

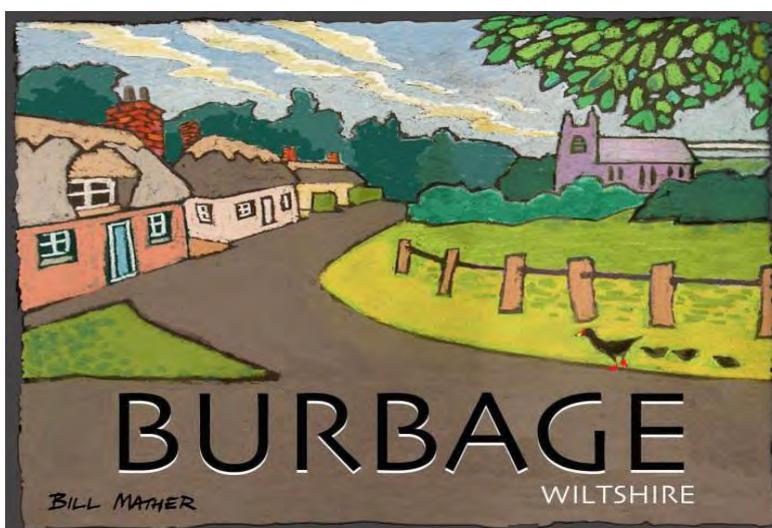
Submission Final Draft

# Burbage

## Neighbourhood

### Development Plan

**Sustainability Appraisal**  
**Environmental Report**



Submission Final Draft June 2017

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## Glossary of Terms

Acronym or Term	Definition
<b>AMR</b>	Annual Monitoring Report (Wiltshire Council)
<b>CA</b>	Conservation Area
<b>DCLG</b>	Department for Communities and Local Government
<b>HRA</b>	Habitat Regulations Assessment
<b>LDF</b>	Local Development Framework
<b>LMR</b>	Local Monitoring Report (Burbage Parish Council)
<b>LPA</b>	Local Planning Authority (Wiltshire Council)
<b>NDP</b>	Neighbourhood Development Plan
<b>NPPF</b>	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.
<b>NPSG</b>	Neighbourhood Planning Steering Group
<b>Qualifying Body</b>	Body authorized by law to create a Neighbourhood Plan. Normally the Parish Council.
<b>SA</b>	Sustainability Appraisal – A wide-ranging appraisal of the impacts of policy (such as this plan) to include socio-economic as well as environmental factors.
<b>SEA</b>	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.
<b>SAC</b>	Special Area of Conservation (Part of the HRA)
<b>SSR</b>	Site Selection Report
<b>SPA</b>	Special Conservation Area (Part of the HRA)
<b>SHMA</b>	Strategic Housing Market Assessment
<b>WCS</b>	Wiltshire Core Strategy

## Non-Technical Summary

### 1. Introduction

The following is an abbreviated description of how the Sustainability Appraisal (SA) process covered by this Environmental Report and the earlier SA Scoping Report was used to assist in the preparation of the Burbage Neighbourhood Development Plan (NDP). It should be appreciated that this process was undertaken twice:

- i. Once on the pre-submission draft that went to Regulation 14 Consultation and,
- ii. Once on the post-Reg-14 draft where this had changed as a result of the consultation.

The first SA (i above) can be found in sections 1-12 and is referred to hereinafter as the 'First SA'. The follow-up SA of the changes following Reg. 14 consultation is given in Sections 13 following and is referred to as the 'Second SA'.

2. The purpose of sustainability appraisal is to promote sustainable development through the integration of environmental, social and economic considerations in the plan making process. In one sense the production of an SA can be seen as a kind of 'eco MOT' - a statement about the sustainability or environmental impact of a plan. A good SA should be able to demonstrate that the plan will deliver 'Sustainable Development'.
3. The Burbage SA stems in part from the requirement for SEA (Strategic Environmental Assessment) that is applied to plans and programmes in Europe likely to have a significant effect on the environment by virtue of the EU's Strategic Environmental Assessment Directive 2001/42 EC transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. Screening of the draft NDP in September 2014 was carried out by Wiltshire Council which confirmed that an SEA was required. However, it was decided to meet this requirement in the case of the Burbage Plan by means of the more rigorous and comprehensive process of SA or Sustainability Appraisal.
4. An SEA or the similar but more comprehensive SA is a much more active and on-going process than simple checking and certification. In practice, it is a continuous analysis and active influence throughout and even beyond the development of a plan, designed to ensure the best outcomes from policy in environmental terms.
5. For example, if an SA identifies problems that could arise from a policy it should lead to modification of that policy – either by changing wording, removing the policy entirely or in proposing what are known as 'mitigation' measures. That is, measures designed to compensate for any possible negative effects. Put simply, an SA should not simply be a static document, but an active process designed to create a better informed, and ultimately more sustainable, plan. Appendix 8 gives an example of how this happened with the Burbage NDP.

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6. The elements of the Pre-Submission NDP subjected to the first Sustainability Appraisal were:

- Vision
- Objectives
- Policy 1 Development Strategy
- Policy 2 Housing (General)
- Policy 3 Housing and Mixed Use Sites
- Policy 4 Developer Contributions
- Policy 5 Economy
- Policy 6 Local Green Space
- Policy 7 Transport
- Policy 8 Heritage

Details of these can be found in the main body of this report and in the NDP itself.

### 7. Stages of the Process

The SA Process has normally several stages as follows:

Preparation Stage	Description
<b>A</b> – Setting the context and objectives for the Sustainability appraisal.	The scope for the ongoing appraisal, establishing an evidence base and Framework of Sustainability Objectives. A separate Scoping Report has been completed and has been published previously to this report.
<b>B</b> - Developing options and assessing effects.	Development and appraisal of options is an iterative process, with effects being predicted and evaluated for their significance, and options amended. Potential mitigation measures for predicted significant effects are considered here.
<b>C</b> – Preparing a Sustainability Appraisal Environmental Report.	This report is a key output of the appraisal process, presenting information on the effects of the plan in a format suitable for public consultation.
<b>D</b> – Consulting on the plan and Sustainability Appraisal Report.	The Sustainability Appraisal Report is published for consultation alongside the plan concerned. Consultation will include the statutory environmental consultation bodies and the public.
<b>E</b> – Monitoring significant effects	The predicted significant effects will be monitored after implementation of the plan to identify any unforeseen effects and undertake appropriate remedial action.

In the case of the Burbage NDP, a second SA was carried out between D and E above in order to assess the changes made as a result of consultation at stage D. This second SA is given in Sections 13 following.

8. From the above table, it follows that this Environmental Report should be read together with other documents, including the SA Scoping Report and the NDP itself. In the case of the Burbage Neighbourhood Development Plan, it should also be read in conjunction the Site Selection Report (SSR) and Conservation Area Appraisal and Management Plan.

### 9. The sustainability appraisal process for the Burbage NDP

The first stage in the process for Burbage was in creating an SA Scoping Report. This summarised the environment of the Parish but also identified, along with community engagement responses, key issues and problems.

10. Also created by the Scoping Report was a set of Sustainability Objectives - together known as the 'Framework'. These are the environmental aims – the eco-touchstone – that the Vision, Objectives and policies of the NDP itself will be judged. In other words, in order to be acceptable in local sustainability terms, the

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NDP must demonstrate that, overall, it supports the Sustainability Objectives and is likely, as far as is reasonably possible, to bring them about.

11. The Sustainability Objectives for Burbage are as follows:

Topic	SA Objective
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>To protect or enhance biodiversity and geological features and avoid losses</li> </ul>
<b>Land &amp; Soil</b>	<ul style="list-style-type: none"> <li>Ensure the efficient and effective use of land, conserving the best quality land if possible and encouraging the re-use of brownfield sites</li> </ul>
<b>Water Resources &amp; Flooding</b>	<ul style="list-style-type: none"> <li>Use and management of water resources in a sustainable manner</li> <li>Protection of people and property from flooding</li> </ul>
<b>Air Quality &amp; Environmental Pollution</b>	<ul style="list-style-type: none"> <li>To maintain the good air quality in the Parish</li> </ul>
<b>Climatic Factors</b>	<ul style="list-style-type: none"> <li>Minimise our impact on climate change and manage its effects</li> </ul>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>Protect, maintain, promote and enhance the historic environment</li> </ul>
<b>Landscape</b>	<ul style="list-style-type: none"> <li>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 of place</li> </ul>
<b>Population &amp; Housing</b>	<ul style="list-style-type: none"> <li>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures</li> </ul>
<b>Community Well-being &amp; Health</b>	<ul style="list-style-type: none"> <li>Provide a safe and healthy environment in which to live</li> <li>Improve access to community services and facilities such as footpaths</li> </ul>
<b>Education &amp; Skills</b>	<ul style="list-style-type: none"> <li>Raise educational attainment and enable people to improve workplace skills</li> </ul>
<b>Service Centre Provision</b>	<ul style="list-style-type: none"> <li>Improve access to range of high quality community services including recreational</li> </ul>
<b>Transport</b>	<ul style="list-style-type: none"> <li>Reduce the need to travel and promote more sustainable transport choices</li> </ul>
<b>Economy &amp; Enterprise</b>	<ul style="list-style-type: none"> <li>Encourage a vibrant and diversified economy and provide for long term sustainable economic growth</li> <li>Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet local needs and a changing workforce</li> </ul>

**\* Selection of topics is identical to the selection used in the Wiltshire Core Strategy**

12. The SEA Directive requires an assessment of “likely significant effects...taking into account the objectives and geographical scope of the plan or programme”. Armed with the Sustainability Framework above, the Vision Objectives and Policies of the NDP were analysed according to a methodology described in detail in the body of the main Report. This was via a matrix that tested each policy strand in terms of what effects it would have against each of the Sustainability Objectives. Effects were scored according to their significance.

13. After each part of the Plan was scored, consideration was given to:

- A discussion of significant effects envisaged
- Why options were adopted or rejected
- Mitigation measures that would prevent reduce or offset any adverse effects.

Details of this process in relation to all of the issues covered is not repeated here but is given in the main body of the SA Environmental Report.

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14. In order to assess the *overall* effects of the NDP, sections of the full Environmental Report analysed the likely cumulative effects of all of the policies, together with an analysis of the overall Sustainability of the Plan was made.

15. **In terms of cumulative effects**, the first SA concluded:

The most significant cumulative effects were likely to result from the proposed level of housing and employment growth. The most likely significant effects are:

16. **Housing provision** – the proposed new housing provision is substantial, though not overwhelmingly so in proportion to the scale of Burbage. There is a good argument that the present size of Burbage is not sufficient to support a wide enough range of services to achieve a desirable level of self-containment. Some growth is therefore needed to reach a more 'critical mass'. The level of growth seems small enough not to compromise Burbage's village identity, but large enough to have a meaningful impact on this overarching planning aim.

17. **Economic growth** – initial community engagement revealed a desire for more local employment. People enjoy living in the village and they would welcome the opportunity to work there and thereby avoid commuting on Wiltshire's often congested roads.

18. **Infrastructure**

Housing provision and employment land provision will give significant economic benefits not just through provision of new homes and jobs but through infrastructure delivery and delivery of new/improved services and facilities. The plan includes a Developer Contributions policy that seeks to help deliver this.

19. The plan also contains requirements for development to be well designed and encourages the provision of green infrastructure such as the retention of Local Green Space and the creation of a network of foot and cycle paths, as well as landscaping schemes and biodiversity enhancement.

20. **Discussion of negative effects of the Pre-Regulation 14 Consultation Plan**

The level of growth proposed could lead to negative effects in relation to:

- Use of Land and soil resources
- Impact on drainage
- Landscape impacts
- Increased car use
- Increased carbon emissions

It is not likely that significant cumulative negative effects would occur in relation to climate change. Indeed, the determination of the plan to retain large green areas within the village is likely to mitigate many of the extreme weather impacts expected.

21. **Mitigation of the Pre-Regulation 14 Consultation Plan**

Other negative impacts however are more amenable to mitigation. For example;

- Any rain water run-off from housing or other development could be managed by means of SUDs (Sustainable Drainage – for example porous surfaces). There is currently no great flood risk issue in the village as shown by the flood risk map in Appendix 3.
- Development is proposed in the AONB, but only in sites well screened from the landscape and adjacent to the village. All such sites are well related to services and facilities and would be linked by the proposed extensions of the footpath and cycle network. Mitigation is possible in every case by careful landscaping and preservation of key views in the designs.
- Increased development could result in increased car use. An absence of good local public transport makes this hard to avoid. However, one should distinguish between car ownership and car use. Increasing the critical mass and facilities of the village, plus providing a network of paths and cycleways could limit actual car use leading to an actual benefit in sustainability overall. Making Burbage more self-sufficient and reducing the need to travel is the key aim of the entire plan.
- Human development usually results in increased carbon emissions; however, mitigation is possible through implementation of sustainable construction methods. This is already encouraged by policies of the WCS and by Building Regulations. Tree and landscaping as part of the plan would also help offset carbon.
- The substantial landscaping required by the plan and the retention of large areas of Green Space will to some extent offset carbon emissions and will help reduce severe weather events in terms of flash flooding and the 'heat island' effect.

22. **Discussion of cumulative effects of the Pre-Regulation 14 Consultation Plan**

Broadly speaking, the plan is expected to have generally positive effects on the local community in terms of improving quality of life, including access to housing and jobs, enhancing local infrastructure and underpinning economic prosperity.

23. The challenge for the plan will be to reduce the environmental impacts of the development necessary to achieve these aims on landscape, heritage, biodiversity, waste, flood risk, climate change and in terms of transport effects. Mitigation is possible to a significant degree, although effectiveness will depend to some extent upon the vigilance of development management by Wiltshire Council.

24. Despite successful mitigation, not all negative effects can be avoided. Having said this, the proposed rate of growth is not enormous and the impacts are therefore likely to be manageable. The plan is inevitably a compromise and there is a trade-off between the economic and social benefits envisaged and environmental impacts.

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25. **Overall sustainability of the of the Pre-Regulation 14 Consultation Plan**  
The main thrust of the plan is likely to improve the supply of local homes and jobs, boost infrastructure including services and facilities, and overall to make the village more sustainable in terms of what it contains within itself, resulting in a reduced need to travel. It is this central aim of what is known as 'spatial sustainability' (the Philosophy behind the Wiltshire Core Strategy) that is at the heart of the NDP and also reflects community wishes as expressed in initial community engagement.
26. The NDP however comes with risks. Significant effects, both positive and negative, are possible in a number of areas. It has also been shown however that it is possible to reduce or avoid many of the predicted adverse effects of implementation.
27. But what would happen without a plan? It is of course true that, if the NDP is not adopted, the Wiltshire Core Strategy (WCS) will continue to offer a planning context, as will the Framework (NPPF). However, this alternative would provide less detail and certainty for developers and, crucially, is less ambitious for Burbage in terms of growth and economic development.
28. Relying on the existing development Plan and the NPPF alone could result in higher levels of environmental protection – for example:
- Possibly lower car use
  - Less land and soil use
  - Possibly lower carbon emissions
29. On the other hand, the NDP is markedly more ambitious in terms of attempting to create a significant increase in economic and physical self-containment, thereby reducing the need to travel, underpinned by more substantial provision of housing and employment. The NDP is likely to be *more* sustainable than doing nothing in terms of this wider sustainability aim.
30. It is therefore likely that simply 'not planning' in terms of creating an NDP would result in negative effects of its own including:
- Fewer homes delivered
  - Less local jobs
  - Less developer funding to provide infrastructure including a new village hall.
  - Poorer local infrastructure and facilities
  - Greater reliance on employment and services outside the village leading ultimately to greater commuting.
  - Un-coordinated development not resulting in joined up infrastructure (e.g. a system of paths and cycle ways).
31. Perhaps the most decisive argument is that the Pre-Submission Plan NDP, by encouraging more (but controlled) growth is likely to create better self-containment and have a greater impact on reducing the need to travel than the exiting planning framework. In other words, whatever the detail on an issue by issue basis, overall, the NDP could, subject to good quality development management by the LPA, create a more sustainable pattern of development.

32. **The Post-Regulation 14 Consultation Plan**

Significant changes were made to the NDP following the Reg 14 Consultation. The quantum of development proposed was drastically reduced, yet the underlying sustainability aims were retained, as were policies concerning green space, developer contributions, heritage protection and transport. The second SA, contained in Sections 13 following of this report, considers the changes made to the:

- Vision
- Objectives
- Policies

Of the revised plan.

33. The SA concluded that all of the changes would enhance sustainability. It states:

- The housing provision level of the new plan is far lower, but still high enough to make a significant contribution to meeting present local affordable need in the short term. Whether it is enough to match rising population levels towards the end of the plan period is open to debate. On the other hand, the new plan could produce more affordable market housing due to the policy requiring smaller units to be built.
- The village will grow more slowly and take longer to reach a critical mass necessary to underwrite a significant improvement in services
- The economic benefits of the development proposed will be lower, especially in terms of delivery of new/improved services (such as the Village Hall) and facilities and local employment
- Local Green Spaces will still be protected, as will heritage
- Some improvements to sustainable transport improvement will be delivered and it is likely that the Doctor's Surgery will be improved.
- More green infrastructure will be delivered with consequently better impacts on biodiversity, climate change, flood risk and health and well-being.
- Less greenfield land will be used by the plan
- There will be lower impact on the landscape, and especially the AONB
- Compare with the pre-Reg. 14 draft plan, lower levels of energy and car use will result
- Benefits will accrue to older and disabled occupants if any other large developments arise.

34. The second SA adds:

Since the 'greener' elements of the pre-Reg. 14 plan have been retained, and since the level of environmental harm is likely to be lower with the revised plan, no additional mitigation over that proposed in the original SA is considered to be necessary.

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35. In terms of overall sustainability following the Regulation 14 consultation changes, the SA states:
- The main thrust of the plan; to make the village more sustainable in terms of self-containment, thereby helping to reduce the need to travel is still likely to occur, though at a reduced rate. Housing will still be balanced with employment and a developer contributions policy will ensure some of the infrastructure improvements sought by the community can still be achieved. The causes of heritage, sustainable transport, tourism, local nature habitat and affordable housing will be advanced.
  - In the above respects the plan is likely to produce the kind of spatial sustainability that is at the heart of both the WCS and Government policy. The NDP policies add to those of the WCS, inserting local detail and providing developers with certainty. They help to deliver a locally significant amount of housing (and make provision of first time buyers, the elderly and disabled) and match this with locally defined environmental protection and enhancement. It is hard to avoid the conclusion that a more sustainable future would result from implementing the plan than from not having the plan at all.
  - The significant changes to the draft plan following the Regulation 14 consultation are also testimony to both the democratic nature of the Neighbourhood Planning process and also to the fact that this particular Plan reflects, above all, the will of the community that created it.

END OF NON-TECHNICAL SUMMARY

# Burbage Neighbourhood Development Plan Sustainability Appraisal

## 1.0 Introduction to the Sustainability Appraisal

- 1.0 This report accompanies the emerging Burbage Neighbourhood Development Plan (NDP), which carries forward and expands on the policies of the Wiltshire Core Strategy (WCS) and also reflects the wishes of the local community. This Sustainability Appraisal Environmental Report builds on the foundations of the earlier Burbage Sustainability Appraisal (SA) Scoping Report.
- 1.2 Screening, completed by the LPA in September 2014, confirmed that the environmental effects of the Burbage NDP were likely to be significant and that an SEA was therefore necessary (see Appendix 1).
- 1.3 This report and the process it is based on satisfies EU Directive 2001/42/EC (The Strategic Environmental Assessment or SEA Directive – see below) which requires an environmental assessment to be carried out on plans which are considered to have significant environmental effects. This Directive is transposed into UK law by The Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No 1633 (SEA Regulations).
- 1.4 Considering social and economic effects alongside environmental ones, via an SA as opposed to a purely environmental SEA, was felt to be more likely to lead to a more balanced and sustainable plan and one which is more likely to meet the needs of a wider cross-section of the local community, since the plan deals with socio-economic issues as well as purely environmental ones. Hence the more comprehensive SA route was chosen as a means of satisfying the SEA Regulations, but also of helping in the creation of a good plan.
- 1.5 The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.6 This process is an opportunity to consider ways by which the plan can help deliver sustainable development as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives which the community might support. It can also strengthen the positive aspects of a plan. Changes were made to the emerging plan in response to the SEA. (See Appendix 8).

## 2.0 Habitat Regulations Assessment (HRA)

- 2.1 In addition to an environmental assessment by means of the SA, European Habitat Regulations (Habitats Directive and the 2010 Habitats Regulations (as amended) also require plans to be screened for their effects on natural habitats. This process is carried out by the LPA.
- 2.2 The NDP was HRA screened in September 2016 by staff from the LPA, Wiltshire Council. A screening decision, is given here as this Environmental Report's Appendix 2.
- 2.3 The Screening found that the NP will have no likely significant effect on any European designated sites. However, if further changes are made to the Plan in terms of adding new sites, the HRA would need to be updated.

## 3.0 The Burbage Neighbourhood Development Plan (Pre-Regulation 14 Consultation).

- 3.1 The SEA Directive requires that the environmental report must include: "...an outline of the contents, main objectives of the plan...and relationship with other relevant plans and programmes".
- 3.2 Accordingly, we can state that the NDP document contains:
- An overall vision which sets out how Burbage parish will develop
  - The NDP's strategic objectives for the area focussing on key issues
  - Policies governing land use matters and including possible locations for development
  - Arrangements for managing and monitoring the delivery of the strategy.

These are discussed in detail below.

### 3.3 The Pre-Regulation 14 Consultation Plan's Vision

The first Burbage Vision statement is as follows:

Burbage will flourish as a living, working village. Any future development in Burbage Parish should support the local economy, provide high quality accommodation for all our community and respect the individual character of where we live, especially in protecting our natural environment and valued green spaces.

The vitality of the village will be enhanced, and new housing will be matched by suitable employment opportunities and infrastructure capable of supporting this development.

The Parish wishes to reduce its carbon footprint by encouraging greater use of local amenities, thus reducing the need to travel away from the village whilst promoting healthy life styles, well-being and an improved physical and social environment.

The BNDP intends to ensure that the local community has a powerful voice in managing future change in the village and in particular a greater say in where, how, what and when development occurs.

### 3.4 Burbage Pre-Regulation 14 Consultation NDP Objectives

The original Plan's Planning Objectives were:

1. To deliver the types of housing and employment needed to sustain the village
2. To steer development to the most sustainable locations (preferably brownfield) likely to receive community support
3. To balance new housing with employment using mixed-use developments if possible
4. To encourage suitable economic activity and employment, including tourism and agricultural diversification, maintaining and expanding local services and facilities, especially those for young people, in order to reduce the need to travel
5. To ensure that the community benefits from new development and to specify main village needs. New development should be matched by necessary infrastructure and development and CIL monies should be used to fill existing infrastructure gaps and to upgrade ageing facilities (such as the village hall) or improve deficiencies.
6. To encourage healthy lifestyles, reduce car use and improve sustainable transport infrastructure such as paths, crossings and bus services.
7. To protect and if possible enhance the recreational green spaces of the Parish
8. To protect the quality, character and local distinctiveness of the natural and historic landscape and village buildings, and maintain high design quality, especially within the conservation area
9. To protect and enhance public and on-street parking.

3.5 The relationship between the Burbage NDP and other plans and programmes is explored more fully in section 4 of the NDP itself, however it's primary role is to take forward and add local detail to the Wiltshire Core Strategy and Government Policy in the control of development and use of land, and in doing so reflect the wishes of the community. The Plan also seeks to compliment and certainly avoid conflict with the plans and programmes of other agencies outside of planning (e.g. English Heritage, Natural England and the Environment Agency). As such the plan adds local detail and substance to the existing Development Plan, interpreting it at a Parish level, while complimenting the activities of other key stakeholders.

3.6 The plan has indeed been prepared with awareness of numerous non-planning policies and programmes, including but not limited to:

The AONB Management Plan  
Burbage Conservation Area Character Appraisal  
Environment Agency Flood Risk Maps  
Pewsey Community Area Plan  
Strategy for Historic Environment in the South West 2004  
Swindon and Wiltshire Strategic Economic Plan January 2016  
Wiltshire Biodiversity Action Plan 2008  
Wiltshire Council (2015): JSA for Pewsey Community Area, [online]  
Wiltshire Joint Health and Wellbeing Strategy 2015-18  
Wiltshire & Swindon Visitor Accommodation Futures 2015 (Tourism Strategy commissioned by the Swindon & Wiltshire Local Enterprise Partnership).

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3.7 The plan has been created not only to avoid conflict with the above plans (and to be in general conformity with the WCS and to comply with the NPPF), but also, where possible, to take forward their aims. For example, the plan aims to:

- Take forward at least the level of housing and employment growth planned by the Wiltshire Core Strategy
- To deliver the Sustainable Development required by the NPPF, in particular by reducing the need to travel and enhancing self-containment.
- To ensure that the character and features described in the Conservation Area Appraisal are preserved or enhanced by the NDP, including the green open spaces.
- To improve village facilities for culture heritage and leisure as sought by the Pewsey Community Area Plan.
- To develop tourist accommodation in line with current market demands (for example country hotels and spas) as sought by the Tourism Strategy 'Wiltshire & Swindon Visitor Accommodation Futures 2015.
- To support development, including that for tourism supporting local jobs, while ensuring protection of the openness of the local landscape as required by the AONB management Plan.
- To enhance sustainable transport modes as sought by the Wiltshire Transport Plan (LTP3) – Objective SO2 and the Joint Wiltshire Health and Wellbeing Strategy.

The above set of examples of connection between the NDP and other plans and programmes is by no means exhaustive.

3.8 Policies included in the Pre-Regulation 14 Consultation plan were:

- Development Strategy
- Housing (General)
- Housing and Mixed Use Sites
- Developer Contributions
- Economy – Sites
- Local Green Space
- Transport
- Heritage

## 4.0 Overall Methodology of this Sustainability Appraisal

### 4.1 Stages of the SEA process in Burbage

The methodology for this appraisal was developed in accordance with the following guidance:

- Environmental Assessment of Neighbourhood Plans: A Guide for Wiltshire's Parish and Town Councils (Wiltshire Council 2013)
- A practical Guide to the Strategic Environmental Assessment (SEA) Directive (ODPM, 2005)
- Planning Advisory Service (PAS) Sustainability Appraisal guidance online at: <http://www.pas.gov.uk/chapter-6-the-role-of-sustainability-appraisal>
- Planning Practice Guidance – Strategic Environmental Assessment and Sustainability Appraisal
- Wiltshire Core Strategy Sustainability Appraisal Report, (Wiltshire Council, 2012).
- Discussions with the SEA Officer at Wiltshire Council

4.2 Sustainability Appraisal (SA) was the method chosen to take forward the requirements of SEA. Although not legally required for an NDP, it is a broader approach that considers social as well as environmental effects which was considered most appropriate for a plan that will influence the local community significantly in many ways.

