, species and GBI assets NOW. Only dealing with monitoring information in the future does not ensure the provision of initial information for future comparison. Loss is likely to occur without knowing what is there in the first place. This is illustrated by the functional link of south Devizes to the Bath &amp; Bradford on Avon SAC, only established by the chance trapping of a ringed male Beichstein's bat in 2013. Although further survey work has been done to gain insight into the behaviour and movement of Annex II bats in this vicinity, much more is required to ensure that developments coming forward for the town do not impact the SAC. A Bat strategy is urgently needed. Despite this known link developments have carried on regardless. More information is needed to ensure the protection of the intricate mosaic of habitats that these rare bats are using. Development site specific survey is disjointed and too late at application stage to reverse allocation that is damaging. Landscape wide ecological survey is needed at an early stage so that a coordinated approach can be taken that accounts for the complexities and interconnectedness of wildlife and the accumulative impact of separate developments. If rare species or habitat is found during the planning process that need to be protected it must be made possible to remove allocated sites rather than just carrying on regardless and allowing development with inadequate mitigation that will not compensate for adverse effects.</p> <p>Our concern that there is presently inadequate protection is based on experience. We realise that this strategy does not deal with detail, but have included reference to our observations of specific situations in order to illustrate the points made. We have found that: developers have not identified nearby designated land when submitting proposals; developer survey has been poor and has not met requirements or has played down the presence of rare species; detailed information about protected species provided in the form of legitimate survey by well qualified independent experts has been ignored; County Councillors have ignored the recommendations of WC Ecologist; poor decisions have been made by Councillors who have no expertise or seemingly little interest in biodiversity issues. Resulting</p>	<p>Reference to the overarching GBI planning principles being used to develop local planning guidelines in the Settlement GBI Frameworks added.</p> <p>Section 5.5 Monitoring &amp; Review updated to confirm the Council will develop a plan and indicators for monitoring implementation of the GBI Strategy. To also be considered as part of the Local Nature Recovery Strategy.</p> <p>Noted</p>

Respondent	Comment	Council's Response
	<p>mitigation has been a token gesture that is not effective and has not compensated for loss of habitat. Recent applications are attempting to bypass the Local Plan meaning that sites are not part of a process where SA is carried out to ensure that development can be steered to the least damaging option. Without firm action to address flaws in the system damaging action will continue and a strategy based on mitigation alone will not prevent loss of biodiversity. Mitigation and planning gain are not new concepts, and loss has continued despite pursuing this approach for decades. Flaws and loopholes in the planning system that favour the developer need to be recognised and dealt with, otherwise the only actual 'gain' will be for developers who will find it easier to advance planning applications with cosmetic mitigation that seems appealing, but still results in loss.</p>	
<p><b>Sedgehill and Semley Parish Council</b></p>	<p>On behalf of Sedgehill and Semley Parish Council, please be advised that we would like to be involved in any future action partnerships or steering groups relating to Wiltshire Council's Our Natural Environment Plan. Our areas of interest are:</p> <ul style="list-style-type: none"> <li>• Nature Recovery and Landscape Management</li> <li>• Sustainable Farming &amp; Land Management</li> <li>• Woodland &amp; Trees</li> </ul>	<p>Noted</p>
<p><b>Winsley Parish Council</b></p>	<p>Winsley Parish Council welcomes these documents and finds that they offer a broad response to the challenges we are facing. We note that the proposals are designed to fit with the National Planning Policy Framework which feels right.</p> <p>Whilst welcoming the overall proposals we have the following comments to make which are either to raise the importance of some of the points made in the documents or to ask questions which we hope may help Wiltshire Council develop their approach further.</p> <p>1. Themes</p> <p>We are concerned that delivering under your chosen six themes risks approaches which do not recognise the natural world's living and inter-related systems; which would be better recognised perhaps by using: energy, air, water, soil and food systems as higher level objectives which would seem then to invite 'naturally' integrated approaches?</p>	<p>Noted</p> <p>Noted – the delivery themes have been selected to broadly reflect the Government's 25 Year Environment Plan themes.</p>

Respondent	Comment	Council's Response
	<p>2. Stakeholders We believe that you correctly identify communities as key stakeholders. However, if communities are to be encouraged to support this work, then community forums may well be in need of creation and fostering as they take on this work? As local people inhabit the spaces that are the subject of this document's intentions then we would welcome local partner organisations to work through networks of local parishes. Furthermore, as every single member of the county is affected by this strategy, and how effectively it is implemented, then actively supporting all communities in partnership working with this strategy acquires even greater significance.</p> <p>3. Regional considerations We would ask that the plans made do indeed reflect the river catchment areas that are present in Wiltshire. Basing the strategy around catchment areas may avoid mistakes and allow us to recognise when benefits have been realised.</p> <p>4. Nature's way It can often be that allowing nature to grow back is often a very effective way of creating the environment human's respond well to. So (for example) where river courses have been buried in underground pipes, they are unseen and unappreciated and the rapid flow of water through piping can contribute to downstream floods. So dig the pipes up, open them to the air to be seen and appreciated and allow the water to find its own route-it will often move in braided channels and create wetlands which reduce the risks of downstream flooding.</p> <p>5. Strategy context This looks complex and we are concerned that it will reduce the possibility of useful change if specific, shared, higher level goals are not kept constantly in focus by all partners.</p> <p>6. Trees It is widely recognised that tree planting is a very effective countermeasures to the climate emergency. How will this be implemented at scale?</p>	<p>Noted - Community Environmental Plans developed by Town/Parish Councils and local stakeholders using the Community Environmental Toolkit will set out actions for delivery of settlement-scale GBI projects to support local priorities.</p> <p>Noted</p> <p>Noted</p> <p>Noted - Community Environmental Plans developed by Town/Parish Councils and local stakeholders using the Community Environmental Toolkit will set out actions for delivery of settlement-scale GBI projects to support local priorities.</p> <p>To be considered as part of the Trees &amp; Woodland Strategy.</p>

