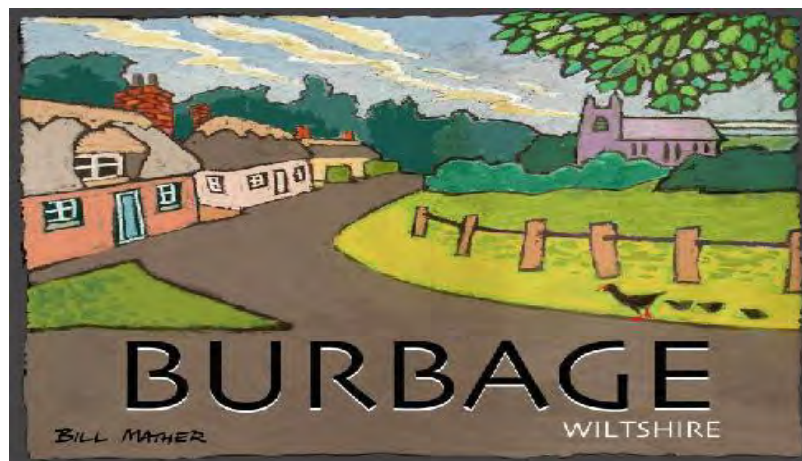


# Burbage Neighbourhood Development Plan

Sustainability Appraisal Scoping Report  
(SEA Regulations)

FINAL



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## Glossary of Terms

Acronym or Term	Definition
<b>AMR</b>	<i>Annual Monitoring Report (Wiltshire Council)</i>
<b>DCLG</b>	<i>Department for Communities and Local Government</i>
<b>HRA</b>	<i>Habitat Regulations Assessment</i>
<b>LDF</b>	<i>Local Development Framework</i>
<b>LMR</b>	<i>Local Monitoring Report (Burbage Parish Council)</i>
<b>LPA</b>	<i>Local Planning Authority (Wiltshire Council)</i>
<b>NDP</b>	<i>Neighbourhood Development Plan</i>
<b>NPPF</b>	<i>National Planning Policy Framework - 'The Framework' sets out planning policies for England and how they are expected to be applied. It provides guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications.</i>
<b>NPSG</b>	<i>Neighbourhood Planning Steering Group</i>
<b>Qualifying Body</b>	<i>Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.</i>
<b>SA</b>	<i>Sustainability Appraisal – A wide-ranging appraisal of the impacts of policy (such as this plan) to include socio-economic as well as environmental factors.</i>
<b>SEA</b>	<i>Strategic Environmental Assessment – European legislation requiring all plans to be assessed for environmental effects. In the UK compliance with the SEA Regulations can be achieved through SA or Sustainability Appraisal which takes into account socio-economic as well as environmental factors.</i>
<b>SAC</b>	<i>Special Area of Conservation (Part of the HRA)</i>
<b>SSR</b>	<i>Site Selection Report</i>
<b>SPA</b>	<i>Special Conservation Area (Part of the HRA)</i>
<b>WCS</b>	<i>Wiltshire Core Strategy</i>

# Burbage ... Neighbourhood Development Plan

## Key Data Sources

...

Wiltshire Council Draft  
Core Strategy, 2015

Wiltshire Council  
Planning Department

Burbage Conservation  
Area - Character  
Appraisal and  
Management  
Proposal  
- 2008

Rural Services  
Network - Evidence  
Base for Wiltshire

North Wessex  
Downs AONB  
Management Plan

National  
Planning Policy  
Framework  
(NPPF)

Wiltshire  
Biodiversity Action  
Plan 2008

Pewsey  
Community Area  
Plan 2011/12

## 1.0 Introduction

- 1.1 This SA (Sustainability Appraisal) Scoping Report has been prepared to satisfy the initial requirements of *The Environmental Assessment of Plans and Programmes Regulations 2004 (The 'SEA Regulations')*.
- 1.2 Because the Burbage NDP will cover social and economic issues as well as environmental ones, it was decided that SA, rather than the more limited SEA Environmental Assessment would be appropriate – even though this is not legally required. It will however allow a broader consideration of the issues.
- 1.3 The Scoping Report summarises the research done to establish the evidence, issues and Sustainability Objectives (The 'Framework') that will form the basis for the final SA Environmental Report which satisfies the requirements of the SEA Regulations. The research has also been used to identify issues for the NDP itself to address. This report is therefore the foundation of the NDP's evidence base.
- 1.4 The Scoping Report was created by a Neighbourhood Planning Steering Group (NPSG) established in June 2013, working with a Wiltshire Council Link Officer and qualified planning consultant.
- 1.5 The Steering Group comprises not just members of the Parish Council, but also other members of the community, including business owners and people with other local interests, who came forward to assist in the process and investigate possibilities available for local people to influence the future of the Parish of Burbage.

1.6 The topics used by the Burbage NPSG to frame their research for this report are the same as those used by Wiltshire Council in the development of their Core Strategy 2012- 2026. These topic areas are:

- Biodiversity
- Land and soil resources
- Water resources and flood risk
- Air quality and environmental pollution
- Climate Change
- Historic environment.
- Landscapes
- Population and housing
- Community Wellbeing and Health
- Education and
- Service Centre Provision
- Transport
- Economy and enterprise.

## 2.0 Development Stages of the Neighbourhood Plan

2.1 In order to produce the Neighbourhood Plan, the following stages are being employed:

- SA Scoping Report - this document summarises all the evidence and states how the Parish is comprised at the present time. It identifies problems, issues and objectives.
- Draft Neighbourhood Development Plan (NDP) - this will comprise an outline of the vision, objectives, policies and proposals and map for informal consultation with the local planning authority. The Draft Plan was informed and modified by interaction with the Scoping Report and its findings.
- Pre-Submission Neighbourhood Plan - this report will comprise the vision, objectives, policies, proposals and map of the plan for the regulation six-week public consultation period.
- Submission Neighbourhood Plan - this report will take into account the representations received on the draft plan during the public consultation period and will amend as necessary its content for submission to the local planning authority.

