

#### Appendix 4: Summary of responses from statutory consultees & stakeholders

Consultee	Comment
WC Highways	<p>The Draft Outline Transport Assessment (DOTA) is a very helpful basis upon which to begin consideration of the likely transport impacts/implications and need for mitigation.</p> <p>It gives the comfort of demonstrating that improvements are achievable, however it is too early to confirm whether the measures identified in the DOTA are the most appropriate, and/or whether there are additional measures required to deal with other issues not yet clearly assessed (for example the extent and impacts of any unwelcome traffic rerouting as a consequence of the overall plan).</p> <p>As stated in the covering letter, there have been a number of concerns raised by local communities and their councillors on the impact of additional MOD and service family vehicles. DIO needs to take account of the discussion at the Councillor Reference Group (CRG) held on 12 June 2014, and to include a record of this meeting within the final SCI to be submitted with the Masterplan.</p> <p>Ongoing discussion should lead to an eventual agreement on the shape, form and extent of a package of transport measures on both the local and trunk road networks – Members will need to be updated on progress as and when the Masterplan is considered for approval.</p> <p>Wiltshire Council awaits the advice of the Highways Agency, whose views have the potential to have a significant effect on the overall 'package'.</p>
WC Conservation	<p>Issues raised early on in the process have been largely addressed. Remaining concerns are matters for recording to be picked up at the planning application stage. Detailed design, and related local visual and heritage impacts are also for the planning application stage. Development at Upavon is particularly sensitive in this respect.</p>
WC Archaeology	<p>There is much ongoing and future archaeological assessment required of both the SFA sites, inside the wire development sites and proposed training infrastructure sites. These assessments may throw up archaeologically significant features that may require changes to the Masterplan.</p> <p>As the individual planning applications are being prepared to be submitted, the DIO and their archaeological specialists and advisers should discuss these with Wiltshire Council as early as possible.</p>
WC Ecology	<p>There may need to be adjustments made in the way that some features have been valued. For example two large areas of calcareous grassland at Perham Down and Larkhill are assessed as being of medium (county) importance and low (district) importance respectively but it is not clear why they are valued differently. Also the relative importance attached to badgers over great crested newts is surprising and the county value assigned to bats in the garrisons may be rather high, and would be better considered when surveys are complete.</p> <p>While it is noted that all designated sites including European protected sites (SAC and SPA), SSSIs and County Wildlife Sites (CWS) have been avoided by the preferred site selection for SFA, some surveys of preferred options have identified calcareous grassland and broadleaved woodland which is of county importance. These sites would be eligible for designation as CWSs and should therefore be assessed against the criteria in the Wildlife Sites Handbook for Wiltshire. A robust and consistent approach to valuing</p>

ecological features is essential to ensure that the impact assessment is as accurate as possible and mitigation is proportionate.

The study of existing site ecology is acceptable for the purposes of supporting the Masterplan. It provides a competent high level evaluation of features within each area e.g. Bulford, Imber etc. and it is likely that all the main issues of concern have been identified. It appears there are no species or habitats directly impacted by the works that would prevent the recommended options being pursued and the study will be helpful in agreeing where further survey and assessment work should be targeted to support forthcoming planning applications.

It is too early for Wiltshire Council to fully endorse the section covering the impact assessment as survey work is incomplete, queries exist with the evaluation of some features and the details of development are not yet available. Details are given regarding the approach to mitigation for each site and these include reference to offsetting the loss of calcareous grassland using the Defra metric which would be welcomed. The metric can of course, and should, be applied to arable, scrub and woodland habitats.

#### HRA Issues

Pleased to see that the Masterplan is accompanied by a strategic level Habitats Regulations Assessment (HRA) which sets out how the army basing programme (ABP) as a whole is likely to affect Natura 2000 sites, particularly Salisbury Plain SAC / SPA and the River Avon SAC; this will provide a useful context when it comes to carry out project level HRA's of the individual planning applications, however it is not the end of the HRA process.

The HRA report identifies 'likely significant effects' upon the protected sites as a result of the proposals including habitat loss and disturbance of breeding bird populations on Salisbury Plain, and impacts of abstraction / discharge on the River Avon. The HRA suggests that it should be possible for the ABP to be delivered without having an adverse effect upon the designated sites but acknowledges that further work is required to further assess the extent of these impacts and ensure that any sufficient mitigation / compensation measures can be secured. While a degree of uncertainty is often unavoidable in a strategic level HRA, this is generally made acceptable where a further HRA will be undertaken 'down the line' when further details are available i.e. at the planning application stage, and where caveats have been inserted into the strategic plan to demonstrate how any residual risks will be dealt with at later stages. The Masterplan document itself does not currently acknowledge any potential constraints to development associated with the HRA or the need for further information and mitigation / compensation measures to support the HRA process through to the planning application stage. It is therefore advised that the Masterplan includes a strong statement acknowledging these constraints and providing a clear commitment to address the unresolved HRA issues (particularly those identified in Section 18.7 of the HRA and summarised below) prior to an application being made in September 2014.

With regards to individual Natural 2000 sites, the main unresolved issues are as follows:

#### River Avon SAC

The HRA is clear that the existing abstraction at Bulford garrison is having a significant effect upon the River Bourne / Nine Mile River, although it is not clear whether this is causing the river to be in unfavourable condition. It will therefore be difficult to demonstrate that the ABP would not exacerbate this situation or make it more difficult for this section of the river to achieve favourable condition in the future. The HRA suggests that the contribution of ABP would be 'negligible', however there do not appear to be any figures to clarify how negligible has been defined. Given the current negative effects which abstraction is having, any additional abstraction is unlikely to be

acceptable. Significant sustainability reductions within the garrison e.g. through reduced leakage, may help to mitigate any necessary additional demands for water from the ABP, however no information on such measures is currently available to be confident that the additional water demand can be accommodated. It is also worth noting that this programme cannot rely on sustainability reductions previously agreed through the Review of Consents which are required to make Wessex Water's abstractions acceptable, or prior MOD commitments for water reduction such as those in its Sustainable Development Strategy. Further detailed modelling work and information on proposed sustainability reductions will be required to demonstrate that the development at Bulford can be consented in line with the requirements of a HRA at the application stage, as agreed with Natural England, the Environment Agency and Wiltshire Council.

With regards to the discharge of foul sewer effluent, the OEA / HRA does not appear to include any evidence to demonstrate that the additional foul sewer effluent generated by the ABP could be accommodated within the headroom of existing permits, if not it will be necessary to assess the potential effects of additional phosphate loading associated with the ABP. The capacity of the STWs within the garrisons need to be confirmed and agreed with the Environment Agency and Wiltshire Council prior to submission of the first applications.