Respondent	Comment	Council's Response
	<p>7. Farming and Allotments Encouraging the development of community engagement in farming is potentially a very effective way of promoting well-being and local food production (with low food miles) in partnership with the communities who will help grow and then eat the food. People who are more knowledgeable about how their food is grown will also help promote organic methods with less pesticide and fertiliser use and better soil quality with carbon sequestration. Where farming space is not available then wider provision of allotments are likely to be welcomed. Education work to support these initiatives would be welcome and social prescribing by the health sector should be promoted.</p> <p>8. Regional self sufficiency The local economy should be re-aligned to help provide locally the resources to generate renewable energy and to grow sustainably the materials that can be used (such as timber) say in house building. This stimulates the local economy whilst keeping transport miles low and builds local resilience as does the creation of greater food production in the region.</p> <p>9. Priorities There doesn't seem sufficient urgency in the priority section of the GBI Strategy. The Climate Strategy recognises that we are feeling the effects of climate change now and hence planning for a two degree temperature rise, whereas a five year review cycle for the Green and Blue Infrastructure appears at odds with that. A three year review cycle would reflect the urgency and the pivotal contribution of Green and Blue infrastructure to coping with the effects of climate change. Climate change is here now and is set to worsen rapidly so urgent action should surely start now!</p> <p>10. Best practice How does the council intend to check for, recognise, and implement examples of best practice which may be found across the UK, Europe or globally?</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Best practice case studies are included in the GBI Strategy document.</p>
<b>Sustainable Sherston</b>	<p>I am part of Sustainable Sherston and would be happy to be the point of contact for any help needed. I would be keen to know more about the Community Environmental Toolkit as we are looking to carry out a local audit (though I'm not yet sure whether this would be a biodiversity survey or an energy audit). I'll check the toolkit but please do keep in touch via this email.</p>	<p>Noted</p>

Respondent	Comment	Council's Response
<b>Wiltshire and Swindon Countryside access Forum</b>	<p>I completed the survey as an individual, but am also the Chair of the Wiltshire and Swindon Countryside Access Forum, and the Area Footpath Secretary for the Wiltshire Ramblers. Both organisations would like to be kept informed of developments in implementing the strategy, and we may also be in a position to become involved.</p> <p>I found the consultation to be very long in aspirations and worthy aims, but there was a complete absence of any timetable or deadlines for its implementation, other than the completion of further plans as shown in diagram 0.1, and the overall objective of becoming carbon neutral by 2030.</p> <p>Given the organisations I mentioned above, my main interest is in the Health and Wellbeing overarching theme, with particular reference to walking and Wiltshire's rights of way network. The document notes the importance for healthy living of walking and cycling, and access to the countryside, but my experience has been that the Council is quite happy to spend large amounts of money on half-baked cycling routes in the major urban areas with only minimal, or no, consultation with likely users, which then have to be scrapped or hugely modified, while little or no consideration appears to be given to maintaining, let alone improving, the rights of way network. This is correctly stated somewhere in the document to be some 6,000 km long. In box 3.5 on page 34, the statement is made that it is important to safeguard the integrity of the county's GBI network from inappropriate development. I certainly agree with this, but it is just as important to protect it from neglect. The Council's rights of way department has been woefully underfunded for years and is now a pale shadow of what it used to be before the Government's austerity campaign began. It seems that it has been viewed by budget setters within the Council as the most expendable/least important department in the council; there are now only six Countryside Access Officers (CAOs) to attempt to keep those 6,000 kms of rights of way in a serviceable condition, and although they do a magnificent job in the circumstances, their task makes King Canute's attempts to turn back the sea look easy by comparison. The case study in box 5.4 on page 74 of the document mentions the work done by volunteers in maintaining the network of rights of way, and it is certainly the case that without us the situation would be even worse. Page 75 mentions that increased funding is to be explored. I suggest that if any is obtained it be directed at the Rights of Way department forthwith.</p>	<p>Noted</p> <p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans.</p> <p>Noted</p>

Respondent	Comment	Council's Response
<b>Private individual</b>	<p>1. The King Alfred Way is a unique asset that is partly within the 'wider countryside' of the county</p> <p>2. There are opportunities to promote it as a tourist activity, and for those doing it to bring tourist money into Salisbury, linking in with train stations in Salisbury – from the route, so many different landscapes can be views and appreciated.</p> <p>3. Eventually, the route could be not just sign posted for wayfinding (its hard to navigate without GPS now), but information boards could be installed at various junctures in the landscape, highlighting the different types of landscape one is passing through or looking out at, with some blurb about why its important now or historically....</p> <p>KAW through Wiltshire - The Wiltshire website could be updated to include a link to this existing GI asset, as its currently missing, or hard to find:</p>	To be considered as part of the Settlement GBI Framework as appropriate.
<b>Bradford on Avon Town Council</b>	<p>Bradford on Avon Town Council welcomes the fact that Wiltshire Council (WC) is developing a Climate Emergency (CE) Strategy. We appreciate that this a complex issue and approve of the range of ideas included in the draft strategy. The lack of integration of this document with the WC Local Plan reduces its efficacy.</p> <p>The CE Strategy lacks vision and commitment to achieving its goal of seeking to make Wiltshire carbon neutral by 2030. The recent IPCC Sixth Assessment Report (AR6) predicts that the world will reach or pass 1.5oC between 2030 and 2035 and is likely to exceed 2oC between the early 2040s and early 2050s. Every fraction of a degree of warming leads to more dangerous and costly impacts. Urgent actions could remediate this to some useful extent. Without WC commitment and urgency, there is little chance of us making much progress at all, and the impact of the Local Plan (unless the final is significantly improved from the draft) is likely to increase the County's carbon footprint rather than address the problem. It is interesting to note, that excessive, poorly thought out housing in the wrong places, of the wrong type and not of environmentally sustainable quality, is referred to as a Plan, whereas the Climate Emergency and Blue-Green Infrastructure documents are both referred to as Strategies; some of the right words, but not really a plan! The CE and BGI need to be fully integrated with the Local Plan and of at least equivalent weight of importance.</p>	<p>Noted</p> <p>Noted</p>