## 3.0 Context and Scope

- 3.1 One of the main tasks of this Scoping Report is to set out the baseline information to establish the local environment, demographic, social and economic context which the plan will reflect and impact upon. This is considered to be an essential first step in identifying areas for policy development. The legal requirements of the scoping stage are defined as:
- To consider the relationship of the plan... with other relevant plans and programmes
  - Establish the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant .....and the way those objectives and any environmental considerations have been taken into account during its preparation.
  - Assess the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.
  - Describe any existing environmental problems relevant to the plan / programme including, in particular, those relating to any areas of a particular environmental importance, e.g. areas designated pursuant to 79/409/EEC and 92/43/EEC.
  - Consult with the relevant authorities, which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes, in deciding on the scope and level of detail of the information which must be included in the environmental report" (Article 5.4 and 6.3).
- 3.2 A comprehensive review has been carried out of those relevant policies, plans and documents which have an influence on the production of a Neighbourhood Plan for Burbage including those published by statutory bodies such as the Environment Agency, English Nature and English Heritage. (see Appendix 1). This review was undertaken to ensure that the up to date policies and the sustainability and environmental issues currently held by other organisations which affect or influence the Burbage area were considered when compiling the plan. In addition, the Statutory Consultees identified above have been consulted on the draft Scoping Report and their concerns have been incorporated into this, the final version. They will also be reflected in the final SA Environmental Report.
- 3.3 National Planning Policy and the saved policies of the extant Local Plan were studied. However, arguably the most important planning document affecting the Burbage NDP is the Wiltshire Core Strategy (WCS). This sets out policies which aim to deliver sustainable development across Wiltshire including Burbage. The Burbage NDP reflects, interprets and takes forward the policies and priorities of the Wiltshire Core Strategy. These policies are already backed by extensive research including a Sustainability Appraisal.

## 4.0 Methodology

- 4.1 The methodology adopted for completing this report is in accordance with the guidance set out by the Department for Communities and Local Government (DCLG) and provided by the Planning Advisory Service (PAS). Advice has been taken from Wiltshire Council, including their Sustainability Appraisal Scoping Report; a similar methodology has been used.
- 4.2 In order to establish the key issues, priorities and objectives for the Plan area, all of the documents listed in Annex 2 were read and noted. These include the relevant plans, policies and programmes identified and suitable sources of baseline information.
- 4.3 This documentary research was combined with input from the community; public consultation exercises were undertaken including a series of open meetings, personal discussion together with paper and on-line surveys. These were delivered to all households and businesses and advertised widely across the Parish of Burbage. The early community engagement was recorded and analysed in 'The Future of Burbage', a separate Report which forms an appendix to the Consultation Statement which will be published alongside the final plan.
- 4.4 The results of this research have been incorporated into this report as an important aspect of baseline information. Finally, the knowledge of the plan making team and direct consultations with the LPA's Link Officer were also useful. All of the above sources fed into the Baseline Data Summary which follows this section.
- 4.5 Once created, the Baseline Data Summary was then used, alongside public consultation inputs, to identify the Issues and Problems, both environmental and otherwise, that the NDP would have to deal with. Following identification of Issues and Problems, these were used to establish a Framework of Objectives. These are the overarching Sustainability Objectives of the NDP, differing from the main plan Objectives in being aspirational and focusing on sustainability rather than on tackling the issues and problems directly with solutions.
- 4.6 The Framework of SA Objectives will be used in the final SA Environmental Report as a touchstone against which the sustainability credentials of each NDP Objective and Policy can be judged. In this way the SA process will advise and inform policy creation in an iterative process, helping to ensure that final policies will deliver sustainable development.

## 5.0 Baseline Data Summary

- 5.1 Baseline data includes the characteristics of the current environment issues and trends in the area to be covered by the Neighbourhood Plan (NDP). The collection of this information ensures that the process is based on sound evidence and, as well as identifying areas for policy, provides the basis for prediction and monitoring of environmental and sustainability effects of the plan.
- 5.2 In order to establish the Area to be covered by the Neighbourhood Plan, the NPSG undertook a survey of all residents and businesses across the Parish. The questions asked covered a variety of subject areas with two key questions on whether or not to develop a Neighbourhood Plan and if so, which area should it cover. The survey found that 85% of respondents felt the Neighbourhood Plan should include the whole Parish of Burbage and not solely the area within the village boundary. The establishment of the Parish as the Designated Area will ensure that planning issues will take into account not just the village but also outer lying areas of the Parish, including Durley and Southgrove Farm. The highlighted area of the map shows the full extent of Burbage Parish from the area of Warren Farm in the north to Southgrove Farm on the border with Collingbourne Kingston Parish. The area outlined in yellow shows the limit of Burbage village within the Parish.