#### Salisbury Plain SPA

The HRA acknowledges that there is potential for in-combination effects between the Wiltshire Core Strategy and the ABP as a result of increased recreational activity on Salisbury Plain causing disturbance to designated populations of ground nesting birds. While most of the disturbance will be associated with WCS, a significant proportion (30%) will be additional, due to the ABP. While there is an existing mitigation strategy in place to address WCS development, this will need to be reviewed to ensure that it can accommodate the volume, extent and proximity of SFA currently proposed under the ABP, which is in excess of that originally anticipated when the mitigation strategy was developed, therefore it is expected that additional measures are likely to be provided to address these impacts. Other impacts such as loss of foraging habitat and disturbance are also outside the scope of the existing mitigation strategy (which only addresses recreational activity), and will require bespoke mitigation / compensation measures. Any mitigation measures should be delivered as part of the overall ABP, as agreed with Natural England and the Council prior to submission of the first application which could impact on the SPA.

#### Salisbury Plain SAC

There is likely to be a loss of calcareous grassland habitats within Salisbury Plain SAC which is as yet unknown, but will require restoration / replacement. It will be necessary to be clear that such habitat restoration / creation works are in addition to any existing work proposed by MOD under its statutory duties as a public landholder and that it is proportionate to any impacts related to ABP; as has been discussed, a 'mitigation tracker' is required to provide clarity on this issue. The scope of the impacts will be dependent upon the final siting and design of certain features, which should be avoided as far as possible through sensitive decision making informed by up to date botanical surveys. Both the mitigation tracker and botanical surveys should be completed prior to the first application which could impact on the Salisbury Plain SAC, in consultation with Natural England and Wiltshire Council.

The OEA identifies an approach to mitigation for recreational impacts arising from ABP on Salisbury Plain SPA based on making contributions towards the strategy which is already in place for development arising from the Wiltshire Core Strategy. Wiltshire Council will work with the MOD and its consultants prior to drawing up planning applications to resolve this, but clearly since the

	<p>ABP brings additional development to the area, Wiltshire Council would wish to see additional measures secured over and above those currently being delivered by its strategy.</p>
WC Landscape	<p>It is noted that there will be significant residual effects at Larkhill SFA and Bulford SFA (south west). Larkhill is subject to enhanced planning constraints implied by the proximity of the WHS. Where development is proposed behind the wire landscape effects can be managed and contained. Additionally the concordat provides protection to the landscape south of the Packway. However the preferred SFA lies in the open countryside to the east of the camp and will have significant landscape and visual effects despite the proposed mitigation.</p> <p>At this stage the study is very high level, it is possible that as the masterplan refines, good design principles and a well developed mitigation strategy could further reduce the significance of effects at both sites. However with such a substantial change in landscape character at these sites, the question is whether an acceptable level of change can be agreed by those with an interest in the area or look for a new location.</p>
WC Education	<p>Views awaited.</p>
WC Public Health	<p>From a public health consideration, the master plan addresses the determinants of health and wellbeing as associated with the built environment. However, at section 8, while the master plan raises the matter of local services and facilities, it does not recognise the impact of the significant increase in the size of the local population and its particular demography. While education and primary health care impacts are considered, the plan does not include the need to increase leisure services provision, community health care, or services for children and young people. The young demography of serving personnel and their families will have an impact on all of these services.</p> <p>Planning to meet the increased demand for primary and secondary health care is underway via a Wiltshire health care commissioners group. Planning is also underway to address the impact on a range of other public health, social, and health care services. At present, it is unclear if the MoD is inclined to provide additional resources for the increased demand on those services or for public leisure facilities in the Larkhill/Bulford/Tidworth area.</p>
Environment Agency	<p><u>Masterplan</u>  We note that the OEA and other documents have been used to inform the site selection process, which we support. However, even though the Masterplan is high level, we believe there could be more direction in this document on what would be required at the planning application stage. A large amount of detailed information has been provided in the OEA and appendices, however, some of the conclusions and required mitigation have not been carried across into the Masterplan, or between the Appendices and OEA report. If possible, we recommend that the Masterplan document is amended to reflect this. For example, referring to the mitigation that is mentioned in section 9.6 of the OEA, and the WFD Assessment recommendations given in section 1.5 (page 19 onwards) in the OEA Appendix 9B. Also there is no mention in the Masterplan of the further investigation that is required to assess water infrastructure requirements. This is discussed in more detail below.</p> <p><u>Water infrastructure</u>  Our main issue at this stage is that there is still further assessment required to establish whether there would be sufficient water supply and wastewater</p>

capacity available to serve the proposed developments. We note in the OEA and supporting Appendices that further assessment is to be done regarding this, however, we wish to point out it is essential this assessment is completed prior to any planning application being submitted to Wiltshire Council.

OEA Section 9.4.4 (page 9-26 onwards) Hydrology: Model Calibration - The model meets acceptance criteria around the Salisbury Plain area and so results from it should be acceptable in terms of their relative accuracy. It is also the best tool available to assess the impacts and not a “crude estimating tool” as highlighted in part of this report.

Whilst it is recognised that the “army re-basing” is only likely to have a small additional impact on the Nine Mile river and ponds, above the existing impact, the impacts of the existing abstractions do have a SIGNIFICANT impact on low flows in the Nine Mile and potentially on pond levels. Any additional abstraction is likely to exacerbate this. The Wessex Basin Model is the best tool available to make this assessment as it is more complex than illustrated in the OEA. The Army Basing water consultant should conclude what the existing impacts are on the rivers and ponds using the tool and reach some conclusion regarding the overall impacts not just the additional impact presented by the abstraction. As the MOD abstractions have not been considered under the Review of Consents or Habitats Directive and no mitigation has been put in place for impacts that result from it, the need for future mitigation should be considered as part of the report.

The OEA and any subsequent EIA should not be relying on Wessex Waters sustainability reductions to mitigate for MOD abstraction impacts on the Bourne (as is alluded to in the report). If necessary, the Wessex Basin Model should be re-run with Wessex Waters proposed sustainability reductions included and the remaining impacts of the MOD abstractions assessed. It is likely that as Wessex Waters abstractions reduce, the proportionate impact of the MOD abstractions will increase (however the overall impact on flows and levels will go down).

Chapter 18 - Preliminary Report to inform a Habitats Regulations Assessment, highlights the need for further modelling/assessment work to be carried out. In particular, Section 18.6.1(River Avon SAC - Water Resources) acknowledges there is an unresolved question about the sustainability of the existing licences.

'... there is an in combination effect which should be addressed, although the solution should focus on the existing licences ... since ABP makes a negligible contribution. It is not possible to say at this stage whether an adverse effect on the integrity of the River Avon SAC is resulting from the existing licenses in combination'.

OEA Section 9.4.5 - Water dependent conservation sites: Our comments provided above are also relevant to this section. Increasing abstraction will increase the amount of time the groundwater table is below pond base level, therefore exacerbating the existing situation. This is significant as the ponds are largely fed by groundwater. This assessment should be made using the tools available (interpretation of the Wessex Basin Model output). Some form of mitigation where required should then be proposed.

OEA Section 9.5.2 - Issues excluded from further discussion/ assessment:  
Discharge of foul sewer effluent - We have previously asked the Army Basing consultants to calculate if the increased discharge volume of foul sewer effluent that results from the Army Re-basing can be accommodated within the existing permit(s). It should not be assumed it can without having undertaken this assessment. Further information is therefore needed to

substantiate this claim.