4.3 The stages of the Sustainability Appraisal are shown in the table below:

Preparation Stage	Description
<b>A</b> – Setting the context and objectives for the Sustainability appraisal.	The scope for the ongoing appraisal, establishing an evidence base and set of Environmental Objectives (The Environmental Framework'). A separate Scoping Report has been completed and is published separately alongside this report.
<b>B</b> - Developing options and assessing effects.	Development and appraisal of options is an iterative process, with effects being predicted and evaluated for their significance, and options amended. Potential mitigation measures for predicted significant effects are considered here.
<b>C</b> – Preparing a Sustainability Appraisal Environmental Report.	This report is a key output of the appraisal process, presenting information on the effects of the plan in a format suitable for public consultation.
<b>D</b> – Consulting on the plan and Sustainability Appraisal Report.	The Sustainability Appraisal Report is published for consultation alongside the plan concerned. Consultation will include the statutory environmental bodies and the public.
<b>E</b> – Monitoring significant effects	The predicted significant effects will be monitored after implementation of the plan to identify any unforeseen effects and undertake appropriate remedial action.

4.4 In the case of the Burbage NDP, a second SA was carried out between D and E above in order to assess the changes made as a result of consultation at stage D. This second SA is given in Sections 13 following.

## 5.0 Scoping the Sustainability Appraisal

- 5.1 Before an SA report can be produced it is necessary to undertake a 'scoping' exercise. The SA Scoping Report for Burbage was published in November 2014, when the Statutory Consultees were approached for their comments. It is part of the suite of documents submitted with the NDP and is available online at:

<http://www.burbage-pc.org.uk/council-indiv.php?id=1699&name=Neighbourhood%20Plan>

The Scoping Report established the evidence base and framework of sustainability objectives that this Report uses to assess the Sustainability of the Vision, Objectives and Policies of the Burbage NDP.

- 5.2 The SA Scoping Report was based on a review and understanding of a wider range of policies, plans, programmes and sustainability objectives from existing plans that are relevant to the NDP. This review is described in the Scoping Report.
- 5.3 The review of plans, policies and programmes was followed by a thorough review of the sustainability 'baseline' in Burbage. The baseline identifies what is currently happening in Burbage and the likely future state of the area if current trends were to continue. It provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. This information is presented within the Scoping Report under the following sustainability topic headings:

- **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.**

These topics are the same used in the SA of Wiltshire's Core Strategy.

5.4 **Identification of Issues and problems.**

The review of plans, policies and programmes, and research of the baseline situation plus consultation with the community in Burbage has enabled the identification of key sustainability issues which are to be found in section 6 of the Scoping Report. Full details of the consultation and research processes involved can be found in the Consultation Statement and the Scoping Report.

5.5 The draft Scoping Report was also sent to the Statutory Consultees for their comments and these were fed back into the draft Scoping Report which was modified as described in the final Scoping Report.

These Consultees were:

- The Environment Agency
- English Heritage
- Natural England

What these responses are is given here for ease of reference as Appendix 7.

## 6.0 The Sustainability Appraisal Framework

- 6.1 An understanding of the Key Issues and Problems led to the creation of a Framework of Sustainability Appraisal Objectives. These Objectives are different in concept and purpose from the objectives of the NDP, although there is a degree of overlap. They are not necessarily intended to be achievable, but are more aspirational in nature, and address the full cross-section of sustainability issues, including social, economic and environmental factors laid down by law or policy. Broadly the SA Objectives are the positive outcomes that the community wants from the NDP in terms of its overall sustainability.
- 6.2 These Sustainability Objectives were used to test the Vision, Planning Objectives and Policies of both Pre-Regulation 14 and post- Regulation 14 versions of the NDP in the rest of this report which follows. The SA Objectives (The SA Framework) are as follows:

Topic	SA Objective
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>To protect or enhance biodiversity and geological features and avoid losses</li> </ul>
<b>Land &amp; Soil</b>	<ul style="list-style-type: none"> <li>Ensure the efficient and effective use of land, conserving the best quality land if possible and encouraging the re-use of brownfield sites</li> </ul>
<b>Water Resources &amp; Flooding</b>	<ul style="list-style-type: none"> <li>Use and management of water resources in a sustainable manner</li> <li>Protection of people and property from flooding</li> </ul>
<b>Air Quality &amp; Environmental Pollution</b>	<ul style="list-style-type: none"> <li>To maintain the good air quality in the Parish</li> </ul>
<b>Climatic Factors</b>	<ul style="list-style-type: none"> <li>Minimise our impact on climate change and manage its effects</li> </ul>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>Protect, maintain, promote and enhance the historic environment</li> </ul>
<b>Landscape</b>	<ul style="list-style-type: none"> <li>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 of place</li> </ul>
<b>Population &amp; Housing</b>	<ul style="list-style-type: none"> <li>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures</li> </ul>
<b>Community Well-being &amp; Health</b>	<ul style="list-style-type: none"> <li>Provide a safe and healthy environment in which to live</li> <li>Improve access to community services and facilities such as footpaths</li> </ul>
<b>Education &amp; Skills</b>	<ul style="list-style-type: none"> <li>Raise educational attainment and enable people to improve workplace skills</li> </ul>
<b>Service Centre Provision</b>	<ul style="list-style-type: none"> <li>Improve access to range of high quality community services including recreational</li> </ul>
<b>Transport</b>	<ul style="list-style-type: none"> <li>Reduce the need to travel and promote more sustainable transport choices</li> </ul>
<b>Economy &amp; Enterprise</b>	<ul style="list-style-type: none"> <li>Encourage a vibrant and diversified economy and provide for long term sustainable economic growth</li> <li>Ensure adequate provision of high-quality employment land and diverse employment opportunities to meet local needs and a changing workforce</li> </ul>

## 7.0 Developing Options and Refining Policy

7.1 The SEA Directive requires an assessment of the likely effects of implementing the NDP, and of 'reasonable alternatives'. Developing options and alternatives is an important part of both the plan-making and sustainability appraisal process. For the NDP, the reasonable alternatives are the different options (or sites) put forward and considered during the preparation of the plan and are considered together in the formal SA assessment section, later in this document.

### 7.2 Assessing the significance of effects

The SEA Directive requires an assessment of "likely significant effects...taking into account the objectives and geographical scope of the plan or programme". PAS guidance states "you are only required to assess the likely significant effects of the plan, not all possibilities". This report uses assessment matrices to present the detailed findings. Each matrix provides a discussion of likely effects, their potential significance 'score', ranging from ++ (significantly positive) to – (significantly negative) and this is given for each policy, objective or vision tested, measured against each SA objective, graded in the following way:

**Table 3 – Stage B: Effects assessment –how effects were graded.**

<b>Significance assessment</b>	<b>Description</b>
++	Option would have a significant positive effect in its current form as it would help resolve an existing issue or maximise opportunities, leading to significant benefits. <b>SIGNIFICANT POSITIVE</b>
+	Option would have a positive effect
?	Effect of option is uncertain
0	Option would have a neutral effect
-	Option would have a negative effect
--	The option would have a significant effect as it would substantially exacerbate existing problems with mitigation problematic. <b>SIGNIFICANT NEGATIVE</b>

Note: assessment of some objectives for a given option may be considered to be positive or negative but with some uncertainties, in which case a symbol such as +/-? or -/? may be used. Effects evaluation is then considered using more detailed criteria for each sustainability objective.

### 7.3 Assessing cumulative effects

The assessment of effects of the NDP policies has included potential secondary, cumulative and synergic effects as required by the SEA Directive. Many sustainability problems result from the accumulation of multiple, small and often indirect effects rather than a few large obvious ones, and consideration of such effects will be included in any further discussion of significant effects in this report. An overview of the likely main cumulative effects of the NDP is included later in this Report.

**7.4 Consideration of mitigation measures**

The SEA Directive requires consideration of “measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effect on the environment of implementing the plan or programme”. These are referred to as mitigation measures, and can include recommendations for improving beneficial effects. In the assessment matrices, potential measures are considered for likely adverse and positive effects. For any effects judged likely to be significant, these are discussed in further sections of this report.

**7.5 Appraisal limitations, difficulties encountered and assumptions made**

In terms of the prediction and evaluation of significant effects, if there is a degree of uncertainty regarding these future effects; more detailed impact assessment will often be required, for example at the planning applications stage, and this has been stated in sustainability appraisal where this is the case. Sometimes additional assessment was undertaken during the course of making the plan – for example the Site Selection report and the Landscape Appraisal for the Grafton Road site. Assessment of Timescale of impacts is difficult and to some extent subjective. This SA errs on the side of caution and generally assumes most impacts to be long term.

7.6 Actual effects will often depend on elements such as the type of development that takes place, its exact location in terms of sensitive environmental receptors, the sustainability of buildings i.e. Materials used, energy and water efficiency etc. design quality and transport mitigation measures. The extent of any mitigation measures to prevent or reduce any effects or compensatory measures for loss will be very important and cannot always be fully assessed at this stage.

7.7 Every effort has been made to present an accurate baseline situation in the scoping report which has been published to provide the sustainability baseline and key issues. Inevitably, a degree of judgement has been required in undertaking the policy appraisals to determine the ‘significance’ of effects. Sustainability appraisal relies on expert judgement, which is guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. The assessment has been carried out at the request of the NDP Steering Group by a qualified Planning Consultant and SA specialist, in conjunction with advice from qualified professional staff at Wiltshire Council.

7.8 At the outset the Steering Group felt that it was worth exploring a ‘high development, high benefit’ plan scenario in order both to offer the community a chance to benefit from significant infrastructure improvements, which would be of practical benefit but also would improve self-containment of the settlement, and so its overall sustainability. This approach accepted at the outset that such a strategy would have environmental costs (for example on the AONB, biodiversity and land use), but that this could be worth the price if the net benefit was a more sustainable settlement. The assessment therefore attempts such a balanced view and the underlying aim (high growth / high benefit) should be borne in mind when examining the scores and conclusions drawn, as this has undoubtedly coloured the approach.

7.9 The first application of the Sustainability Framework in assessing policy was based on the first draft of policies created before the Regulation 14 consultation. These versions are given here in this document as they are assessed. In many cases the SA revealed ways that the draft policies could be improved and changes were in fact made to each policy before the formal public consultation required by Regulation 14. Published policies in the consultation draft have therefore already benefited from the SA process.

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- 7.10 Changes to policy recommended by the SA are given here in Appendix 8. By comparing the draft policies contained within this SA and the revised policies shown in the consultation draft it is possible to clearly see that the SA has been instrumental in selecting and improving policy in the NDP.

## 8.0 Formal Sustainability Appraisal of Vision and Objectives

- 8.1 As we have seen, the Sustainability Appraisal Framework consists of sustainability objectives, acting as a touchstone against which the effects of the NDP can be judged. The first application for this Framework is in assessing the sustainability of the underlying Vision of the NDP.
- 8.2 The **Pre-Regulation 14 Consultation Plan’s** Vision was as follows:

Burbage will flourish as a living, working village. Any future development in Burbage Parish should support the local economy, provide high quality accommodation for all our community and respect the individual character of where we live, especially in protecting our natural environment and valued green spaces.

The vitality of the village will be enhanced, and new housing will be matched by suitable employment opportunities and infrastructure capable of supporting this development.

The Parish wishes to reduce its carbon footprint by encouraging greater use of local amenities, thus reducing the need to travel away from the village whilst promoting healthy life styles, well-being and an improved physical and social environment.

The BNDP intends to ensure that the local community has a powerful voice in managing future change in the village and in particular a greater say in where, how, what and when development occurs.

**Note: Subsequent amendments as a result of SA are given in Appendix 8.**

### Scoring of Pre-Regulation 14 Consultation Plan Vision

Sustainability Objectives	Plan Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
	<b>VISION</b>	+	0	0	0	+	+	0	++	++	0	++	++	++

## Submission Draft

### Justification of Scoring for Pre-Regulation 14 Consultation Plan Vision:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev?	Spatial Scale?	Perm?		
Biodiversity	No	LT	I	A	P	Envisages protection of natural environment, yet some house construction means that overall effect only mildly positive.	Yes. WCS policies require care is taken with biodiversity – e.g. improvement of habitat on development sites.
Land and Soil	No	LT	I	A	P	Will consume some land for development but will conserve most valued green spaces. Directs development to less valued areas.	No.
Water and Flood Risk	No	LT	R	A	P	Housing development drainage could add to floor risk, however risk level locally is not great.	Yes. WCS requires SUDS and other measures to ensure no increase in flood risk elsewhere.
Air Quality	No	MT	R	A	T	More development is proposed which could increase traffic. However, the Vision also aims to reduce need to travel. Overall effect on air quality likely to be neutral	Future technology should reduce emissions of vehicles.
Climatic	No	LT	I	B	P	Vision promotes development which will emit carbon. However, it also preserves green space and reduces need to travel which will help stabilize or reduce carbon.	WCS design polices already require developers to consider climate change and design accordingly as do building regulations.
Historic Env.	No	LT	I	A	P	Vision is silent about heritage, but it does require control of development in terms of preservation of character and location.	Policies in the NDP will preserve or enhance heritage.
Landscape	No	LT	I	A	P	Development is proposed in AONB. However, these sites chosen are of poor landscape quality. Given that major green spaces will be preserved the overall effect on landscape will be neutral.	Yes, WCS and NDP policies require landscape to be conserved.
Population & Housing	Yes	LT	I	A	P	Vision secures high quality housing in necessary quantities.	Negative impacts can be mitigated through wording of policies and by conditions attached to permissions.
Community and Health	Yes	LT	I	A	P	Vision secures open spaces and promotes sustainable transport. Social and community facilities will be enhanced.	None needed.
Education	No	LT	R	A	P	Vision is unlikely to have a significant effect on this topic as it does not form part of the vision.	None needed.
Serv. Centre	Yes	LT	I	A	P	Vision promotes increased vitality and facilities enhancing role of village as a local service centre hub	Development controlled by other policies of WCS and negative impacts addressed by condition.
Transport	Yes	LT	I	A	P	Sustainable transport and reduced use of car promoted.	None needed
Economy	Yes	LTI	I	A	P	Employment sites promoted	Development controlled by other policies of WCS and negative impacts addressed by condition.

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev:** (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
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8.3 **Burbage Pre-Regulation 14 Consultation NDP Vision: discussion of significant effects envisaged.**

The vision is one that embraces development, harnessing and directing it for social and economic good. It proposes development where some habitat loss and land use may be expected. However, it also seeks to protect the natural environment, including existing green spaces. Overall therefore the effect on issues like biodiversity, land and soil and landscape are felt to be neutral or mildly positive. In some instances however there will be a modest environmental price to pay for achievement in other areas.

8.4 In terms of impact on the community, and community health and cohesion, the effects are likely to be positive, given the emphasis on creating new housing, infrastructure, and facilities. The emphasis on local democracy and involvement is also encouraging.

8.5 In general sustainability terms, the vision is positive since it aims to improve the self-containment of the village and reduce the need to travel and improve sustainable transport.

8.6 **Why options were adopted or rejected**

The vision rejects a NIMBY attitude to development and instead seeks to control and direct it for the good of the community. As such, while it mentions and supports environmental sustainability its main focus is on the human community and satisfying its needs in as least harmful and most environmentally beneficial means possible.

8.7 **Mitigation measures that would prevent reduce or offset any adverse effects.**

The Vision does not exist in a policy vacuum. Any development that follows it will also have to comply with Wiltshire Core Strategy (WCS) policies, the NPPF and the detailed policies of the NDP. These, together with conditions that can be attached to planning permissions, provide effective mechanisms of mitigation for any potentially negative impacts.

### 8.8 The Pre-Regulation 14 Consultation Plan Objectives

1. To deliver the types of housing and employment needed to sustain the village
2. To steer development to the most sustainable locations (preferably brownfield) likely to receive community support
3. To balance new housing with employment using mixed-use developments if possible
4. To encourage suitable economic activity and employment, including tourism and agricultural diversification, maintaining and expanding local services and facilities, especially those for young people, in order to reduce the need to travel
5. To ensure that the community benefits from new development and to specify main village needs. New development should be matched by necessary infrastructure and development and CIL monies should be used to fill existing infrastructure gaps and to upgrade ageing facilities (such as the village hall) or improve deficiencies.
6. To encourage healthy lifestyles, reduce car use and improve sustainable transport infrastructure such as paths, crossings and bus services.
7. To protect and if possible enhance the recreational green spaces of the Parish
8. To protect the quality, character and local distinctiveness of the natural and historic landscape and village buildings, and maintain high design quality, especially within the conservation area
9. To protect and enhance public and on-street parking.

**Note: Subsequent amendments as a result of SA are given in Appendix 8.**

#### Scoring of Objectives:

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Plan Objectives													
1	0	--	0	0	-	0	0	++	+	+	++	0	++
2	+	++	0	0	0	0	++	0	0	0	0	0	0
3	0	+	0	0	+	0	0	0	+	0	+	++	++
4	0	-	0	0	+	+	-	0	+	0	++	++	++
5	+	0	0	+	+	0	0	0	++	+	++	++	++
6	0	0	0	++	+	0	0	0	++	0	+	++	+
7	++	++	++	++	+	0	+	0	++	+	+	++	++
8	+	0	+	0	0	++	++	+	+	+	+	0	+
9	-	-	-	-	-	-	-	+	-	0	++	-	++

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**Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 1:**

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Some house building likely to negatively impact on biodiversity. On the other hand, development of largest site requires biodiversity enhancement.	Yes. WCS polices and planning conditions. Biodiversity enhancement scheme,
Land and Soil	Yes	LT	I	A	P	Development proposed will consumer land. However, this is considered to be a necessary price to achieve other objectives.	No
Water and Flood Risk	No	LT	I	A	P	Low flood risk area.	Yes. SUDS required by virtue of WCS policy.
Air Quality	No	LT	I	A	P	Development density of village will remain low	Yes. Future technology should reduce emissions of vehicles.
Climatic	No	LT	I	A/ B	P	Development will generate carbon emissions. However, quantum is small.	Yes. WCS design polices already require developers to consider climate change and design accordingly as do building regulations.
Historic Env.	No	LT	I	A	P	Development is mainly on sites away from heritage interests.	Yes. WCS and NDP policies require consideration of heritage in terms of design of new developments.
Landscape	No	LT	I	A	P	Development is proposed in AONB but not in highly sensitive areas. E.g. bypass site already degraded by bypass.	Required landscaping and biodiversity enhancements will offset impact. Consider emphasizing in policies.
Population & Housing	Yes	LT	I	A	T	Development proposed will meet housing needs for some time to come.	Yes. WCS and NDP policies in terms of design.
Community and Health	No	LT	I	A	T	Development will enhance critical mass of village making social and other facilities more viable.	No
Education	No	LT	I	A	T	Development will result in educational contributions	Yes. Expansion of school.
Serv. Centre	Yes	LT	I	A	P	Development will make businesses and other facilities more viable.	No
Transport	No	LT	I	A	T	Development will create demand for more public transport, in turn this will make services more viable.	Additional services. Transport polices of NDP will boost sustainable transport
Economy	Yes	LT	I	A	T	Development will make businesses and other facilities more viable.	Markey should respond to increased demand.

Key: (See also Appendix 5 for an explanation of scoring methodology)

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 Spatial Scale; **A** = **Local Area Specific**, **B** = **Cross county border**, **C** = **County wide**; **Perm**: (permanent?) **P**=Permanent, **T** = Temporary **OP** = Option considered

**8.9 Burbage Pre-Regulation 14 Consultation NDP Objective 1: discussion of significant effects envisaged.**

Development will have some negative impacts on land and soil, and probably on carbon emissions. However, the benefits for the community, economy and overall sustainability of the village will be considerable. To a considerable extent negative impacts can be mitigated.

**8.10 Why options were adopted or rejected**

Not delivering the housing and employment the village needs to thrive was never a realistic option. It would not have been supported by the community and would not be in keeping with Government guidance and WCS policy.

**8.11 Mitigation measures that would prevent reduce or offset any adverse effects.**

WCS policy already provides a framework of policies such as design, flood risk, heritage and biodiversity that would mitigate any negative impacts. The NDP also contains policies that attempt to create sustainable development by avoiding such impacts. In some cases, development would also result in positive impacts offsetting the negative ones – for example the creation of a nature reserve / park as part of the bypass development.

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Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 2:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Brownfield sites used when possible. Biodiversity enhanced where possible.	WCS and NDP policies require biodiversity enhancement or mitigation of losses.
Land and Soil	Yes	LT	I	A	P	Greenfield land will only be used where necessary. Development steered away from most sensitive areas / best soils when possible.	No
Water and Flood Risk	No	LT	I	A	P	Low flood risk area	SUDs required by policy
Air Quality	No	LT	I	A	P	Air quality unlikely to be affected by quantum proposed. In some cases, (e.g. Mundy's Yard) it could be improved for existing residents.	No
Climatic	No	LT	I	A	P	Location of development will not affect climate	No
Historic Env.	No	LT	I	A	P	Development not proposed in close proximity to heritage assets.	Existing policies of NDP and WCS require high design levels and protection of heritage
Landscape	Yes	LT	I	A	P	Objective attempts to use as little greenfield land as possible.	Landscaping schemes and mitigation required by existing WCS policy
Population & Housing	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary
Community and Health	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary
Education	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary
Serv. Centre	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary
Transport	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary
Economy	No	LT	I	A	P	Sufficient housing will be delivered on sites selected.	None necessary

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** = Short Term; **Rev**: (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
 Spatial Scale; **A** = **Local Area Specific**, **B** = **Cross county border**, **C** = **County wide**; **Perm**: (permanent?) **P**=Permanent, **T** = Temporary **OP** = Option considered

8.12 **Burbage Pre-Regulation 14 Consultation NDP Objective 2: discussion of significant effects envisaged.**

The objective aims to direct most development to brownfield sites (where possible) and the most suitable locations. This is taken to mean the least harmful in terms of land use and landscape impacts. As such the Objective has a significantly positive effect on landscape and land /soil use. There are no significantly harmful impacts from this Objective.

8.13 **Why options were adopted or rejected**

There was a general desire in the plan making team to use the least harmful land for development – and hence this Objective. However, it is realised that, in order to achieve the other Objectives some compromise will be necessary regarding greenfield sites.

8.14 **Mitigation measures that would prevent reduce or offset any adverse effects.**

Mitigation is not required.

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### Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 3:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Mix of development unlikely to affect impact on biodiversity.	WCS and NDP policies require biodiversity enhancement or mitigation of losses.
Land and Soil	No	LT	I	A	P	Mixed use development is probably more land efficient overall.	None Needed
Water and Flood Risk	No	LT	I	A	P	Mix of development unlikely to affect impact on water use and flood risk.	None Needed
Air Quality	No	LT	I	A	P	Careful choice of employment uses on mixed developments should not present any air quality problems.	None beyond care at planning application stage
Climatic	No	LT	I	A	P	Mixed uses could reduce carbon by reducing the need to travel. Possibly a minor positive effect.	Tree planting in development landscaping? Consider amending policies.
Historic Env.	No	LT	I	A	P	Mix of development unlikely to affect impact on historic environment	None Needed
Landscape	No	LT	I	A	P	Mix of development unlikely to affect impact on Landscape	None Needed
Population & Housing	No	LT	I	A	P	Mix of development unlikely to affect impact on this SA Objective	None Needed
Community and Health	No	LT	I	A	P	Possibly a small positive impact on community well-being due to reduction in travel time to work and boost to quality of life as a result.	None Needed
Education	No	LT	I	A	P	Mix of development unlikely to affect impact on this SA Objective	None Needed
Serv. Centre	No	LT	I	A	P	Increase of employment likely to be beneficial for provision of services	None Needed
Transport	Yes	LT	I	A	P	Positive impact due to reduced need to travel	None Needed
Economy	Yes	LT	I	A	P	Increase of employment likely to be beneficial for economy	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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8.15 **Burbage Pre-Regulation 14 Consultation NDP Objective 3: discussion of significant effects envisaged.**

Mixed use development are likely to be positive in terms of creating space for employment uses to expand. They will also help reduce the need to travel. Given the marginal viability of pure employment sites at the present time in this area, it is hoped that an element of residential development will help bring forward some employment use. Some existing sites (e.g. Harepath Farm) are already at capacity.

8.16 **Why options were adopted or rejected**

It is an overarching aim of the plan to reduce the need to travel and improve self-containment of the village. As part of this employment sites have an obvious role to play. However, viability is marginal for such sites (Ref. Wiltshire Council Viability Study). An effective subsidy from housing development however could deliver some small mixed use sites.

8.17 **Mitigation measures that would prevent, reduce or offset any adverse effects.**

Mitigation is generally not needed, providing site layout and exact mix of uses are considered with car at the planning application stage. However, the possibility of increased carbon emissions from the developments could be mitigated by additional tree planting in the landscaping. Policy wording could be adjusted to allow for this.

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Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 4:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Significant impact unlikely as scale is modest and local alternative habitats are numerous.	Yes. Habitat enhancement and conservation required by WCS policies.
Land and Soil	No	LT	I	A	P	Some land will be consumed as a result of this Objective, but this is necessary to improve the overall self-containment of the village. Scale is relatively modest so impact not very significant.	No
Water and Flood Risk	No	LT	I	A	P	Development unlikely to affect impact on water use and flood risk given low local risk and modest scale of proposals.	Yes. WCS and Government policies apply. SUDS and other mitigation possible if required.
Air Quality	No	LT	I	A	P	Dispersed nature of sites and modest quantum unlikely to create problems.	Yes. Careful layout and uses permitted required at planning application stage.
Climatic	No	LT	I	A / B	P	Reduction in need to travel likely to reduce carbon emissions overall.	Tree planting and landscaping would offset carbon. Consider modification of policies to reflect this.
Historic Env.	No	LT	I	A	P	Boost to tourism likely to be beneficial to tourism and hence to heritage. (For example encourages maintenance).	None needed.
Landscape	No	LT	I	A	P	Could impact on Landscape. However, sites are modest and located away from most sensitive areas.	Landscaping schemes and mitigation required by existing WCS policy
Population & Housing	No	LT	I	A	P	May increase population.	None Needed
Community and Health	No	LT	I	A	P	Development will ]make social and other facilities more viable.	None Needed
Education	No	LT	I	A	P	No significant impact expected	None Needed
Serv. Centre	Yes	LT	I	A	P	Development will make social and other facilities more viable.	None Needed
Transport	Yes	LT	I	A	P	Development will make social and other facilities more viable.	None Needed
Economy	Yes	LT	I	A	P	Development will boost local economy due to local spending by businesses	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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8.18 **Burbage Pre-Regulation 14 Consultation NDP Objective 4: discussion of significant effects envisaged.**

Significant beneficial effects will result from this objective in the areas of Service Centre, Transport and Economy. Negative impacts will be minor and in the main capable of mitigation. Given that negative effects are not significant, and the social, economic and transport related ones are positive, the costs are likely to be considered worth paying. Explicit mention of self-containment as an aim would make this aspect of the overall plan clearer.

8.19 **Why options were adopted or rejected**

Initial community engagement showed that there was significant interest in matching any housing growth to growth in local jobs. The living environment in Burbage is pleasant and many people want to work close to home and reduce increasingly problematic and congested journeys out to work.

8.20 **Mitigation measures that would prevent reduce or offset any adverse effects.**

Mitigation measures for impacts caused by employment development are possible as outlined above. Effectiveness of these however will largely rely on development management officers and the implementation of WCS planning policies and the imposition of planning conditions when appropriate. It may be appropriate to re-visit the NDP policies to ensure that mitigation measures are accounted for if appropriate.