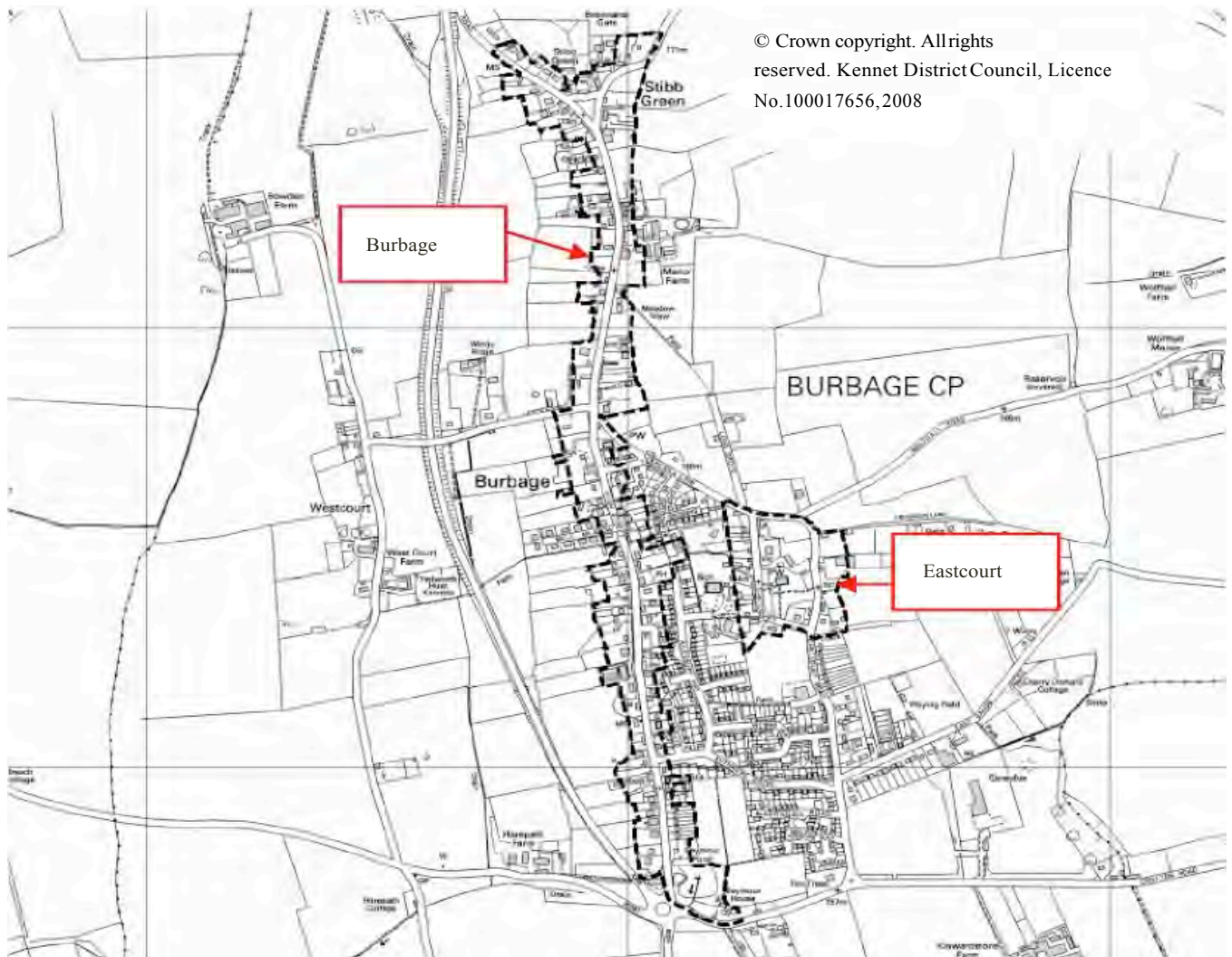


### 5.3 Parish profile

Burbage village was first designated a conservation area in 1993 in recognition of its architectural and historic character. It is a linear settlement which has evolved from several hamlets on the periphery of the Savernake estate. The conservation area specifically encompasses The High Street - the main feature of Burbage - which is over one-mile-long, running from Stibb Green in the north to Marr Green in the south.



5.4 Burbage lies on the north-south route of the Marlborough to Salisbury road where it crosses the Vale of Pewsey. The village itself forms a ribbon development with properties of all ages running alongside the High Street's mile long span. This is punctuated at the north and southern ends with Stibb Green and Marr Green. The east and southeast parts of the village are more dominated by developments of the twentieth century.



5.5 The High Street itself is largely characterised by high banks bordered by mature trees and hedgerows; these narrow enclosed areas are however interspersed with wide open zones. The essential pattern of buildings in the High Street is created by widely spaced, set back frontage buildings set in their own grounds. This form of development contrasts markedly with the housing estates built in the village during the latter half of the twentieth century. These large scale developments impinge most noticeably upon the traditional appearance of the High Street in the form of large, open visibility splays at the various road junctions.

- 5.6 A wealth of community facilities are spread across the village including the High Street (pub, petrol filling station/shop and Post Office); Eastcourt (Church and Church Centre); Barn Meadow (Village Hall, playing fields and Royal British Legion) and the area to the East of the village (cricket club, tennis courts and rather dilapidated Scout Hut).
- 5.7 The Parish has a population of about 1,400 and provides numerous services for the surrounding rural area and other local communities including Doctors Surgery, convenience store and Post Office. In effect it is on its way to becoming a mini service-centre.
- 5.8 In 2008 a Conservation Report was published with the aim of recording and protecting the local environment and heritage. This has been adopted by the local planning authority for the purposes of conservation and development control.
- 5.9 **Landscape**  
The parish of Burbage lies towards the eastern end of the Vale of Pewsey, a fertile region and the catchment area for the Salisbury Avon although no river actually runs west-east. The vale runs between chalk downs rising in places to 289 metres, which are part of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The main purpose of the AONB designation is to conserve and maintain the natural landscape, enhancing its unique beauty; with a secondary aim of meeting the needs of those who live and work there.
- 5.10 The Downs range northwards from Salisbury Plain to the Thames Valley. To the east of Burbage the Kennet Valley cuts through the Downs so that effectively Burbage lies on a connecting ridge of higher ground about 11 miles wide with the Marlborough Downs to the north and the Hampshire Downs to the south.
- 5.11 The northern edge of the Parish boundary crosses into the Savernake Estate, including the ancient Savernake Forest, a former royal hunting park. The landscape setting of the settlement makes a key contribution to the character and appearance of the conservation area.
- 5.12 The forest of Savernake to the north and agricultural fields directly to the east, west and south all contribute to the rural flavour of the area. Much of Burbage lies on the tongue of greensand which extends east from Pewsey Vale. Chalk overlies the greensand to the south of the village and north of the canal the chalk sequence returns with deposits of clay-with-flints. The greensand 'ridge' of Burbage forms the watershed between the east-flowing Kennet and the south-flowing Avon.
- 5.13 **Historical environment**  
The parish of Burbage lies to the south of Savernake Forest, a fact which has had considerable influence over this community at many times in its history, and at the eastern end of the Vale of Pewsey. The parish contains the villages of Burbage and Durley, the hamlets of Stibb Green and Ram Alley, and various outlying farms. The main village is Burbage, which was originally three strips of ribbon development, Westcourt, Burbage and Eastcourt, which were based on early estates. Durley village was planted on about 230 acres of rough pasture belonging to Burbage. There are now many Savernake estate houses in Durley.
- 5.14 There is no single architectural style prevalent within Burbage Parish and its conservation areas however the building materials are characteristic of those found generally in the Vale of Pewsey; brick and timber framed buildings are therefore found in quantity. The local geological prevalence of flint in chalk is also used in many of the village dwellings.