Uplift in water supply demand - Whilst Wessex Water and Veolia's abstraction have been assessed under the Review of Consents up to their full licence condition, the MOD abstractions have not. The impact of these abstractions should be assessed.

Other issues to be dealt with at planning application stage

In addition to the water infrastructure assessments, we would require the following information to be included as part of any planning applications submitted to Wiltshire Council. It would be beneficial to make reference to these issues in the Masterplan, if possible.

Flood Risk

At this stage we do not have any major concerns with the Masterplan from a flood risk perspective.

We note that no Flood Risk Assessment (FRA) has yet been carried out; we shall be in a better position to comment on the flood risk implications of the proposals once we have seen the FRA. We note that in the 'constraints summary' (PCR Appendix 14) flood risk will be controlled through Sustainable Drainage Systems (SUDS) design once the extent of hard surface runoff is established. A strategy for managing surface water runoff based on a SUDS approach is welcomed. We recommend the FRA be prepared in accordance with current good practice and guidance in accordance with the National Planning Policy Framework (NPPF).

Please be aware that the Nine Mile River is designated an 'ordinary' watercourse and as such consent (Land Drainage Consent) from the Lead Local Flood Authority (LLFA) may be required for works associated with a proposed new crossing. At this location the LLFA is Wiltshire Council. You are advised to contact the Drainage Team to discuss their requirements:-

<http://www.wiltshire.gov.uk/communityandliving/civilemergencies/drainage/draingeordinarywatercourseconsent.htm>

Potential land contamination

OEA Chapter 11 recognises that further intrusive / Phase 2 site investigation works may be required as part of a planning condition to assess the current ground and groundwater conditions on the sites and update earlier reports prior to redevelopment. We would support this recommendation for any planning permissions granted to include contaminated land condition(s). It is likely that we will request further site investigation and monitoring as part of a planning condition, along with a remediation strategy and other requirements.

Pollution prevention and waste management

We note from the OEA that a Construction Environment Management Plan (CEMP) will be produced, which will address: waste and water management; procedures for dealing with chemicals, fuels and oils; and other pollution prevention measures. Our Pollution Prevention guidance, available on our website, should be incorporated into the CEMP.

During the construction stage the management of waste should take into account the waste hierarchy, with recycling and reuse of construction, demolition and excavation maximised wherever possible. This aims to achieve targets to reduce landfill and promote construction waste as a re-usable resource. A scheme for recycling/disposing of waste resulting from demolition and construction works should be produced.

Biodiversity

	<p><u>Winterbourne streams</u> The Nine Mile River is a chalk stream and is therefore recognised as a Priority Habitat under the UK Biodiversity Action Plan. As a general obligation under the UK BAP the Environment Agency and other bodies have a number of objectives to maintain and enhance the characteristic habitats, plants and animals of chalk rivers, including winterbournes. The UK BAP specifically identifies the need to protect chalk rivers from inappropriate development and secure the opportunities for enhancement through development, and other land use changes.</p> <p>Winterbournes are rare habitats and they can support unique plant and invertebrate communities. Some rare invertebrates can include the rare mayfly, <i>Paraleptophlebia wernerii</i> which is a red data book species.</p> <p><u>Environmental Enhancements</u> Any development should seek to include environmental enhancements, e.g: enhancing any existing ponds; creation of additional ponds, which could provide habitats for Great Crested Newts; native tree planting along the Nine Mile river; or river restoration.</p> <p><u>Protected Species</u> We note that otter and water vole surveys have been undertaken, along with other species surveys. Any protected species found in and around the sites proposed for development should be protected and appropriate mitigation measures should be put in place. Places for shelter and feeding need to be protected and the connectivity between sites which protected species use should be maintained.</p> <p><u>Bridges crossing rivers</u> Any bridges shall be clear spanning structures with the abutments set back to provide bank widths of at least 1 metre beneath the bridge and a height above the bank top of no less than 1 metre. This will maintain a continuous river corridor and provide for movement of wildlife.</p> <p><u>Delivery strategy (page 57, Masterplan) - Design Code</u> We note that a Design Code will be produced which will consider design solutions for building form, architectural details, features and materials. It will also include proposals for boundary treatments and hard and soft landscaping works. We presume this would incorporate sustainable construction methods to achieve energy and water efficiency.</p> <p>The incorporation of water efficiency measures into the project proposals will provide resilience to some of the extremes of weather conditions that climate change brings. It benefits future residents by reducing water bills, and also benefits wider society by allowing more water to go round in times of shortage.</p> <p>The army basing developments should include water efficient systems and fittings. These should include dual-flush toilets, water butts, water-saving taps, showers and baths, and appliances with the highest water efficiency rating (as a minimum).</p> <p>Greywater recycling and rainwater harvesting should be considered.</p>
Highways Agency	<p>Initial response provided requesting additional information.</p> <p>In summary additional information is required so that detailed checks of the traffic impact on the highway network can be made. It is recommended that trip distribution / assignment is provided for each individual site prior to combined distribution for all of the sites so that checks can easily be made.</p>

<p>English Heritage</p>	<p>English Heritage recognises MoD's strong commitment to the conservation of the historic environment within its estate, with its stated aim of sustainable development and role as steward of the historic assets within its holdings. MOD's desire to demonstrate exemplary management of the heritage assets within its land is reflected in its valuable role as a pro-active partner, particularly with regard to the conservation of the Stonehenge World Heritage Site, part of which falls within the Salisbury Plain Training Area (SPTA) and the wider defence estate.</p> <p>Salisbury Plain and its environs are blessed with an exceptionally rich historic environment. In addition to containing the highest concentration of Scheduled Monuments in Wiltshire, SPTA contains unusually well-preserved prehistoric and Romano-British landscapes, whose survival can largely be attributed to the set-aside of the land for military training and the resultant absence of the plough levelling of sites as seen widely elsewhere in the county. MoD's central role in the careful conservation of these nationally-important sites &amp; landscapes is acknowledged.</p> <p>We also recognise the strategic importance of the Army Rebasing Programme and the need to identify and deliver appropriate sites for development within a relatively short timescale, ready for the redeployment of troops to SPTA. EH reiterates its commitment to work constructively with DIO to ensure that the programme receives priority, timely advice on historic environment issues within our remit.</p> <p>We have set out this advice in terms of the five main sites Larkhill, Bulford, Tidworth, Perham Down/Ludgershall and Upavon, and have broken comments down into Behind the Wire and Outside the Wire, the latter to encompass service family accommodation (SFA) and other aspects of infrastructure.</p> <p>We note the proposed improvements to training area infrastructure, and anticipate further discussions in due course, but are unable to offer any detailed comments in the absence of specific proposals at this stage, beyond those made in our letter dated 28<sup>th</sup> April 2014 providing advice on the Outline Environmental Appraisal.</p> <p><u>LARKHILL</u></p> <p><u>Behind the Wire</u> EH is grateful for the overview of proposed developments and tour of Larkhill garrison provided by Lt Col Le Feuvre on 5<sup>th</sup> March, which helped us to understand the nature &amp; scope of requirements at this base. From the plans provided and from the site visit we recommend that the Programme considers the potential visual &amp; setting impacts of development at the Purvis Lines sites and in the northern part of the garrison upon Scheduled Monuments to the north and west of the site. This is particularly with regard to Knighton Barrow long barrow and Robin Hoods Ball Neolithic enclosure, but potential setting impacts upon other Scheduled Monuments and the northern edge of the Stonehenge World Heritage Site should also be considered.</p> <p><u>Outside the Wire</u> <u>Service family accommodation</u> We are pleased that the Programme has responded positively to our previously expressed advice against any significant SFA development south of The Packway. The removal of potential allocation sites from the Stonehenge World Heritage Site (WHS) will serve to preserve its Outstanding Universal Value and to protect the integrity of the landscape within the WHS boundary.</p>
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The recommended SFA site north of The Packway was the subject of discussion between the Programme team and EH in May of this year. We are heartened to see that no SFA is proposed within those land parcels lying adjacent to and north of Durrington Walls Scheduled Monument and the NE corner of the WHS and that the Recommended site has been pulled back to the west & north, including the golf range.