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### Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 5:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Developer contributions are likely to be sought for landscaping and habitat enhancement	None Needed
Land and Soil	No	LT	I	A	P	Unlikely to be any direct impact, could improve footpaths and access.	None Needed
Water and Flood Risk	No	LT	I	A	P	Unlikely to be any direct impact	None Needed
Air Quality	No	LT	I	A	P	Unlikely to be a great impact, however landscaping required under this objective could potentially improve air quality – however this is hard to quantify.	None Needed
Climatic	No	LT	I	A	P	Unlikely to be a great impact, however sustainable transport improvements required under this objective could potentially reduce carbon emissions.	None Needed
Historic Env.	No	LT	I	A	P	Unlikely to be any direct impact	None Needed
Landscape	No	LT	I	A	P	landscaping required under this objective would improve this issue.	None Needed
Population & Housing	No	LT	I	A	P	Unlikely to be any direct impact	None Needed
Community and Health	Yes	LT	I	A	P	Improvement in social and sustainable transport infrastructure will be of significant benefit.	None Needed
Education	No	LT	I	A	P	Provision of village hall will aid adult education.	None Needed
Serv. Centre	Yes	LT	I	A	P	Improvements in infrastructure will improve facilities and self-containment.	None Needed
Transport	Yes	LT	I	A	P	Sustainable transport improved (e.g. cycle ways) and reliance on car likely to be reduced.	None Needed
Economy	Yes	LT	I	A	P	Infrastructure improvements will make village more attractive and practical and will be an asset to the local economy.	None Needed

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8.21 **Burbage N Pre-Regulation 14 Consultation NDP Objective 5: discussion of significant effects envisaged.**

As the objective seeks infrastructure improvements, it will benefit the community, health or residents, education, the role of village as a de facto service centre, will improve sustainable transport and access to green space. The assets created will boost the attractiveness of the village, encouraging tourism and assisting the local economy by making Burbage a more attractive place to invest.

8.22 **Why options were adopted or rejected**

The community recognises that it must not, in requiring developer contributions, impose unreasonable costs, not make schemes unviable. However, it is considered reasonable to set out in advance what the community expects. This will give certainty to developers and ensure that the normal benefits of development are directed in a planned way.

It was never a realistic option to expect residents to simply wait and see what benefits development might bring, since the entire point of a neighbourhood Plan is for the Community to have some control and ensure development happens in a planned way and one it can support.

8.23 **Mitigation measures that would prevent reduce or offset any adverse effects.**

No mitigation is necessary for beneficial infrastructure., However careful design will be important.

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**Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 6:**

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Unlikely to impact habitat, however footpaths and verges could act as wildlife corridors.	None Needed
Land and Soil	No	LT	I	A	P	Small amount of land may be needed for footpaths – but not significant when viewed over village as a whole.	None Needed
Water and Flood Risk	No	LT	I	A	P	Unlikely to have any direct effect. Possibly a slight effect on climate change by virtue of reduced carbon if a modal shift is achieved.	None Needed
Air Quality	Yes	LT	I	A	P	Reduced car use likely to be beneficial	None Needed
Climatic	No	LT	I	A / B	P	If significant modal shift achieved then should reduce carbon emissions from transport.	None Needed
Historic Env.	No	LT	I	A	P	Unlikely to have any direct effect. Heritage policies in WCS and NDP will safeguard heritage from any physical or setting impacts from path construction.	Careful design in proximity to heritage.
Landscape	No	LT	I	A	P	Minimal effect from path construction. Greater appreciation of landscape possible with more paths.	Careful design in key areas.
Population & Housing	No	LT	I	A	P	No direct impact, however the creation of a better environment could encourage people to live in Burbage.	None Needed
Community and Health	Yes	LT	I	A	P	Improvement in health and wellbeing likely due to increased exercise possibilities and less incentive to use the car for short journeys.	None Needed
Education	No	LT	I	A	P	No direct impact likely.	None Needed
Serv. Centre	No	LT	I	A	P	Some positive impact likely as communication and transport will be improved. Likely to make village more attractive for investment.	None Needed. =Could however update policy to make sure paths connect with work and retail sites.
Transport	Yes	LT	I	A	P	Significant positive impact expected. Should reduce car use, tackling emissions and air quality as well as congestion.	None Needed.
Economy	Yes	LT	I	A	P	Positive impact expected. Will improve transport, cut congestion. Will make village more attractive for investment.	None Needed. Could however update policy to make sure paths connect with work and retail sites.

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8.24 **Burbage Pre-Regulation 14 Consultation Plan Objective 6: discussion of significant effects envisaged.**

Improved sustainable transport including an extended foot and cycle path network, will provide a low-emissions alternative to the car. Increased opportunities for informal exercise, as more car journeys are made on foot will help health and wellbeing. Air quality and community health should benefit.

There are also likely to be positive effects on the local economy and transport systems. Reducing car use could help fight congestion and the availability of a first class path and cycleway network will also make the village more attractive for investors.

8.25 **Why options were adopted or rejected**

Doing nothing was not a realistic option, and neither was any policy that encouraged car use. There are already congestion problems in the village and, as the plan promotes more development, it is necessary to ensure that this is sustainable by boosting the availability of sustainable transport modes. The village already has a reasonably good paths network but this and the bust stops could be improved further to facilitate greater use and allow more journeys to be made by means other than the car.

8.26 **Mitigation measures that would prevent, reduce or offset any adverse effects.**

There are unlikely to be any significant negative effects from an Objective that encourages sustainable transport. However, the positive impacts could be increased by tweaking the relevant policy sections (for example by ensuring paths connect residential and employment / retail uses).

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**Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 7:**

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	Yes	LT	I	A	P	The Green spaces are large and preserving or enhancing them is likely to have a beneficial effect on biodiversity	None Needed, but landscaping and in particular hedgerow improvement or planting could increase beneficial effects.
Land and Soil	Yes	LT	I	A	P	Large green areas will help maintain balance of land use.	None Needed,
Water and Flood Risk	Yes	LT	I	A	P	Large green areas will help to maintain sustainable drainage.	None Needed,
Air Quality	No	LT	I	A	P	The Green spaces are large and preserving or enhancing them is likely reduce impacts of new development or traffic increases.	None Needed, but effectiveness could be increased by more tree planting and landscaping. Consider revising policy wording.
Climatic	No	LT	I	A	P	Large green spaces will help reduce heat islands and overall temperature of urban areas as climate change raises mean temperatures	None Needed.
Historic Env.	No	LT	I	A	P	Settings of existing buildings maintained, but most listed buildings are away from main green spaces.	None Needed.
Landscape	No	LT	I	A	P	Existing landscape and greenness of village maintained.	None Needed, but effectiveness could be increased by more planting / landscaping. Consider revising policy
Population & Housing	No	LT	I	A	P	No direct impact likely. Green spaces however do make village more attractive to new residents.	None Needed.
Community and Health	Yes	LT	I	A	P	Encourages recreation, enhancing health and well-being.	None Needed, but use could be enhanced by ensuring good footpath and Cycleway links. Add detail to Developer Contributions Policy.
Education	No	LT	I	A	P	Green Space will facilitate physical education and practice for sports.	None Needed.
Serv. Centre	No	LT	I	A	P	Green space will improve attractiveness for investors and will encourage tourism.	None Needed
Transport	Yes	LT	I	A	P	Green spaces, if linked by footpaths will be part of sustainable transport system	None Needed, but use could be enhanced by ensuring good footpath and Cycleway links. Add detail to Developer Contributions Policy.
Economy	Yes	LT	I	A	P	Green space will improve attractiveness for investors and will encourage tourism.	None Needed, but use could be enhanced by ensuring good footpath and Cycleway links. Add detail to Developer Contributions Policy.

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8.27 **Burbage Pre-Regulation 14 Consultation NDP Objective 7: discussion of significant effects envisaged.**

This is an Objective with wide ranging benefits. From the more obvious ones of community health and well-being to incidental impacts in terms of helping future-proof the village against climate change and flood risk.

8.28 There are significant economic and transport benefits, however these could be maximised by minor changes to policy wording. There are no significant negative effects predicted.

8.29 **Why options were adopted or rejected**

The Site Selection Report (SSR) demonstrated why particular green spaces were selected for special protection.

8.30 Here it should suffice to say that protection of green one space has always been a popular issue in the village. An NDP that did not address this through Objectives and policy would not be locally credible.

8.31 **Mitigation measures that would prevent, reduce or offset any adverse effects.**

Mitigation measures are not needed, since the effect of the Objective is beneficial. However, the impact of the Objective could be greater if subsequent policy was modified as indicated above.

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### Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 8:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	A modest benefit should accrue to biodiversity as the Objective protects the natural environment.	Not required
Land and Soil	No	LT	I	A	P	Objective should result in more thoughtful and efficient use of this resource	Not Required
Water and Flood Risk	No	LT	I	A	P	Preservation of green areas could result and this would benefit drainage.	Not required
Air Quality	No	LT	I	A	P	Minor benefit if natural environment conserved	Not required
Climatic	No	LT	I	A	P	Unlikely to have an impact, though may help reduce heat island effect of buildings if green areas of village are conserved	Not required
Historic Env.	Yes	LT	I	A	P	Significant benefit since Objective seeks to preserve historic buildings and their settings.	Not required
Landscape	Yes	LT	I	A	P	Significant benefit since Objective seeks to preserve landscape and setting of village.	Not required
Population & Housing	No	LT	I	A	P	Minor benefit may result as high quality design could make village more attractive.	Not required
Community and Health	No	LT	I	A	P	Minor benefit may accrue as quality design and conservation of heritage can increase sense of well being	Not required
Education	No	LT	I	A	P	Minor benefit may accrue if heritage is conserved as it will represent an educational resource.	Not required
Serv. Centre	No	LT	I	A	P	Minor benefit to attractiveness of village to investment if good quality design is encouraged.	Not required
Transport	No	LT	I	A	P	No impact likely	Not required
Economy	No	LT	I	A	P	Minor benefit to attractiveness of village to investment if good quality design is encouraged.	Not required

Key: (See also Appendix 5 for an explanation of scoring methodology)

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8.32 **Burbage Pre-Regulation 14 Consultation NDP Objective 8: discussion of significant effects envisaged.**

The only significant effects likely from this Objective are beneficial ones in terms of protection of Heritage and Landscape. Given the attractiveness of the village and the good viability for development there according to the Wiltshire Local Plan Viability Study (see SSR), it is unlikely that stricter control would negatively impact on the local economy or employment. Indeed, tourism is likely to benefit.

8.33 **Why options were adopted or rejected**

Given the presence of the AONB and Conservation Area and the enthusiasm of local residents for their high-quality environment, not having as an Objective the preservation of Heritage and Landscape was never a realistic option. The quality of the local environment is why many people chose to live in Burbage and also underpins the emerging tourism industry. Protection of such valued assets makes the choice of such an Objective inevitable.

8.34 **Mitigation measures that would prevent reduce or offset any adverse effects.**

No mitigation is required for an Objective that has such an overwhelmingly positive effect. However, any policy governing design has to tread a fine line between ensuring appropriate quality while not impacting negatively on overall viability. This is a matter to carefully consider when wording policy.

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### Justification of Scoring for Pre-Regulation 14 Consultation Plan Objective 9:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Car parks could impact negatively, but not to a great degree as total area would be small.	Yes. Landscaping and habitat enhancement.
Land and Soil	No	LT	I	A	P	Car parks would use land.	No.
Water and Flood Risk	No	LT	I	A	P	Hard standing areas could contribute to flash flooding by increasing speed of run-off.	Yes. Suds required in all new proposed car parks. Revise policy / Objective.
Air Quality	No	LT	I	A	P	Minor deterioration of very local air quality from vehicle emissions possible.	No. Other than to reduce car use through other policies.
Climatic	No	LT	I	A	P	Increased parking could increase car number and hence carbon emissions. Hard standings could add to heat island effect though impact would be very small.	Yes. Mitigation through other objectives and policies aimed at reducing actual car use. Other policies aimed at increasing landscaping and trees.
Historic Env.	No	ST?	I	A	P	Parking will have to be well sited to avoid clash with settings of listed buildings.	Yes. Via other policies of WCS.
Landscape	No	ST?	I	A	P	Parking will have to be well sited to avoid clash with sensitive landscapes.	Yes, landscaping and planting. Revise Objective / policy.
Population & Housing	No	ST?	I	A	P	Will help reduce congestion and make area more attractive to live in for car users.	No.
Community and Health	No	ST?	I	A	P	Minor health impacts possible if air quality affected.	No. Other than to reduce car use through other policies.
Education	No	ST?	I	A	P	None likely	No. Other than to reduce car use through other policies.
Serv. Centre	Yes	ST?	I	A	P	Positive benefit in facilitating use of retail and other services by reducing congestion and allowing convenient parking.	None needed
Transport	No	ST?	I	A	P	Benefit to car users, but possible negative impact on sustainable transport by making car use more attractive.	Yes. Other Objectives and policies that aim to aim to reduce need for car use.
Economy	Yes	ST?	I	A	P	Benefit to local businesses and employees in being able to park more easily.	None needed.

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8.35 **Burbage Pre-Regulation 14 Consultation NDP Objective 9: discussion of significant effects envisaged.**

Significant and positive effects are likely in terms of benefits to the local economy and car users. Negative impacts are smaller on an individual basis, but together represent a significant environmental cost of this objective.

8.36 Mitigation is however possible, and while not likely to remove all of the negative effects could bring them down to an acceptable level. It is recommended that the draft Objective and other policies are revised to ensure mitigation takes place.

8.37 **Why options were adopted or rejected**

The Objective aims to deal with a known issue of congestion caused by insufficient parking at certain points in the village. Given the lack of viable public transport alternatives, provision has to be made for the car and for reducing congestion when this occurs in ways which slow traffic and are potentially dangerous.

8.38 However, care needs to be taken in framing this policy that car use is not encouraged and that negative impacts are mitigated.

8.39 **Mitigation measures that would prevent reduce or offset any adverse effects.**

Mitigation measures include landscaping, careful design and other policies (both NDP and WCS) that could reduce negative impacts as described above. While high levels of car ownership are inevitable in rural Burbage, care must be taken that overall actual car use is stabilised or reduced. The overall thrust of the plan is to improve self-containment and reduce the need to travel. This may be the best mitigation of all.

## 9.0 Formal Sustainability Appraisal of Policies and Sites

- 9.1 A formal SA analysis was undertaken for each policy option (alternative) and site in the Pre-Regulation 14 Consultation Plan. The NDP is not required to assess all possible sites or options and in fact, only sites or policies likely to gain community support were analysed. Each aspect of the Plan was scored, as described above, by the effects it would have against the SA Objectives. Following this, a table is used to explore:
- The nature of effects
  - The significance of effects
  - The evidence for such effects being likely
  - Possible mitigation measures.
- 9.2 Sites were, in addition, subject to an entirely separate site planning selection process, in which they were assessed according to criteria contained within the separate Sites Selection Report (SSR). This assessment focussed on planning, rather than sustainability issues, including viability and deliverability.
- 9.3 The formal SA of all policies and sites of the Pre-Regulation 14 Consultation NDP is given below.

9.4 **Burbage NDP Pre-Regulation 14 Consultation Policy 1 – Development Strategy**

9.5 **Draft Policy Assessed:**

Policy 1 - Development Strategy	
a.	Within the Limits of Development (LoD) of Burbage, development will only be permitted on brownfield sites or those identified in this plan unless it can be demonstrated that these possibilities are unsuitable or unavailable.
b.	Other than sites identified in this plan, residential development outside the LoD will be acceptable only in exceptional circumstances. Applicants would have to demonstrate a lack of available sites within the village and prove that no significant negative impact would occur in the AONB.
c.	Mixed-use developments including housing and retail or B1 and B2 industrial employment uses are encouraged and will receive favourable consideration subject to compliance with other policies of the plan.
d.	Development in the hamlets and outer small settlements of the community area will normally be limited to the conversion or extension of existing buildings. However, development of single dwellings or modest employment facilities such as workshops, in addition or instead of conversion, may be acceptable providing such schemes comply with other policies of the Plan.

**Note: Subsequent amendments to policies as a result of SA are given in Appendix 8.**

- 9.6 This over-arching policy represents the general strategy for the future development of Burbage to 2026. The policy requires that brownfield and lower land quality sites are developed before greenfield ones (as a preference and where available), and that development in general should be concentrated within the village boundary. The policy therefore, except in specified instances, imposes a presumption in favour of development within or adjacent to the boundary subject to compliance with other policies of the Plan.
- 9.7 The Plan also aims to protect the interests of first time buyers by ensuring a supply of small and hence low-cost dwellings. It aims to enhance self-containment by encouraging mixed use developments.
- 9.8 In terms of the overall pattern of development, there was a desire to ensure that, within limits needed to protect the environment, the plan should benefit the entire Parish – the outlying hamlets as well as the main village of Burbage. As such it was not considered right to rigidly insist that absolutely all development take place only in and immediately around Burbage.
- 9.9 While mindful of the inevitable and necessary restrictions of the surrounding AONB, the plan aims to nevertheless prevent hamlets from being necessarily caught in a ‘Sustainability Trap’; denied absolutely all growth because planning strategy decreed it to be unsustainable on the basis of remote location.
- 9.10 The attitude of the plan is that modest development – for example extensions of existing dwellings or suitable sites for tourist development, could be appropriate in the hamlets and at the farms. The process of site selection which considered several sites beyond the village is contained within the SSR. Not all of them passed.

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9.11 The aim is not to challenge the overall strategy of the WCS but to interpret it by suggesting that, in the case of Burbage, a key issue in maintaining vitality is in allowing the entire community to benefit from moderate and controlled development, especially if this helps underpin local employment, for which aim there was considerable support in early community engagement.

9.12 This is considered to be a reasonable policy for the following reasons:

- It is socially inclusive and enjoys strong community support
- It seeks to increase local employment possibilities
- It seeks to help first time buyers and those who cannot afford larger homes
- It aims to increase self-containment
- It will ensure that most development is well related to services and facilities
- It recognises that sustainability is about maintaining a thriving local economy and developing tourism as well as protecting the environment
- It makes efficient and sustainable use of land.

**Options considered for this policy together with reasons:**

Option	Reason for selection
a. The policy in full as stated	<ul style="list-style-type: none"> <li>• Reflects consultation responses</li> <li>• Permits whole Parish to benefit from appropriate and controlled development</li> </ul>
b. The Policy but without element 'd'	<ul style="list-style-type: none"> <li>• Abandons modest development in the wider Parish in favour of stricter environmental protection</li> </ul>
c. Have no policy other than CS 1 and 2	<ul style="list-style-type: none"> <li>• Relies on Wiltshire Core Strategy's Development Strategy and does not seek to interpret it at local level</li> </ul>

9.12 Option 'a' is essentially more pro-economic development (e.g. tourism), while Option 'b' does allow a major development outside the village but errs on the side of environmental protection as far as development in the Hamlets is concerned. Option 'c' accepts the broad development strategy policy of the WCS without seeking to interpret it further at local level.

**Scoring of Options:**

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Plan Objectives													
a	-?	+/0	0	0	0	0	-	++	+	0	++	0	++
b	0	+	0	0	0	0	0	+	-	0	++	+	+
c	?	++	0	0	0	0?	++	+	-	0	-	++	-

\* Option C is scored with reference to its impact on Burbage.

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### Justification of Scoring a:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No.	LT	R	A	P	Most development on brownfield land. Some outside village. More than envisaged by WCS	Other policies of the WCS and NDP. Planning conditions can also mitigate impacts.
Land and Soil	No	LT	I	A	P	Directs development mainly to brownfield but does include land outside village boundary and greenfield	Other policies of the WCS and NDP. Planning conditions can also mitigate impacts
Water and Flood Risk	No	LT	I	A	P	Not a huge issue locally. Even though number of dwellings will increase moderately, unlikely to have a major effect downstream.	Other policies of the WCS. Mitigation possible through SUDS via planning conditions.
Air Quality	No	LT	I	A	P	No present issues and modest quantum of development seems unlikely to increase pollution to a problem level.	Policies of WCS and NDP prevent unsuitable land uses mixing in a way that could create air quality issues.
Climatic	No	LT	I	A	P	Quantum of development modest. Location unlikely to affect emissions.	None needed
Historic Env.	No	LT	I	A	P	Location unlikely to affect heritage assets due to protection afforded by other policies.	Other policies of the WCS and NDP.
Landscape	No	LT	I	A	P	Minor negative impact might be expected from locating development adjacent to existing buildings in open countryside.	Design and Landscape policies of WCS and NDP. Planning conditions can ensure design is landscape- sensitive.
Population & Housing	Yes	LT	I	A	P	Policy is likely to result in delivery of a larger quantum of housing than the minima promoted in the WCS.	None needed
Community and Health	No	LT	I	A	P	By underpinning the economic prosperity of the Parish, the policy will enable additional infrastructure through planning obligations and CIL.	None needed
Education	No	LT	R	A	P	No direct impact likely from siting development as proposed.	None needed
Serv. Centre	Yes	LT	I	A	P	encouraging use of brownfield land, a higher density of development will be encouraged – improving the critical mass of population that is good for business. Permitting selected tourist and other low-key employment use in hamlets will also stimulate local economy.	None needed
Transport	No	LT	I	A	P	Concentrating development in the village will improve viability of sustainable transport including bus services. It is possible that there could be a negative impact from car use in the hamlets, but this will be very small. Overall a neutral effect.	None Needed
Economy	Yes	LT	I	A	P	The policy encourages a good supply of housing and employment land. It also boosts tourism and farm diversification. These are positive impacts in terms of local wealth generation and employment.	None Needed

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### Justification of Scoring b:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Most development on brownfield land. None in the wider Parish	Other policies of the WCS and NDP. Planning conditions can also mitigate impacts.
Land and Soil	No	LT	I	A	P	Directs development mainly to brownfield. But does still include some land outside settlement boundary.	None Needed
Water and Flood Risk	No	LT	R	A	P	Not a huge issue locally. Even though number of dwellings will increase moderately, unlikely to have a major effect downstream.	Other policies of the WCS. Mitigation possible through SUDS via planning conditions.
Air Quality	No	LT	R	A	P	No present issues and modest quantum of development seems unlikely to increase pollution to a problem level.	Policies of WCS and NDP prevent unsuitable land uses mixing in a way that could create air quality issues.
Climatic	No	LT	R	A	P	Quantum of development modest. Location unlikely to affect emissions.	None needed
Historic Env.	No	LT	R	A	P	Location unlikely to affect heritage assets due to protection afforded by other policies.	Other policies of the WCS and NDP.
Landscape	No	LT	R	A	P	As most development on brownfield sites, unlikely to have a major impact.	Design and Landscape policies of WCS and NDP. Planning conditions can ensure design is landscape- sensitive
Population & Housing	Yes	LT	I	A	P	Policy likely to result in delivery of a larger quantum of housing than the minima promoted in the WCS but not as much as option 'a'.	None needed
Community and Health	No	LT	I	A	P	By underpinning the economic prosperity of the Parish, the policy will enable additional infrastructure through planning obligations and CIL though not as much as option 'a'.	None needed
Education	No	LT	R	A	P	No direct impact likely from siting development as proposed.	None needed
Serv. Centre	Yes	LT	I	A	P	encouraging use of brownfield land, a higher density of development will be encouraged – improving the critical mass of population. Less benefit for Tourism and farm diversification than Option 'b'.	None needed
Transport	No	LT	I	A	P	Concentrating development in the village will improve viability of sustainable transport including bus services. Unlike option 'a' less negative impact on rural car use.	None Needed
Economy	No	LT	I	A	P	Moderate positive impact but not as great as option 'a'.	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring c:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Broad locational policy unclear as to whether this would affect biodiversity significantly	Development mitigation as per other WCS polices
Land and Soil	Yes	LT	I	A	P	Prioritises brownfield land. Overall would use less land as development levels proposed by WCS are lower than the NDP and prevent development outside the settlement boundary.	None needed
Water and Flood Risk	No	LT	R	A	P	Broad locational policy, no direct effect on flood risk	WCS contains policies requiring SUDS.
Air Quality	No?	ST	R	A	P	Directs development into major centres, possibly worsening air quality there. Less development for Burbage so could result in better air quality though impact likely to be slight	Sustainable transport plans and investment.
Climatic	No	LT	I	A	P	Proposes less development than NDP proportionately. However, concentrates it into major centres where heat island effect could be worse.	Tree planting and green space preservation in urban developments.
Historic Env.	No?	LT	I	A	P	Development concentrated into historic centres. Could facilitate regeneration but could also impact negatively on heritage unless well managed.	WCS policies regarding heritage should control impacts, but will rely on good development control.
Landscape	No	LT	I	A	P	Directs development into major centres, avoiding some sensitive landscapes. However impact on townscapes and edge of settlement countryside is unclear.	Good design and development control could improve quality of schemes, though some emerging ones are of poor landscape quality (e.g. Ashton Park, Trowbridge).
Population & Housing	No	LT	R	A	P	Will create significant number of new homes, but proportionately less than the NDP	Flexibility allowed by Neighbourhood Plans will increase quantum where communities wish this.
Community and Health	No	LT	R	A	P	Proposes less development enabling fewer infrastructure upgrades versus NDP.	Investment via regeneration and other programmes, but will require political will.
Education	No	LT	R	A	P	Broad locational policy. Unlikely to have impact.	None needed.
Serv. Centre	No	LT	R	A	P	Boosts viability of main centres but lower quantum for villages means service centre role won't be enhanced as much as by NDP.	Neighbourhood Plans can redress balance where communities wish it.
Transport	Yes	LT	R	A	P	Broad locational policy involving less development in Burbage should reduce the need to travel and could lead to lower car use.	None needed
Economy	No	LT	R	A	P	Would result in less development and less enhancement of the local economy in Burbage.	Neighbourhood Plans can redress balance where communities wish it.

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9.13 **Burbage Pre-Regulation 14 Consultation NDP Policy 1**

**Development Strategy: discussion of significant effects envisaged.**

Broadly speaking, 'a' is the most pro-development option, with the lowest level of environmental protection to landscape and biodiversity interests, but with the biggest benefits to the local economy, service centre status, community and housing. It would enable the biggest improvements in infrastructure.

9.14 Option 'b' involves less development and is likely to be more environmentally benign, however it carries fewer economic and social benefits and is less socially inclusive.

9.15 Option 'c' envisages a lower level of development than either 'a' or 'b' and is therefore better for landscape, sustainable transport and possibly biodiversity. However, it scores lowest for community, economy and service centre role. It would also deliver the lowest quantum of housing.

9.16 **Why options were adopted or rejected**

Option 'c' appears to provide the best environmental protection but fails to deliver the necessary quantum of development that would allow the village to develop the critical mass necessary to improve self-containment and hence overall sustainability of the settlement. It would deliver less in terms of facilities and infrastructure.

9.17 Option 'b' offers greater development benefits, but excludes the rural element of the community from enjoying the benefits of controlled and modest growth, especially for tourism.

9.18 Option 'a' has the biggest benefits to the local economy, service centre status, community and housing. It would also enable the biggest improvements in infrastructure. There are modest environmental impacts suggested, but many of the apparently negative impacts are in fact capable of mitigation.

9.19 **Mitigation measures that would prevent reduce or offset any adverse effects.**

Both the WCS and the NDP contain policies that would help mitigate negative impacts in terms of biodiversity, landscape and transport. For example, biodiversity enhancement, planting and landscaping and the boosting of sustainable transport modes through developer contributions.

9.20 In order to maximise impact of mitigation, modification of some policies should be considered in order to make clear (for example) the requirements for tree planting and other landscaping that would help mitigate impacts (as discussed above in the tables).