Respondent	Comment	Council's Response
	<p>6. There is a lack of measurable objectives and associated milestones. If the strategy is to be succeed, there needs to be more detail on clear aims on a yearly or every two years basis;</p> <p>7. There is a lack of capital investment and budget commitments;</p> <p>8. If the Strategy is to achieve its aims, immediate reversal of plans implementing climate destructive, high emission plans and policies, until such time as detailed carbon reduction delivery plans have been adopted, including the excessive housing target and poor housing standards, Westbury Incinerator etc.;</p> <p>9. Active travel infrastructure needs significantly better emphasis: more than 'encouragement' for active travel. Greater provision of safe walking and cycling routes, EV charging points, EV taxis, car-sharing/clubs and all other possibilities to help reduce emissions as well as reducing the total number of vehicles on our roads;</p> <p>10. There is no clear path for improving public transport which should be so much more than buses, especially improvement and protection of existing routes on the train services as these efficiently removes vehicles from the roads. This is highlighted by the local outrage about removal of the direct route to Waterloo with no consultation and expectation that Wiltshire Council should champion that cause;</p> <p>11. No detail on sites to generate renewable energy, plant trees, apply regenerative agriculture or produce food for local consumption;</p> <p>12. Complete dependency on other plans and strategies that are yet to be developed, which in themselves present a significant risk of increasing the County's emissions (e.g. through more commuter based development and road building);</p> <p>13. All Wiltshire Council business should aspire to carbon-zero operationally. Recently announced, the Silverwood School extension approval with a recommendation to be operationally carbon-zero is commendable. However it is needs to consider all aspects, including that a majority of students will be transported there (cars? buses?), rather than gaining education and support within or near their own communities.</p> <p>14. Lack of detail of what is included specifically in BGI Strategy, makes it difficult to comment as a community;</p> <p>15. The BGI has limited definitions of what types of protection will be provided at designated sites and what are those sites;</p>	<p>6. Section 5.5 Monitoring &amp; Review updated to confirm the Council will develop a plan and indicators for monitoring implementation of the GBI Strategy.</p> <p>7. Noted</p> <p>8. Noted</p> <p>9. Noted</p> <p>10. Noted</p> <p>11. To be considered as part of the Trees &amp; Woodland Strategy and Local Nature Recovery Strategy.</p> <p>12. Noted</p> <p>13. Noted</p> <p>14. To be considered as part of the Settlement GBI Framework as appropriate.</p> <p>15. Reference to the overarching GBI planning principles being used to develop local planning guidelines in the Settlement GBI Frameworks added.</p>

Respondent	Comment	Council's Response
	<p>16. The consultation response from Bradford on Avon was overwhelmingly in support of protecting existing greenspaces for well-being and wildlife; it is uncertain whether (for example) the Old Golf Course is 'in' the BGI and if it is, what protection it would be given;</p> <p>17. The BGI document focuses on 'access' to wildlife and economic impacts, but despite all the evidence of massive loss insect, bird and mammal wildlife both in quantity and species, there are no actions suggested for enhancement or regeneration of habitats and safe corridors for wildlife. BOATC's made Neighbourhood Plan has green space protections, but the green corridors policy was removed due to lack of evidence (pre- 2016). We now have a significant amount of evidence and consultation, which will be incorporated into a Neighbourhood Plan update.</p> <p>18. BOATC employing a dedicated Green Space Officer putting our community in the vanguard of BGI; Bradford on Avon Town Council</p> <p>19. The Council could do more to indicate how it will use its influence to educate and lead residents and businesses to do more to reduce their own carbon footprint and protection of wildlife in areas beyond the Council's control. Bradford on Avon Town Council is keen to continue to support Wiltshire Council and its councillors in taking the urgent action that is now required. We declared a similar Climate Emergency within days of WC's declaration in 2019, which we augmented in 2020 with an Ecological Emergency. <a href="https://bradfordonavontowncouncil.gov.uk/town-council-commits-to-a-greener-future/">https://bradfordonavontowncouncil.gov.uk/town-council-commits-to-a-greener-future/</a> We have been working hard to engage with our community, doing projects and taking actions as best we can, but we are a small town and need support and leadership for the County to make any significant impact. There is little need for more evidence gathering, investigations and assessments; the evidence is irrefutable. There is an urgent need for more ambition and immediate action.</p> <p>Bradford on Avon Town Council is extremely interested in the GBI strategy particularly along the River Avon which is central to the wellbeing, biodiversity and heritage of our whole community. We would be keen to work with Wiltshire Council to protect and enhance our riverside and other green spaces and continue to take a strong lead on this, as we take on responsibility for these in the imminent asset transfers.</p> <p>Prepared by Cllr [REDACTED] 14/10/21, in conjunction with BOATC and support from residents and groups including Climate Friendly BOA, BOA Preservation Trust.</p>	<p>16. To be considered as part of the Settlement GBI Framework as appropriate.</p> <p>17. To be considered as part of the Settlement GBI Framework as appropriate.</p> <p>18. Noted</p> <p>19. Noted</p> <p>Noted</p>