Initial viewshed analysis suggests there will be little intervisibility between the WHS and its monuments and the recommended site – however a robust and thorough Heritage Impact Assessment, including a setting & visual impact assessment, is required to conclusively demonstrate that the projected impacts will be minimised. This is necessary to establish that development at this location can be achieved without harming the setting & context of the WHS or of the monuments within it.

It is possible that careful design and planning may be able to mitigate such impacts to an extent, given the location of the Recommended site in relation to the WHS, but we must reserve definitive comment pending detailed proposals and an appropriate Heritage Impact Assessment (HIA).

#### Other Infrastructure – Larkhill Sewage Treatment Works

From recent discussions regarding this facility we are aware that it is close to or at its current operational capacity. It is very likely that an expanded facility will be required to service the increased population of the enlarged Larkhill garrison and community. The present STW lies close to the heart of the Stonehenge WHS and partially within one of its key Scheduled Monuments, the neolithic Cursus. We believe there is little or no scope to extend or enlarge the STW in proximity to the Cursus due to the detrimental impacts this would have upon both the setting of the Cursus and Stonehenge itself, with which it is directly inter-visible. Allied to this, it would be highly likely to harm OUV and detract from a number of the Attributes making up the significance of the WHS.

#### Recommendation

We understand that the Programme is considering options for sewage treatment at Larkhill and recommend that alternative locations for STW development are selected, away from the heart of the WHS. We would be unable to support expansion or enlargement of the current facility for the reasons given above.

#### BULFORD

##### Behind the Wire

The proposed Living site shown in the south-east corner of the base may have the potential to impact upon the setting of Scheduled Monument No. 1009576 *Group of five bowl barrows south of Bulford Camp*. The potential setting impact should be assessed and appropriate mitigation measures considered as details emerge for this site.

##### Outside the Wire

The Recommended SFA site north of Double Hedges may have some potential to impact upon the setting of the group of Scheduled round barrows to the south of the A3028 road.

The Recommended Officers SFA site may have some potential to impact upon the setting of Scheduled Monument No. 1009903 *Beacon Hill monuments – bowl barrow, boundary feature, settlement and field system*.

These potential setting impacts should be assessed and appropriate mitigation measures considered as details emerge for these sites.

	<p><u>TIDWORTH</u></p> <p><u>Behind the Wire</u>  Technical development in the western part of the base could have the potential to impact upon the setting of Scheduled Monuments to the west and north of the site. These potential setting impacts should be assessed and appropriate mitigation measures considered as details emerge for this site.</p> <p><u>PERHAM DOWN/LUDGERSHALL</u></p> <p><u>Behind the Wire</u>  The relatively small proposed Working Site in the southernmost part of the base may have the potential to impact upon the setting of Scheduled Monument No. 1009833 <i>Boundary earthwork on Lamb Down</i>. The potential setting impact should be assessed and appropriate mitigation measures considered as details emerge for this site.</p> <p><u>Outside the Wire</u>  We are pleased to see that the Potential SFA site PL18 is no longer part of the Masterplan proposals and welcome its removal, which will help preserve the landscape setting of Ludgershall Castle Scheduled Monument.</p> <p><u>UPAVON</u></p> <p><u>Behind the Wire</u>  We note that proposals here could potentially impact upon the range of Listed structures within the base and/or their settings. We would wish to understand how proposals within the wire at Upavon will avoid or mitigate any such harmful impacts as the scheme for this site develops.</p> <p><u>General comments</u>  Heritage assessment work – an extensive suite of heritage assessments will be required to inform direct and indirect impacts upon heritage assets, with regard given to the comments in this document about particular designated assets. The guidance in NPPF should be followed in assessing significance and impact upon that significance arising from the proposals. Setting impacts should be assessed following the guidance in <i>The Setting of Heritage Assets</i> (EH2011).</p> <p>Finally we are aware that the Programme team is in ongoing consultation with Wiltshire Council heritage advisers and recommend that any such advice be followed to ensure an appropriate approach to the treatment of undesignated heritage assets throughout the process.</p>
Natural England	<p><u>General mitigation measures</u>  We note that a suite of general mitigation measures is listed in section 7.6.2. These include “Within garrison sites seek opportunities to maximise on site green space for recreational use which also maximises value for wildlife;” At this stage we would welcome a comprehensive wildlife management plan for the land controlled by DIO in these settlements more generally, as there may be significant opportunities to enhance biodiversity on their estate through for example, changes to the management regime of Public Open Space. We also suggest the specific mitigation measures include consideration of specific invertebrates for which the local area is important (e.g. planting and managing blackthorn for Brown Hairstreak).</p> <p>In section 18.7.2 regarding the mitigation tracker, we reiterate previous advice that any measures classified as mitigation must be clearly over-and-above the MoD’s existing duties to ‘enhance’ under the Wildlife and Countryside Act.</p>

#### Additional surveys

Section 7.6.1 sets out proposed additional surveys. Based on a brief site visit it appears that the area of grassland at Bulford north, although managed as amenity grassland, appears to be of reasonable botanical value, contrary to the implication of figure 7.23. We therefore advise that further botanical survey is carried out to establish its ecological value.

#### Approach to selecting SFA sites

It is important to ensure that suitable alternatives are considered in the development of the masterplan, so that when planning applications are made the EIA requirements to have considered alternatives have been fulfilled. We note that the Phase 2 Planning Context Report Phase 2 Constraints and Opportunities Mapping And Preliminary Socio-Economic Infrastructure Assessment Draft Version 2 says:

1.1.4. The study area as set out in Phase 1 covered mainly land within a 10 mile radius from the establishment gates and training area. This is in compliance with a requirement within JSP 464 Tri-Service Accommodation Regulations (TSARs) which states that "SFA is to be provided as close as possible to the Service person's duty station with DE Ops Housing always attempting in the first instance to offer SFA within 10 mile radius of the duty station". Whilst there is a need to comply with JSP 464, the area of search for SFA sites will need to be refined before master planning commences in order to take account of planning policy context, specifically the need to site new development on MOD sites close to existing settlements in order to minimise the need to travel. Accordingly, the area of search for SFA sites will be centred in and around the bases of Larkhill, Bulford, Tidworth and Perham Down which reflects locations of duty stations for incoming units (see Table 1 – Key Unit Transfers and SFA Calculations).