- 5.15 Brickwork is frequently of good quality, featuring vitrified headers or, in the case of some Victorian buildings, carefully engineered designs in yellow and red stock bricks. The palette of materials includes the extensive use of thatch, particularly 'Long Straw', Welsh slate and, more recently, plain clay tiles. Walls are often of timber frame construction with brick and noggin infill. Roughcast and colourwash finishes are a common sight throughout the older areas of the village.
- 5.16 From the twentieth century onwards, brick and tiles have become the most common material for use in construction in the village. Double glazed units are common in more modern dwellings however these are largely timber framed; PVCu or trickle-vented fixtures are not encouraged.
- 5.17 A number of brick boundary walls form the backdrop and setting of protected buildings whilst also cropping the banks of the High Street; these contribute further to the built character and setting of the conservation area.
- 5.18 The Kennet and Avon Canal along with a rich assortment of vernacular buildings are established features of Burbage. They create diversity and individuality and harmonise with the softer green landscape made up of mature trees, hedgerows and green spaces between buildings. The history and evolution of the village is evident through the variety of buildings set out in the linear ribbon pattern.
- 5.19 **Population and Housing Provision**  
Burbage is located in the predominantly rural county of Wiltshire and shares a reasonable common demography with the rest of the county.
- 5.20 **Population**  
The 2011 Census records the Parish as having an adult (aged 16 and over) population of 1,429; 182 were aged between 65 and 74 years and 146 aged over 75 years. The Census further shows that 32% of the population of the Parish is aged 65 and over with 57% in the 35 to 64 age bracket. Local authority statistics forecast that by 2026 there will be an increase of 9,300 in the population of Kennet District, which covers the whole of Pewsey Vale and includes the town of Devizes.
- 5.21 **Housing**  
There are 758 dwellings none of which are classified as 'shared' in the latest Census. Approximately 94% of dwellings in the Parish are houses or bungalows, whether detached, semi-detached or terraced; the remaining accommodation is flats, maisonettes or apartments.
- 5.22 23% of people live alone; 41% are in two person households with 34% of residents in accommodation containing between 3 and 5 adults. Only 14 properties contain 6 or more people. The majority of housing (71%) within the Parish is owned either outright or with a mortgage; 25% of accommodation is rented either privately or social housing.

**5.23 Community well-being and health**

There are many thriving sports clubs within the village e.g. football, cricket, tennis, pool among them; most of which have well attended junior sections. The cricket pitch has a well-equipped club house and bar which hold regular other events for the whole community. Other fitness activities for all ages are held in the Village Hall including adult and children's dance and fitness, table tennis, tai chi and 'Zumba' classes.

5.24 Primary health care is provided by a Doctor's surgery at The Sprays, Burbage with good facilities including Practice Nursing and dispensing facilities on site. Secondary health care is provided mainly at the Great Western Hospital, Swindon and at the local Savernake hospital. Sheltered care for the elderly is available in the village at Seymour Court. Local authority indicators show that although general health is improving an ageing population may have implications for the provision of services, housing and recreation.

5.25 Burbage is acknowledged as a low crime area and the local population says they feel reasonably safe in their environment. Local policing is provided from Marlborough and Tidworth.

**5.26 Education and skills**

Pre-school and Primary education are provided in the parish by the local Primary School and pre-school facilities. The Primary School is located in Blackman's Lane, Burbage. At the time of the OfSted inspection in 2012 there were 118 pupils registered. Secondary education provision is outside the parish with Pewsey Vale and St John's School Marlborough being key providers.

**5.27 Service centre provision**

Pewsey and Marlborough are designated as the local Service Centres in the Core Strategy, but Burbage has some local and well-used resources including Marr Green Farm Shop, 'Mace' convenience store, petrol filling station and shop and a Post Office with retail facilities. In reality it is already a local service centre and there is a desire among the community to strengthen this role.

5.28 All Saints Church in Eastcourt is part of the Deanery of Pewsey in Salisbury Diocese and caters for the needs of the local Anglican community with services held weekly and a variety of other groups and events held throughout the year.

5.29 Similarly, there are many social clubs and societies outside the remit of the church which are usually held at either the Village Hall, Church Centre or Scout Hall; for example: Brownies and Scouts, Film Club and regular quiz nights. The Village Hall is attached to the British Legion in a dual building which is acknowledged as being in need of refurbishment or redevelopment. There is a strong sense of community within the Parish and many services for local groups which are established and provided by local people; such as monthly Market and Meet and weekly 'Fill the Gap' lunch club.

5.30 **Transport: roads**

Due to the rural and largely agricultural nature of the settlement and Parish, there are many small roads and by-ways; some unsuitable for large volumes and weight of modern traffic. The A346 runs north/south through the Parish and is a designated freight route, connecting Salisbury and the A303 trunk route in the South to Swindon and the M4/M5 to the North.

5.31 Those who live in the area are heavily dependent on cars especially as the bus service is often infrequent. Local bus services and personal transport are required for employment, school, shopping and all other services.

5.32 There are good footpaths but no cycle paths within the Parish; however, the bicycle is often used as an alternative to the car for local (within Parish) travel. This could change as fuel prices increase and suitable accommodation made in any new development.

5.33 **Rail**

The Great Western rail line between Paddington and Penzance runs to the north of the village close to Burbage Wharf. Railway stations are located at Pewsey and Great Bedwyn, making daily commuting to London, Reading and other employment centres quite feasible and there are many within the Parish who use these facilities.

5.34 **Cycling**

National Cycle Route 4 runs through the Northern section of Parish on its sector between Great Bedwyn and Bristol. This is a well-used and defined long-distance cycle way used for recreational purposes by residents and visitors alike. Many cyclists using the route stay in local B & B accommodation bringing benefit to the local rural economy. The Wiltshire Cycleway, a 160-mile route around the county, lies East of the Parish boundary on its section between Everleigh and Great Bedwyn and North of the Parish between Great Bedwyn and Marlborough. There is great potential to extend this network throughout the village, in particular linking the areas of green space.



### 5.35 Canal

The Kennet and Avon Canal runs east/west through the Parish with Burbage Wharf at the north of the village boundary. Today very little freight is carried but there is a thriving traffic of 'boat people' and tourists who have hired barges for their holiday. The maintenance and management of this historic waterway is most important to the local economy.

*The 87-mile-long Kennet and Avon Canal runs between the Rivers Thames in the east and Avon at Bristol in the west. It is England's most southerly canal and runs through some of the country's best-loved landscapes including the Vale of Pewsey. It now owes its existence to the dedication of waterway enthusiasts and local people who formed the Kennet & Avon Canal Trust and helped to restore the canal to its former glory.*

The canal bank footpaths are well-used by local walkers and tourists alike.

### 5.36 **Economy and enterprise**

Burbage is 'a working village' with a range of assorted small businesses and entrepreneurs some of which provide employment for those who live and work in the area. There are limited employment opportunities in the village, but there is a developing trend for home working and a number of small business sites within the Parish. There is a local desire for more employment in the village.