9.21 **Burbage Pre-Regulation 14 Consultation NDP Policy 2 – Housing**

9.22 **Draft Policy Assessed:**

Policy 2 – Housing (General)
a. Any development of 4 or more houses must include at least 25% of the total number of houses as 1 or 2 bedroom dwellings.
b. Developments for retirement housing will be looked on favourably, whether as stand-alone or as elements of a larger scheme, subject to compliance with other policies of the plan.
c. Development of 4 or more dwellings should include designs that facilitate working from home (for example home offices or home office support hubs within the development).

Note: Subsequent amendments to policies as a result of SA are given in Appendix 8.

9.23 It was not considered necessary to consider any more than the two options below – broadly this will compare the effects of the policy against doing nothing – that is, requiring no more than existing WCS policies.

**Options considered for this policy together with reasons:**

Option	Reason for selection
a. The policy as stated in full	To ensure housing provided meets with local needs and wishes. To add greater detail and clarity for developers
b. Rely only on WCS Housing Policies	For purposes of comparison

**Scoring of Options:**

Sustainability Objectives	Plan Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
		a	0	0	0	0	0	0	0	0	++	++	0	+
b	0	0	0	0	0	0	0	0	+	+	0	+	0	+

\* Option ‘b’ is scored with reference to impact on Burbage.

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### Justification of Scoring a:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Land and Soil	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Water and Flood Risk	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Air Quality	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Climatic	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Historic Env.	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Landscape	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Population & Housing	Yes	LT	I	A	P	Policy will ensure right mix of housing for the community	None needed
Community and Health	Yes	LT	I	A	P	Policy will ensure right mix of housing for the community	None needed
Education	No	LT	I	A	P	Type and nature of housing unlikely to affect this issue	None needed
Serv. Centre	No	LT	I	A	P	Housing to meet the community's needs will help improve critical mass of customers for local businesses and services.	None needed
Transport	No	LT	R	A	P	Includes promotion of working from home - facilitating beneficial reduction in car use.	None needed
Economy	No	LT	I	A	P	Housing to meet the community's needs will help improve critical mass of customers for local businesses and services.	None needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring b:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Land and Soil	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Water and Flood Risk	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Air Quality	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Climatic	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Historic Env.	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Landscape	No	LT	R	A	P	Type and nature of housing unlikely to affect this issue	None needed
Population & Housing	No	LT	I	A	P	Will provide housing, though not to levels in Burbage suggested by the NDP	None needed
Community and Health	No	LT	I	A	P	Policy aims to create a balanced mix of housing and meet community needs.	None needed
Education	No	LT	I	A	P	Type and nature of housing unlikely to affect this issue	None needed
Serv. Centre	No	LT	I	A	P	Housing to meet the community's needs will help improve critical mass of customers for local businesses and services.	None needed
Transport	No	LT	R	A	P	Housing will generate more demand for transport but this is taken care of in other WCS policies.	Other WCS policies
Economy	No	LT	I	A	P	Housing to meet the community's needs will help improve critical mass of customers for local businesses and services.	None needed

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9.24 **Burbage Pre-Regulation 14 Consultation NDP Policy 2 – Housing: discussion of significant effects envisaged.**

This policy is really about adding detail to the WCS – in particular ensuring that the housing provided meets local needs and circumstances. It also encourages working from home.

9.25 The effect of these embellishments to WCS policy is to improve the effects on ‘housing’ and ‘community areas’ of assessment; making the overarching policy more locally relevant to the Burbage community and delivering a slightly more sustainable outcome in terms of more explicitly encouraging working from home.

9.26 **Why options were adopted or rejected**

The policy proposed does not supplant but simply adds local detail to the WCS policy – something that is well within the role and capacity of a Neighbourhood Plan.

9.27 While the aim is reasonable and the policy appears environmentally sound, it could perhaps be improved and made even more locally specific. The Rural Housing Needs Survey undertaken by Wiltshire Council in 2014 (See Appendix in the NDP) indicated some demand for affordable, but also for housing adapted to meet disabled needs, specifically;

- 1x supported, single-level home providing assistance with personal care and access to an emergency support system such as Lifeline and
- 1x four-bedroom home (wheelchair accessible)

9.28 The plan making team might therefore want to consider whether adding a requirement for this kind of housing would be useful. Given the quantum of development proposed it seems not unreasonable for a developer to provide such homes as part of the mix. However, in order not to affect viability this would have to be on the larger schemes only.

9.29 **Mitigation measures that would prevent reduce or offset any adverse effects.**

None needed. However, modification might help improve effectiveness.

9.30 **Burbage Pre-Regulation 14 Consultation NDP Policy 3 – Housing and Mixed Use Sites**

9.31 **Draft Policy Assessed:**

Housing and Mixed Use Sites
<p>a. Grafton Road - Housing Development of 15 homes of mixed size and type is acceptable subject to:</p> <ul style="list-style-type: none"> <li>- Satisfactory highway access</li> <li>- Screening of existing properties to south</li> </ul>
<p>b. Mundy's Yard and Scout Hut – Mixed Use, 20 Homes plus associated offices or retail. The proposal here is to re-locate the existing Scout Hut and Mundy's builders yard to other, better locations. Mundy's would probably go to an all employment location such as Hirata I. The Scout Hut could go to Barn Meadow or Red Lion Field Local Green Spaces.</p> <p>Subject to:</p> <ul style="list-style-type: none"> <li>- Satisfactory re-location of existing Scout Hut / Mundy's business</li> <li>- modest element of employment use in replacement scheme</li> </ul>
<p>c. Bypass Site. Land between village and bypass. Housing Development of up to 80 homes with green spaces and habitat Improvement. Subject to:</p> <ul style="list-style-type: none"> <li>- incorporation of public green space / park</li> <li>- habitat enhancement scheme</li> <li>- adequate screening for existing properties to east</li> <li>- linking to village by network of paths and cycle ways</li> <li>- Adequate noise attenuation for new properties closest to by-pass.</li> <li>- Replacement of existing Village Hall as part of the scheme</li> </ul>
<p>d. Hirata II – Housing Development of up to 60 homes. Subject to:</p> <ul style="list-style-type: none"> <li>- adequate screening for nearby properties</li> </ul>

**Note: Subsequent amendments to policies as a result of SA are given in Appendix 8.**

9.32 Site selection for the NDP began with initial community engagement followed by a formal site selection process, recorded in the Site Selection Report (SSR). The SA process below is in addition to that and only tests the sites that have already passed the SSR criteria. In the following section, each site is considered separately with a scoring sheet of its own.

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Sites considered for this policy together with reasons:

Site no.	Site name	Reason for selection
3.a	Grafton Road	See SSR
3.b	Mundy's Yard / Scout Hut	See SSR
3.c	Bypass Site	See SSR
3.d	Hirata II	See SSR

Scoring of Sites:

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Plan Objectives													
3.a	0	--	0	0	-	0	-	++	++	+	++	-	++
3.b	0	++	0	++	0	0	0	++	++	+	+	+	+
3.c	-	--	0?	0	-	0	--	++	++	+	++	-	+
3.d	0	--	0	0	-	0	--	++	++	+	++	-	+

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### Site No. 3 a (Grafton Road) Justification of Scoring:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Mono-culture agriculture already likely to be species poor.	Planting and habitat creation along existing wooded edges
Land and Soil	Yes	LT	I	A	P	Will use greenfield land	None
Water and Flood Risk	No	LT	R	A	P	Low flood risk area	SUDs would prevent flooding downstream of Burbage
Air Quality	No	LT	I	A	P	Development of normal density unlikely to cause a problem.	None needed
Climatic	No	LT	I	A	P	Construction will involve carbon emissions. Could exacerbate heat island effect together with adjacent development.	Sustainable construction. Tree planting to offset some carbon and to mitigate heat island effect as climate changes.
Historic Env.	No	LT	I	A	P	No sensitive receptors likely to be affected.	None needed
Landscape	No	LT	I	A	P	Is in AONB. On the other hand, site is surrounded on all sides and reads as part of the village, not open landscape.	Enhance tree planting on periphery.
Population & Housing	Yes	LT	I	A	P	Would help meet housing need and create critical mass for Burbage's population	None needed
Community and Health	Yes	LT	I	A	P	Would help meet housing need and create critical mass for Burbage's population. Would help fund infrastructure from CIL and S106.	None needed
Education	No	LT	R	A	P	Would create additional demand but generate funds to enhance school.	Enhancement of existing school - support grant and developer contribution
Serv. Centre	Yes	LT	I	A	P	Would increase local customer base for businesses and services	None needed
Transport	No	LT	R	A	P	Would probably be dependent on car use	Enhancement of sustainable transport. Enhancement of self-containment (e.g. facilities)
Economy	Yes	LT	I	A	P	Would increase local customer base for businesses	None needed

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### Site No. 3.b (Mundy's Yard / Scout Hut) Justification of Scoring:

9.33 The proposal here is to re-locate the existing Scout Hut and Mun Red Lion Field Local Green Spaces. Redevelopment of the site would be with a mainly residential scheme but with office or retail elements.

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Little impact as sites already is use.	Planting and habitat creation.
Land and Soil	Yes	LT	I	A	P	Brownfield sites	None needed
Water and Flood Risk	No	LT	R	A	P	Low-risk area	SUDs
Air Quality	Yes	LT	R	A	P	Improvement as Mundy's creates dust and this use would be moved further from dwellings.	None needed
Climatic	No	LT	I	A	P	Small development. Will generate carbon ion construction but impact small in terms of heat island effect. New buildings should emit proportionately less carbon.	Tree planting Sustainable construction
Historic Env.	No	LT	I	A	P	No receptors near-by.	None needed
Landscape	No	LT	I	A	P	Brownfield site. With care landscape impact could be improved with modern buildings.	Landscaping scheme and sympathetic building design
Population & Housing	Yes	LT	I	A	P	Will help create local homes	None needed
Community and Health	Yes	LT	I	A	P	Will relocate and enhance existing scout hut. Will reduce impact of dust from Mundy's on residents.	None needed other than to relocate Mundy's to an appropriate site not immediately adjacent to housing.
Education	No	LT	R	A	P	Small site with moderate additional demand on education.	Support grant and funding to enhance school from developer contributions.
Serv. Centre	No	LT	I	A	P	Will add a small amount to local customer base for facilities	None needed
Transport	Yes?	LT	R	A	P	Could increase car use.	Sustainable transport schemes, improvement of facilities to increase self-containment and reduce need to travel.
Economy	Yes	LT	I	A	P	Will add a small amount to local customer base for facilities. Will create a new site for retail in a central part of the village.	None needed

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### Site No. 3.c (Bypass) Justification of Scoring:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Per m?		
Biodiversity	No	LT	I	A	P	Land quality is of mixed quality. Yet significant habitat loss will occur. On the other hand, habitat and green space enhancement is proposed.	Habitat / green space enhancement as proposed.
Land and Soil	Yes	LT	I	A	P	Will use a substantial quantity of greenfield land.	No.
Water and Flood Risk	No	LT	R	A	P	Could generate significant run-off unless this is properly managed.	Should be able to mitigate through SUDs.
Air Quality	No	LT	I	A	P	Main road nearby but site is elevated and exposed. On edge of village so air quality should be good.	None needed
Climatic	No	LT	I	A	P	Will create carbon emissions from construction and subsequent use. Mass of roofs could also create local heat island.	Tree planting and habitat enhancement as proposed will help offset carbon and reduce heat island effect.
Historic Env.	No	LT	I	A	P	Historic buildings of high street are already well screened and no development is proposed close enough to impact on settings.	Good design and layout.
Landscape	Yes	LT	R	A	P	AONB. Tranquility already degraded by by-pass but impact will be considerable. However, size would lead to benefits for services and infrastructure.	Good design, layout, landscaping and habitat enhancement.
Population & Housing	Yes	LT	I	A	P	Would create many homes and scale means that types for all the community could be achieved.	None needed except WCS and NDP policies to ensure correct mix of housing types and tenures provided.
Community and Health	Yes	LT	I	A	P	Would create many homes and scale means that new village hall could be provided as part of the scheme.	None needed except careful negotiation to ensure community benefits.
Education	No	LT	R	A	P	Would increase demand but would also present opportunity for expansion of school	Expansion of existing facilities by means of developer and Government funding
Serv. Centre	Yes	LT	I	A	P	Would increase local customer base for businesses and services	None needed other than private sector investment to meet demand.
Transport	No	LT	I	A	P	Would increase car use although would also increase critical mass of Burbage making local facilities more viable.	Upgrades to local facilities as proposed under Developer Contributions policy. Private sector investment to meet demand for shops and services. Sustainable development upgrades as proposed
Economy	No	LT	I	A	P	Would increase local customer base for businesses and services	None required.

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### Site No. 3.d (Hirata II) Justification of Scoring:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Mono-culture agriculture already likely to be species poor. Deep Ploughed.	Planting and habitat creation along existing wooded edges
Land and Soil	Yes	LT	I	A	P	In AONB. Will use a substantial quantity of greenfield land.	Landscaping and Screening Possible.
Water and Flood Risk	No	LT	I	A	P	Low flood risk area	SUDs would prevent flooding downstream of Burbage
Air Quality	No	LT	I	A	P	Development of normal density on edge of village site unlikely to cause a problem.	Layout would have to be done carefully in light of nearby employment uses.
Climatic	No	LT	I	A	P	Construction will involve carbon emissions. Could exacerbate heat island effect together with adjacent development. On the other hand density is relatively low.	Sustainable construction. Tree planting to offset some carbon and to mitigate heat island effect as climate changes.
Historic Env.	No	LT	I	A	P	No sensitive receptors likely to be affected.	None needed
Landscape	Yes	LT	R	A	P	AONB	Possible to a degree. Tree planting and landscaping
Population & Housing	Yes	LT	I	A	P	Would help meet housing need and create critical mass for Burbage's population	None needed
Community and Health	Yes	LT	I	A	P	Would help meet housing need and create critical mass for Burbage's population. Would help fund infrastructure from CIL and S106.	None needed
Education	No	LT	R	A	P	Would create additional demand but generate funds to enhance school.	Enhancement of existing school - support grant and developer contribution
Serv. Centre	Yes	LT	I	A	P	Would increase local customer base for businesses and services	None needed
Transport	No	LT	I	A	P	Would probably be dependent on car use	Enhancement of sustainable transport. Enhancement of self-containment (e.g. facilities)
Economy	No	LT	I	A	P	Would increase local customer base for businesses	None needed

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- 9.34 **Burbage Pre-Regulation 14 Consultation NDP Policy 3 – Housing and Mixed Use Sites: discussion of significant effects envisaged.**
- 9.35 The sites given above have already passed a selection process (see SSR) in which some were weeded out. The SA therefore is only concerned with sites that are already considered to be broadly, in planning terms, acceptable. The SA provides greater depth to the analysis in considering a broader spread of matters, and in particular social ones, in more detail.
- 9.36 Broadly speaking, the sites all tend to be selected on the basis of their contribution not only to meeting housing need, but also to creating a critical mass for Burbage sufficiently high to support more services and facilities and improve overall self-containment. In other words, the argument, and driving theme of the NDP, is that a larger Burbage would in practice be more sustainable a location (and better place to live) than it is if it does not grow.
- 9.37 In terms of the magnitude of growth needed, this is felt to be beyond the levels considered appropriate by the Wiltshire Core Strategy, and hence a substantial number of homes are proposed.
- 9.38 The Rural Housing Needs Survey indicated that 17 affordable units would be required. At an affordability level of 40 % this suggests development totaling 43 homes would be needed to meet this demand. By way of comparison, NDP sites in the present draft could amount to a total of 175 over the 10 years to 2026 (around 18 a year). However, these numbers are indicative and could be reduced as a result of consultation and through the planning process.
- 9.39 Whatever the level, the HNS report also pointed out that over 87% of residents surveyed supported more housebuilding.
- 9.40 However, growth at any price, even to meet need, would not be acceptable. The sites all come with a price-tag of environmental costs – as does all human development. For example, they all tend to have negative impacts in terms of land use, landscape, climate change and transport. However, as shown, with the exception of land use these can be mitigated. Additionally, there are benefits in terms of relocating some existing uses (such as Mundy's Yard) and in terms of benefits from development in terms of environmental improvement (such as the habitat and landscape upgrade of the Bypass Site). The mixed-use site to replace Mundy's / Scout Hut would keep employment and residential uses in close proximity – a sustainability benefit if suitable employment uses were involved (such as retail / office) which would not clash with dwelling use.
- 9.41 Additionally, the NDP and the WCS both provide mechanisms to ensure that growth does not have to mean environmental degradation but can actually result in improvement. For example, one mechanism for ensuring that growth does in fact lead to improved infrastructure (and hence better self-containment) is contained in NDP policy 4 – which seeks to use contributions from development of the selected sites to make good current deficiencies. These would include a better foot and cycle path network, more tree planting and a new village hall. Similarly, heritage, biodiversity and landscape policies in the WCS and NDP are also aimed at environmental up-grading simultaneously with growth.

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### 9.42 Why options were adopted or rejected

Site No.	Site Name	Reasons
3 a.	Grafton Road	<p>See SSR. Also:</p> <p>While in the AONB, and outside but adjacent to the village boundary, the site in fact reads very much as part of the village envelope. It is also directly adjacent to another site recently built outside the boundary (St Dunstan's) and seems therefore to be in a logical position for development. It is well related to services, facilities and transport.</p> <p>There are negative impacts likely in terms of land use, landscape and transport, but mitigation is possible, with the exception of land use. Additionally, balanced against the draw-backs there are significant social and economic benefits as shown.</p> <p>In particular, the site will help increase the critical mass of Burbage, making facilities and services more viable. It will provide some affordable housing. This in turn will increase self-containment. There will also be significant benefits from developer contributions.</p>

3. b	Mundy's Yard / Scout Hut	<p>See SSR. Also:</p> <p>The proposal here is to re-locate a run-down scout hut and builders yard from immediately adjacent to residential properties to Red Lion Field and Hirata employment site respectively (or other suitable locations).</p> <p>While the development of a new site of the Scout Hut and Mundy's (to be determined) would use some greenfield land, it would make available a brownfield site for a mixed residential / office / retail use scheme.</p> <p>The dust generated from Mundy's will be located away from residential properties, while the Scouts would get a new scout hut – developer contributions would be expected to assist this, and this seems reasonable, though viability of a mixed scheme might not leave too much to spare. Policy should be amended to prevent an onerous burden being imposed.</p>
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3. c	Bypass Site	<p>See SSR. Also:</p> <p>The Bypass site is the largest and most ambitious one in the NDP, and comes with significant environmental costs. However, it is also the scheme that offers the largest benefits, both in terms of the site (presently low quality land contributing little to the landscape or village) and in terms of developer contributions.</p> <p>The site would use a large plot of land and would be located within the AONB. There would be negative landscape and biodiversity impacts, notwithstanding that these could be mitigated by the proposed landscaping and that the proposed density is low to allow for this.</p> <p>With significant benefits in the categories of housing, community, economy and service centre, the site only makes sense within a 'high growth, high benefit' Strategy that sees developing the village as the way to make existing and better services and facilities more viable. That approach accepts some environmental damage in exchange for significant benefits. More than this, the sum of those benefits would improve the overall sustainability of the settlement by increasing self-containment and helping reduce the need to travel.</p> <p>This is bound to be a controversial option.</p>
3.d	Hirata II	<p>See SSR. Also:</p> <p>This is a greenfield site in agricultural use. It is also located within the AONB and is likely to lead to an increase in car use in the village.</p> <p>On the other hand, the site is well related to the village, to transport links and employment. It is already partly screened by mature trees and good landscaping could enhance this further.</p> <p>There are significant benefits in terms of housing provided (including affordable), Community and the village's role as service centre, the latter based on the assumption that the additional homes would lead to expansion of services.</p> <p>There are significant environmental costs for this option, and while mitigation is possible to a certain degree, it is up to the community to decide how far development of this site would be considered sustainable. From the point of view of this Sustainability Appraisal the site is just acceptable, but this will depend heavily on good planning at the development management stage.</p> <p>Suggest the policy is amended to ensure landscape and sustainable transport are given more weight.</p>

9.43 **Mitigation measures that would prevent reduce or offset any adverse effects.** Mitigation of specific issues is possible in many cases and is described above. In the case of Bypass – the largest scheme – adequate mitigation should be secured through a masterplan with community involvement.

9.44 **Burbage Pre-Regulation 14 Consultation NDP Policy 4 – Developer Contributions**

9.45 **Draft Policy Assessed:**

Developer Contributions
a. To replace or re-build the existing village hall
b. To improve sporting facilities
c. To establish a café or meeting place
d. To provide additional public parking
e. To enhance local broadband services
f. To connect to or enhance sustainable transport modes, including foot or cycle paths, bus services or infrastructure to facilitate any of these.

Note: Subsequent amendments to policies as a result of SA are given in Appendix 8.

9.46 A central aim of the NPD is to improve self-containment and raise life-quality, by using development to help provide necessary infrastructure. Key to this will be the Developer Contributions Policy which sets out the elements that are needed in order for the NDP Vision to result in sustainable development.

9.47 Developer contributions can be negotiated at the planning application or master-planning stage and are additional to the benefits that will accrue to the community through CIL, although those funds may also be used to support any item required. The following policy identifies areas for priority investment as schemes come are suggestions expressed by the local community (for example in the initial Survey).

Options considered for this policy together with reasons:

Option	Reason for selection
a The policy in full as stated	Includes elements needed in mitigation of impacts of development and also some suggested by the community as necessary to improve quality of life.
b The policy without section 'd' of the policy (additional parking)	Excludes provision of car parks for purposes of comparison with option a.
c Rely on WCS policy CP 3 regarding infrastructure and ad-hoc negotiation (in as far as it affects Burbage)	Comparison and consideration with option 'a'

Scoring of Options:

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Options													
a	0	-	-?	0	0	0	0	+	++	++	++	+	++
b	0	0	0	+	+	0	0	+	++	++	+	++	+
c	+	0	+	0	+	0	++	+	++	++	+	++	+

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### Justification of Scoring:a

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Some habitat may be used in construction but wildlife corridors may be created via footpath network.	Habitat creation as part of schemes.
Land and Soil	No	LT	I	A	P	Brownfield and greenfield land will be used.	None.
Water and Flood Risk	No	LT	R	A	P	Additional parking could increase run-off unless designed with SUDS. Suggest amend policy.	SUDS
Air Quality	No	ST	R	A	P	Car parking could increase car emissions, but cycle and footpaths will enable sustainable transport choices to be made for local journeys. Any effect slight. Overall neutral.	None needed
Climatic	No	LT	I	A	P	Effects small - not significant	None needed
Historic Env.	No	LT	I	A	P	None likely	WCS and NDP policies should protect buildings and settings.
Landscape	No	LT	R	A	P	Scale of changes is small. Very small effects.	Design policies of WCS will control impact of any new construction.
Population & Housing	No	LT	I	A	P	Could make Burbage a more attractive place to live	None needed
Community and Health	Yes	LT	I	A	P	Better and additional facilities and encouragement of exercise	None needed
Education	Yes	LT	I	A	P	Sports education will be facilitated.	None needed
Serv. Centre	Yes	LT	I	A	P	Facilities will add to critical mass of services and reduce need to travel. Car parking could encourage customers from outside the village to stop.	None needed
Transport	No	LT	I	A	P	Facilities could reduce need to travel and sustainable transport will be facilitated. However car use also encouraged.	None needed
Economy	Yes	LT	I	A	P	More facilities likely to benefit local businesses. Café and Hall could create employment.	None needed However negotiation of benefits must respect economic limits of viability.

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring: b

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Less habitat may be used in construction but wildlife corridors may be created via footpath network.	None needed
Land and Soil	No	LT	I	A	P	Less land will be used in construction	None needed
Water and Flood Risk	No	LT	R	A	P	Drainage could be better than with 'a'.	None needed
Air Quality	No	LT	R	A	P	Emphasis on sustainable transport could improve air quality by reducing car use. Though effect would be slight.	None needed
Climatic	No	LT	I	A	P	B would result in lower carbon emissions due to reduction in car use compared with 'a'	None needed
Historic Env.	No	LT	I	A	P	None likely	None needed
Landscape	No	LT	R	A	P	Scale of changes is small. Very small effects.	None needed
Population & Housing	No	LT	I	A	P	Could make Burbage a more attractive place to live	None needed
Community and Health	Yes	LT	I	A	P	Better and additional facilities and encouragement of exercise	None needed
Education	Yes	LT	I	A	P	Sports education will be facilitated.	None needed
Serv. Centre	No	LT	I	A	P	Facilities will add to critical mass of services and reduce need to travel. Insufficient parking may adversely affect local businesses.	Parking!
Transport	Yes	LT	I	A	P	Sustainable transport modes will be encouraged above car use.	None needed
Economy	No	LT	I	A	P	More facilities likely to benefit local businesses. Café and Hall could create employment. But insufficient parking may adversely affect local businesses.	Parking. Negotiation of benefits must respect economic limits of viability.

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring:c

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Requirement for environmental enhancement but dedicated policy likely to be more effective	None needed
Land and Soil	No	LT	R	A	P	No direct effect	None needed
Water and Flood Risk	No	LT	R	A	P	Has requirement for flood alleviation, but not a major issue in Burbage.	None needed
Air Quality	No	LT	R	A	P	Has requirement for open space which could assist, but hard to quantify. Dedicated policy likely to be more effective	None needed
Climatic	No	LT	R	A	P	Encourages low-carbon and renewable energy. Dedicated policy likely to be more effective	None needed
Historic Env.	No	LT	R	A	P	No direct effect	None needed
Landscape	Yes	LT	R	A	P	Encourages open space provision but dedicated policy likely to be more effective	None needed
Population & Housing	No	LT	R	A	P	Dedicated policy likely to be more effective	None needed
Community and Health	Yes	LT	R	A	P	Better and additional facilities and encouragement of exercise	None needed
Education	Yes	LT	I	A	P	Requires educational infrastructure.	None needed
Serv. Centre	Yes	LT	I	A	P	Dedicated policy likely to be more effective Insufficient parking may adversely affect local businesses.	None needed
Transport	Yes	LT	I	A	P	Encourages sustainable transport. Dedicated policy likely better	None needed
Economy	Yes	LT	I	A	P	Dedicated policy likely to be more effective. Less parking may adversely affect local businesses.	None needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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- 9.48 **Burbage Pre-Regulation 14 Consultation NDP Policy 4 – Developer Contributions: discussion of significant effects envisaged.**
- 9.49 In a sense it is unfair to directly compare a wide-ranging and comprehensive policy like CP3 of the WCS with an intentionally local and more limited purpose. However, it does serve to show the positive and negative impacts of what is proposed for Burbage. Assessment however should not be on the basis of a simple comparison of scores.
- 9.50 For, while the WCS policy alone appears to provides a more sustainable alternative than either of the NDP alternatives, it's chief drawback is that it does not reflect local priorities. It is therefore unlikely to be seen by the local community as sufficient.
- 9.51 Option a –the policy as originally proposed – on the other hand reflects peculiarly local issues. For instance, while there is attention paid to encouraging alternatives to the car, there is also a pragmatic recognition that car use is inevitable in such a rural area and that a lack of off-road parking is in fact creating congestion at peak times and in certain locations.
- 9.52 Option b – the 'low-fat' or more sustainable version of 'a' removes the car –parking proposal. It is more sustainable an alternative in terms of lower emissions and sustainable transport use, but at the same time it would benefit the local economy less.
- 9.53 All options have a certain balance to them, and none are particularly harmful, In the end it will be up to local residents to choose whether the economic gains of 'a' outweigh the costs. It would be possible to reduce the potentially negative impact of the car parking by amending the policy to make it clear that only off-road public car parking of a strictly limited scale is proposed.
- 9.54 **Why options were adopted or rejected**  
Option a is the most balanced policy – aimed at both securing economic and environmental benefits. The SA however makes the costs and benefits of three options clear and it will be up to the community to comment and make changes if they wish during public consultation.
- 9.55 **Mitigation measures that would prevent reduce or offset any adverse effects.**  
Specify limited additional parking.