It is unclear on what basis there is a requirement to site new SFA accommodation on MOD sites, and it would be very helpful if this was made clear. We note that the masterplan proposes to secure SFA accommodation from the private sector, suggesting that SFA need not be located on MOD sites. If the requirement to site new development on MOD sites is not absolute, then the area of search should be expanded to include land outside of MOD sites, within a reasonable distance.

In the absence of suitable justification for the requirement to only build on MOD land, (or appropriate consideration of alternatives) our advice is that the council should not endorse this masterplan as a material consideration, as there is no certainty that the masterplan plan is deliverable in that the EIAs for the applications may conclude that alternatives to the proposed locations are more suitable.

#### Comments on specific sites

##### Perham Down

We note that the Perham Down SFA site ZVI map shows that the site is visible from the North Wessex Downs AONB. However, no representative views have been assessed from this designation, which lies at its closest point some 900m away. We advise that impacts on this designated landscape should be explicitly considered in the OEA, and unless they can be ruled out from a desk based exercise, representative viewpoints assessed.

If this site is taken forward, care will be required when it comes to the planning application stage to ensure that the proposals do not detract from the special qualities of the AONB, and opportunities taken to enhance the landscape. We also advise that you to seek the advice of the North Wessex Downs AONB. Their knowledge of the location and wider landscape setting of the development should help to confirm whether or not it would impact significantly on the purposes of the AONB designation. They will also be able advise on whether the development accords with the aims and policies set out

in the AONB management plan.

#### Larkhill SFA and Bulford SFA South-West

We note that, according to the OEA, the residual landscape character and visual impact (post mitigation) for two of the proposed sites is moderate adverse. These are Larkhill SFA, (landscape and visual) and Bulford SFA South-West (landscape and visual). Of these two sites we are more concerned with respect to the Larkhill SFA site. To judge from the information in the OEA, Larkhill is currently visually enclosed by a ridgeline to the North East, and the proposed development will extend the settlement over and beyond this ridge, introducing the built form into an area currently very rural in appearance (see photo of view point 2, Figure 10.59.1) and view 7, Figure 10.59.4, on the boundary of the World Heritage Site. In the absence of a suitable justification for the requirement to only build on MOD land, (or appropriate consideration of alternatives) as described above, we advise that this site is not selected. If accommodation must be built on MOD land, it is not Natural England's role to weigh the landscape impacts against other considerations, but draw your and Wiltshire Council's attention to the significant landscape impacts that would result from these allocations.

#### Upavon Garrison

We note that this site adjoins the North Wessex Downs AONB. If redevelopment of this site is taken forward, care will be required when it comes to the planning application stage to ensure that the proposals do not detract from the special qualities of the AONB, and opportunities taken to enhance the landscape. As per Perham Down, above, we advise that you seek the advice of the North Wessex Downs AONB unit.

#### Bulford SFA North

As mentioned above (under "additional surveys"), we query the habitat status of the area of grassland at Bulford North, and thus query the assessment of impact at the end of page 7-100 as negligible.

#### Biodiversity compensation

Natural England concurs with the general principle that, after avoiding and mitigating, residual biodiversity impacts should be compensated for, and note that the intent is to use the DEFRA biodiversity offsetting metric to establish the level of compensation required. If this approach is to be adopted, we advise that the following points are considered.

1. The DEFRA metric covers a wider suite of habitats than just priority habitats. For example, it includes arable land and woodland. However, the OEA only makes reference to using it for loss of calcareous grassland. If you propose to apply the metric in a manner which differs from the published method, this should be supported by reasoning. We note that the mitigation in the OEA includes reference to replacing any woodland lost with an equivalent area (e.g. page 7-157). Whether "an equivalent area" is appropriate could be ascertained by use of the offsetting metric.
2. Any compensation measures will need to show that they are additional to what would have happened in their absence. For example:
  - a. Any requirements for mitigation or compensation for impacts on protected sites or protected species will need to be considered separately from and in addition to any compensation provided in the form of a biodiversity offset.
  - b. Compensation on land within the SAC might be construed as not being additional, but merely fulfilling a duty that the DIO have in any event to manage the SAC appropriately.
3. The metric does not factor in impacts on priority species. This will need to be considered as an additional matter.

#### Impacts on public rights of way

We note that some of the allocations (e.g. Bulford South, and Larkhill) will affect the public right of way assets of these communities. We advise that to be in line with the Draft CP52 (If damage or loss to green infrastructure is unavoidable, the creation of new green infrastructure ...will be required), the masterplan should show how any loss of quality due to the "urbanisation" of the public right of way network will be compensated for, such that there is no net detriment to the network.

More generally, given the extent of the MOD estate, options to enhance the recreational access resource available to the public should be considered. One such option is associated with the Larkhill SFA. An additional pedestrian route running north south to the immediate east of the housing and golf centre, linking the public rights of way to the north and south might provide an additional valuable recreational link.

#### Recreational impacts on Stone Curlew

Whilst contributions to the stone curlew mitigation strategy will be welcomed, the strategy does not consider housing within walking distance of the SPA. In this context we advise that the HRA should consider whether increased population in such close proximity to the SPA is likely to require additional measures to mitigate potential impacts on stone curlew.

#### Training infrastructure

We recognise that there are many details still to be agreed regarding the plans for the CME, IBSR and ETR, including the proposed crossing of the Nine Mile River. It is therefore not possible to fully assess potential impacts at this stage. However whilst there are proposals to manage damage to chalk grassland, the potential impacts of training on the Nine Mile River winterbourne (which is a feature of the Salisbury Plain SSSI) do not seem to have been considered, and it is not clear whether the effect of the existing training or any proposed changes to training has been assessed on this feature.

#### Designations

The masterplan and OEA documents should acknowledge that the Nine Mile River winterbourne is a notified feature of the Salisbury Plain SSSI as is the Great Crested Newt, also a European Protected Species. Whilst the Nine Mile River winterbourne is a notified feature of Salisbury Plain SSSI it is also the intention of Natural England to notify as SSSI the winterbourne and perennial length of the Nine Mile River downstream of Salisbury Plain SSSI, and we consider the river and its associated riparian habitat here to be of national importance. This river is a tributary of the River Avon and its flow supports the River Avon System SSSI and River Avon SAC.