5.37 There is one employment site on the A338, Hungerford Road which still has available development capacity. It is important to attract new small businesses for local employment. The area surrounding the Parish is primarily agricultural there are, however, examples of farming diversification which provide local employment and add to the economy.

5.38 Tourism is an important part of the local economy visitors being attracted to the beautiful landscape with its historic features, the Kennet and Avon canal, Savernake forest and the general peace and quiet of the Wiltshire countryside. This element of the economy should be encouraged and developed if possible. There is a recognised need for more tourist accommodation in the local area which might be a hotel, B&B's or holiday lets.

### 5.39 **Biodiversity**

The Pewsey Downs and River Avon are designated Special Areas of Conservation (SAC) in the draft Wiltshire Core Strategy. They also form part of the North Wessex Downs AONB and as such a Management Plan is in place which seeks to protect the impact of tourism and development on the natural and unique habitats of the area.

**5.40 Land and soil resources**

The Vale of Pewsey in which the Parish of Burbage lies; is a nationally recognised geographical feature. The floor of the valley is largely greensand whilst the escarpments to the north and south are chalk grassland. Burbage lies between Marlborough Downs to the north and part of Salisbury Plain, to the south. The Parish is predominately rural with most land used for agricultural purposes.



**Figure 1 -Map showing extent of Greensand in the Pewsey Community Area**

There are no (known) mineral resources in this area featured in the Wiltshire and Swindon Minerals Local plan 2001.

**5.41 Water resources and flood risk**

The source of the Hampshire river Avon rises within the Pewsey Community Area; from where it flows through a series of historic, protected water meadows, through Pewsey and then across the Vale to the south. Whilst it does not cross Burbage Parish the area does form part of the ground water catchment area for the river.

5.42 The Kennet and Avon Canal runs east/west through Burbage parish to the north of the village. It is noted for its industrial, cultural, landscape, ecological and tourism values. It has an important role to play in the enjoyment of the countryside in the Parish.

5.43 The risk of flooding in the immediate area is not high; however, it is important that any new development manages the impact of surface water and any possible risks. Any development proposed should be formally assessed for the possibility of flooding and suitable precautions taken to minimise any possible adverse effects. Recent extreme weather conditions resulted in flooding at Harepath Farm and Marr Green Farm bends. The Parish lies within the remit of Thames Water (Swindon) and Oxford Water Resource Zone (WRZ).



#### 5.44 **Air quality and environmental pollution**

The main A346 runs north-south along the western boundary of the Parish from its intersection with the A338 which turns east at that point near the southern most edge of the village development. The A346 is an officially designated north south freight route and although the building of the by-pass reduced pollution from traffic in the village, noise pollution remains an issue for some residents. Traffic management can make a significant contribution to reducing exhaust emissions and any development should not attract the constant use of large heavy vehicles apart from essential collection and delivery.

*The Core Strategy contains policies to encourage more sustainable forms of transport, which could help reduce transport's impact on air quality and now has a specific policy in relation to air quality which could help improve air quality.*

- 5.45 Excessive noise could have an adverse effect on the environment and the quality of life enjoyed by the community. Its impact is already a material consideration when determining planning applications. Burbage enjoys a fairly high level of peace and quiet at present.
- 5.46 Light pollution, although not a present problem, should always be considered when any new development might significantly increase the current modest levels of artificial night light. This is particularly so in the context of the AONB. The local authority's current policy of turning off or diming street lighting during silent hours has gone a long way in reducing night light pollution.
- 5.47 The River Avon SAC and ground water sources are particularly vulnerable to the effects of diffuse and point source pollution which include ecological damage due to excessive algal growth. The pre- submission Core Strategy identifies the need for the use of sustainable drainage and water conservation measures across the county, including the River Avon SAC catchment within which Burbage Parish lies. Air quality in the county has improved year on year.

**5.48 Climatic factors**

The evidence for climate change is now overwhelming and there is little doubt that rises in global temperature are partly the result of increased human generated gas emissions. Predicted global temperature rises range from 1.1 to 6.4 degrees. This may well increase the risk of flood and storm damage as weather patterns become more unpredictable. Burbage will not escape the localised consequences of these wider changes.

5.49 Planning policies should continue to focus on mitigation and adaption to reduce greenhouse gas emissions and the monitoring by the local authority of the current levels noted. The opportunity to use renewable energy would be welcomed, but should not be at the expense of the character of the North Wessex Downs AONB. New buildings should always employ energy-efficient devices and be built to the highest eco standards available.

## 6.0 Identifying Key Issues and Problems

The SEA Directive 2001/42/EC requires consideration of:

*"Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (Annex d)*

Further than this, an SA is expected to consider all of the socio-economic issues relevant to the plan in addition.

6.1 Identifying key environmental and sustainability issues leads on from the collection of baseline information. These issues may be defined as both problems and opportunities, identifying these issues aid the understanding of matters which need addressing. This further informs the environmental assessment process and helps identify sustainability objectives and indicators. Consequently, many of the sustainability issues described in this section have been identified following the review of policies, plans and programmes. For example, the AONB management Plan, or the Wiltshire Core Strategy. However, the role of the community is also very important when identifying environmental and sustainability issues and their input through community consultation has been considerable. Using the data gathered above plus the input and local knowledge of the community the following are thought to be the Key environmental issues and problems. Using the same headings as the Wiltshire Core Strategy to aid cross reference, these are as follows:

### 6.2 **Biodiversity**

- There is a danger that development could, if not strictly controlled, seriously affect the nature and balance of the countryside.
- Sites of Special Scientific Interest require protection.
- The Stibb Green, Barn Meadow and Glebe Land (including the area between Taskers Lane and Eastcourt) have been identified as areas within the Village which require protection, along with other similar green spaces.
- Green areas used for sporting activities are also important for wildlife. They could be threatened by development and must therefore be protected.

### 6.3 **Land and soil resources**

- Farming and other rural activities are vital to the area. The present move towards diversification is important both economically and environmentally whilst protecting agricultural land.
- There is pressure on maintaining the settlement boundary.
- To develop outside the settlement boundary would mean the use of greenfield/agricultural land which could affect the AONB.
- Future development should be at a minimal density to protect the nature of the Village.
- The use of brownfield sites should be maximised.
- Some land use will be necessary to meet other planning objectives

### 6.4 **Water resources and flood risk.**

- There are two important water resources in the Pewsey Vale, the river Avon and the Kennet and Avon canal and the integrity of both have to be protected from any adverse effect from development and water levels maintained.
- Abstraction must be strictly controlled and there should be no adverse effect on water meadows in the local area.
- There is very little risk of flooding in the Parish.
- Drainage must be considered in any new development so that increased run-off does not contribute to problems elsewhere.