9.56 **Burbage Pre-Regulation 14 Consultation NDP Policy 5 – Economy: Generic Policies**

9.57 **Draft Policy Assessed:**

Economy: Business, Employment and Tourism – Generic Policies	
a.	Working from home and small workshops not likely to impact on the amenity of neighbours by virtue of operation including traffic generation will be permitted throughout the plan area, subject to compliance with other policies of the plan.
b.	Tourism related businesses will be permitted within and without the village LOD, subject to compliance with other policies of the plan.
c.	Farm diversification involving conversion of existing farm buildings or extension of same to a maximum of + 50% of total floor area of the buildings will be permitted in the Parish outside the LoD, subject to acceptable impacts on the openness and scenic quality of the AONB and compliance with other policies of the plan. Where necessary for viability purposes such developments may include a small element of market housing (usually a single dwelling).

Note: Subsequent amendments to policies as a result of SA are given in Appendix 8.

Options considered for this policy together with reasons:

Policy Option	Reason for selection
a The policy in full as stated.	Maximum promotion of local economic development and enhancement of clarity for businesses.
b To have no policy and rely on the WCS e.g. CP 39 and 48.	For purposes of comparison.

Scoring of Options:

Sustainable Objectives	1. Biodiv.	2. Land & soil	3. Water & flood risk	4. Air quality	5. Climatic	6. Historic Env.	7. Landscape	8. Population & Housing	9. Community & Health	10. Education	11. Service Centre	12. Transport	13. Economy & Enterprise
a	0?	0	0	0	0	+	0	+	+	0	+	+	++
b	0?	-	0	0	0	+	0	0	+	0	0	0	+

Impacts of WCS policy are assessed in terms of how they would be likely to impact on Burbage

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### Justification of Scoring 5. a:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Land use will be small. Impact likely to be low.	None needed
Land and Soil	No	LT	R	A	P	Land use will be small – limit imposed on rural development. Impact likely to be low.	None needed
Water and Flood Risk	No	LT	R	A	P	Low risk locally. Small scale of development unlikely to have an impact.	None needed
Air Quality	No	LT	R	A	P	Small quantum of development, unlikely to have an impact	None needed
Climatic	No	LT	I	A	P	Small quantum of development, unlikely to have an impact	Renewable energy
Historic Env.	No	LT	I	A	P	Small quantum of development, unlikely to have an impact	Other policies of NDP and WCS
Landscape	No	LT	I	A	P	Small quantum of development, unlikely to have significant impact. Policy restricts scale	Challenge will be at development management to implement other design policies.
Population & Housing	No	LT	I	A	P	Will enable a few extra homes to come forward as part of tourism schemes.	None needed
Community and Health	Yes	LT	I	A	P	Will encourage fully employment to the benefit of the community.	None needed
Education	No	LT	I	A	P	Little direct benefit or impact	None needed
Serv. Centre	No	LT	I	A	P	Strong promotion of tourism will benefit business.	None needed
Transport	No	LT	I	A	P	Some traffic from rural enterprises likely but policy also promote home working and small businesses in the village.	Promotion of public transport and path / cycle network
Economy	Yes	LT	I	A	P	Significant benefit as policy provides certainty and encouragement for business and jobs.	None needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring 5. b:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Land use will be small. Impact likely to be low.	None needed
Land and Soil	No	LT	R	A	P	Land use will be small – limit imposed on rural development. Impact likely to be low.	None needed
Water and Flood Risk	No	LT	R	A	P	Low risk locally. Small scale of development unlikely to have an impact.	None needed
Air Quality	No	LT	R	A	P	Small quantum of development, unlikely to have an impact	None needed
Climatic	No	LT	R	A	P	Small quantum of development, unlikely to have an impact	Renewable energy
Historic Env.	No	LT	I	A	P	Small quantum of development, unlikely to have an impact	Other polices of NDP and WCS
Landscape	No	LT	R	A	P	Small quantum of development, unlikely to have significant impact.	Challenge will be at development management to implement other design policies.
Population & Housing	No	LT	R	A	P	No direct encouragement so probably neutral	
Community and Health	No	LT	I	A	P	Will encourage fully employment to the benefit of the community. Dedicated policy likely to be more effective	None needed
Education	No	LT	I	A	P	Little direct benefit or impact	None needed
Serv. Centre	No	LT	R	A	P	Promotion of tourism but not as strongly as NDP. Dedicated policy likely to be more effective	None needed
Transport	No	LT	R	A	P	Some traffic from rural enterprises likely, but scale small.	Support for public transport by Wiltshire Council or Government
Economy	No	LT	R	A	P	Benefit, but not as great as NDP policy – less certainty and does not address tourism development viability. Dedicated policy likely to be more effective	Direct grant support for business development

Key: (See also Appendix 5 for an explanation of scoring methodology)

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9.58 **Burbage Pre-Regulation 14 Consultation NDP Policy 5 – Economy: discussion of significant effects envisaged.**

9.59 The sustainability effects of the two options are very similar, and in particular, there are no significant negative effects with either.

9.60 However, the real value of option ‘a’, - the NDP policy – over and above the WCS is that it provides local detail, more certainty and, although specifying a physical limit to farm diversification (which the WCS does not directly), is more permissive in housing terms, explicitly stating that a small element of market housing will be permitted as part of rural tourism schemes.

9.61 This policy could help overcome the relatively low exploitation of tourism in the area, despite the great potential for this to contribute more to the employment mix. It is possible therefore that the beneficial economic effects of the NDP policy would be greater than simply relying on the WCS alone.

9.62 **Why options were adopted or rejected**

Option a was adopted because of the housing and economic benefits outlined above.

9.63 **Mitigation measures that would prevent reduce or offset any adverse effects.**

Virtually no negative effects likely, however risk can be offset by good development management and implementation of other NDP and WCS policies.

9.64 **Pre-Regulation 14 Consultation NDP, Economy: Business, Employment and Tourism - Sites**

9.65 **Draft Policy Assessed:**

Employment will be acceptable at the following sites;

1. Hirata I (Expansion of existing facility)
2. Harepath Farm (Expansion of existing facility)

Tourism development will be acceptable at:

3. Wolf Hall (Country Hotel and / or other tourism related use)

**Note: Subsequent amendments to these policies are given in Appendix 8.**

**Options considered for this policy together with reasons:**

Policy Option	Reason for selection
1. Hirata I	Existing factory site – well related to road network. Well shielded in landscape terms from wider AONB. Could be expanded to provide employment within walking and cycling distance of housing.
2. Harepath Farm	Extension of existing site into corner plot with few other uses. Well screened from wider landscape and well related to road network.
3. Wolf Hall	Historic site with associations to Henry VIII puts Burbage on the tourist map. Present building and grounds appear somewhat neglected. Sensitive tourist development could capitalize on history without overall harm to AONB.

**Scoring of Options:**

Sustainable Objectives	1. Biodiv.	2. Land & soil	3. Water & flood risk	4. Air quality	5. Climatic	6. Historic Env.	7. Landscape	8. Population & Housing	9. Community & Health	10. Education	11. Service Centre	12. Transport	13. Economy & Enterprise
Options													
1	-?	-	0	0	-	0	-	+?	+	+?	+	0	++
2	-	-	0	0?	-	0	-	+?	+	+?	+	0	++
3	-	++	0	0	-	++	+?	0	0	+	+	--	++

## Submission Draft

### Justification of Scoring Employment Site 1: Hirata 1

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Possibly a negative impact, although current site is mainly grass so probably not species rich.	Planting, habitat creation as part of scheme. Consider changes to policy.
Land and Soil	No	LT	I	A	P	Will use a part-greenfield site.	None
Water and Flood Risk	No	LT	R	A	P	Low local probability	SUDs
Air Quality	No	LT	I	A	P	Unlikely providing non-polluting uses are accepted.	Change Policy to specify acceptable uses.
Climatic	No	LT	I	A	P	Construction and use will emit carbon. However, proximity to housing will reduce need to travel to work.	Specify renewables in policy?
Historic Env.	No	LT	I	A	P	No significant receptors nearby	None needed.
Landscape	Yes	LT	I	A	P	Will develop greenfield site in AONB, but is well screened from wider landscape.	Landscaping scheme
Population & Housing	No	LT	I	A	P	Employment could make Burbage more attractive to live in.	None needed
Community and Health	No	LT	I	A	P	Employment will benefit wealth of community and well-being.	None needed
Education	No	LT	I	A	P	Possibility or internships and apprenticeships.	None needed
Serv. Centre	No	LT	I	A	P	Will enhance economy and benefit local businesses	None needed
Transport	No	LT	R?	A	P	Well located to road network and within walking distance of housing. Most transport probably by car.	Enhance cycle and footpath network.
Economy	Yes	LT	I	A	P	Will create jobs and support existing businesses. Will improve self-containment of the village.	None needed.

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring Employment Site 2: Harepath Farm

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	Probably a negative impact, although current site is mainly grass so not species rich.	Planting, habitat creation as part of scheme. Consider changes to policy.
Land and Soil	No	LT	I	A	P	Will use a part-greenfield site.	None
Water and Flood Risk	No	LT	R?	A	P	Low local probability	SUDs
Air Quality	No	LT	I	A	P	Unlikely providing non-polluting uses are accepted. Close to main road.	Change Policy to specify acceptable uses.
Climatic	No	LT	I	A	P	Construction and use will emit carbon. However, proximity to housing will reduce need to travel to work.	Specify renewables in policy
Historic Env.	No	LT	I	A	P	No significant receptors nearby	None needed.
Landscape	No	LT	I	A	P	Will develop greenfield site in AONB, but is well screened from wider landscape.	Landscaping scheme
Population & Housing	No	LT	I	A	P	Employment could make Burbage more attractive to live in.	None needed
Community and Health	No	LT	I	A	P	Employment will benefit wealth of community and well-being.	None needed
Education	No	LT	I	A	P	Possibility of internships and apprenticeships.	None needed
Serv. Centre	No	LT	I	A	P	Will enhance economy and benefit local businesses	None needed
Transport	No	LT	R?	A	P	Well located to road network and within walking distance of housing	Enhance cycle and footpath network. Crossing of main road required?
Economy	Yes	LT	I	A	P	Will create jobs and support existing businesses. Will improve self-containment of the village.	None needed.

Key: (See also Appendix 5 for an explanation of scoring methodology)

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### Justification of Scoring Employment Site 3: Wolf Hall

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R?	A	P	Possibly a negative impact as site is fairly overgrown / under-maintained.	Planting, habitat creation as part of scheme. Consider changes to policy.
Land and Soil	No	LT	I	A	P	Brownfield site	None needed
Water and Flood Risk	No	LT	R?	A	P	Low local probability	SUDs
Air Quality	No	LT	I	A	P	Unlikely problem in rural area	None needed
Climatic	No	LT	I	A	P	Construction and use will emit carbon. So will transport	Specify renewables in policy and travel plan.
Historic Env.	Yes	LT	I	A	P	Good development could improve setting of the historic building as it is currently under-maintained.	Design and other policies of NDP and WCS.
Landscape	No	LT	R?	A	P	In AONB, but would a good scheme exposing the house more could enhance historic and cultural resonance of landscape.	Design and landscaping scheme to be carefully negotiated at planning application stage. Specify in policy.
Population & Housing	No	LT	I	A	P	Unlikely given rural location outside village. Could increase local temporary population in summer.	None needed
Community and Health	No	LT	I	A	P	Benefit to local economy will underpin prosperity and well-being.	None needed
Education	No	LT	I	A	P	Historic site could be exploited for educational tourism.	None needed
Serv. Centre	No	LT	I	A	P	Will enhance economy and benefit local businesses	None needed
Transport	Yes	LT	I	A	P	Will increase car journeys.	Specify sustainable travel plan.
Economy	Yes	LT	I	A	P	Will create jobs and support existing businesses.	None needed.

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- 9.66 **Burbage Pre-Regulation 14 Consultation Plan NDP Policy 5 – Economy, SITES: discussion of significant effects envisaged.**
- 9.67 It is not surprising that all three sites put forward for initial SA have benefits in terms of economy, local employment and consolidation of Burbage as a minor local service centre. These must all be weighed against the various environmental negatives (few of which are of great magnitude).
- 9.68 There are some environmental costs involved with all options, but these can to a considerable degree be mitigated as indicated. In the case of Wolf Hall, there is a significant negative in terms of its unsustainable location from a transport point of view. However, a requirement added to the policy for a sustainable transport plan could help reduce the negative impact here. While located in the AONB, the existing site is under-maintained and detracts from the landscape at present. Development, if correctly designed, could lead to landscape and heritage benefits.
- 9.69 **Why options were adopted or rejected**  
None of the options is worthy of rejection, since all have positive impacts to weigh against any disadvantages. In addition, significant mitigation is possible. Taking them forward will depend on community support.
- 9.70 **Mitigation measures that would prevent reduce or offset any adverse effects.**  
As described above.

9.71 **Burbage Pre-Regulation 14 Consultation NDP Policy 6 – Local Green Space**

9.72 **Draft Policy Assessed:**

Green Spaces
<p>The following are formally designated as Green Space and will remain as open spaces, retaining their existing recreational uses.</p> <p>a. Children’s playground and Barn Meadow b. Red Lion Field</p> <p>New residential or employment development will not be permitted on the Green Spaces. Extension of existing buildings or new buildings for recreational or community use will however be permitted.</p>

Note: Subsequent amendments to these policies are given in Appendix 8.

**Options considered for this policy together with reasons:**

Policy Option (Sites)	Reason for selection
1. Barn Meadow (and children’s playground)	Best Fits NPPF Criteria for Local Green Space – see also Site Selection Report
2. Red Lion Field	Best Fits NPPF Criteria for Local Green Space – see also Site Selection Report

**Scoring of Options:**

Sustainable Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Options													
1	+	++	++	+	++	++	++	+	++	++	+	+	+
2	+	++	++	+	++	0	++	+	++	++	+	+	+

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### Justification of Scoring 1.Barn Meadow

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Areas are not species-rich but retention would preserve what there is. Surrounding trees are nesting sites for birds.	None needed
Land and Soil	Yes	LT	R	A	P	Retention of land would prevent more intensive use.	None needed
Water and Flood Risk	Yes	LT	R	A	P	Presence of tracts of grass in village centre assists with drainage.	None needed
Air Quality	No	LT	I	A	P	Little problem with air quality but open space will clearly help this.	None needed
Climatic	Yes	LT	R	A	P	Green spaces in village centre will help prevent heat island effect as climate warms.	None needed
Historic Env.	Yes	LT	I	A	P	Retention as green open space will enhance conservation area setting.	None needed
Landscape	Yes	LT	R	A	P	Retention of green open space contributes positively to landscape setting of the village.	None needed
Population & Housing	No	LT	R	A	P	Green spaces are part of attraction of Burbage as a place to live. Sufficient housing sites have been allocated so retention will not compromise housing.	None needed
Community and Health	Yes	LT	R	A	P	Space is well used by community for formal and informal exercise.	None needed
Education	Yes	LT	R	A	P	Part of area is used for physical education by the school.	None needed
Serv. Centre	No	LT	R	A	P	Green open space adds to attractiveness of area for investors.	None needed
Transport	No	LT	R	A	P	Contains current footpaths. Retention keeps link open for footpath enhancement and linking parts of village by sustainable means.	None needed
Economy	No	LT	R	A	P	Green open space adds to attractiveness of area for investors.	None needed

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### Justification of Scoring 2. Red Lion Field

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Areas are not species-rich but retention would preserve what there is. Surrounding trees are nesting sites for birds.	None needed
Land and Soil	Yes	LT	R	A	P	Retention of land would prevent more intensive use.	None needed
Water and Flood Risk	Yes	LT	R	A	P	Presence of tracts of grass in village centre assists with drainage.	None needed
Air Quality	No	LT	R	A	P	Little problem with air quality but open space will clearly help this.	None needed
Climatic	Yes	LT	R	A	P	Green spaces in village centre will help prevent heat island effect as climate warms.	None needed
Historic Env.	No	LT	R	A	P	No receptors nearby	None needed
Landscape	Yes	LT	R	A	P	Retention of green open space contributes positively to landscape setting of the village.	None needed
Population & Housing	No	LT	R	A	P	Green spaces are part of attraction of Burbage as a place to live. Sufficient housing sites have been allocated so retention will not compromise housing.	None needed
Community and Health	Yes	LT	R	A	P	Space is well used by community for formal and informal exercise.	None needed
Education	Yes	LT	R	A	P	Part of area is used for physical education by the school.	None needed
Serv. Centre	No	LT	R	A	P	Green open space adds to attractiveness of area for investors.	None needed
Transport	No	LT	R	A	P	Contains current footpaths. Retention keeps link open for footpath enhancement and linking parts of village by sustainable means.	None needed
Economy	No	LT	R	A	P	Green open space adds to attractiveness of area for investors.	None needed

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- 9.73 **Burbage Pre-Regulation 14 Consultation Plan NDP Policy 6 – Local Green Space (Sites): discussion of significant effects envisaged.**
- 9.74 The assessment found no significant negative effects for either proposed Local Green Space. Both contribute significantly to the overall sustainability of Burbage from their value to community health, well-being and education to their positive effects on drainage and climate change adaptation.
- 9.75 Given the number of housing sites proposed elsewhere, retention of both green spaces will not compromise the delivery of housing, while their presence does much to raise the quality of the local environment, boosting attractiveness to inward migration.
- 9.76 **Why options were adopted or rejected**  
SSR explains site selection rationale.
- 9.77 **Mitigation measures that would prevent reduce or offset any adverse effects.**  
None needed.

9.78 Burbage Pre-Regulation 14 Consultation NDP Policy 7 – Transport

9.79 Draft Policy Assessed:

Transport
<p>a. Developers will need to demonstrate how their scheme links to the existing footpath or cycle network. Where reasonable opportunities exist to physically connect to these networks, the new schemes should include proposals to do so. Where direct connection is not possible proposals should indicate an off-site provision. Financial contributions towards enhancing the overall network are acceptable and may be sought under the Developer Contributions Policy.</p>
<p>b. New housing or housing development within the LOD will be required to demonstrate that sufficient parking is provided within the scheme to prevent the need for residents to park on the street. Where adequate parking cannot be physically provided on site contributions toward suitable public parking facilities elsewhere in the village will be acceptable.</p>

Note: Subsequent amendments to polices as a result of SA are given in Appendix 8.

Options considered for this policy together with reasons:

Option	Reason for selection
a. Policy in full as stated	Policy derives from community engagement
b. Section a only	To compare with policy excluding additional car parking element
c. No Policy – rely on Wiltshire Core Strategy	For purposes of comparison.

Scoring of Options:

Sustainable Objectives	Biodiv.	Land & Soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Options													
a.	-?	-?	-?	-?	+	0	-?	+		0	++	++	++
b.	0	0	0	+	++	0	0	0	++	0	+	+	+
c.	0	0	0	+	+	0	0	0	+	0	-?	-?	-?

N.B. Scoring of 'c' reflects likely effects on Burbage.

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### Justification of Scoring: a

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	More land used for parking could detract from biodiversity but depends on sites chosen.	Landscaping
Land and Soil	No	LT	I	A	P	Car parking would use land; however, quantum would probably be very small.	Establish quantum needed in policy?
Water and Flood Risk	No	LT	R?	A	P	Additional parking could speed run-off.	SUDs
Air Quality	No	LT	I	A	P	Car parking could encourage car use leading to more pollution, but effect, if any likely to be slight. People have cars in Burbage because they need them.	Tree planting?
Climatic	No	LT	R?	A	P	Car parking could lead to more car use, but effects of sustainable transport network proposed would be likely to more than off-set this.	Tree planting?
Historic Env.	No	LT	I	A	P	No direct effect likely	None needed
Landscape	No	LT	R?	A	P	Car parks could affect landscape quality, but only small ones are proposed and effect would depend on location.	Landscaping
Population & Housing	No	LT	I	A	P	Adequate parking would make Burbage more attractive as a place to live.	None needed
Community and Health	No	LT	I	A	P	Adequate parking could reduce road hazards caused by congestion and would help to boost local economy.	None needed
Education		LT	I	A	P	Unlikely to be any direct effects.	None needed
Serv. Centre	Yes	LT	I	A	P	Good parking would significantly improve business prospects, especially retail, but also tourism.	None needed
Transport	Yes	LT	I	A	P	Significant improvement for car users and sustainable transport	None needed
Economy	Yes	LT	I	A	P	Significant boost to local economy and attractiveness to investment from ease of parking and access.	None needed

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### Justification of Scoring: b

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	No habitat disturbance likely	None needed
Land and Soil	No	LT	R	A	P	No land take for car parks	None needed
Water and Flood Risk	No	LT	R	A	P	Drainage unaffected	None needed
Air Quality	No	LT	R	A	P	No impact likely – footpaths could in fact reduce pollution by cutting car use. Effect however small due to low traffic volumes	None needed
Climatic	Yes	LT	R	A	P	Could reduce carbon emissions by providing alternative to car use for local journeys.	None needed
Historic Env.	No	LT	I	A	P	Unlikely to affect this issue	None needed
Landscape	No	LT	R	A	P	Unlikely to affect this issue	None needed
Population & Housing	No	LT	R	A	P	Unlikely to have a direct effect	None needed
Community and Health	Yes	LT	R	A	P	Significant positive effect by facilitating exercise	None needed
Education	No	LT	I	A	P	Unlikely to affect this issue	None needed
Serv. Centre	No	LT	R	A	P	Likely to facilitate transport but would not benefit retail businesses as well as option a.	None needed
Transport	No	LT	R	A	P	Would benefit sustainable transport but not car users or customers for retail businesses.	None needed
Economy	No	LT	R	A	P	Likely to facilitate transport but would not benefit retail businesses as well as option a.	None needed

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## Submission Draft

### Justification of Scoring: c

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	No habitat disturbance likely	None needed
Land and Soil	No	LT	R	A	P	No land take for car parks	None needed
Water and Flood Risk	No	LT	R	A	P	Drainage unaffected	None needed
Air Quality	No	LT	R	A	P	No impact likely.	None needed
Climatic	No	LT	R	A	P	Overall WCS policies promote sustainable over non-sustainable modes.	None needed
Historic Env.	No	LT	R	A	P	Unlikely to affect this issue	None needed
Landscape	No	LT	R	A	P	Unlikely to affect this issue	None needed
Population & Housing	No	LT	R	A	P	Unlikely to affect this issue	None needed
Community and Health	No	LT	R	A	P	Overall WCS policies promote sustainable over non-sustainable modes.	None needed
Education	No	LT	R	A	P	Unlikely to affect this issue	None needed
Serv. Centre	No	LT	R	A	P	Concentration on sustainable transport may hold economy back – there is little choice for Burbage but to rely on the car	Subsidised public transport
Transport	No	LT	R	A	P	Contains a balanced transport policy overall	NDP policy for Burbage promoting more locally relevant policy
Economy	No	LT	R	A	P	Concentration on sustainable transport may hold economy back – there is little choice for Burbage but to rely on the car	NDP policy for Burbage promoting more locally relevant policy

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- 9.80 **Burbage Pre-Regulation 14 Consultation NDP Policy 7 – Transport : discussion of significant effects envisaged.**
- 9.81 Arguably, the most sustainable policy in terms of environmental impact would be ‘b’, since this builds on the fundamentally sustainable foundations of WCS policy while adding more local detail and increasing the possibility that a unified and more effective sustainable transport system could be constructed over the whole village.
- 9.82 However, option ‘a’ does this while promoting the economic growth more likely to lead to improved self-containment in the long term. Additionally, it is more locally relevant; car use is unavoidable in Burbage given the lack of sustainable transport. The car parks proposed are principally small scale and designed to alleviate current congestion issues and promote retail and tourism interest in the village. Negative impacts would occur but they would be of a relatively minor nature and capable of some mitigation.
- 9.83 **Why options were adopted or rejected**  
All options have significant local benefits with the exception of simply relying on WCS policy. While option ‘a’ has some negative impacts none of these are significant and some can be mitigated. This option also addresses some key concerns in the village – especially congestion and a lack of public parking. Option ‘a’ would best support the overall aim of the plan to improve self-containment and overall sustainability by increasing the critical mass of Burbage and boosting its economy.
- 9.84 **Mitigation measures that would prevent reduce or offset any adverse effects.**  
Mitigation is as indicated above for each option. For policy option ‘a’ The policy could be amended so that it limits the scale of parking to be provided to a minimal level.

9.85 Burbage Pre-Regulation 14 Consultation NDP Policy 8 – Heritage

9.86 Draft Policy Assessed:

Heritage
<p>Within the Conservation Area development proposals will have to demonstrate how their schemes reflect the guidance contained within the Burbage Conservation Area Character Appraisal and Management Proposal, February 2008, and in particular how they relate to the specific local character that surrounds them.</p> <p>New development must add positively to rather than detract from the character of the conservation area. This is especially important in terms of design, scale and choice of local or traditional materials.</p> <p>New development must also protect or enhance existing views in and out towards the AONB and not compromise those views enjoyed currently by others.</p>

Note: Subsequent amendments to these policies are given in Appendix 8.

Options considered for this policy together with reasons:

Option	Reason for selection
1. Policy in full as stated.	Policy requires attention be paid to published local guidance. Adds local clarity regarding issues.
2. No Policy - rely on Conservation Area Appraisal and Wiltshire Core Strategy	For purposes of comparison.