<p><b>Private Individual</b></p>	<p>I endorse the Wiltshire Climate Alliance Response to Green and Blue Infrastructure Strategy October 2021. This is a comprehensive and well-presented response. I have the following observations and comments which may be of some use.</p> <p>Wiltshire Council must recognise and formally declare an Ecological Crisis. The UK is one of the most nature depleted countries in the world. In the bottom 10 per cent, Natural History Museum Report Oct 2021. The UK is the most nature depleted country in Europe. 41 per cent of all species have declined in UK since 1970. UK State of Nature Report 2019.</p> <p>The GBIS needs to frame its strategy in the context of understanding the ecological emergency as it applies to Wiltshire and its neighbours in the South West. The Global Climate Emergency and Ecological and Biodiversity emergency are intimately linked, they are inseparable issues. We can't wait for climate measures to be implemented before acting on the urgency of measures needed to restore Biodiversity. The two emergencies are interlinked and should be given equal primacy in the formation, adoption and implementation of Council Policy. The Council cannot declare a Climate emergency without at the same time recognising and declaring an Ecological Emergency. This should promote and lead to the preservation and restoration of biodiversity as a central aim of Planning Policy.</p> <p>No net loss of Biodiversity, should be a given and should genuinely deliver a Biodiversity net gain, which should mean what it says. This is often stated as an ambition but there are very few examples of net gain this actually being realised. The Council should create an inventory of how this has been delivered so far, and how it plans to do so in the future. It is essential that Biodiversity net gain is supported by significant investment (at cost to Developers), to define what and where to implement appropriate biodiversity net-gain measures. This needs to be backed and supported by the commitment to monitoring the results of actions. This also requires significant investment.</p> <p>There is already plenty of environmental information and data already held (collected over many years by volunteers), and held for example by the Wiltshire and Swindon Biological Records Centre (and others). There is already much accumulated and incontrovertible evidence of the decline in wildlife, and habitats to be able to define a Nature Recovery Plan. It is time for concrete actions not more reports.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Biodiversity Net Gain of at least 10% will be mandated as part of the Environment Act 2021</p> <p>The Local Nature Recovery Strategy will use numerous data sets to establish a current position with regards to habitats across Wiltshire, where improvements are needed and identify areas for enhancement.</p>
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	<p>The protected sites network, SSSIs, NNRs, Priority habitats and Local Wildlife Sites already provide the framework and building blocks of a future GBIS. However such sites are not all in a favourable condition. Landowners need to be incentivised and supported to restore them to favourable condition and to expand them within an enhanced, integrated GBIS. They need to be supported with both direct investment towards land management but also through provision of advice and support through access to professional advisors.</p> <p>The Wilshire and Swindon Local Nature Partnership declined and ultimately became in-active due to the withdrawal of funding support from both Wiltshire Council and Swindon Borough Council. A future Wiltshire Climate and Environment Forum must be properly supported by staffing and financial resources in order to properly support and enable partners and community interest groups to contribute to the ambitions of the GBIS. It will require investment and commitment from WC and recognition that successful partnership working requires financial investment and support. It is unlikely to survive on goodwill alone.</p> <p>The GBI needs to aim high and set ambitious, testing targets for the restoration of biodiversity. Failing this will see the continued decline in wildlife and habitats. Planning Policy needs to be equally ambitious in recognition of the Ecological crisis. For example it could adopt the principle of an equivalence model for the restoration of biodiversity. That is to adopt the principle of allocating an equivalent amount of land to be set aside for biodiversity restoration, equal to that of each large development proposal. (e.g. Wetland restoration, Grassland restoration, Woodland restoration, Re-wilded land). These could also be framed in the context of providing rural economic (and related urban) benefits, and business opportunities, if framed in the right way.</p> <p>Confirming the baseline condition of Wiltshire habitats and species is a never-ending and ongoing (resource-hungry) exercise. Enough information already exists, held by Natural England, and WSBRC (and Wiltshire Wildlife Trust) to confirm that wildlife is in decline and species and habitats are in unfavourable condition. The priority should be to acknowledge this and to define ambitious targets to reverse this, and restore wildlife to the countryside. On the proposed interactive PDF maps including species, habitats, agri-environmental etc. The environmental and biological data to inform these already exists. It just needs pulling together.</p>	<p>Noted</p> <p>Noted</p> <p>To be considered as part of the Local Nature Recovery Strategy.</p> <p>The Council is already working in partnership with Wiltshire and Swindon Biological Records Centre (WSBRC) and Natural England to pull all the data sets together to form the evidence base to underpin the emerging Local Nature recovery Strategy.</p>
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	<p>It is essential that the new Wiltshire Climate and Environment Forum maintains links with the Swindon and Wiltshire LEP, and that they share and declare common objectives to restore biodiversity. The LEP is the driver for economic investment into Wiltshire. The SWLEP should equally acknowledge the Ecological crisis and be fully cognisant of the aims and ambitions of the Wiltshire GBIS. The same amount of energy and priority that is put into securing and delivering economic investment (which often seems to be able to be mobilised very swiftly) needs to be given to securing the investment required to support GBIS ambitions and the restoration of biodiversity. GBIS ambitions and targets (and Climate mitigation targets) need to be embedded into the economic investment plans (and the Local Industrial Strategy) and targets adopted by the SWLEP. Investment in Natural Capital (and biodiversity restoration) must be an integrated ambition of the SWLEP.</p> <p>The GBIS and the LIS should not be parallel strategies. They need to recognise the ambition of each other in acknowledgment of the shared need to address the Climate and Ecological Crisis in order to deliver sustainable development goals. Ecological and Environmental Monitoring is fundamental to the success of the definition and implementation of the GBIS. Such monitoring has long been poorly supported and invested in, and in some case withdrawn completely by Central and Local Government (e.g. support for Local Wildlife Sites in Wiltshire). Lack of investment in the future will mean that we do not have the ability to measure the success of future actions implemented. And no measure of the value for money of such interventions and investments.</p> <p>I refer to Wiltshire Climate Alliance's Concerns under Theme 3: Nature Recovery &amp; Land Management:</p> <p>Concern 1. Yes there is a lot of language which is vague with reference to for example, encourage, promote, consider opportunities etc. There has to be clear recognition of the Ecological Crisis and strong Leadership in the first instance. Needs to be clear about promoting, and demonstrating the benefits of a healthy, wildlife rich natural environment. This has been brought into sharp focus by the Pandemic. The wellbeing of the planet is fundamental for the wellbeing of communities and the people who live in those communities.</p>	<p>Noted</p> <p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.</p>
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	<p>Concern 3. Absolutely agree. For too long Development Planning (and Developers) have held the upper hand. The GBIS needs to be a fundamental, integrated component of all Planning proposals. Development Planning proposals should be declined if they don't include a minimum level of GBI (and this minimum GBI baseline should be set at a high level) recognising the historic losses of Biodiversity and the need to restore nature. We may in fact have already reached or gone beyond the tipping point for many species.</p> <p>Concern 5. Biodiversity Net Gain. GBI Biodiversity net gain principles should therefore be set very high. Agree this should not be seen as a loophole, enabling development alongside piece meal GBI improvements that are not integrated (or connected) with a wider understanding of the overall GBI framework that is based on existing scientific evidence (distribution of species, habitats, interconnectedness of habitats, SSSIs, Wildlife sites, Agri-environment schemes etc). Development proposals should pass a series of Climate, Water Resource and Ecological tests before being allowed.</p> <p>I refer to the full GBI Strategy document:</p> <p>Box 4.14 Green Infrastructure Standards pg 56. While it is good to have standards. I personally consider these national standards are inadequate. They lack ambition of the scale and recognition of the need to restore biodiversity, and the importance and value of having natural green space (and wildlife habitats) where people live. Having adequate good quality wildlife rich green spaces near where people live will mitigate some of the damaging impacts of people visiting our most important and valuable wildlife sites, sadly emphasised by damage seen to many local sites seen during the recent pandemic lockdowns.</p> <p>Box 1.1. Responding to the Climate Emergency. There should be an equivalent Box, "Responding to the Ecological Emergency" Not all measures required to mitigate/adapt to climate change will automatically deliver for Biodiversity. The Ecological emergency should have equal billing and the Strategy must be framed in full acknowledgement of the Ecological Emergency</p> <p>Box 3.2 National Policy and Biodiversity Net Gain. Habitats enhanced and left in a measurably better state than before development. This must be supported by monitoring, to be paid for by the developer.</p>	<p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate.</p> <p>Noted</p> <p>Noted</p> <p>To be considered in the new Local Plan in line with the NPPF and latest legislation requirements as appropriate</p>
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	<p>Sustainable drainage systems (SuDS), on and off site GI - We note and support the incorporation of SuDS into new development. Similarly we welcome the provision of both on site and off site GI as a theme for focused attention, together with the need to secure long term management arrangements at the outset Natural England support the notion to 'encourage greater respect for nature in how we use water' and advise the GBI strategy highlight opportunities for homeowners as well as developers to include methods for reducing surface water flood risk.</p> <p>Theme 3: Nature Recovery &amp; Landscape Management</p> <p>A major commitment in the Government's 25 Year Environment Plan, the NRN is a single, national network which will benefit people and wildlife by increasing, improving and joining-up wildlife-rich places across England, stretching from our cities to countryside, mountains to coast. It will contain sites designated for nature conservation and other wildlife-rich places where there is the potential to restore or create new wildlife habitat or form stepping stones to help wildlife populations grow and move. It will improve landscape resilience to climate change, providing natural solutions that reduce carbon and manage flood risk; sustain vital ecosystems such as improved soil, clean water and clean air and enable us to enjoy and connect with nature where we live, work and play – benefiting our health and wellbeing. We welcome the recognition of the links between the GBIS and the forthcoming Local Nature Recovery Strategies and look forward to supporting the Council to develop that connection.</p> <p>Theme 4 Woodland and Trees</p> <p>Natural England support the principles of the theme and commend the councils decision to produce a Tree and Woodland Planting Strategy.</p> <p>Theme 5: Healthy Living</p> <p>Health and wellbeing</p> <p>The current Covid situation has also further shown how valuable it is to have access to green space close to where people live. A recent review (May 2020 - see link below) of evidence for the health and wellbeing benefits of green infrastructure sets out the sizeable body of research that underlines the importance of creating more, bigger, better and joined-up green spaces, especially near to where people live, and</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Reference to evidence of health and well-being benefits of GBI has been strengthened in Section 4.2 - Theme 5: Healthy Living.</p>
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	<p>to address inequalities. <a href="https://www.gov.uk/government/statistics/the-people-and-nature-survey-forengland-monthlyinterim-indicators-for-april-2020-experimental-statistics">https://www.gov.uk/government/statistics/the-people-and-nature-survey-forengland-monthlyinterim-indicators-for-april-2020-experimental-statistics</a>. A further research document (September 2020 - see link below) sets out evidence that green infrastructure supports health and wellbeing through promoting positive mental health states, providing a context and motivation for physical activity and recreation, and allowing people to experience nature. <a href="http://publications.naturalengland.org.uk/publication/4799558023643136">http://publications.naturalengland.org.uk/publication/4799558023643136</a></p> <p>Natural England advise that social and health benefits from allotments, orchards, community gardens and historic environment areas should be given greater emphasis. The work to connect with mental health workers providing 'eco therapy' is a great example of how an area can support local biodiversity, provide an important local food source, be a valuable space for health and wellbeing and create a sense of place for local residents. There is a strong evidence base demonstrating how access to nature, rich environments and green spaces will have a positive impact on health and wellbeing. Access to good quality natural green space and parks at all scales in a way that most people can experience nature and lead more active and healthy lives. It is often communities that are economically disadvantaged with poorer health and educational outcomes that also have the worst provision of good quality BGI.</p> <p>Natural England note that there is no mechanism to understand how accessible BGI is across the plan area. This information should be combined with data like the index of multiple deprivation to understand how inequalities will be strategically addressed.</p>	<p>Noted</p> <p>Accessible GBI to be considered as part of the Settlement GBI Frameworks.</p>
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Respondent	Comment	Council's Response
<b>Personal response</b>	<p>Consider the cost benefit from a system perspective, over a longer time period and in light of other strategic priorities of the UK government and WC to save money and deliver multiple objectives at the same time. For example, re the councils Blue-Green Infrastructure strategy and the biodiversity crisis we also face, use Active Travel routes to create 'green corridors' within towns and in linking communities and include biodiversity positive landscaping and planting schemes as ways to keep routes safe (e.g. as boundaries to stop people wandering onto cycle paths when they go through parks and open spaces). For example, Active travel is good for physical and mental health and will reduce costs of delivering other services from the public purse. For example, cycle routes are much less costly to maintain therefore over time this will save money if it gets people off the roads. (Acknowledging that WC investment CBA must use the government Green Book for its investment consideration - this proposal is that WC considers wider CB).</p>	<p>Reference to using GBI corridors for active travel routes added to Theme 5: Healthy Living</p>