### 6.5 **Air quality and environmental pollution**

- An increase in heavy goods vehicles has affected air quality adversely.
- There should be as little increase in traffic, especially HGVs, as possible.
- Relocating bad neighbour uses away from housing could improve local air quality (e.g. dust at Mundy's Yard).

## 6.6 Climatic factors

- As a result of climate change weather patterns are altering. The effects of this change may impact on water supply, flood risk, food production, energy use, transportation and a number of other areas. Green spaces currently help prevent a 'heat island' effect in summer. These need to be preserved and landscaping required including trees from new developments.
- Planning and development policies will need to focus on mitigating the effect of climate change.
- New residential, economic and mixed use developments should employ renewable energy and energy saving techniques.

## 6.7 Historic environment

- There are a number of features within the area that require protection for their heritage and archaeological value.
- The conservation area must be protected and preserved from any inappropriate development within the parish.
- Historic village and rural landscapes are important and require protection.

## 6.8 Landscape

- The Pewsey Vale landscape is a prime reason for the North Wessex Downs AONB designation and this should be conserved and enhanced to preserve the natural beauty of the area.
- Rights of way and byways add to the appreciation of the landscape and should not be disturbed by new developments. New footpaths will increase enjoyment of landscape assets.
- The important special individual quality of the landscape is a tourist attraction which supports the local economy. This should be exploited, though with care.

## 6.9 Population and housing

- Burbage has a mixture of architectural types examples of which are set out in the Burbage Conservation Area Report, 2008. This vernacular should be sustained particularly in the conservation area.
- All listed buildings should be protected.
- The Wiltshire Core strategy sets out the number of houses required to be built in the Pewsey Community Area by 2026. This is however a minimum number.
- Affordable and market housing should be included in future developments to allow local people to remain in the parish. This could include smaller, cheaper market houses.
- Core Policy 44 allows for small sites of up to 10 affordable houses only on sites adjacent to development limits and which would be available for local use both initially and subsequently.

## 6.10 Community wellbeing and health

- There are facilities within the village which cater for the elderly and those that require care; consider and monitor if this will continue to be sufficient for the ageing population.
- Consider if the available primary care is sufficient in the light of any future increase in housing and is secondary care reasonably accessible?
- Accommodation exists for community activities; however much is recognized as being in need of redevelopment and/or updating to meet with current and possible future requirements.
- There is a wide selection of sports facilities and clubs which should be protected.
- Local services e.g. post office, village shop, etc. must be retained and enhanced if possible.

### 6.11 Education and skills

- There is no FE provision in the village and little opportunity for adult education in the area.
- There is sufficient primary school capacity for current requirements

### 6.12 Service centre provision

- Maintaining and enhancing current service outlets in the village. Sustaining the viability of the village enterprises
- Attract new and different services to the village.
- Enable more (small) employment sites from which services can be provided.

### 6.13 Transport

- This rural area is heavily dependent on cars and public transport
- The increase in heavy good vehicles using an undesignated north /south freight route causes damage to the A346, most notable at the Wharf B crossing of the railway line and Kennet and Avon Canal.
- Enhanced public transport links to be integrated with trains in Great Bedwyn and Pewsey.
- There is a recognised need for safety features such as pedestrian crossings as well as better footpaths / cycle ways.
- The general increase in traffic is detrimental to the environment, conservation areas, small villages, rural roads and any new development should recognise this problem.

### 6.14 Economy and enterprise

- Current employment sites have capacity for further development but there is a recognized need for smaller sites to enable new small businesses in the local area.
- Local employment is welcomed as it reduces the need to travel. Existing road journeys are long and journey times unreliable.
- Local businesses and retail should be encouraged and enhanced. New enterprises require support.
- There are a high proportion of daily commuters out of the village, but there is also an increase in working from home as travelling becomes more expensive. Ideas on how to support such new working environments should be considered.
- There is a trend for rural diversification by conversion of buildings etc. to employment sites.
- The Kennet and Avon Canal is a prime tourist asset for the area and those using it could be encouraged to make use of the village facilities.

## 7.0 Establishing the SEA Objectives and Framework

- 7.1 Having identified the key environmental issues, the next step is to turn awareness of what these are into actual objectives that any policy would have to support to help deliver. While not specifically required by the SEA Directive, objectives are a recognised way of considering the effects of alternative policies.
- 7.2 A set of SA Objectives (below) will form the Framework by which policy options can be considered and tested to determine whether they are likely to have a positive or negative impact. In fact, they will be the main tool in testing the plan to ensure that it delivers sustainable development.
- 7.3 Sustainability Appraisal objectives (which are overall environmental objectives) are different in concept and purpose from the objectives of the Neighbourhood Plan (the Planning objectives of the plan), though there is a degree of overlap. SA Objectives are not necessarily intended to be achievable, but are more aspirational in nature, addressing the full cross-section of sustainability issues. The proposed environmental and sustainability objectives are therefore intentionally broad in nature.



## The Burbage NDP SA Objectives and Framework

<b>Topic- Biodiversity</b>	
Objective	To protect or enhance biodiversity and geological features and avoid losses
<b>Topic- Land and Soil</b>	
Objective	Ensure the efficient and effective use of land, conserving the best quality land if possible and encouraging the re use of brownfield sites
<b>Topic- Water Resources and Flooding</b>	
Objective	Use and management of water resources in a sustainable manner
Objective	Protection of people and property from flooding
<b>Topic- Air Quality and Environmental Pollution</b>	
Objective	To maintain the good air quality in the Parish
<b>Topic- Climatic Factors</b>	
Objective	Minimise our impact on climate change and manage its effects
<b>Topic- Historic Environment</b>	
Objective	Protect, maintain, promote and enhance the historic environment
<b>Topic- Landscape</b>	
Objective	Conserve and enhance the character and quality of the Parish's rural landscape, most especially the North Wessex Downs AONB and its setting and views in and out, maintaining and strengthening local distinctiveness and sense
<b>Topic- Population and Housing</b>	
Objective	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
<b>Topic- Community Well-being and Health</b>	
Objective	Provide a safe and healthy environment in which to live
Objective	Improve access to community services and facilities footpaths
<b>Topic- Education and Skills</b>	
Objective	Raise educational attainment and enable people to improve workplace skills
<b>Topic- Service Centre Provision</b>	
Objective	Improve access to range of high quality community services including recreational
<b>Topic- Transport</b>	
Objective	Reduce the need to travel and promote more sustainable transport choices
<b>Topic- Economy and Enterprise</b>	
Objective	Encourage a vibrant and diversified economy and provide for long term sustainable economic growth
Objective	Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet local needs and a changing workforce

The above set of Objectives forms the SA Framework that will be used to inform and assess the policies of the Neighbourhood Plan. The Framework will be used in the final SA Environmental Report to ensure that the plan delivers sustainable development.