Scoring of Options:

Sustainable Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Options													
a.	0	0	0	0	0	++	++	+	+	+	+	0	++
b.	0	0	0	0	0	+	+	+	0	+	+	0	+

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### Justification of Scoring 1:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Land and Soil	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Water and Flood Risk	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Air Quality	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Climatic	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Historic Env.	Yes	LT	R	A	P	Policy requires attention be paid to local guidance and adds detail. Likely to better protect than relying on guidance unsupported along with WCS.	None needed. Good development management implementation will however be key. Linking the CA appraisal to the NDP is designed to ensure more attention is paid to this issue at the critical planning application stage.
Landscape	Yes	LT	R	A	P	Covers landscape issues in relation to CA. Boosts value of Landscape protection	None needed. Good development management implementation will however be key. Policy is designed to ensure more attention is paid to this issue at the critical planning application stage.
Population & Housing	No	LT	R	A	P	Heritage and character is a key element in people wanting to live in Burbage.	None needed
Community and Health	No	LT	R	A	P	Good quality environment likely to underpin wellbeing.	None needed
Education	No	LT	R	A	P	Heritage is a useful educational resource	None needed
Serv. Centre	No	LT	R	A	P	Heritage is part of the attractiveness of the area to inward investors.	None needed
Transport	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Economy	Yes	LT	R	A	P	Developing tourism is a key aim of the Plan. Heritage protection therefore is important to the overall economic development of the village.	None needed

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### Justification of Scoring 2:

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
							None needed
Biodiversity	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Land and Soil	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Water and Flood Risk	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Air Quality	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Climatic	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Historic Env.	No	LT	R	A	P	Some protection still provided but not a string as option 'a'.	None needed. Risk that poor development management could fail to adequately protect heritage.
Landscape	No	LT	R	A	P	Some protection still provided but not a string as option 'a' which adds local detail.	None needed None needed. Risk that poor development management could fail to adequately protect landscape.
Population & Housing	No	LT	R	A	P	Heritage and character is a key element in people wanting to live in Burbage.	None needed
Community and Health	No	LT	R	A	P	Good quality environment likely to underpin wellbeing. Likely to be less effective than option 'a' however.	None needed
Education	No	LT	R	A	P	Heritage is a useful educational resource. Resource better protected by option 'a'.	None needed
Serv. Centre	No	LT	R	A	P	Heritage is part of the attractiveness of the area to inward investors.	None needed
Transport	No	LT	R	A	P	Heritage policy unlikely to have a direct effect on this issue	None needed
Economy	No	LT	R	A	P	Developing tourism is a key aim of the Plan. Protection probably less than with option 'a'.	None needed

**Key:** (See also Appendix 5 for an explanation of scoring methodology)

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9.87 **Burbage Pre-Regulation 14 Consultation NDP Policy 8 – Heritage: discussion of significant effects envisaged.**

Both options offer some protection for heritage, and neither has any negative effects. However, the beneficial effects of option 'a' are greater because the policy is more locally specific and raises the awareness and status of the existing Conservation Area Management Plan. This is likely to have significantly beneficial effects at the development management (planning application) stage.

9.88 **Why options were adopted or rejected**

Option 'a' offers the best protection as well as adding local detail and clarity for developers.

9.89 **Mitigation measures that would prevent reduce or offset any adverse effects.**

None needed, however, the quality of development management will be key in determining outcomes.

## 10.0 Cumulative effects of the Pre-Regulation 14 Consultation NDP

### 10.1 Introduction

While an appraisal of an individual policy is a valuable exercise, in reality actual impacts of the NDP on the plan area will be complex and arise from interplay of factors, acted on by the entire range of policies. Such effects 'add-up' to become cumulative, over both time and space. Some of these effects can be unintended and it is therefore important to consider these effects when drafting and subsequently modifying policy.

10.2 The SEA Regulations require consideration of likely significant effects, to include;

- Accumulative (building up over time or in an area)
- Secondary (indirect effects that may be other than intended or in ways unintended)
- Synergistic (combined effects of policies working together).

Effects must be considered over varying timescales and an assessment made as to whether these are likely to be positive or negative. An appraisal may suggest mitigation measures for cumulative effects. It should be noted that it is difficult to do more than anticipate general trends in assessing a matter as complex as cumulative effects of a plan upon a complex interplay of environmental, social, economic and other factors.

10.3 The draft policies of the NDP have been found to have a range of sustainability implications and these are outlined in the previous section. Broadly however, it can be stated that:

10.4 The proposed Vision, Objectives and Policies do amount to a consistent strategy aimed at logical and legitimate planning outcomes.

10.5 The underlying nature of the Plan is a strategy that seeks to achieve social and economic outcomes at an acknowledged but acceptable environmental cost; harnessing economic growth to improve facilities, quality of life and employment, thus in turn improving 'self-containment' and the overall sustainability of Burbage. It accepts that economic and infrastructure development will have an environmental price but seeks to mitigate that whenever possible.

10.6 This is a dynamic strategy, but clearly not one without environmental risks or costs. The question for the community is whether these costs and risks are reasonable, whether they are capable of adequate and effective mitigation and whether they represent a price worth paying for wider sustainability objectives.

### 10.7 Most significant cumulative effects

The most significant cumulative effects of the NDP strategy are likely to result from the proposed level of housing and employment growth. The actual effects cannot be known precisely and will depend on the nature of development in any given location, the quality of development management by the LPA, and the quality of mitigation. However, the most likely significant effects are:

- 10.8 **Housing provision** – the proposed new housing provision is substantial, though not overwhelmingly so in proportion to the scale of Burbage. This will do much to address affordability issues in Burbage and provide new homes for the local workforce to meet the employment needs of new business also proposed. It is not large enough to change the basic ‘village’ nature of Burbage.
- 10.9 There is a good argument that the present size of Burbage is not sufficient to support a wide enough range of services to achieve a desirable level of self-containment. Some growth is therefore needed to reach a more ‘critical mass’. The level of growth seems small enough not to compromise Burbage’s village identity, but large enough to have a meaningful impact on this overarching planning aim.
- 10.10 **Economic Growth** – initial community engagement revealed a desire for more local employment. People enjoy living in the village and they would welcome the opportunity to work there and avoid often congested and expensive commuting on Wiltshire’s roads.
- 10.11 The pro-active nature of the Plan seeks to balance housing and employment growth, allocating sites and setting out clear guidelines. It is an investment, jobs and business--friendly approach that is valid in sustainability terms; likely to deliver favourable outcomes in terms of reducing the need to travel and lowering carbon emissions from transport.
- 10.12 **Infrastructure**  
Housing provision and employment land provision will give significant economic benefits not just through provision of new homes and jobs but through infrastructure delivery and delivery of new/improved services and facilities. The plan includes a Developer Contributions policy that seeks to help deliver this.
- 10.13 The plan also contains requirements for development to be well designed and encourages the provision of green infrastructure such as the retention of Local Green Space and the creation of a network of foot and cycle paths, as well as landscaping schemes and biodiversity enhancement.
- 10.14 **Discussion of negative effects**  
The level of growth proposed could lead to negative effects in relation to:
- Use of Land and soil resources
  - Impact on drainage
  - Landscape impacts
  - Increased car use
  - Increased carbon emissions
- It is not likely that significant cumulative negative effects would occur in relation to climate change. Indeed, the determination of the plan to retain large green areas within the village is likely to mitigate many of the extreme weather impacts expected.
- 10.15 Taking the use of land and soils first; some development is proposed on greenfield sites currently used for agriculture. Even though the plan does prioritise brownfield land, there would be no way to mitigate the loss of this element of the overall resource. It would be a price that would have to be paid to meet the other objectives of the plan.

#### 10.16 **Mitigation**

Other negative impacts however are more amenable to mitigation. For example;

- Any run-off from housing or other development could be managed by means of SUDs. There is currently no great flood risk issue in the village as shown by the flood risk map in Appendix 3.
- Development is proposed in the AONB and outside the village boundary, and this must be considered to be a negative impact. However, the sites are in general well screened from the wider landscape and are immediately adjacent to the village. Wiltshire Core Strategy policy allows village boundaries to be changed via the neighbourhood plan process. All such sites are well related to services and facilities and would be linked by the proposed extensions of the footpath and cycle network. Mitigation, to varying degrees, is possible in every case by careful landscaping and preservation of key views in the designs.
- Increased development could result in increased car use. An absence of good local public transport makes this hard to avoid. However, one should distinguish between car ownership and car use. Most new residents are likely to own a car. However, increasing the critical mass and facilities of the village, plus providing a network of paths and cycleways could limit actual car use as the synergy between greater critical mass of population, more services being provided and realistic non-car alternatives for local journeys should combine to improve sustainability overall. This overall spatial sustainability of Burbage as a settlement is perhaps the Key aim of the entire plan.
- Human development usually results in increased carbon emissions; however, mitigation is possible through implementation of sustainable construction methods. This is already encouraged by policies of the WCS by Building Regulations. Tree and landscaping as part of the plan would also help offset carbon used in construction.
- The substantial landscaping required by the plan and the retention of large areas of Green Space will to some extent offset carbon emissions and will reduce impact of severe weather events in terms of flash flooding and the 'heat island' effect.

#### 10.17 **Discussion of Synergistic and Cumulative Effects**

Broadly speaking, the plan is expected to have generally positive effects on the local community in terms of improving quality of life, including and access to housing and jobs, enhancing local infrastructure and underpinning economic prosperity. This will mainly come from the synergy between economic and infrastructure benefits.

10.18 The challenge for the plan will be to reduce the environmental impacts of the development necessary to achieve these aims on landscape, heritage, biodiversity, waste, flood risk, climate change and in terms of transport effects. Mitigation is possible to a significant degree, although effectiveness will depend upon the vigilance of development management and the success or otherwise in implementing policy.

10.19 Despite successful mitigation not all negative effects can be avoided, the plan is inevitably a compromise and the trade-off between social and community benefits proposed is ultimately something for the community to assess.

## 11.0 Overall sustainability of the Pre-Regulation 14 Consultation Plan NDP Strategy

- 11.1 The main thrust and effect of the plan is likely to improve the supply of local homes and jobs, boost infrastructure including services and facilities, and overall to make the village more sustainable in terms of self-containment, resulting in a reduced need to travel. It is this central aim of spatial sustainability that is at the very heart of the 'high growth / high benefit' draft NDP and also seems to reflect community wishes as expressed in the initial community engagement.
- 11.2 The pre-regulation 14 NDP however comes with risks. This Sustainability Appraisal Report has assessed the likely effects of implementing the NDP Strategy and it has found that significant effects, both positive and negative, are possible in a number of areas. These are described above. It has also been shown however that, while it will be possible to mitigate the negative impacts, there will still be a significant environmental cost to pay for the level of growth proposed.
- 11.3 It is worth considering at this point, as an alternative, what would happen without a plan. It is of course true that, if the NDP is not adopted, the Wiltshire Core Strategy (WCS) will continue to offer a planning context, as will the Framework (NPPF). However, this alternative would provide less detail and certainty for developers and, crucially, is less ambitious for Burbage in terms of growth and economic development.
- 11.4 Relying on the exiting development Plan and the NPPF alone could result in higher levels of environmental protection – for example:
- Probably lower car use
  - Less land and soil use
  - Probably lower carbon emissions
  - Development in AONB prevented.
- 11.5 On the other hand, the NDP is markedly more ambitious in terms of attempting to create a significant increase in economic and physical self-containment, underpinned by more substantial provision of housing and employment.
- 11.6 It is therefore likely that simply 'not planning' in terms of creating an NDP would result in negative effects of its own including:
- Fewer homes delivered
  - Less local jobs
  - Less developer funding to provide needed infrastructure including a new village hall.
  - Greater reliance on employment and services outside the village leading ultimately to greater commuting.
  - Un-coordinated development not resulting in joined up infrastructure (e.g. a system of paths and cycle ways).
- 11.7 Perhaps the most decisive argument is that the NDP, by encouraging more growth (and *balanced* growth) is likely to create better self-containment and have a greater impact on reducing the need to travel than the exiting planning framework. The key question however is whether the price in terms of environmental impact is worth paying?

## 12.0 Effect of the Sustainability Appraisal on the Pre-Regulation 14 Consultation Plan NDP

- 12.1 Sustainability Appraisals is intended to be an iterative process – both advising, informing and changing policy as it evolves. This has been the case with the Burbage NDP.
- 12.2 The first SA exercise was undertaken on the draft Vision, Objectives and Policies of the Pre-Regulation 14 Consultation Draft. This early draft was based on ideas developed from early community engagement and the SA Scoping Report.
- 12.3 During this exercise as can be seen in the scoring tables above, the SA team made suggestions, principally on how the plan could be improved, especially in terms of mitigation. These suggestions were taken forward and the Regulation 14 Draft duly amended before going out to the Regulation 14 consultation itself. These changes can be seen in Appendix 8 to this report. Additionally, it is possible to compare, side-by-side the texts of the Vision, Objectives and Policies given here in the SA (the original ones) with the modified text that is, as a result, in the NDP Regulation 14 Consultation Draft.
- 12.4 Following the Regulation 14 Consultation, any changes made to the NDP were again subjected to SA and this is recorded in the following section. No changes were made as a result of the SA this second time.

## Burbage NDP VISION

Burbage will continue to flourish as a living, working village. Future developmental growth will be moderate and in general keeping with Burbage's position in the settlement hierarchy of the Wiltshire Core Strategy as a 'Large Village'.

Housing development will continue to slowly grow the village in a moderate manner, but, whenever possible, this will be matched by appropriate local employment opportunities to improve the self-containment of the village and reduce the need for out-commuting as far as is possible. We will protect the most important green spaces.

The vitality of the village will be enhanced by the provision of new infrastructure including if possible an extended doctor's surgery and better facilities for recreation and young people. Parking and road safety will be improved as will sustainable transport such as the foot and cycle path network.

The BNDP intends to ensure that the local community has a powerful voice in managing future change in the village and in particular a greater say in where, how, what and when development occurs.

### 13.2 The Vision

The original Vision read as follows:

Burbage will flourish as a living, working village. Any future development in Burbage Parish should support the local economy, provide high quality accommodation for all our community and respect the individual character of where we live, especially in protecting our natural environment and valued green spaces.

The vitality of the village will be enhanced, and new housing will be matched by suitable employment opportunities and infrastructure capable of supporting this development.

The Parish wishes to reduce its carbon footprint by encouraging greater use of local amenities, thus reducing the need to travel away from the village whilst promoting healthy life styles, well-being and an improved physical and social environment.

The BNDP intends to ensure that the local community has a powerful voice in managing future change in the village and in particular a greater say in where, how, what and when development occurs.

### 13.3 The new Vision reads:

13.4 **Scoring of Original Vision.** The original Vision Scored as follows:

Sustainability Objectives	Economy & Enterprise	Transport	Service Centre	Education	Community & Health	Population & Housing	Landscape	Historic Env.	Climatic	Air quality	Water & flood risk	Land & soil	Biodiv.
Plan Objectives													
VISION	++	++	++	0	++	++	0	+	+	0	0	0	+

13.5 **Scoring of New Vision**

The scoring is very similar but more positive for sustainability in the areas of Land / Soil (less land used - fewer houses) and Landscape (less impact - less housing). Only the Population and Housing indicator is lower, although still positive.

Sustainability Objectives	Economy & Enterprise	Transport	Service Centre	Education	Community & Health	Population & Housing	Landscape	Historic Env.	Climatic	Air quality	Water & flood risk	Land & soil	Biodiv.
Plan Objectives													
VISION	++	++	++	0	++	+	+	+	+	0	0	0/+	+

13.6 Given the similarity of the underlying themes between the two Visions, and the fact that the changes to the Vision reflect a lower level of development with lower impacts, it is not considered necessary to add further justification to the scores above, which demonstrate, together with the analysis from the original Vision that the new Vision is also likely to deliver sustainable development.

## The OBJECTIVES OF THE Burbage NDP

1. To deliver the housing and employment the village needs
2. To steer development to locations that are supported by the community
3. To encourage employment, including tourism and micro and start-up businesses
4. To ensure that the community benefits in terms of improved infrastructure
5. To encourage healthy lifestyles, reduce car use and improve sustainable transport
6. To protect and if possible enhance the recreational green spaces of the Parish
7. To protect the quality, character and local distinctiveness of the natural and historic landscape and village buildings, and maintain high design quality, especially within the conservation area
8. To improve opportunities for leisure and recreation, especially for young people.

- agricultural diversification, maintaining and expanding local services and facilities, especially those for young people, in order to reduce the need to travel
5. To ensure that the community benefits from new development and to specify main village needs. New development should be matched by necessary infrastructure and development and CIL monies should be used to fill existing infrastructure gaps and to upgrade ageing facilities (such as the village hall) or improve deficiencies.
  6. To encourage healthy lifestyles, reduce car use and improve sustainable transport infrastructure such as paths, crossings and bus services.
  7. To protect and if possible enhance the recreational green spaces of the Parish
  8. To protect the quality, character and local distinctiveness of the natural and historic landscape and village buildings, and maintain high design quality, especially within the conservation area
  9. To protect and enhance public and on-street parking.

And, the new Objectives are:

- 13.8 With the exception of deletion Objective 9 (village car park), the Objectives remain very similar.

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13.9 The Original Objectives scored as follows:

Scoring of Objectives:

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Health	Community & Education	Service Centre	Transport	Economy & Enterprise
Plan Objectives													
1	0	--	0	0	-	0	0	++	+	+	++	0	++
2	+	++	0	0	0	0	++	0	0	0	0	0	0
3	0	+	0	0	+	0	0	0	+	0	+	++	++
4	0	-	0	0	+	+	-	0	+	0	++	++	++
5	+	0	0	+	+	0	0	0	++	+	++	++	++
6	+	+	+	++	+	0	+	0	++	+	+	0	+
7	++	++	++	++	+	0	+	0	++	+	+	++	++
8	+	0	+	0	0	++	++	+	+	+	+	0	+
9	-	-	-	-	-	-	-	+	-	0	++	-	++

13.10 The new Objectives score like this:

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Health	Community & Education	Service Centre	Transport	Economy & Enterprise
Plan Objectives													
1	0	-	0	0	0	0	0	+	+	+	+	+	+
2	+	++	0	0	0	+	++	0	0	0	0	0	0
3	0	0	0	0	+	0	0	0	+	0	+	++	++
4	0	-	0	0	+	+	0	0	+	0	++	++	++
5	+	0	0	+	+	0	0	0	++	+	++	++	++
6	+	0	0	++	+	0	0	0	++	0	+	++	+
7	++	0	0	0	+	++	++	0	0	+	0	0	+
8	+	0	0	+	0	0	+	0	++	+	+	+	0

13.11 As with the Vision, the Objectives remain fundamentally similar to the original set, but with a lower level of development underlying them. Impacts will inevitably be lower therefore and the above table indicates more positive and fewer negative scores. With this in mind, it is not considered necessary to repeat the full justification tables. However, the following comments can be made.

13.12 In terms of Justifying the above scores, this is not considered to be necessary in detail, as they are fundamentally similar to the original Objectives. However, it can be said that:

- The dropping of Objective 9 (the Car Park) significantly improves the overall sustainability the Objectives, since this was an element that would encourages car use, with subsequent impacts on air quality, land use and distance travelled.
- On the other hand, the reduced quantum of development underlying these Objectives means that, although more benign to the environment, they will produce fewer positives scores – less benefits - under the headings ‘Population and Housing’ and ‘Service Centre’. Fewer homes will be created and the village population will be lower, encouraging fewer businesses and services.
- The original Objectives were assessed as having an overall positive effect on Sustainability. The new ones, being very similar but involving less development are clearly likely to have an even more positive impact.

### 13.13 **The Policies**

There were both positive (retaining or adding to) and negative (removing or deleting) changes resulting from the regulation 14 consultation. The deletions and retentions require no additional assessment. These were:

1. a. - deleted
1. b - deleted
1. c – substantially retained.
- 1 d. - substantially retained
2. a – retained
2. b – retained
2. c - deleted
3. a – retained (Grafton Road Site)
3. b – deleted
3. c – deleted
3. d - deleted
4. a – deleted (Village Hall)
4. b – substantially retained
4. c – deleted
4. d – deleted
4. e – deleted
4. f – retained
5. a – substantially retained
5. b – retained
5. c. – substantially retained, although market housing element removed.
5. (Sites) 1 - deleted
5. (Sites) 2 - retained
5. (Sites) 3 - deleted
6. a – retained
6. b - retained
7. a – substantially retained
7. b – substantially retained
8. all parts – substantially retained (some detail added re viability).

13.14 The new elements of policy which do require further SA assessment were:

- 1. i – Infilling
- 1. iii – First Time Buyers
- 2. iii - New policy element re disabled access
- 4. i - Policy element re Drs. surgery
- 4. iv - New policy element re tree planting

13.15 1. i – Infilling  
1. iii – First Time Buyers

Policy 1 - Development Strategy	
i.	Apart from the sites allocated in this plan, most future local housing need is expected to be met by small-scale infilling and modest schemes of up to 10 houses. Any larger non-infill schemes will have to demonstrate a clear need for development on this scale within the context of Wiltshire Core Strategy Policies 1,2 and 18.
iii.	In all developments of greater than 5 units a proportion of homes should be aimed at first-time buyers. For the purposes of this policy, this means one and two-bedroom dwellings.

**Policy 1. Scoring of new policy elements**

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Policy elements													
i.	0	0	0	0	0	0	+	+	0	0	0	0	0
iii.	0	0	0	0	0	0	0	+	+	0	0	0	0

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### Justification of Scoring i):

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No.	LT	I	A	P	Small scale of development. Some on brownfield.	Other policies of the WCS and NDP. Planning conditions can also mitigate impacts.
Land and Soil	No	LT	I	A	P	Small scale of development. Some on brownfield.	Other policies of the WCS and NDP. Planning conditions can also mitigate impacts
Water and Flood Risk	No	LT	I	A	P	Not a huge issue locally. Even though number of dwellings will increase slightly, unlikely to have a major effect downstream.	Other policies of the WCS. Mitigation possible through SUDS via planning conditions.
Air Quality	No	LT	I	A	P	No present issues and modest quantum of development seems unlikely to increase pollution to a problem level.	Policies of WCS and NDP
Climatic	No	LT	I	A	P	Quantum of development modest. Location unlikely to affect emissions.	None needed
Historic Env.	No	LT	I	A	P	Location unlikely to affect heritage assets due to protection afforded by other policies.	Other policies of the WCS and NDP.
Landscape	Yes	LT	I	A	R	Impacts on AONB will be minimised	Design and Landscape policies of WCS and NDP. Planning conditions can ensure design is landscape- sensitive.
Population & Housing	Yes	LT	I	A	P	Policy will deliver housing.	None needed
Community and Health	No	LT	I	A	P	No significant impact likely, other than small increase in community size.	None needed
Education	No	LT	I	A	P	No direct impact likely from siting development as proposed.	None needed
Serv. Centre	No	LT	I	A	P	Little impact likely from this small growth level.	None needed
Transport	No	LT	I	A	P	Little impact likely from this small growth level.	None Needed
Economy	No	LT	I	A	P	Little impact likely from this small growth level.	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev:** (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
 Spatial Scale; **A** = **Local Area Specific**, **B** = **Cross county border**, **C** = **County wide**; **Perm:** (permanent?) **P**=Permanent, **T** = Temporary **OP** = Option considered

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### Justification of Scoring iii):

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No.	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Land and Soil	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Water and Flood Risk	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Air Quality	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Climatic	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Historic Env.	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Landscape	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Population & Housing	Yes	LT	I	A	P	Will benefit people who cannot currently access Market housing.	None needed
Community and Health	Yes	LT	I	A	P	Will benefit a wider social spread in the population. Open access to housing market wider than would otherwise be the case.	None needed
Education	No	LT	R	A	T?	Possible increase in educational need, but quantum proposed is small so overall little effect.	None needed
Serv. Centre	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Transport	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None Needed
Economy	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev**: (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
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13.16 2. iii new policy element re disabled access

**Policy 2- Housing (General)**

iii. Developments of more than 25 homes should include provision of at least one home specifically design for disabled access or to facilitate care at home whether this is an affordable or open market home.

**Policy 2. Scoring of new policy elements**

<b>Sustainability Objectives</b>	<b>Biodiv.</b>	<b>Land &amp; soil</b>	<b>Water &amp; flood risk</b>	<b>Air quality</b>	<b>Climatic</b>	<b>Historic Env.</b>	<b>Landscape</b>	<b>Population &amp; Housing</b>	<b>Community &amp; Health</b>	<b>Education</b>	<b>Service Centre</b>	<b>Transport</b>	<b>Economy &amp; Enterprise</b>
<b>Policy elements</b>													
iii.	0	0	0	0	0	0	0	+	++	0	0	0	0

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### Justification of Scoring iii):

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No.	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Land and Soil	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Water and Flood Risk	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Air Quality	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Climatic	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Historic Env.	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Landscape	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Population & Housing	Yes	LT	I	A	P	Policy will ensure housing provision is inclusive in accordance with WCS and NPPF. Due to locally good viability this is considered to be affordable.	None needed.
Community and Health	Yes	LT	I	A	P	Policy is socially inclusive and will help disabled people live in the community.	None needed.
Education	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Serv. Centre	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Transport	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed
Economy	No	LT	I	A	P	Tenure or type of resident unlikely to affect this issue	None needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev**: (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
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- 13.17 4. - i new policy element re Doctor's surgery  
 4. - iv new policy element re tree planting

Policy 4 - Developer Contributions
i. To extend the Doctor's Surgery and / or maintain medical facilities in Burbage.
iv. To plant new trees and landscaping especially along sustainable transport links or in areas which would protect landscape from development, or as avenues. Specimen trees in prime locations as landmarks would also be welcomed.

Policy 4. Scoring of new policy elements

Sustainability Objectives	Biodiv.	Land & soil	Water & flood risk	Air quality	Climatic	Historic Env.	Landscape	Population & Housing	Community & Health	Education	Service Centre	Transport	Economy & Enterprise
Policy elements													
i.	0	0	0	0	0	0	0	++	++	0	++	0	0
iv.	++	+	+	+	+	0	+	0	+	0	0	0	0

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### Justification of Scoring i):

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Land and Soil	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Water and Flood Risk	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Air Quality	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Climatic	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Historic Env.	No	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Landscape	No	LT	I	A	P	New facilities unlikely to affect this issue due to small scale needed.	None needed
Population & Housing	Yes	LT	I	A	P	Will help support growing population	None needed
Community and Health	Yes	LT	I	A	P	Will directly support local health care	None needed
Education	No	LT	R	A	P	New facilities unlikely to affect this issue	None needed
Serv. Centre	Yes	LT	I	A	P	New facilities unlikely to affect this issue	None needed
Transport	No	LT	I	A	P	New facilities unlikely to affect this issue	None Needed
Economy	No	LT	I	A	P	New facilities unlikely to affect this issue	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev:** (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
 Spatial Scale; **A** = **Local Area Specific**, **B** = **Cross county border**, **C** = **County wide**; **Perm:** (permanent?) **P**=Permanent, **T** = Temporary **OP** = Option considered

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### Justification of Scoring iv):

S. A. Objectives	Sig. Effect?	Assessment of Effects				Justification / Evidence?	Mitigation?
		Time	Rev ?	Spatial Scale?	Perm ?		
Biodiversity	Yes	LT	R	A	P	Trees and hedgerows will act as habitat and aid connection of habitat.	None Needed
Land and Soil	Yes	LT	R	A	P	Trees help aerate soil	None Needed
Water and Flood Risk	Yes	LT	R	A	P	Trees and hedgerow help drain land.	None Needed
Air Quality	Yes	LT	R	A	P	Trees improve air quality.	None Needed
Climatic	Yes	LT	R	A	P	Trees absorb carbon. Also, act to provide shade and cooling during hot spells.	None Needed
Historic Env.	No	LT	I	A	P	Unlikely to be any impact	None Needed
Landscape	Yes	LT	R	A	P	Will help keep large areas of the village green.	None Needed
Population & Housing	No	LT	I	A	P	Unlikely to be any impact	None Needed
Community and Health	Yes	LT	R	A	P	Improvement in air quality and sense of well-being likely.	None Needed
Education	No	LT	I	A	P	Unlikely to be any impact	None Needed
Serv. Centre	No	LT	I	A	P	Unlikely to be any impact	None Needed
Transport	No	LT	I	A	P	Unlikely to be any impact	None Needed
Economy	No	LT	I	A	P	Unlikely to be any impact	None Needed

Key: (See also Appendix 5 for an explanation of scoring methodology)

Time: **LT** = Long Term, **MT** = Medium Term, **ST** =Short Term; **Rev:** (Reversible): **R**=Effect Reversible, **I** = Effect Irreversible  
 Spatial Scale; **A** = **Local Area Specific**, **B** = **Cross county border**, **C** = **County wide**; **Perm:** (permanent?) **P**=Permanent, **T** = Temporary **OP** = Option considered

## 14.0 New cumulative effects of NDP

- 14.1 The SA of the original (pre-Reg. 14) NDP concluded that the NDP, as then written, intended *'harnessing economic growth to improve facilities, quality of life and employment, thus in turn improving 'self-containment' and the overall sustainability of Burbage'*. This was a high-growth, high social-benefit approach with some environmental costs. In the revised post-Reg. 14 plan, the amount of growth proposed has been significantly scaled back. Nevertheless, this underlying objective remains the same; the plan aims to balance insofar as is possible, employment and housing growth and to make sure that village infrastructure benefits from development, especially in terms of improving its services and facilities. The concern is still with the overall sustainability of the village as a whole.
- 14.2 The effect will still be to improve self-containment and help reduce the need to travel, but to a lesser extent than the earlier plan, since less development equates to lesser funds lower population to support services. On the other hand, environmental impacts will be lower, as there will be lower levels of growth. The village will still develop in line with the overall settlement strategy of the Wiltshire Core Strategy (CP's 1 and 2), perhaps more so and the growth level of the Post-Reg. 14 NDP is more in line with the latter.
- 14.3 The following effects accumulating over time are likely:
- The housing provision level of the new plan is far lower, but still high enough to make a significant contribution to meeting present local affordable need in the short term. Whether it is enough to match rising population levels towards the end of the plan period is open to debate. On the other hand, the new plan could produce more affordable market housing due to the revised new policy requiring smaller units to be built.
  - The village will grow more slowly and take longer to reach a critical mass necessary to underwrite a significant improvement in services
  - The economic benefits of the development proposed will be lower, especially in terms of delivery of new/improved services (such as the Village Hall) and facilities and local employment
  - Local Green Spaces will still be protected, as will heritage
  - Some improvements to sustainable transport improvement will be delivered and it is likely that the Doctor's Surgery will be improved.
  - More green infrastructure will be delivered with consequently better impacts on biodiversity, climate change, flood risk and health and well-being.
  - Less greenfield land will be used by the plan
  - There will be lower impact on the landscape, and especially the AONB
  - Compare with the pre-Reg. 14 draft plan, lower levels of energy and car use will result
  - Benefits will accrue to older and disabled occupants if any other large developments arise.