#### Proposed Nine Mile River crossing

##### Habitats

Marshy grassland, whilst not particularly botanically diverse, is generally uncommon. In this case the habitat is hydrologically linked with the river habitat and subject to unconstrained seasonal flooding. If considered in isolation, a low-moderate value could be attributed to it, however here it is integral to the natural functioning of the river and we therefore disagree with the assessment of low value. Similarly whilst wet broadleaved and mixed plantation woodland is not of great value considered in isolation, the woodland adjacent to the river provides supporting river habitat to the Nine Mile River and would be targeted for restoration following notification of the river

There does not appear to be an assessment of the broadleaved semi-natural woodland, yet part of this habitat is included in the area for the proposed crossing (map under section 5).Where habitats such as calcareous grassland and scrub form part of the riparian corridor and are therefore integral to the

river habitat they should be assessed in tandem.

Natural England considers the Nine Mile River to be of national (high) value and, as mentioned above, intends to notify the river and its supporting riparian habitat as a SSSI for its winterbourne and chalk river habitat. In particular, as shown by the flooded photographs the river is relatively unconstrained. In addition it is a tributary of the River Avon SAC and the upstream section of the river (including winterbourne and bourne habitats) is a notified feature of Salisbury Plain SSSI.

We are concerned that the proposed route of the Nine Mile River crossing is through the marshy grassland and area of area of *Carex acutiformis* swamp. Whilst this may be the easiest in terms of construction, it is not the least damaging to the mosaic of habitats here and we advise that further assessment is required to include the impact on the natural hydrology and flooding pattern of the area. This will help to identify the best all-round solution.

#### Construction/operational Impacts

Loss of small areas of habitat have been assessed as very low or negligible value, however Natural England is of the opinion that these habitats should be assessed as part of the rivers riparian biotope mosaic. This may lead to re-evaluation as higher than low, very low or negligible. Short and long term impacts on the local morphology, hydrology and flooding pattern of the site need to be assessed, including the potential for increased siltation from run-off. In addition, if considering a ford as a crossing option, how the crossing would be restricted/limited in width, particularly in wet weather, should be addressed.

#### In-combination impacts

As mentioned previously it is not clear whether the proposed (or existing) levels of training are likely to impact on the winterbourne feature of the Nine Mile River. Ideally the weighting given to vehicles should be sufficient to protect the Nine Mile River and its ponds as well as the chalk grassland, and considers the time of year when the aquatic habitat and Great Crested Newt populations would be sensitive to vehicle movements. The winterbourne habitat needs to be included in the framework for protecting the chalk grassland and its effectiveness should be monitored. The impact of adding another crossing on the river in addition to existing crossings/bridges should also be considered.

#### Water Quality

The water quality of the Nine Mile River is presently high and we advise that potential impacts on water quality need further assessment. The proposed crossing lies less than 2km upstream of the confluence with the River Avon SAC and there is therefore the potential that any pollution incident could directly impact on the SAC, as well as on ground water. Aquatic invertebrates are also sensitive to pollution incidences.

#### Water resources

We have concerns about the argument that because the effects of abstraction are already having a significant adverse impact on integrity of the Avon, the contribution of the rebasing proposals are negligible. Whilst the uplift due to the rebasing may be insignificant compared to the existing MoD impact, **it does represent an increase in abstraction**. Whether or not the MoD considers it to be significant, the total abstraction planned is likely to have a significant effect on the integrity of the SAC and needs to be considered in that light.

#### Additional comments on water resources

Where the report refers to surface water abstraction not being critical as

additional abstraction is possible for 30-50% of the time, there is no reference to any flow conditions which may result in limitations on this additional abstraction.

Regarding the current impact of abstraction and surface water flow, the AMEC report indicates that modelling also shows impacts on the Wylve and Till, which are both part of the River Avon SAC. We therefore question how the residual impact can be minor or negligible. For a Habitats Regulations Assessment it is the impact of the actual abstraction planned which needs to be considered, not purely the proposal for 'uplift' in abstraction.

Table 9.4: reference is made to Salisbury Plain with the Nine Mile River as unfavourable recovering. While this may be the case for Salisbury Plain, the winterbourne feature has not been assessed to date.

9.4.4: the report states that the degree to which the ponds interact with groundwater is not fully understood. We advise that further assessment is necessary as the impact on ponds is inconclusive.

9.4.8: the water quality data is rather out of date, ideally this would be updated.

9.5.3 Soil Impact Assessment: – The Military training infrastructure section refers to there being no impact from operations due to the stone tracks with relation in the Nine Mile River crossing. It should be noted that the stone will need to be of suitable geology/inert in order not to impact on the chemistry of the groundwater.

Table 9.19: The impact of water supply is recorded as negligible, however this is when comparing to the existing level of impact. The modelling shows that the actual abstraction impact may be significant – i.e. the existing level of abstraction may have a significant impact (the quantity the MoD plan to abstract).

9.9.2: The Environment Agency has stated the need to address leakage and reduce it to below 30%. Natural England supports this, however it should also be borne in mind that this may result in increased impacts of abstraction on the Avon, Bourne and Nine Mile River and in particular the winterbourne and newt ponds which needs to be assessed.

#### Appendix 9A

We have noticed a significant error that has implications for the conclusions made in the OEA. The report refers to the environmental flow indicator (EFI) for the River Avon at Q95 being <15% below natural under the Water Framework Directive (WFD) (the existing method), but this is incorrect – under WFD the Environment Agency and Natural England agreed EFI for the River Avon at Q95 to protect the SAC was <10% below natural. (The EFI targets agreed and used for the RoC were <Qn50 – 10% below natural and >Qn50% - 15% below natural). The report notes that flow screening tools are not designed for the ephemeral reaches. Therefore any conclusions based on the output for the winterbourne section of the Nine Mile River and ponds, and the winterbourne section of the Bourne, need to be treated with caution. On the one hand the report states that the model is not sensitive enough to assess impacts on ponds drying and therefore it is difficult to conclude no impact, yet it also concludes that abstractions mean that the ponds dry for greater than 10 days one year in four, and that natural climatic variations have as much or greater influence than abstraction on the levels in the pond. Natural England therefore advises that due to the model uncertainties the conclusions need to be interpreted with caution and potential impacts need further investigation before being ruled out. We advise that results should also be related to impacts on Great Crested Newts.