## 8.0 SUMMARY

- 8.1 The extensive research undertaken for the Scoping Report has two purposes; firstly, as the first research for the plan undertaken it forms the basis for the Evidence Base that underpins the Plan itself. In more simple terms, the research helped identify the environmental problems and issues of the area and in so doing suggested areas for policy development. Secondly, once the problems and issues were apparent it was possible to devise a series of Sustainability Objectives for any future policies. These Sustainability Appraisal (SA) Objectives form the Framework that will be used to test the environmental credentials of the NDP's policies and planning objectives. In other words, the Framework will be used to check whether than Plan is likely to help to deliver Sustainable Development.
- 8.2 **Key Problems and issues identified were broadly as follows.**  
Like many larger villages set within a high quality rural landscape, Burbage is seen by many as a desirable place to live, leading to a certain amount of development pressure. However, the current range of services and facilities is relatively limited, especially as housing numbers rise, leading to high levels of car use and threatening the sustainability of the overall settlement.
- 8.3 While it does not oppose steady and sustainable growth, the community feels that a fundamental and overall challenge for the NDP is therefore to address this threat to sustainability by managing development, improving self-containment, reducing the need to travel and improving sustainable transport modes, among other actions, both within the context of the NDP and without. More specific Key Problems for the Plan to deal with are identified as:
- To accommodate necessary housing development, and to ensure it reflects the needs of all the community, and direct it towards brownfield land when possible and ideally within the settlement boundary.
  - To attempt to balance new housing with enhanced employment opportunities, possibly via mixed use development, but also by encouraging small enterprises including tourism
  - To enhance existing facilities and infrastructure - including sustainable transport, road safety, retail provision, services and adult education
  - To protect the best parts of the village's historic character and landscape setting including key green spaces that help reduce overall development density
  - To preserve the best quality land for agriculture if possible
  - To preserve Green Space for Recreation, and habitats for nature.
  - To ensure that neither new development nor increasing traffic impacts negatively on water resources, air quality nor lead to flooding. Additionally, to protect the village against effects of climate change.
- 8.4 **Sustainability Objectives (the Framework)**  
The resulting Sustainability Objectives (the Framework) is an attempt to set down what aims are necessary for policy in order to tackle the Problems and Issues of the Area in a way likely to improve sustainability. These are the benchmarks against which the sustainability of the NDP's Objectives and policies will be judged in the final SA Environmental report. The Sustainability Objectives were refined in response to comments from the Statutory Consultees.

## 9.0 Statutory Consultees

### 9.1 Statutory consultees

The following responses were received from the Statutory Consultees. The further response of the SA and plan making team to these follows each one.

### 9.2 Environment Agency: The Scoping Report adequately covers issues relevant to the Environment Agency. No further comment.

*SA and Plan Response:* Noted.

### 9.3 English Heritage: Unlikely that EH may have to be greatly involved. However, suggest that evidence base for historic environment improved. Plan team should work with conservation section of LPA.

*SA and Plan Response:* Noted. A detailed map showing heritage assets will be added either in the full Environmental Report or in the NDP. This will help better inform the community. In addition, consideration will be given to providing further evidence and explaining this to the community. The Conservation Section of the LPA will now be directly consulted at the first main consultation stage; to ensure the overall LPA response addresses this concern.

### 9.3 Natural England:

Presence of North Wessex Downs AONB be specifically mentioned in relevant Objective.

*SA and Plan Response:* Agreed. SA Scoping Report text altered to do this.

Under the land and soil topic, explicit reference should be made to protecting best and most versatile soils.

*SA and Plan Response:* Agreed. SA Scoping Report text altered to do this.

when determining the objective; *Provide a safe and healthy environment in which to live*, we suggest that maintaining and enhancing the formal and informal footpath network should be included, as, other matters being equal, it is preferable to avoid urbanising such recreational assets.

*SA and Plan Response:* Agreed. SA Scoping Report text altered to do this.

We advise that great weight is given to landscape in selecting sites, and once sites have been selected, you may wish to consider setting out within the plan how they are to be developed (including with reference to landscape matters), or including a more generic landscape policy if you feel it would add value over and above that in Wiltshire Core Strategy.

*SA and Plan Response:* Agreed. Will carry forward into policy. This is something the community support.

Depending on local circumstances, it may also be appropriate to set out in the plan any environmental improvement aspirations (e.g. creation of a new linking footpath, or laying of a prominent hedge), and how they may be delivered.

*SA and Plan Response:*

Agreed. There will be a policy in the main plan covering Developer Contributions that will cover this issue.

## Appendix 1. Sources and References

### References and Sources – Preparing the SA

Environmental Assessment of Plans and Programmes Regulations 2004  
Localism Act 2011  
Neighbourhood Planning (General) Regulations 2012  
Planning and Compulsory Planning Act 2004  
Planning Practice Guidance – online resource  
Town and Country Planning Act 1990 (As Amended)  
Wiltshire Council, Neighbourhood Planning Guidance February 2013  
Wiltshire Council, Environmental Assessment of Neighbourhood Plans, Feb.2014  
Wiltshire Council, SEA Guidance Note, September 2015