Online Survey Comments	Council's Response
As a strategy document detailing aims, clear enough, but not clear how this will progress to practical action and clear results. We could seek to do all of this and achieve nothing. How do we make sure that doesn't happen?	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
Basic errors such as bold font on I and spelling was distracting as was poor font choices	Typos corrected
The plan consistently fails to clarify the terms it uses and fails to provide evidence for statements made. I refer as one example the reference to 'Right Tree in the Right Place' it would be important to define what is meant to the Council by this term as I take this to mean that a tree is selected that will be healthy and live a long life and not planted on priority habitat - the plan seems to mean something else but does not clarify what	Glossary added.
But again not enough was done to encourage individuals to do more within their own property boundaries. Converting to Green energy if they can afford to do this; convert to an EV if they can afford it; plants trees and bushes wherever possible in their gardens; collect grey water if they can; if we all reduce carbon footprint it will reduce the heavy rainy storms, and flooding; create healthier living as environment not as polluted; and in turn would create economic recovery and natural capital	Text box added to emphasise the role of Neighbourhood Plans/Community Environmental Plans (developed using the Community Environmental Toolkit) in identifying local GBI needs and opportunities (Section 3.2)
I don't understand how a few cycle lanes and allotments will offset the loss of healthy living, green space by overdevelopment of green field sites while neglecting to develop brown spaces within already settled towns, eg Trowbridge	Noted
Mindful of cost. Balance easier and more difficult progress, to make progress in all areas. Foster care and concern for place, a small section of the population litters and fly tips. This negatively impacts others' mental health and anger, especially where it is too dangerous for the public to deal with it. There's little point in having the GBI plan perfect but not dealing with litter and flytipping; a sad eyesore.	Noted
A very muddled strategy - and an insulting survey. The term "white" is a derogatory racial term.	Noted
There were a lot of unfamiliar terms and corporate 'speak'. The Summary would not have passed the Plain English campaign!	Glossary added
I think it could have been written in much clearer English aimed at the general population rather than Council staff who are more familiar with the terms used.	Glossary added
I found it difficult to understand some of it due to some of the long technical words and they didn't explain what it means	Glossary added