The impact appears skewed for the Nine Mile River, i.e. there is a greater

	<p>impact on flows when the river is naturally flowing, however it is the protection of flows across the whole flow cycle that is important. In addition the impacts on groundwater drawdown can affect vegetation and also the area that will support the winterbourne habitat. The length of time the winterbourne is dry/flowing is important but also the depth that the groundwater falls to should be considered. Whilst the report states that flows do not quickly recover, once they fail due to groundwater recession they are unlikely to recharge within a 10 or 20 day period and the impacts of this will need to be considered.</p> <p>Appendix 9B</p> <p>We advise that the targets used should be those that are the most stringent, whether they are WFD or JNCC. Proposals leading to deterioration to any surface or groundwater bodies, including the Nine Mile River (which we consider is of national importance as indicated by our intention to notify as SSSI) is of concern.</p>
Wessex Water	<p><u>Background –</u></p> <p><u>Ludgershall</u> Southern Water is sewerage undertaker for the main Ludgershall area; Wessex Water for water supply. Veolia is sewerage and water supply undertaker for the western area.</p> <p><u>Tidworth</u> Veolia is the main sewerage undertaker for Tidworth with Wessex Water operating a small inset area.</p> <p><u>Amesbury, Bulford, Durrington and Larkhill</u> Wessex Water's Ratfyn sewage treatment works (STW) serves a catchment including North Amesbury, Durrington and Bulford. Wessex Water's Amesbury STW serves the rest of Amesbury.</p> <p><u>Foul water</u> It is assumed for the purposes of this exercise that revised dwelling figures provided by Wiltshire Council for Amesbury, Bulford and Durrington (410) will drain / pump to Amesbury STW and Army basing dwellings proposed at Bulford, and Larkhill (780) will drain/pump to Ratfyn STW. It is assumed that dwellings proposed at Bulford will be "outside the wire" and existing arrangements for private sewage treatment will continue "inside the wire".</p> <p><u>Amesbury Sewage Treatment Works</u> (Additional 410 dwellings above original Core Strategy numbers of 2100) The STW is presently being extended. Due to uncertainty surrounding growth rates in the catchment a 10 year design horizon has been adopted, with anticipation that additional treatment capacity will be required around 2025. An additional 410 dwellings are likely to trigger the need for additional filter capacity prior to 2025. Improvements to the STW to ensure consent compliance will be managed by Wessex Water with details on development growth provided by Wiltshire Council and DIO as appropriate.</p> <p><u>Ratfyn Sewage Treatment Works</u> (Additional 780 dwellings above original Core Strategy Numbers of 2100) The works was extended in 2009, it is anticipated that the additional proposed dwellings can be accommodated within existing discharge consents, with improvements unlikely before 2029.</p> <p><u>Water Resources</u> Sufficient capacity is available within existing abstraction licences to serve the uplift in water supply demand for proposed development in Amesbury, Durrington and Bulford. Sufficient capacity is available to serve the uplift in water supply demand for proposed development in Ludgershall. Although it is noted that locations have not been provided to Wessex Water for Ludgershall and supply will be dependent upon Veolia's ongoing bulk supply provision to Wessex Water for</p>



	<p>this area.</p>
<p>Veolia &amp; Southern Water</p>	<p>No specific responses received.</p> <p>The applicant has confirmed that Southern Water provide sewerage treatment for Ludgershall through their treatment works located to the south of Ludgershall. SW has tried to establish the spare capacity at the STW, however they do not have the asset on their systems, meaning that it has been hard to get any information. Given that to discharge to this STW MOD would require getting on-site drainage adopted by Kelda, followed by discharging off site to Ludgershall, the applicant has chosen not to pursue this option due to the site being within the Veolia inset area and Veolia having networks next to the site already.</p> <p>Veolia have not replied specifically about the site, WYG are currently in ongoing discussions with Veolia to gather further information. Initial information suggests that they will require a level 2 capacity check for each site and the applicant has instructed its agent to carry out these checks.</p>
<p>MUJV Ltd</p>	<p>MUJV are a company set up between UK Power Network, Veolia and Morgan Sindall and under Army Basing have 2 roles; inside the wire they are partners with Aspire to ensure that they deliver and maintain the utilities (electricity, gas water and sewerage). Outside the wire, and in particular in the discussions with the statutory service providers for gas and electricity reinforcements, they are facilitators for assessing and negotiating the additional demands due to their understanding of the services and requirement.</p> <p>MUJV already have a commitment in principle for the enhanced supplies at Ratfyn and Upavon for electricity and are already in discussion with SGN regarding the required gas reinforcements. MUJV are not aware following discussions with S&amp;SE and SGN of any overarching capacity issues.</p>
<p>National Trust</p>	<p>In response to the current consultation, we continue to be seriously concerned about the scale of Service Family Accommodation (SFA) being proposed at Larkhill, and its impacts on the World Heritage Site and its setting.</p> <p><u>Scale</u> The current proposals continue to refer to the Army's "preference" for 540 houses in the proposed SFA development at Larkhill. This scale of development is a significant departure from the initial working assumption that <u>only 138 houses</u> should be provided here.</p> <p>The proposals at Larkhill would have a profound impact in terms of the extent of urbanisation within the setting of the World Heritage Site (Amesbury and Durrington are already growing); the increase in traffic which is already impacting on the Outstanding Universal Value; land management pressures on surrounding land (including that looked after by the Trust); the need to maintain 'dark skies' where possible; and the overall tranquillity and dignity of the World Heritage Site and its setting.</p> <p>It is considered that the current proposals would not comply with the requirements of Wiltshire Core Strategy policy 59 ("giving precedence to the protection of the World Heritage Site and its setting", etc.); with the objectives of the World Heritage Site Management Plan (which the Council has confirmed as a material consideration in planning decisions); nor with the relevant section of the National Planning Policy Framework (giving "great weight" to the conservation of heritage assets and providing "clear and convincing justification" for any harm or loss).</p> <p><u>Rationale</u> The apparent "need" for this scale of additional housing stems from the MOD's intention to station 4300 additional troops at Salisbury Plain – in</p>

contrast to troop reductions in other regions – and for the majority of troops to be based at Larkhill.

It continues to be unclear as to whether the environmental constraints at Larkhill, in particular the fact that it straddles the boundary of a World Heritage Site, were given due consideration in advance of the Army basing announcement in March 2013. Greater clarity and openness is sought in respect of this strategic decision-making, not least given the Government's role as a signatory to the World Heritage Convention 1972.

More detailed points

In terms of location, the exclusion of sites south of the Packway (within the World Heritage Site) and sites L15a and 15b from the SFA housing proposals is welcomed. These sites would have had a particularly detrimental impact on the World Heritage Site and its setting.

It would be undesirable for development to take place on the golf centre site, which provides a buffer between the intended housing site and the World Heritage Site, as well as a location for recreational opportunities for troops and their families.

The Overarching Environmental Statement appears to make no assessment of the impact of additional traffic on the World Heritage Site and its Outstanding Universal Value. Impacts on the Site seem to be predominantly based on visual impacts, despite the management plan stating clearly that "roads and traffic have an adverse effect on the WHS" (Issue 34), and that a key aim is "to restore the tranquillity and dignity of the WHS" (para 14.6.1).

Both the cultural heritage and landscape assessments refer to views from the World Heritage Site outwards, yet there is little assessment of views towards the Site from the north, within which new development at Larkhill would also be seen (e.g. when travelling southwards along the A345, where currently development at Larkhill is hardly visible). Core policy 59 of the emerging Core Strategy confirms that both views in and out of the Site require consideration. This is supported by UNESCO's opinion on the Runkerry Golf course development in Northern Ireland, which made clear that important views within the landscape setting of World Heritage Sites are also part of their Outstanding Universal Value.

In relation to the above (in respect of cultural heritage), we attach a copy of the Visibility of Scheduled Monuments map referred to in our last letter. With the extent of the SFA site at Larkhill as currently proposed, it would appear to transgress into the area where 'over 13 scheduled monuments' are visible.