### References and Sources – Evidence Base for Research

An Air Quality Strategy for Wiltshire 2006  
AONB Management Plan  
CIRIA (2010) Planning for SuDs – making it happen [online]  
County SMR and GIS System  
Designated Sites – Natural England website  
European Commission (2011) 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020' {online}  
Flood Risk Maps – Environment Agency website  
Kennet Local Plan 2011 (saved policies)  
HM Government (2010) The Government's Statement on the Historic Environment for England [online]  
National Planning Policy Framework  
Neighbourhood Planning Advice Note – Historic England website  
Pewsey SA Report  
Strategy for Historic Environment in the South West 2004  
The Hampshire Avon Catchment Abstraction Management Strategy for Wiltshire 2006  
UK Census - Wiltshire and Burbage Parish - 2011  
UK Climate Projections (UKCP09) team. <http://ukclimateprojections.defra.gov.uk/>  
Wiltshire Biodiversity Action Plan 2008  
Wiltshire Core Strategy 2015  
Wiltshire Core Strategy Habitat Regulations Assessment  
Wiltshire History Online <http://history.wiltshire.gov.uk/community/>  
Wiltshire Infrastructure Delivery Plan 2011-2016  
Wiltshire and Swindon Waste Local Plan 2011  
Wiltshire and Swindon Minerals Local Plan 2001  
Wiltshire Renewable Energy Action Plan  
Wiltshire Strategy for 14 - 19 Education and Training 2005  
Wiltshire and Swindon Economic Strategy 2003 - 2008  
Wiltshire and Swindon Historic Environment Record  
Wiltshire Council (2015): JSA for Pewsey Community Area, [online]  
Wiltshire Council Landscape Character Assessment 2010

## Appendix 2. Statutory Consultee Comments in Full

Environment Agency:

Mr David King Wiltshire Council Planning Policy County Hall Bythesea Road Trowbridge Wiltshire BA14 8JD	<b>Our ref:</b> WX/2009/110257/OR-19/PO: L01 <b>Your ref:</b> Burbage NP SEA Scoping Report  <b>Date:</b> 26 February 2015
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Dear Mr King

### **Burbage Neighbourhood Plan SEA Scoping Report**

We have reviewed the SEA Scoping Report for the Burbage Neighbourhood Development Plan. It adequately covers those issues within our remit; therefore we have no other comments to make.

Yours sincerely

**E Challans**

**Ms Ellie Challans**  
**Sustainable Places - Planning Advisor**

Direct dial 01258 483321  
E-mail [swx.sp@environment-agency.gov.uk](mailto:swx.sp@environment-agency.gov.uk)

English Heritage:

**From:** Stuart, David [<mailto:David.Stuart@english-heritage.org.uk>] **Sent:** 04 March 2015 14:38 **To:** King, David **Subject:** RE: SEA Scoping Rreport Consultation Burbage Neighbourhood Plan

David

As I have now reminded myself, the consultation period on Scoping Reports is 5 weeks not 6! So we were both right (and wrong!).

I have also looked again at the Report itself, and attached the response we sent to the community just before Christmas which was also sent to you at the time.

This is not a Plan which we feel will generate issues for the historic environment such that we need to become involved in detail. Our view would be that the relevant local planning authority should be able to cover the heritage agenda using its own expertise. For this reason we were, and remain, content to offer generic advice and refer to our published guidance on SEAs.

Although the view is that an SEA is required primarily due to the potential for impact on the AONB, the Council has previously highlighted that there is potential for impact to heritage assets, namely the conservation area, though those effects are not necessarily likely to be significant and this is therefore more of a supporting consideration. This understanding underpins our position.

Our SEA guidance advocates a proportionate approach in setting out heritage assets, their significance, issues, indicators and criteria for measuring change and impact. The Scoping Report is quite a discursive document, and doesn't go into detail in defining those heritage considerations referred to. Appendix A only highlights the statutory need to protect and enhance heritage assets and Appendix B repeats this as a solitary Objective. While the community may be content in the scope of its identification of what defines the heritage significance of the Plan area there will still need to be sufficient evidence of this nature to be able to assess the impacts to individual

and collective heritage assets arising from policies and proposals. Where harm to those assets may arise they will need to demonstrate that other options have been evaluated and that the eventual impact is minimised and deemed acceptable as sustainable development in accordance with the NPPF.

At this stage it is difficult for us to assert whether the Report is at all light in key areas relating to the heritage of the Plan area. However, it should become clear during the Plan assessment process where evidence may need to be beefed up, and no doubt the final report will demonstrate where, how and why this has been done and also if to an adequate degree.

Kind regards

David

David Stuart | Historic Places Adviser

Direct line: 0117 975 0680

Mobile phone: 0797 924 0316

English Heritage | 29 Queen Square

Bristol | BS1 4ND

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

Natural England:



Date: 23<sup>rd</sup> December 2014

Our ref: 138650

Your ref: -

[marrgreenfarm@btinternet.com](mailto:marrgreenfarm@btinternet.com)

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

**RE: Burbage Neighbourhood Development Plan SA Scoping Report Consultation**

Thank you for the above your consultation. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**SA Scoping Report**

The area where we can contribute most in terms of advice is the Sustainability Assessment Framework, and so have concentrated our advice on this aspect of the report.

In terms of our remit, the principle reason for requiring a Sustainability Appraisal is the fact that the NDP area falls within the North Wessex Downs AONB. We advise that the presence of this landscape designation as a major environmental feature of the plan area is explicitly referred to in the relevant objective.

We also advise that under the land and soil topic, explicit reference should be made to protecting best and most versatile soils.

Finally, when determining the objective; *Provide a safe and healthy environment in which to live*, we suggest that maintaining and enhancing the formal and informal footpath network should be included, as, other matters being equal, it is preferable to avoid urbanising such recreational assets.

In other regards we advise that the SA framework appears to cover all other aspects of the natural environment satisfactorily.

**Draft Plan**

In terms of the draft report, again our primary concern relates to landscape, both in terms of where (housing) provision occurs how it is designed. We advise that great weight is given to landscape in selecting sites, and once sites have been selected, you may wish to consider setting out within the plan how they are to be developed (including with reference to landscape matters), or including a more generic landscape policy if you feel it would add value over and above that in Wiltshire Core Strategy.

Depending on local circumstances, it may also be appropriate to set out in the plan any environmental improvement aspirations (e.g. creation of a new linking footpath, or laying of a prominent hedge), and how they may be delivered.

We have provided a guide called [Planning for the environment at the neighbourhood level](#) which may also be of use.

For any correspondence or queries relating to this consultation only, please contact Charles Routh on 07990 773630 or by email at [charles.routh@naturalengland.org.uk](mailto:charles.routh@naturalengland.org.uk). For all other correspondence, please email [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk), or if it is not possible to consult by email, please send to the above address.

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