Online Survey Comments	Council's Response
I think it would help to acknowledge that the Climate Change Strategy is overarching, and that actions would be prioritised together.	Goal 1 has been strengthened to emphasise support for reducing carbon emissions and achieving net zero targets through sustaining a health natural environment and nature-based solutions.
The New Forest National Park authority logo didn't appear on page 71. An important partner, doing partnership working with organisations linking to the Solent and coastline and beyond.	New Forest National Park logo added
There seems to be a plethora of plans overlapping with one another. Are any of them coming to fruition or is there a danger that we are just heaping up words?	Noted
There have been many government environment promises in the past, let's hope this actually begins to take physical action,	Noted
Rather dense and repetitive with phatic phrases 'working with' 'aim to achieve' 'plan to ...'	Glossary added
One thing that isn't quite clear to me is how all sections of the community will be engaged, including poorer and disadvantaged groups.	Text box added to emphasise the role of Neighbourhood Plans/Community Environmental Plans (developed using the Community Environmental Toolkit) in identifying local GBI needs and opportunities (Section 3.2)
It does not give detailed timeline for implementation.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
It might be a strategy but it's more like an aspiration. If Wiltshire council had considered all these aspects before instead giving planning permission for anything from housing estates to industrial sites where there s no requirement then there would be no need for a strategy!	Noted
Took me a while to get the structure: CET to Settlement Frameworks to LNRS to GBI to Environment Bill but now can see how it fits together.	Noted
The means and actual plans missing.	The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.
On the whole I thought it was well presented. It would be useful for the mapping to not be so pixelated (though I suppose these might have been made available elsewhere). I suppose some GIS layers dedicated to the GBI strategy could be added to online mapping info if it hasn't been done so already.	Mapping resolution improved

Online Survey Comments	Council's Response
I have a MSc in Global Environmental Challenges. I know the subject inside out. This is typical council gobbledegook to a lay person, don't believe for a second you're actually going to do anything.	Noted
See point above. Not enough about the interdependence and connectivity of every aspect of the strategy, and how they relate to climate change and vice versa.	Noted
We keep seeing the words but the actions by Wiltshire Council don't match the words, the departments are not joined up giving them the emphasis required in a climate emergency. The delivery priorities need to all be equal as they are all important and should be at the heart of decisions.	Noted
I don't see how the delivery themes fit to the goals with actions. To protect the existing environment, stop building roads and destroying habitats. Need more connecting corridors for wildlife, where are they identified? Which areas of land are going to be given over to tree planting. How are the rivers going to be clean? How can the public access green spaces on private land without restriction, eg Calne-Chippenham cycle route closed for shooting!	Local GBI needs and priorities to be identified in Neighbourhood Plans/Community Environmental Plans (developed using the Community Environmental Toolkit).
There needs to be a huge emphasis on education, creating a change in personal expectations (ie we will all need to change the way we live and give some things up) - critical to success will be ensuring people accept the need for and want to make these changes. The language and methods used need to be engaging, compelling and visible to all.	Noted
There are some very complicated paragraphs and some missed opportunities for being direct about action.	Noted
However on page 11 of the Exec Summary, defining B& G infrastructure you fail to include Wiltshire's many chalk streams and rivers which I understand are of international importance. Water extraction is not mentioned, this actually puts a cap on what development can and should be allowed. If there isn't enough to supply without depleting the natural environment, then no further development to be allowed. Simple really. Then we need a plan for water use reduction and waste treatment,	Noted
It is a good approach to restoring a very complex and interlinked system. I liked the idea of 'dividing' up the county by the water catchment areas and applying all the components of the strategy in each of the areas. This appears to be a good way of integrating the component parts to areas that individuals, communities, organisations and businesses can relate to.	Noted
GBI The Canal & River Trust fully support the work of the council in relation to the proposed GBI strategy and we particularly welcome the recognition of the importance of blue infrastructure. The Kennet & Avon canal is a perfect example of multifunctional green/blue infrastructure, and the Wilts & Berks canal can provide similar opportunities in advance of it becoming navigable. We suggest active travel should be added to the list of possible benefits. Nationally our canals experienced a huge increase in use...	Active travel benefits of canals emphasised in new text added to Goal 1