- 14.4 Since the 'greener' elements of the pre-Reg. 14 plan have been retained, and since the level of environmental harm is likely to be lower with the revised plan, no additional mitigation over that proposed in the original SA is considered to be necessary.

## 15.0 Overall sustainability of the NDP after Reg 14 changes

- 15.1 The main thrust of the plan; to make the village more sustainable in terms of self-containment, thereby helping to reduce the need to travel, is still likely to occur, though at a reduced rate. Housing will still be balanced with employment and a developer contributions policy will ensure some of the infrastructure improvements sought by the community can still be achieved. The causes of heritage, sustainable transport, tourism, local nature habitat and affordable housing will be advanced.
- 15.2 In the above respects the plan is likely to produce the kind of spatial sustainability that is at the heart of both the WCS and Government policy. The NDP policies add to those of the WCS, inserting local detail and providing developers with certainty. They 'plan positively' for development as required by Government guidance to deliver a locally significant amount of housing (and make provision for first time buyers, the elderly and disabled) and match this with locally defined environmental protection and enhancement. It is hard to avoid the conclusion that a more sustainable future would result from implementing the plan than from not having the plan at all.
- 15.3 The significant changes to the draft plan following the Regulation 14 consultation are also testimony to both the democratic nature of the Neighbourhood Planning process and also to the fact that this particular Plan reflects, above all, the will of the community that created it. The community decided against a higher growth strategy, and towards a more balanced and environmentally conscious approach that nevertheless meets the expected growth levels for Burbage as set out in the Wiltshire Core Strategy. The evidence from the SA assisted the debate that enabled the above change.

## 16.0 Monitoring of predicted significant effects

16.1 The SEA Directive requires that the Environmental Report shall include...

*“a description of the measures envisaged concerning monitoring...” and adds;  
“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial measures.”*

16.2 In the UK, The Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 17) stipulates that;

“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”

16.3 Monitoring is intended to:

- Monitor the predicted significant effects of the plan
- Track whether the plan has had any unforeseen effects
- Ensure action can be taken to reduce / offset the significant effects of the plan

16.4 Monitoring is primarily the responsibility of the LPA – Wiltshire Council – which regularly monitors the effects of all parts of the Development Plan and reports these as an Annual Monitoring Report (AMR). There is no need for the Parish Council (lead agency on the NDP) to duplicate these activities.

16.5 However, the Parish Council does have access to local knowledge relevant to monitoring and also wishes to ensure that the plan stays on track and delivers benefits as intended. It is therefore proposed that a Local Monitoring report will be produced once every three years for the life of the plan. This will include some LPA data and some local information based on an inspection and assessment. It can be produced as a table supplemented by a written report. The Report will be made available to the LPA.

16.6 The Local Monitoring Report (LMR) including the Monitoring Table will be prepared for the Parish Council and supplied to the LPA. It will also be made available to the community via the Parish Website. The LMR will take the form of a simple table plus a few paragraphs of explanatory and advisory text.

Monitoring Table

SA Objective Topic	Objective Description	Actual Effects Observed	Monitoring Indicator	Data Source	Recommended Action
<b>Biodiversity</b>	Protect. Enhance. Prevent losses.		Written summary	PC. Local observation	
<b>Land and Soil</b>	Effective use.		Infill development plus site allocated as per policy	PC	
<b>Water and Flooding</b>	Sustainable use. Flood Protection		Reported flood incidents (EA)	EA	
<b>Air and Pollution</b>	Maintain air quality.		Number of complaints to Parish Council	PC	
<b>Climate</b>	Minimise impact Manage effects		Observed climate. Casualties due to extreme weather. Number of trees hedgerows planted due to planning permissions	PC Health Authority PC	
<b>Historic Environment</b>	Protect, promote, enhance.		Number of Objections received by PC to proposals affecting heritage assets.	PC	
<b>Landscape</b>	Conserve AONB and views		Number of Objections received by PC to proposals affecting AONB.	PC	
<b>Population and Housing</b>	Provide everyone with homes		Number of homes delivered. Number with 2 bedrooms or less. Number with disabled facilities	PC / LPA	
<b>Wellbeing and Health</b>	Create healthy environment		State of existing facilities – written summary.	PC	
<b>Education and Skills</b>	Raise attainment		Issues reported to the PC	PC	
<b>Service Centre</b>	Improve range and quality		Number of services gained or lost	PC	
<b>Transport</b>	Reduce need to travel. Promote Sustainable modes.		New facilities gained e.g. metres length of foot and cycle paths.	PC / LPA	
<b>Economy and Enterprise</b>	Encourage employment and provide land.		Occupancy of Harepath farm and extension if delivered. Summary of other employment gains and losses	PC	

16.6 The written summary and conclusion of the LMR will allow the Parish Council to identify not only whether the policies are working, but also what other issues are emerging. It will also enable the Council to judge the effectiveness of mitigation measures proposed. In some cases, monitoring may identify the need for a policy to be amended or deleted, which could trigger a review of the NDP, or for further policy guidance to be developed e.g. as a Supplementary Planning Document.

## Appendices

### **Appendix 1: SEA Screening Decision**

**Strategic Environmental Assessment - Screening determination for the Burbage Neighbourhood Plan**

**14 April 2014 (Updated September 2014)**

**Wiltshire Council**

**Contents**

1. Introduction
2. Legislative requirements
3. The Burbage Neighbourhood Plan
4. SEA Screening assessment
5. SEA Screening determination

## 1. Introduction

- 1.1 This document provides a screening determination of the need to carry out a Strategic Environmental Assessment (SEA) of the Burbage Neighbourhood Plan.
- 1.2 Wiltshire Council, as the 'Responsible Authority'<sup>1</sup> under the SEA Regulations<sup>2</sup>, is responsible for undertaking this screening process of the Burbage Neighbourhood Plan. It will determine if the plan is likely to have significant environmental effects, and hence whether SEA is required.
- 1.3 This process has been carried out in accordance with the requirements of European Directive 2001/42/EC<sup>3</sup>, often known as the Strategic Environmental Assessment (SEA) Directive, which has been transposed into English law by the SEA Regulations.

## 2. Legislative requirements

- 2.1 The Localism Act 2011 requires neighbourhood plans to comply with EU legislation. The screening procedure outlined in this report meets the requirements of the SEA Directive and Regulations, as introduced in Section 1 of this document.

- 2.2 Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:

1. *are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), and which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Regulation 5, para. (2)(b)*

2. *in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Regulation 5, para. (3)*

3. *set the framework for future development consent of projects<sup>4</sup> (Regulation 5, para. (4)(b)*

4. *are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Regulation 5, para. (4)(c)*

An environmental assessment need not be carried out for:

a) *plans which determine the use of a small area<sup>5</sup> at local level (Regulation 5, para. (6)(a); or*

<sup>1</sup>The organisation which adopts the neighbourhood plan (this is described in Wiltshire Council's guide *Neighbourhood planning – a guide for Wiltshire's parish and town councils* (2013) as 'makes the plan').

<sup>2</sup>The Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup>European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"<sup>4</sup> European Commission guidance states that plans and programmes which **set the framework for future development consent of projects** would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. **Development consent** is defined in the EIA Directive as "the decision of the competent authority or authorities which entitled the developer to proceed with the project" (Article 1(2) of the EIA Directive).

<sup>5</sup>European Commission guidance suggests that **plans which determine the use of small areas at local level** might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"



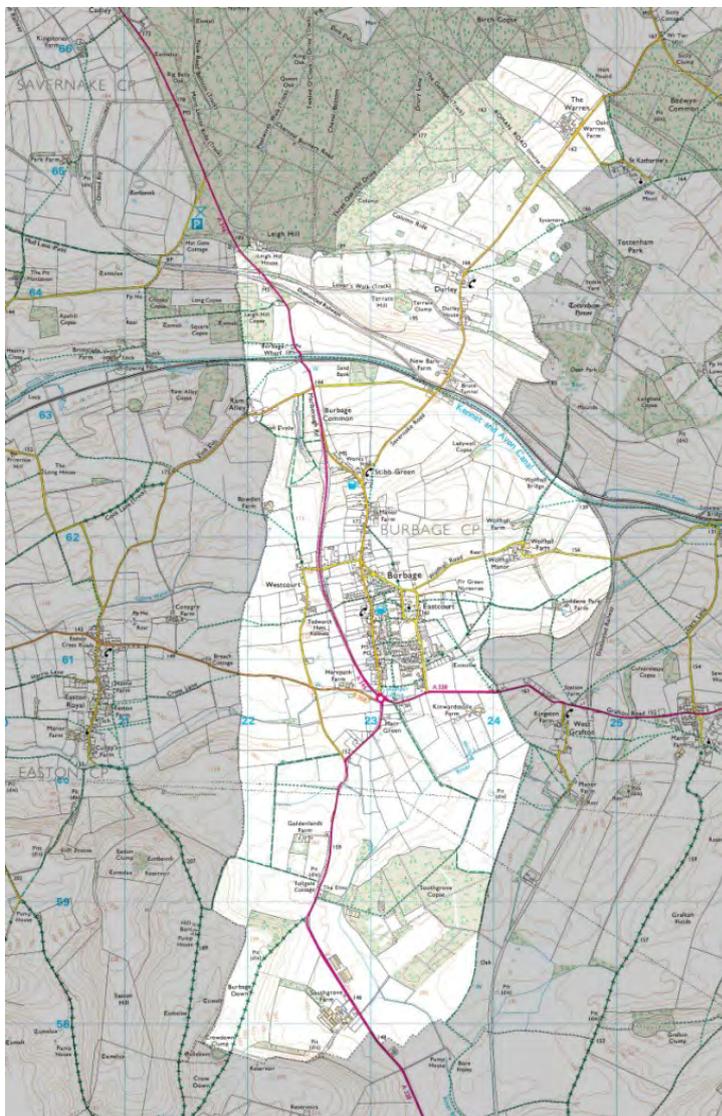
\* Plans falling in this category (No.8) will be screened by Wiltshire Council to determine if they are likely to have significant environmental effects. This determination will be made on a case by case basis.

NB This diagram is intended as a guide to the criteria for application of the Directive to neighbourhood plans. It has no legal status.

### 3. The Burbage Neighbourhood Plan

- 3.1 The Burbage Neighbourhood Plan is a neighbourhood plan for the Burbage Community Area. The ability to produce neighbourhood plans is a function of the Localism Act 2011. The aim is for local communities to have greater control over what happens in their area.
- 3.2 The Burbage Neighbourhood Plan conforms with higher level policy, including the National Planning Policy Framework (NPPF) and the Wiltshire Core Strategy. The Core Strategy sets out strategic objectives for Wiltshire, focusing on key issues and a delivery strategy for achieving these objectives, setting out how much development is intended to happen, where, when, and by what means it will be delivered.

### Neighbourhood Plan Area for Burbage



## Background

- 3.3 Burbage Parish is set in an area of distinctly rural character nestled in the North Wessex Downs AONB. The main settlement, Burbage, has a population of 1660 residents in 760 dwellings (2011 Census). There are a range of services and amenities; two public houses, a Primary school, post office, village shop, farm shop and a garage. 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. Rail access is reasonably close, but public transport provision is poor and a dependence on private car transport is evident.

## Steering Group

- 3.4 The plan process is being led by Burbage Parish Council. As part of the process a steering group has been set up, and is made up of representatives of the community and local businesses. The steering group has had and will continue to have input into the plan making process and help to represent the views of local people in the plan making process.

## Aims and objectives of the Burbage Neighbourhood Plan

- 3.5 The strategy proposed by the Burbage Neighbourhood Plan is broadly in line with the Core Strategy's approach. The Burbage NDP seeks to deliver employment and housing and to support service and retail provision within the Parish. Sustainable development which reduces commuting and encourages young people to stay in the parish are at the heart of this goal.
- 3.6 Following recent consultation by the steering group to the parish key themes have been identified:
1. To provide the opportunity for everyone in the Burbage community to live in good quality, affordable housing, ensuring a mix of dwelling types, sizes and tenure types.
  2. New housing is to be on appropriate brownfield sites in the first instance- infilling within the village boundary. Some areas are to be avoided. (see point 3)
  3. Areas within the village boundary to be protected from development include Barn Field and Red Lion sports areas, existing recreation and play areas, Church Green, the immediate Seymour Pond surrounds and all other publically accessed open spaces.
  4. Sites considered appropriate for housing development include the area adjacent to Seymour Pond, various small infill areas near to existing housing and the brownfield site of the Scout Hut, although this is well used currently by community groups.
  5. Burbage is in a distinctly rural setting and new housing development must not compromise the character and beauty of the setting. Housing design and density must reflect the features of the rural village.
  6. Encourage development of employment opportunities that are small scale units with fewer than 10 employees each, located in areas alongside existing employment sites and away from existing homes.
  7. The Conservation Area status of Burbage village is to be maintained. The village's historic buildings and the pattern of its street, footpaths and public spaces is to be conserved. New amenities can be added, but existing ones cannot be lost.

8. In the interest of conserving and enhancing the natural environment, land allocated for development should be firstly, brownfield or secondly, of lesser environmental value- low quality agricultural land outside the village boundary, such as the area east of Seymour Pond.
9. The Burbage community area's carbon footprint can be reduced by encouraging greater use of local amenities and thus reducing the need to travel away from the village. Infrastructure contributions from developers should be directed towards improving the primary and pre-school education provision, the medical practice, the community facility of the Village Hall and the sports club facilities to provide more for young people in the area to do and to encourage new residents to use local facilities.
10. Increased use of alternative transport methods is to be encouraged through the funding of Car Share Schemes, Community Transport provision and improved Public Transport.
11. Promoting healthy life styles and well-being. The network of footpaths that link Burbage to its neighbours and to the Kennet and Avon Canal, Savernake Forest and the rural hinterland needs to be enhanced and promoted and safety needs to be improved by removing the conflict with vehicles where possible.
12. Any future development must ensure adequate enhancements are made to existing infrastructure- utility provision and waste management for example. This includes the provision of recycling facilities.
13. The provision of Superfast Broadband is more than just desirable- the promotion of homeworking through multi-use housing developments and increased employment sites locally is dependent on Broadband improvement. This will enable appropriate development in terms of size and design, reduce the need to commute, increase the use of local services and businesses and promote economic improvement. Pressure from Developers needs to be brought to bear on Providers to implement this essential service.

## Neighbourhood Plan Designation

- 3.7 Consultation on the designation of the Burbage Neighbourhood Plan took place between 17 March – 30 April 2014.

## 4. SEA Screening assessment

- 4.1 Wiltshire Council, as the responsible authority, considers that the Burbage Neighbourhood Plan falls within the scope of the SEA Regulations on the basis that it is a plan that:
- a)** is subject to preparation or adoption by an authority at national, regional or local level (Regulation 2);
  - b)** that is prepared for town and country planning or land use and it is a plan that sets the framework for the future development consent of projects generally (Regulation 5, para 4); and
  - c)** will apply to a wider area other than a small area at local level and is not a minor modification to an existing plan or programme (Regulation 5, para.6).
- 4.2 A determination under Regulation 9 is therefore required as to whether the Burbage Neighbourhood Plan is likely to have significant environmental effects.

- 4.3 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations includes two sets of characteristics for determining the likely significance of effects on the environment. These relate to i) the characteristics of the Burbage neighbourhood plan and ii) the characteristics of the effects and of the area likely to be affected by the Burbage Neighbourhood Plan. In making a determination, Wiltshire Council will take into account the criteria specified in Schedule I as follows:

### **1. The characteristics of the plans and programmes, having regard in particular to:**

- (a)** the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- (b)** the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- (c)** the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- (d)** environmental problems relevant to the plan or programme; and
- (e)** the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

### **2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:**

- (a)** the probability, duration, frequency and reversibility of the effects;
- (b)** the cumulative nature of the effects;
- (c)** the transboundary nature of the effects;
- (d)** the risks to human health or the environment (for example, due to accidents);
- (e)** the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- (f)** the value and vulnerability of the area likely to be affected due to—
  - (i)** special natural characteristics or cultural heritage;
  - (ii)** exceeded environmental quality standards or limit values; or
  - (iii)** intensive land-use; and
- (g)** the effects on areas or landscapes which have a recognised national, Community or international protection status.

(h)

4.4 The screening assessment of the Burbage Neighbourhood Plan is set out below:

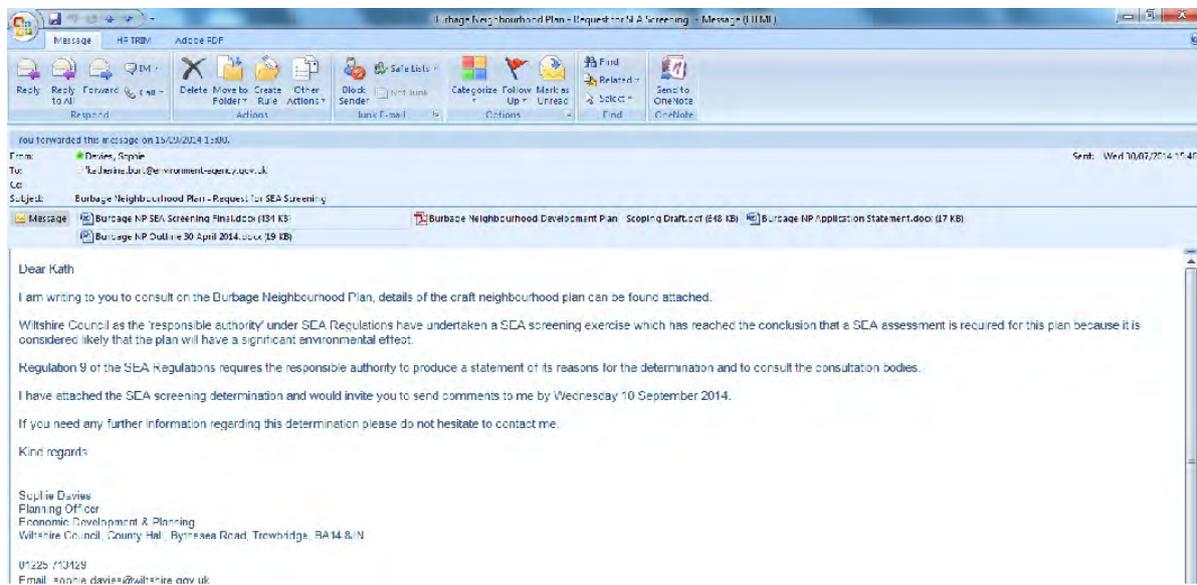
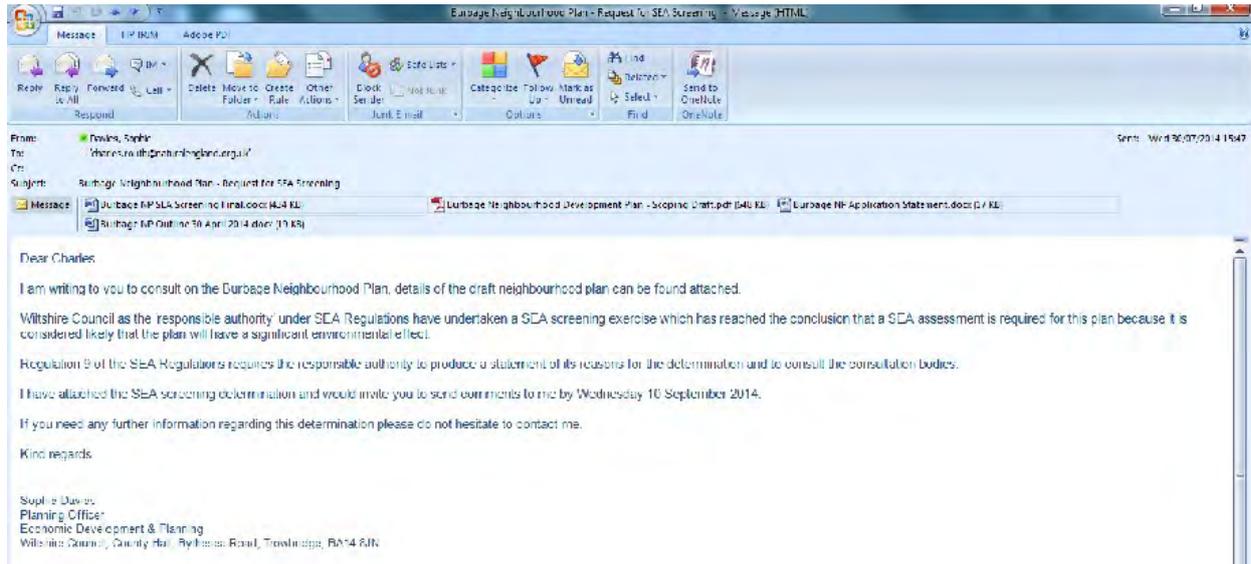
Criteria (Schedule 1 SEA Regs.)	Significant environmental effect likely?	Justification and evidence
<b>1. The characteristics of plans, having regard, in particular, to:</b>		
(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The neighbourhood plan will set a new policy framework for the parish. It will set a framework for projects and activities in terms of deciding the location for new development and the nature, size and operating conditions of such <u>developments</u> .
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	No	The neighbourhood plan must be in conformity with the Wiltshire Core Strategy. It will inform future revisions to the Core Strategy but not to the extent where significant environmental <u>effects would be likely</u> .
(c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The neighbourhood plan will accord with other plans and programmes that require it to support the delivery of sustainable development.
(d) environmental problems relevant to the plan	No	The neighbourhood plan will seek to address environmental problems that are relevant to the parish but there are no specific significant <u>environmental problems that need resolving</u> .
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	No	Implementation of Community legislation is dealt with at the higher policy level through the Wiltshire Core Strategy. Neighbourhood plans are a voluntary mechanism and not required for implementing Community legislation.
<b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
(a) the probability, duration, frequency and reversibility of the effects	? <sup>7</sup>	The neighbourhood plan will set the vision, objectives and strategy for new development in the parish and therefore effects are likely and <u>long-term</u> .
(b) the cumulative nature of the effects	? <sup>8</sup>	There are likely to be cumulative affects arising from and between the different policies within the <u>neighbourhood plan</u> .
(c) the transboundary nature of the effects	No	There are no transboundary effects arising from the <u>neighbourhood plan</u> .
(d) the risks to human health or the environment (for example, due to <u>accidents</u> )	No	There are unlikely to be risks to human health or the environment arising from the <u>neighbourhood plan</u> .
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	No	The neighbourhood plan will apply to the entire parish area (a population of approximately 1660 residents in 760 dwellings (2011 census)). Significant effects due to the geographical size of the area and population size are not considered <u>likely</u> .

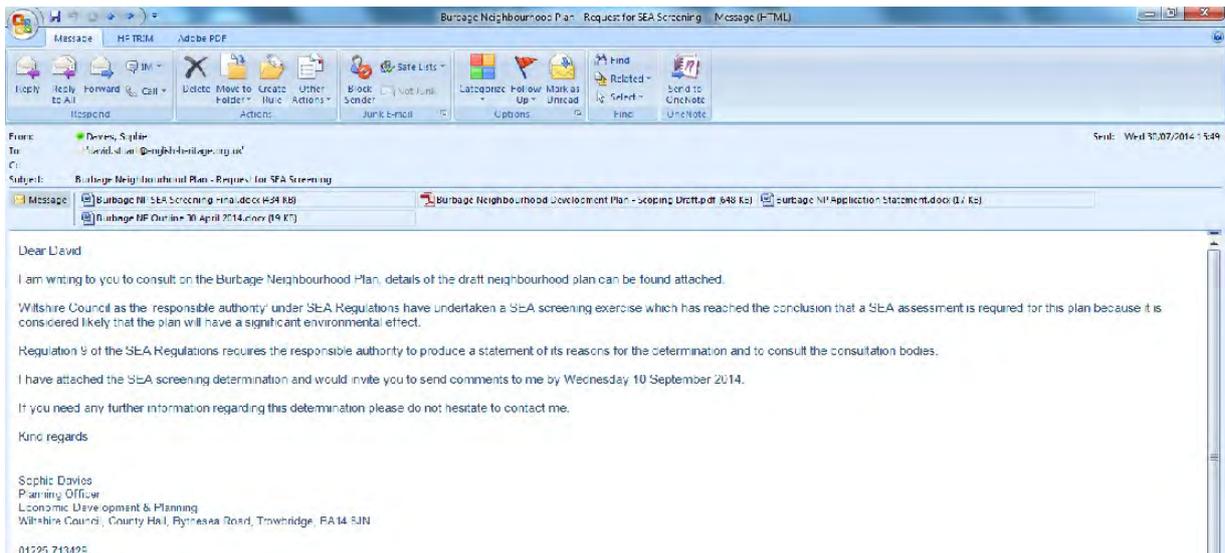
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	Yes	The neighbourhood plan is located in the North Wessex Downs AONB. There are SSSIs, ancient woodland (Savernake Forest), SPA, SAC and local wildlife sites in the plan area and development has the potential to impact upon these sites. Proposed development maybe considered as likely to significantly affect these environmental assets.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	Yes	There are national and European landscape/biodiversity designations (see (f)) and also conservation area and the Kennet and Avon Canal within and on the edge of the plan area.