Linked to the above (in respect of landscape), it is noted with concern that the currently proposed SFA at Larkhill is acknowledged to have a "major adverse" effect on landscape character, and that the "rural and distinctive character of the site would be lost" (para. 10.5.2 of OES).

It is also noted with concern that the proposed SFA housing at Larkhill could "physically and permanently impact on unknown archaeological assets" within the development site, with a "very high" impact likely. This is the consequence of large scale residential development in such an archaeologically rich area.

As per our original comments we continue to support English Heritage's stance (as set out in 6.4 of the current Masterplan) to resist any expansion of the existing Larkhill Sewage Treatment Works (STW), particularly above ground as it is in full view of Stonehenge, and we would prefer to see it removed completely.

Transport related

The SFA proposals at Larkhill on their own would result in 'up to 540 houses' worth of additional traffic, which would add to an unsatisfactory existing situation in terms of highway capacity and performance. This includes what

	<p>the Outline Transport Assessment describes as the “frequently congested” A303, and vehicles using the Packway as an alternative.</p> <p>In respect of the A303, section 4.3 of the Outline Transport Assessment refers only to discussions of Somerset County Council and partners regarding potential improvements, rather than to the A303/A30/A358 Corridor Feasibility Study currently being undertaken by the DfT. We would recommend that the MOD/DIO engage more actively on the issue, rather than ‘monitor’ the situation as currently indicated.</p> <p>The road junction at the eastern end of the Packway has been identified as requiring an upgrade. Any upgrade must take into account that it would visually impact on the World Heritage Site and the setting of Durrington Walls scheduled monument. It would also be physically very close to the upstanding and buried components of Durrington Walls and its associated features. Any proposals would have to involve archaeological mitigation commensurate with a site of this archaeological sensitivity and significance.</p> <p>Finally, any measures that would improve road surfacing and reduce traffic noise would be welcomed, albeit they would not necessarily address the range of issues and concerns set out in this letter.</p>
<p>Hampshire CC</p>	<p><u>Transport</u></p> <p>There is broad agreement on the methodology used in the assessment of transport matters and the County Council’s Highways team are currently working through the information supplied in response to more detailed enquiries which were raised. It will be necessary to secure a Travel Plan to prioritise sustainable travel in connection with the development and for robust measures to be implemented to manage the impact of construction traffic.</p> <p>It is noted that the need to bring forward improvements to the A303/A338 junction slip roads is recognised. Otherwise and subject to the detailed information confirming the conclusions of the assessment it is considered there is unlikely to be a significant transport impact on Hampshire.</p> <p><u>Education</u></p> <p>As with many Local Authorities Hampshire’s education estate in the north-west of the county is largely full in the primary system and as numbers feed through this will also be the case re secondary places. It is noted that in 4.1 of the Masterplan the Army have confirmed that after taking account of planning and site constraints the additional Service Family Accommodation should be located as close as practicable to the camp where the soldiers will be based.</p> <p>This is to be welcomed and provided this is achieved within the time and costs constraints of the project it will avoid the need to procure standing properties in the wider area which may well have included properties in Hampshire notable Andover which would have increased demand for primary and secondary places and key to the timely provision of additional school places will be having sufficient notice of when families will be moving, where they will be moving to, the ages of children within those families and the capital to deliver what is required. Therefore it will be important that the plans for addition SFA in Wiltshire at Larkhill, Bulford, Tidworth and Perham Down/Ludgershall are delivered as set out in the Masterplan along with appropriate community infrastructure for each of the new housing developments. However should service family accommodation be required within Hampshire early negotiations would be required on contributions to any additional school capacity required.</p>
<p>Test Valley BC</p>	<p>As education and highway authority it falls to Hampshire County Council to respond on these matters however the Council wishes to raise two points on</p>

	<p>these issues.</p> <p>Firstly, the issue of secondary school provision within Test Valley. The document (page 33 and 50) refers to the possible expansion of Wellington Academy and that this is not the preferred option of Wiltshire Council and that a further study is required. The Council needs to be assured that the future demand for school places has taken account of the existing situation of the three existing secondary schools in Andover and factored in future requirements from existing and proposed residential development within the borough.</p> <p>The Council supports the transport mitigation proposed especially the junction of A303(T)/ A338 (page 36).</p> <p>Regarding sustainable transport infrastructure it may be useful to identify Andover rail station in section 5.3.</p>
<p>Bulford PC (response to initial consultation)</p>	<p>a. Bulford Parish Council understands on good authority that the number of SFA dwellings required in this Parish is 250 - with, perhaps, an eventual small amount of adjustment resulting from circumstances in neighbouring Parishes.</p> <p>b. On this basis, Council considers that this number of dwellings should be accommodated in one estate without mixing its composition with civilian content.</p> <p>Reasons :</p> <p>(1) Ease of administration including the resolution of neighbour disputes. (2) A mixed estate would result in unnecessarily large increases in the green land area required (outside established Development Boundaries).</p> <p>c. Council considers that the 250 dwelling estate in this Parish should be established as one estate within the following designated areas :-</p> <p>(1) B6 - northern portion. (2) B16 - northern portion. (3) B23 (4) B30</p> <p>Reasons :</p> <p>(1) Ease of administration - this general area lies opposite to the established SFA Canadian Estate and alongside (for part of its length) the military Married Quarters lying to the north east of the Parish Housing Estate (marked in green on the Consultation Map); a solid military administrative framework already exists in this area. (2) Road Access - this area would allow for exit &amp; entry on to two roads, the Bulford Road and Double Hedges, thereby easing vehicular congestion. (3) This area would allow for a sensible and logical extension of the Parish Development Boundary. (4) SFA dwellings in this area would facilitate social inter-action between the military families and those in the Parish civilian housing estate; it could also provide direct (largely internal) road access to the Parish Village Hall and recreational facilities. (5) SFA households in this area would readily connect with the combined footpath and cycleway (that is in the last stages of planning) over Aerial Hill, Folly Bottom, and Amesbury; moreover, entry to an established Bridleway, leading directly to Amesbury, lies adjacent to this route. (6) Electrical, water, and sewage infra-structure have already been enlarged and improved to the recently re-built Canadian Estate and it is thought that an extension would be comparatively easy.</p> <p>The Council suggests that improvements to local facilities including buses, roads, schools, medical and child care facilities will be necessary. Shared</p>

	recreational facilities is suggested to promote integration.
Durrington TC	<p>The Town Council are delighted that due consideration has been taken of our objections and also the positive comments made from your initial consultation.</p> <p>Whilst we are disappointed that no houses will be going south of The Packway we accept the compromise of the houses to the North and West of the Golf Course as a fair solution.</p> <p><u>Road Safety</u></p> <p>Foremost in our minds at this stage is road safety. The access to and from the proposed site needs to be assessed fully and we recommend that the speed limit on the Packway be reduced from 60 to 40 mph with a provision of a roundabout for easy access to SFA.</p>