Online Survey Comments	Council's Response
All 6 of the delivery themes listed above are important. Strategic GBI sites need to be better defined with clear boundaries and presented on larger scale map(s), also showing Strategic GBI in adjoining counties. Whilst production of Settlement Frameworks are welcomed, there is a missed opportunity to focus on drawing up additional detailed plans for 'linking areas' - which link Strategic GBI sites to form more robust, continuous GBI corridors through the county and over its boundaries	Noted
The delivery and links between the various plans and who is to be responsible for them is not clear.	Noted
The devil is in the detail. The Strategy is good (although could have included a baseline for future delivery to be monitored against), but the council should quickly move into developing and delivering action plans. What will be done and where (targets), by whom, what will it cost, and what are the funding sources (both committed and not yet committed).	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
In places the print was too small to read.	Legibility of text improved
There was a lot of lengthy aspirations but not a lot of concrete goals or details. The text was not very readable.	Noted. Legibility of text improved
There is not enough about Protection of green and Blue assets - nor about protecting Biodiversity from development/ infrastructure projects eg road building. No mention of reversal of cuts in last few years to "Green" services and posts - such as Countryside posts; the closure of the Wiltshire Tree Warden scheme; the end of education projects eg Forest School activities. It is counter to the GBI strategy that eg Wilts Tree officers/Ecologists are over worked and cover too large an area/.	Noted
It was a rather long document. This is likely to affect the level of community engagement.	A summary version of the Consultation Draft was produced.
The maps on pages 19 and 20 are poor quality and lack sufficient information to understand or comment on.	Hyperlink to larger-scale maps in the Evidence Base online provided
Extremely thorough but perhaps over complicated and repetitive	Noted
The maps were too high level to understand in relation to local communities. No clarity about what I, as an individual, should be doing. No quantification of the impact of different strategies - so answering Q5 was difficult	Settlement-focussed maps to be provided as part of the Settlement GBI Frameworks.
Repetitive so easy to grasp the aims but not how you intend to do it	Noted
The 3 goal diagrams helped explain the interconnectedness of all	Noted
Easy to understand but no action planning, no budgeting, no responsibility or accountability, no timescales. No teeth. As Greta Thunberg said so eloquently, just more 'Blah blah blah'!	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
The maps are poor resolution and there is lack of detail. I understand the concept but not really what Wiltshire Council are going to do.	Hyperlink to larger-scale maps in the Evidence Base online provided



Online Survey Comments	Council's Response
It was a very dense document, I appreciate it's a complex subject but I think it could have been delivered in a simpler way. Very frustrating that the maps weren't clear, that there was no key and so rendered pointless.	Hyperlink to larger-scale maps in the Evidence Base online provided
It could go further and do more. Try being bold for a change. Less electric now the price is sky high and more hydrogen fuels.	Noted
All goals and delivery themes are important. We welcome the recognition of the importance of partnership working and in particular the engagement with town and parish councils. The Bremhill Neighbourhood Plan has objectives that go a long way in meeting the goals and delivery themes of the GBI Strategy. The specific objectives are Green and Open Spaces, The Local Landscape and Wildlife, Management of Water Courses and Flood Mitigation and Community Wellbeing. For example in the Green and Open Spaces.	Noted
This is a complex area, and for the lay person it is a lot of new information. However, the reading of the strategy did clarify many of the concepts and broaden my understanding of the issues and actions that need to be taken.	Noted
What is not understandable is why this implemented in 2012 when the Green Infrastructure Core Strategy Consultation was published.	Noted
I have been involved in conservation for many years and taken part in various consultations. However not sure how user friendly the document will be to people in general.	A summary version of the Consultation Draft was produced.
The goals were unambiguous and clearly expressed, however the plethora of graphics was confusing and did not add to comprehension of the strategy.	Noted
This was clear but much of it is aspirational and vague with no clear way forward to delivery.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
A clear statement of what the strategy is and is not is needed ie what it does and does not 'trump' in terms of planning decisions, changes of land use etc. The strategy needs to be a working document which people can use in future: it needs to be clear what will flow from the strategy in terms of Wiltshire Council decisions which are made after adoption. People need to know whether decision makers will have to have regard to the Strategy or not?	Noted
I think the document is excellent. The only change I would make is to have four goals not three. I would put mitigation into a separate goal as it is more important than the adaptation and resilience.	Goal 1 has been strengthened to emphasise support for reducing carbon emissions and achieving net zero targets through sustaining a health natural environment and nature-based solutions.

Online Survey Comments	Council's Response
It lacks detail as to actually what will take place. Will Wiltshire owned farms be examples of good soil management and regeneration? Will local producers of crops grown on healthy soil be supported in their work and from air pollution from surrounding areas. Will workable cycleways and footpaths and electric vehicle charging points for all be high on the agenda? Without nature humans will not survive, this needs to be made evident to all Wiltshire residents.	The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities.
It is very difficult to list the delivery themes in order of preference as they all interact. Obviously you have to make a start so why not take Flood and Water Management and this will involve Farming, Landscape management and Trees	Noted
What is a swale? Why use this obscure language?	Glossary added
The strategy is a bit too wordy, even the executive summary	Noted
That action is taken to reduce and remove harmful activities which impact the green/blue infrastructure including the lawful discharge of sewage into the River Marden.	Noted
More words describing commitment to actual NEAR-TERM ACTIONS needed.	Noted
The strategy is filled with jargon-ridden language. I have worked as an environmental professional, so this was not a problem for me. If the Council wants to create enthusiasm for this strategy from the general public, it will need a different document.	Glossary added
Ranking themes (above) makes no sense, as these should all be integrated. Areas such as meadows/permanent pasture is virtually ignored, tho as important as woodland in terms of biodiversity, carbon sequestration etc. <u>Nothing on agroforestry, regenerative farming.</u>	Reference to potential of floodplain meadows to lock up carbon added to Theme 1 Flooding & Water Management. Reference to benefits of agroforestry/regenerative farming practices added to Theme 2 Sustainable Farming & Land Management
The strategy context looks complex and we are concerned that it will reduce the possibility of useful change if specific, shared, higher level goals are not kept constantly in focus by all partners.	Community Environmental Plans developed by Town/Parish Councils and local stakeholders using the Community Environmental Toolkit will set out actions for delivery of settlement-scale GBI projects to support local priorities.
As above the attempt to rank the delivery themes is meaningless and counter productive, they are all important in different ways. The question below on Partnership working should be about just that, not just treating it as a way to act top down and inform the public	Noted
Not enough sense of urgency. It's already 2.5 yrs since the climate emergency was declared. Also a similar document produced in 2010 was essentially torn up? Need to demonstrate urgency in the action list.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).

Online Survey Comments	Council's Response
It did bring to mind Greta Thunberg's Bla bla bla. The words are fine but will they be implemented.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
There needs to be more definitive goals and deadlines for every year.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
The GBI strategy provides a clear vision for way ahead. However, Wiltshire Council needs to reconsider prioritisation of delivery themes. They are all important and inter-dependant on each other with the "whole" being greater than the sum of the "parts". Accordingly, all themes need to be taken forward in a holistic approach to delivery the maximum benefit across Wiltshire.	Noted
If you are sincere In your intention of reducing CO <sup>2</sup> , how do you justify your intention to build a waste incinerator at Westbury? Why not a plastic reprocessing plant instead?	Noted
I think the time frames could be more aspirational it almost seems written to fit the next plan period rather than reflecting the urgency of the current crisis	Noted
More actions and safe guards ie monitoring needed - Give nature a chance - put it first for once! (ie Nature, communities, Business) is always last and never gets and equal say.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
Waffle without intent	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
The strategy says some good things, but how about some targets specific to Wiltshire	Noted
Question 5.0 is not good. It is not reasonable to ask us to put the items in order because they are all important. The question is - how will the Council persuade the public to pay much higher rates, and the Govt to pay their share when all the necessary work has to be funded. How willing are we all to accept a lowering of our living standards to meet these costs which will be very high >	Noted
It was very general and a bit fluffy. It didn't delve into what delivery plans might look like, case studies or possible ideas. Calling it GBI is interesting in itself, it seems to imply that nature is a commodity. Instead it is vital for our survival! Also the notion that we can just create it as we want it doesn't do justice to how mature systems are established over time.	The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities. Case studies provided.
Lack of clarity on the how. eg details on Settlement Frameworks and planning principals are crucial to delivery but not available yet. How will you prevent reliance on Net Biodiversity Gain as a source of funding from facilitating development at the expense of GBI aims. The woodland and trees theme can't be achieved without an audit list of trees (and hedgerows) felled as well as planted	References to the purpose of the Settlement GBI Frameworks strengthened throughout the document where appropriate. Tree audit to be considered as part of the Tree & Woodland Strategy.

Online Survey Comments	Council's Response
<p>There are many fine words in this document, which should have been produced many years ago. Specific targets are needed to ensure effectiveness can be monitored and reported on. I would be interested to hear more about how the Council will ensure the proposed Climate and Environment Forum is more effective than the Local Nature Partnership. This document is urgently needed NOW as many new/recently approved planning applications give scant regard to multi-functional space</p>	<p>Section 5.5 Monitoring &amp; Review updated to confirm the Council will develop a plan and indicators for monitoring implementation of the GBI Strategy.</p>
<p>Aims are clear, but the how is not. Too much emphasis on "encourage" How will you manage conflict eg where GBI aims conflict with developers requests or planning permission. Who decides the "worth" of what is being lost and what would be "net biodiversity gain" Will ancient woodland indeed be "off limits" as mentioned in the strategy. How will you handle resistance to change - eg from people who like "tidy" verges</p>	<p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities. Case studies provided.</p>
<p>The document is wide ranging and, to a large extent not focussed. Too many diagrams that actually give no clarity on where the Council are going and how they're going to get there. Too many vague promises and statements</p>	<p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities. Case studies provided.</p>
<p>It was very waffly and didn't commit to specific actions.</p>	<p>Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).</p>
<p>Far too much verbiage and too many acronyms for an "executive" summary.</p>	<p>Glossary added</p>
<p>Very difficult - way too many words, even in the Summary. Main document is FAR too long to understand, and it appears to carry a lot of duplication. Priorities for Action are the only clearly understandable parts of the main document. Now we need to know how precisely these priorities will be actually implemented.</p>	<p>The Local Nature Recovery Strategy will set out actions for delivery of strategic landscape-scale GBI projects within priority areas, and actions for delivery of settlement-scale GBI projects will be set out in Community Environmental Plans to support local priorities. Case studies provided.</p>
<p>It is very high level so I was struggling to understand what practical steps will result from the strategy and how we will know if the strategy has been successful given the lack of key performance indicators.</p>	<p>Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).</p>
<p>See above comment on need to streamline so more impactful/readable</p>	<p>Noted</p>
<p>Nowhere near as clearly communicated or well laid out as the draft Climate Strategy. Not as engaging, harder to understand. Maybe a stronger vision statement needed: now; (intermediate); end state.</p>	<p>Noted</p>

Online Survey Comments	Council's Response
Many questions on how outcomes will actually be delivered.	Text boxes added to emphasise that the Council will develop an Action Plan (Section 5.4) and Monitoring Plan (Section 5.5).
I only started to understand it deeply after I had come across the Evidence Base and Workshop Report. There is jargon and there are unclear passages.	Glossary added