## 5. SEA Screening determination

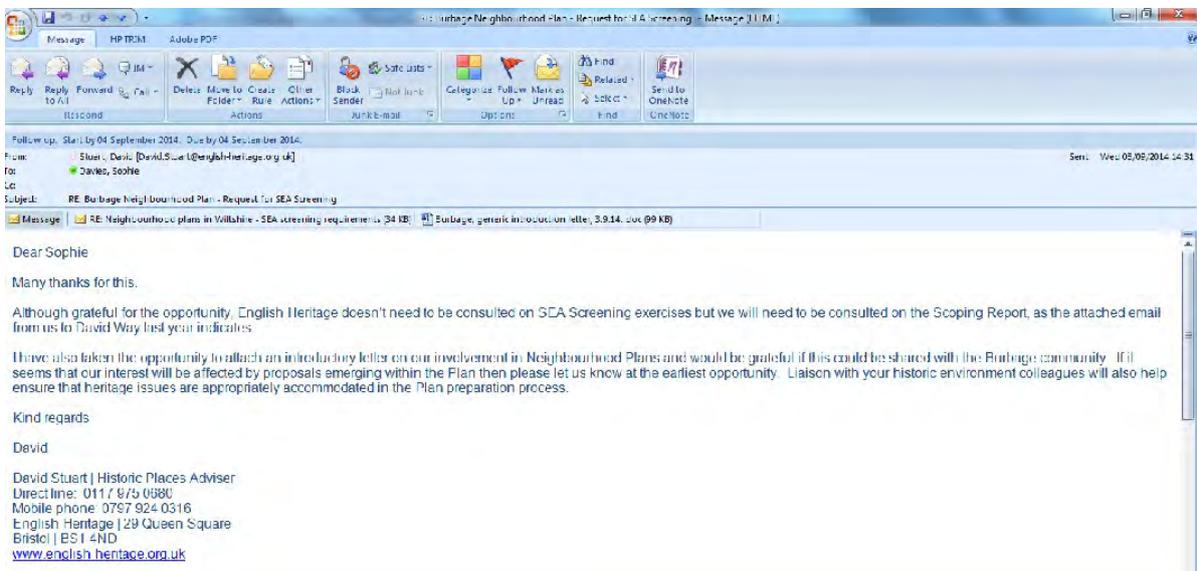
- 5.1 Regulation 9 of the SEA Regulations requires that the responsible authority shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall —
- (a) take into account the criteria specified in Schedule 1 to these Regulations; and  
(b) consult the consultation bodies.
- 5.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 5.4 Wiltshire Council, as the responsible authority, considers that the proposed Burbage Neighbourhood Plan is likely to have a significant environmental effect and accordingly will require a Strategic Environmental Assessment.
- 5.5 This decision is made for the following reason:
- The Neighbourhood Plan is likely to allocate sites and control development within the North Wessex Downs AONB and its surrounding area, which is likely to have environmental impacts.

## Appendix A – Request for consultation response on screening determination from statutory consultation bodies





## Appendix B – Consultation responses from statutory consultation bodies



Date: 10<sup>th</sup> September 2014

Our ref: 128111

Your ref: -



[Sophie.Davies@witshire.gov.uk](mailto:Sophie.Davies@witshire.gov.uk)

Wiltshire Council

Customer Services  
Morbeyn House  
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Cricket  
CIVILSOU

T 0300 043 3800

**BY EMAIL ONLY**

Dear Ms Davies,

**Consultation: Burbage Neighbourhood Plan Sustainability Appraisal Screening.**

Many thanks for the above consultation.

Natural England is a statutory consultee in neighbourhood planning. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise our detailed engagement to those plans that may impact on internationally or nationally designated landscape or nature conservation sites, and/or require Strategic Environmental Assessment or screening for Habitats Regulations Assessment.

It is not Natural England's role to advise on whether a SEA is required, but to identify to the responsible authority any effects on the environmental interests for which we are concerned that are likely to be significant.

However, we concur that on the basis of the material supplied with the consultation that you have correctly identified the most significant environmental interests liable to be affected by the plan, namely the North Wessex Downs AONB. In addition, Savemake Forest SSSI lies within the plan area, and could conceivably be affected, although it is likely that all potential allocations will be sufficiently far from that site to have negligible impact.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan, although we understand that there is a significant bat population making use of the old Savemake railway tunnel. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Page 1 of 2

For any correspondence or queries relating to this consultation only, please contact Charles Routh on 07990 773630. For any new consultations or issues, please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Charles Routh

Lead Adviser, Somerset, Avon and Wiltshire Sustainable Development Team, Natural England.

## Appendix 2: HRA Screening Decision

### Burbage Neighbourhood Plan Habitats Regulations Assessment (HRA) Screening

#### 1. Screening Methodology

Each element of the draft plan has been categorised against the screening criteria developed by Natural England. This process is necessary to help provide a clear audit trail for the assessment and, if necessary, identify the need for the wording of policies to be amended or new policies added to be certain that the neighbourhood plan will not have a significant negative effect on a European site.

The criteria used were as follows:

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

The effect of each draft policy has been considered both individually, and in combination. The effects of the whole plan have also been considered in combination with the Wiltshire Core Strategy.

#### 2. Wiltshire Core Strategy HRA

Wiltshire Core strategy HRA derived a set of parameters by which to determine the likelihood of potential impact on Natura 2000 sites. Applying these parameters to the Burbage Neighbourhood Plan Area identifies the following issues to be assessed.

*Recreation – Natura 2000 sites within 5km of the plan area, or where Salisbury Plain SPA/SAC is within 15km of the plan area.*

- Salisbury Plain SPA and SAC

*Hydrology / Hydrogeology - Sites that fall wholly or partly within either the Thames Water (Swindon) and Oxford Water Resource Zone WRZ (SWOX WRZ), or the Wessex Water North WRZ, may be susceptible to impact. (The Parish of Burbage is serviced partly by Wessex Water and partly by Thames Water (Swindon) and Oxford (SWOX)).*

- Salisbury Plain SAC / SPA
- Bath and Bradford on Avon Bats SAC
- Pewsey Downs SAC
- North Meadow and Clattinger Farm SAC
- River Avon SAC
- River Lambourn SAC
- Kennet & Lambourn Floodplain SAC

## Submission Draft

### *Nitrogen Deposition – Natura 2000 Sites within 200m of a main road*

- Porton Down SPA
- Salisbury Plain SAC / SPA
- Southampton Water SPA
- Clattinger Farm SAC
- River Avon SAC
- Rodborough Common SAC
- Cotswolds Beechwoods SAC

### *Physical Damage / Interruption of Flight Lines*

- Bath and Bradford on Avon Bats SAC

### **3. SCREENING OF POTENTIAL IMPACTS**

Draft policies, including sites allocated for housing or employment development within the emerging Burbage neighbourhood plan have been screened against each of the above potential impacts, for each Natura 2000 site.

#### *Recreation.*

**Salisbury Plain SPA/SAC** - The Wiltshire Core Strategy HRA assessed that the issues relating to additional recreational pressure as a result of residential development growth are dealt with sufficiently in the “Salisbury Plain SPA HRA and Mitigation Strategy” which prescribes developer contributions made under CIL, to deliver monitoring and adaptive management on the plains. Core Policy 50 of the Wiltshire Core Strategy implements this approach.

#### *Hydrology/Hydrogeology*

**Water Resource** - It is expected that the small scale of residential or industrial developments proposed by the Burbage Neighbourhood Plan will be accommodated within the existing abstraction license levels. Current licences have undergone HRA by the Environment Agency, as have Wessex Water’s Water Resource Management Plan and Thames Water’s Water Resource Management Plan, therefore the Council is satisfied that the issue does not require further assessment at the Neighbourhood Plan level.

**Water Quality** – Issues of water quality, including surface water drainage will be dealt with through Development Management as described in Core Policy 50. The use of SUDS and suitable pollution control measures will be required for most proposals. The small scale of housing and employment development proposed within the Burbage NP is unlikely to result in impacts on watercourses outside of the plan area.

#### *Nitrogen Deposition*

The effect on Natura 2000 sites, as identified in the Wiltshire Core Strategy HRA as being sensitive to adverse impact, in relation to the Burbage Neighbourhood Plan has been considered and it is deemed that the small scale of development described in the Burbage NP, and the distances from the European sites make it unlikely that impact would occur as a result of implementation of the plan.

#### *Physical Damage/Interruption of Flightlines*

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The Burbage Neighbourhood Plan area is sufficiently distant from the Bath & Bradford on Avon Bat SAC that loss of habitat would not result in physical damage or interruption of flight lines associated with the SAC.

### **4. SCREENING OF EMERGING BURBAGE NEIGHBOURHOOD PLAN POLICIES**

The Burbage Neighbourhood Plan includes draft policies to address the following policy objectives:

- Development Strategy
- Housing (General)
- Housing & Mixed Use Sites
- Developer Contributions
- Economy (Business, Employment & Tourism)
- Green Spaces
- Transport
- Heritage

All parts of the plan have been screened for potential impacts upon the Natura 2000 network, as set out in Section 5.

- a. Assessment of all elements of the plan 'in combination'
  - The draft policies would not have any in combination effects
  
- b. Assessment of the effects of the plan as a whole, in combination with Wiltshire Core Strategy
  - The plan would not have any in combination effects with the Wiltshire Core Strategy

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Policy Area	Policy	Categorisation in initial screening	Comments & recommendations
<b>Policy 1 Development Strategy</b>	a. Within the Limits of Development (LoD) of Burbage, development will only be permitted on brownfield sites or those identified in this plan unless it can be demonstrated that these possibilities are unsuitable or unavailable.	A1	
	b. Other than sites identified in this plan, residential development outside the LoD will be acceptable only in exceptional circumstances. Applicants would have to demonstrate a lack of available sites within the village and prove that, no significant negative impact would occur in the AONB.	A1	
	c. Mixed-use developments including housing and retail or B1 and B2 industrial employment uses are encouraged and will receive favourable consideration subject to compliance with other policies of the plan.	A1	
	d. Development in the hamlets and outer small settlements of the community area will normally be limited to the conversion or extension of existing buildings. However, development of single dwellings or modest employment facilities such as workshops, in addition or instead of conversion, may be acceptable providing such schemes comply with other policies of the Plan.	A1	
<b>Policy 2 Housing (General)</b>	a. Any development of 4 or more houses must include at least 25% of the total number of as 1 or 2 bedroom dwellings.	A1	
	b. Developments for retirement housing will be looked on favourably, whether as stand-alone or as elements of a larger scheme, subject to compliance with other policies of the plan.	A1	
	c. Development should include designs that facilitate working from home (for example home offices).	A1	

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Policy Area	Policy	Categorisation in initial screening	Comments & recommendations
<b>Policy 3 Housing &amp; Mixed Use Sites</b>	a. Grafton Road - Housing Development of 15 homes of mixed size and type is acceptable subject to: - Satisfactory highway access - Screening of existing properties to south	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.
	b. Mundy's Yard and Scout Hut – Mixed Use, 20 Homes plus associated offices or retail. Subject to: - Satisfactory re-location of existing Scout Hut / Mundy's business - modest element of employment use in replacement scheme	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.
	c. Bypass Site. Land between village and bypass. Housing Development of up to 80 homes with green spaces and habitat Improvement. Subject to: - incorporation of public green space / park - habitat enhancement scheme - adequate screening for existing properties to east - linking to village by network of paths and cycle ways - Adequate noise attenuation for new properties closest to by-pass. - Replacement of existing Village Hall as part of the scheme	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.
	d. Hirata II – Housing Development of up to 60 homes. Subject to: - adequate screening for nearby properties	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.

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Policy Area	Policy	Categorisation in initial screening	Comments & recommendations
<b>Policy 4 Developer Contributions</b>	a. To replace or re-build the existing village hall	B	Replacement of the village hall within the boundary of the plan area will be sufficiently far from N2K sites such that there will be no mechanism for effect.
	b. To improve sporting facilities	A1	
	c. To establish a café or meeting place	A1	
	d. To provide additional public parking	A1	
	e. To enhance local broadband services	A1	
	f. To connect to or enhance sustainable transport modes, including foot or cycle paths, bus services or infrastructure to facilitate any of these.	A1	
<b>Policy 5 Economy (Business, Employment and Tourism)</b>	a. Employment uses generating more than 3 new employees or involving noise generating or other 'bad neighbour' uses will be located adjacent to or on existing employment sites.	A1	
	b. Working from home and small workshops not likely to impact on the amenity of neighbours by virtue of operation including traffic generation will be permitted throughout the plan area, subject to compliance with other policies of the plan.	A1	
	c. Tourism related businesses will be encouraged within and without the village LOD, subject to compliance with other policies of the plan.	A1	
	d. Farm diversification involving conversion of existing farm buildings or extension of same to a maximum of + 50% of existing size will be permitted in the Parish outside the LoD, subject to no harm being done to the overall openness and scenic quality of the AONB and compliance with other policies of the plan.	A1	

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Policy Area	Policy	Categorisation in initial screening	Comments & recommendations
<b>Policy 5 Economy (Business, Employment and Tourism)</b>  <b>SITES</b>	Employment will be acceptable at the following sites; 1. Hirata I (Expansion of existing facility). Subject to: - linking network of cycle and footpaths with rest of village 2. Harepath Farm (Expansion of existing facility) Subject to: - Satisfactory access	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.
	Tourism development will be acceptable at: 3. Wolf Hall (Country Hotel and / or other tourism related use. Subject to: - Protection of AONB in terms of views in and out - Acceptable landscape impact - Creation of sustainable travel plan - acceptable impact on historic building and setting of Wolf Hall	B	The allocated development site is sufficiently far from N2K sites such that there is no mechanism for effect, with the exception of Salisbury Plain SPA/SAC for which a mitigation programme is in place.
<b>Policy 6 Green Spaces</b>	The following are formally designated as Green Space and will remain as open spaces, retaining their existing recreational uses.  a. Barn Meadow (including Children's Playground) b. Lion Field  New residential or employment development will not normally be permitted on the Green Spaces. Extension of existing buildings or new buildings for recreational or community use will however be permitted.	A2/A3	

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Policy Area	Policy	Categorisation in initial screening	Comments & recommendations
<b>Policy 7 Transport</b>	a. Development will need to demonstrate how their scheme links functionally to the existing footpath or cycle network. Where opportunities exist to physically connect to these networks, the new schemes should include proposals to do so. Connections should enable both enhanced use of sustainable transport within and outside of the LoD, enabling access to the entire Parish for the benefit of tourism. Financial contributions towards enhancing the network may be sought under the Developer Contributions Policy.	A1	
	b. New housing or housing development within the LOD will be required to demonstrate that sufficient parking is provided within the scheme to avoid residents or visitors parking on the street, even if these means provision above the minimum standards set by the LPA. Where adequate parking cannot be physically provided on site contributions toward suitable facilities elsewhere in the village will be acceptable.	A1	
<b>Policy 8 Heritage</b>	Within the Conservation Area development proposals will have to demonstrate how their schemes reflect the guidance contained within the Burbage Conservation Area Character Appraisal and Management Proposal, February 2008, and in particular how they relate to the specific local character that surrounds them. New development must add to rather than detract from the character of the conservation area. This is especially important in terms of design, scale and choice of local or traditional materials. It must also protect or enhance existing views in and out towards the AONB.	A1	

A / B (Green) – Screened out

C / D (Red) – Screened in

**CONCLUSION**

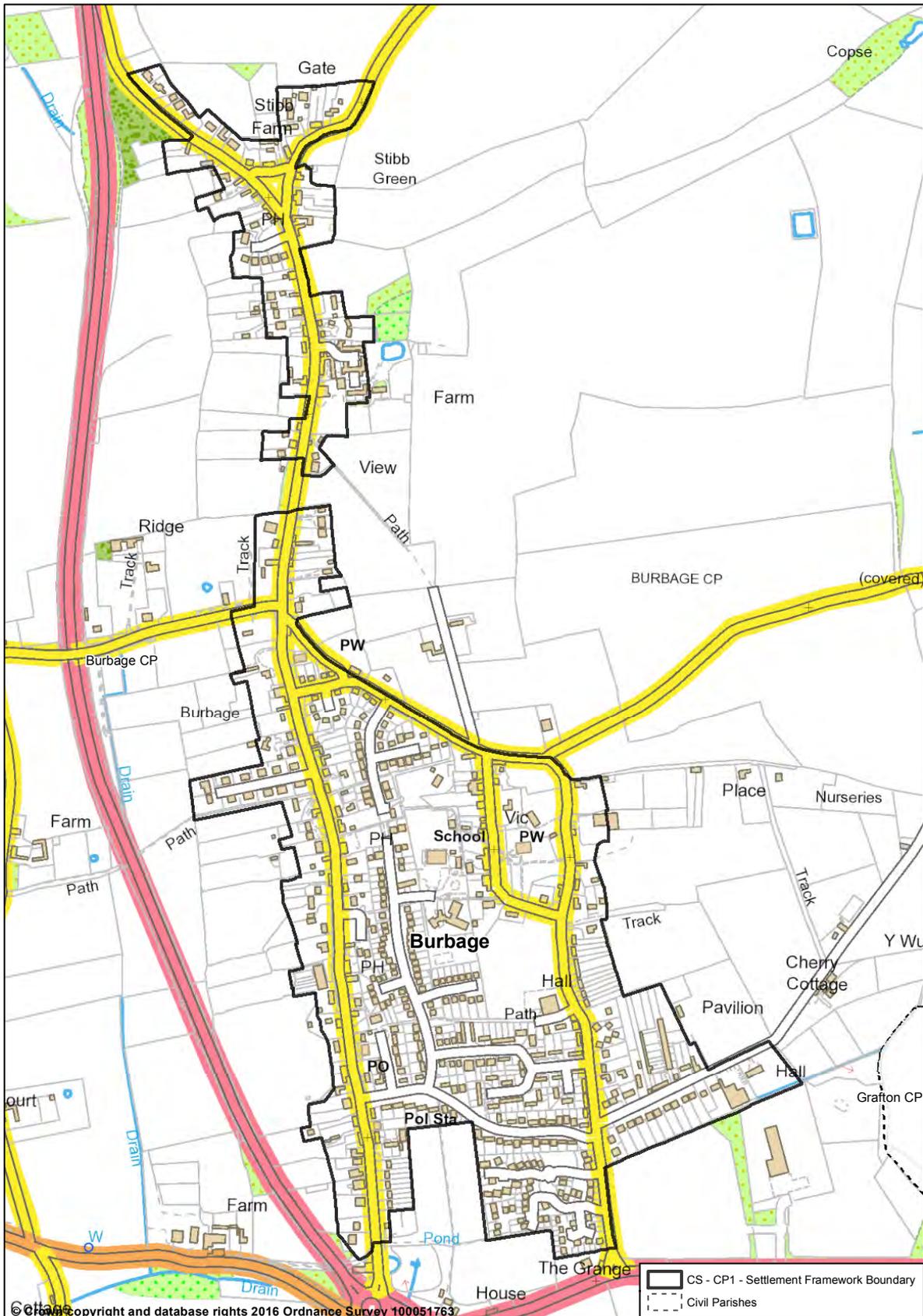
A relatively small number of sites are allocated for housing (up to 175) and employment development within the Burbage Neighbourhood Plan.

All Natura 2000 sites are sufficiently far from the plan area and scale of development identified by the plan sufficiently small such that there would be no mechanism for impact, or that adverse impacts would be deemed *de minimus*.

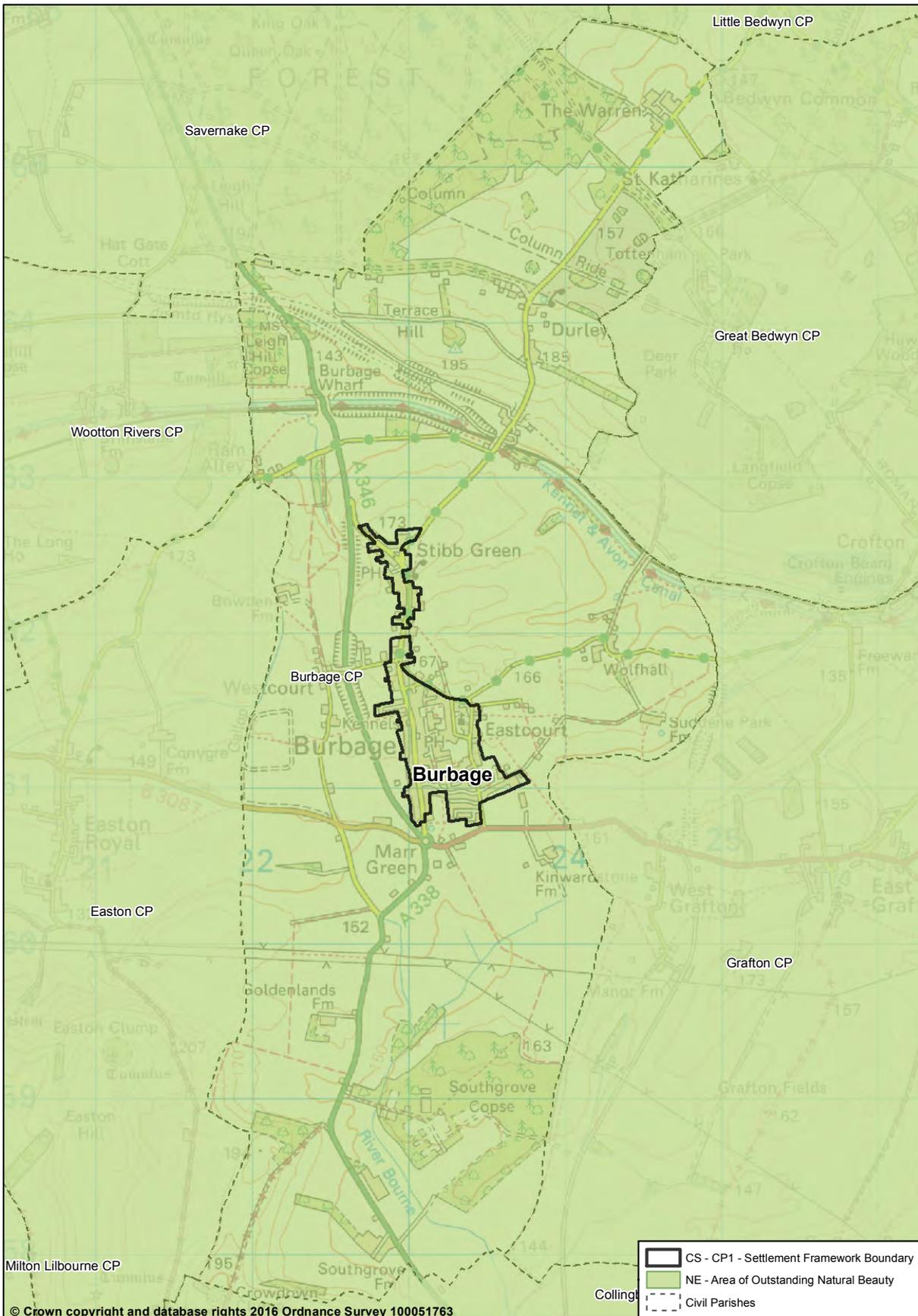
It can therefore be concluded that the Burbage Neighbourhood Plan would have no likely significant effects upon the Natura 2000 network alone or in combination. As such, no appropriate assessment of the current submission draft is considered necessary, and no amendments, deletions or additions to the plan are required to make the plan HRA compliant.

Appendix 3: Constraint Maps

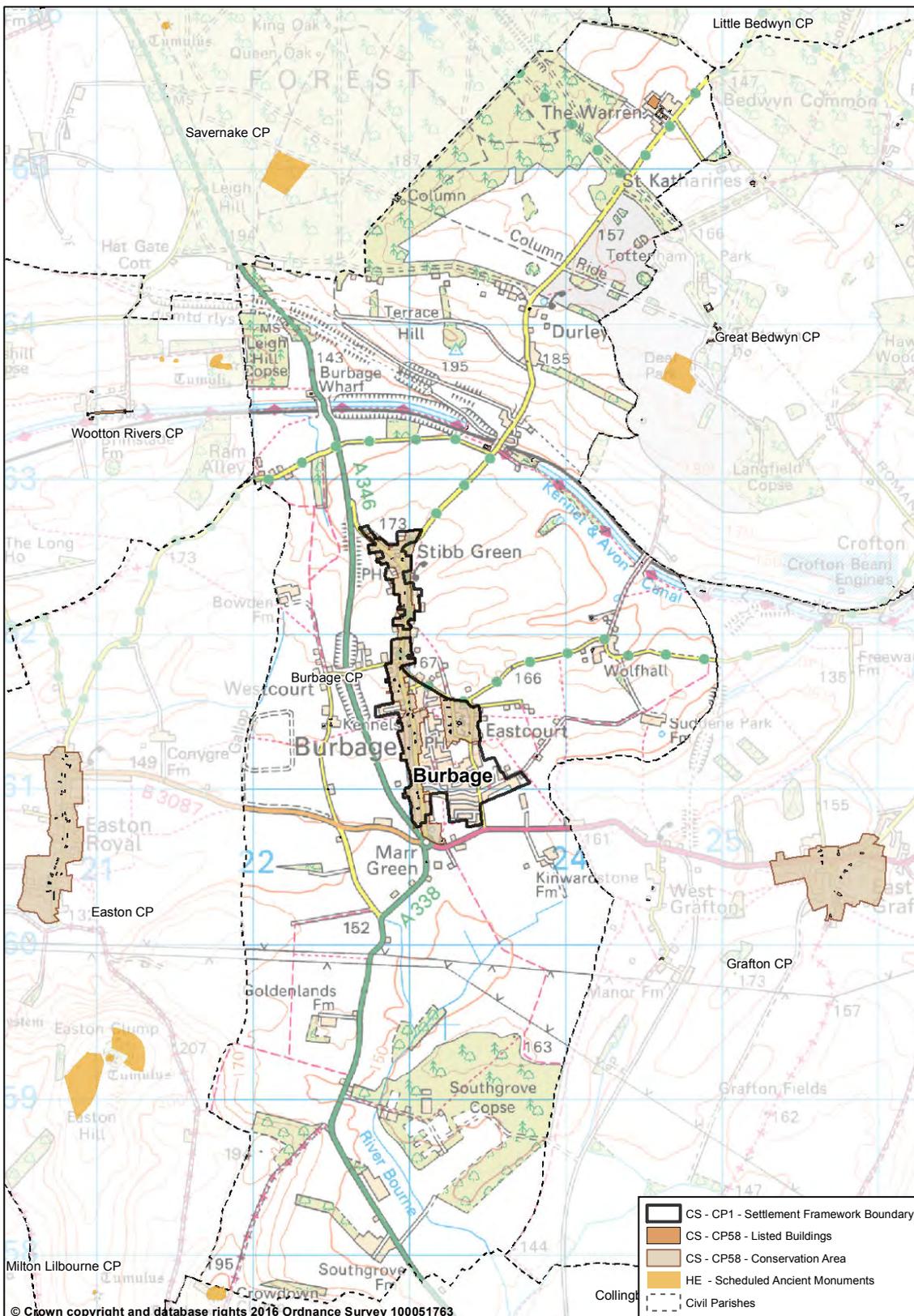
i. Burbage Parish with the Limit of Development in Black



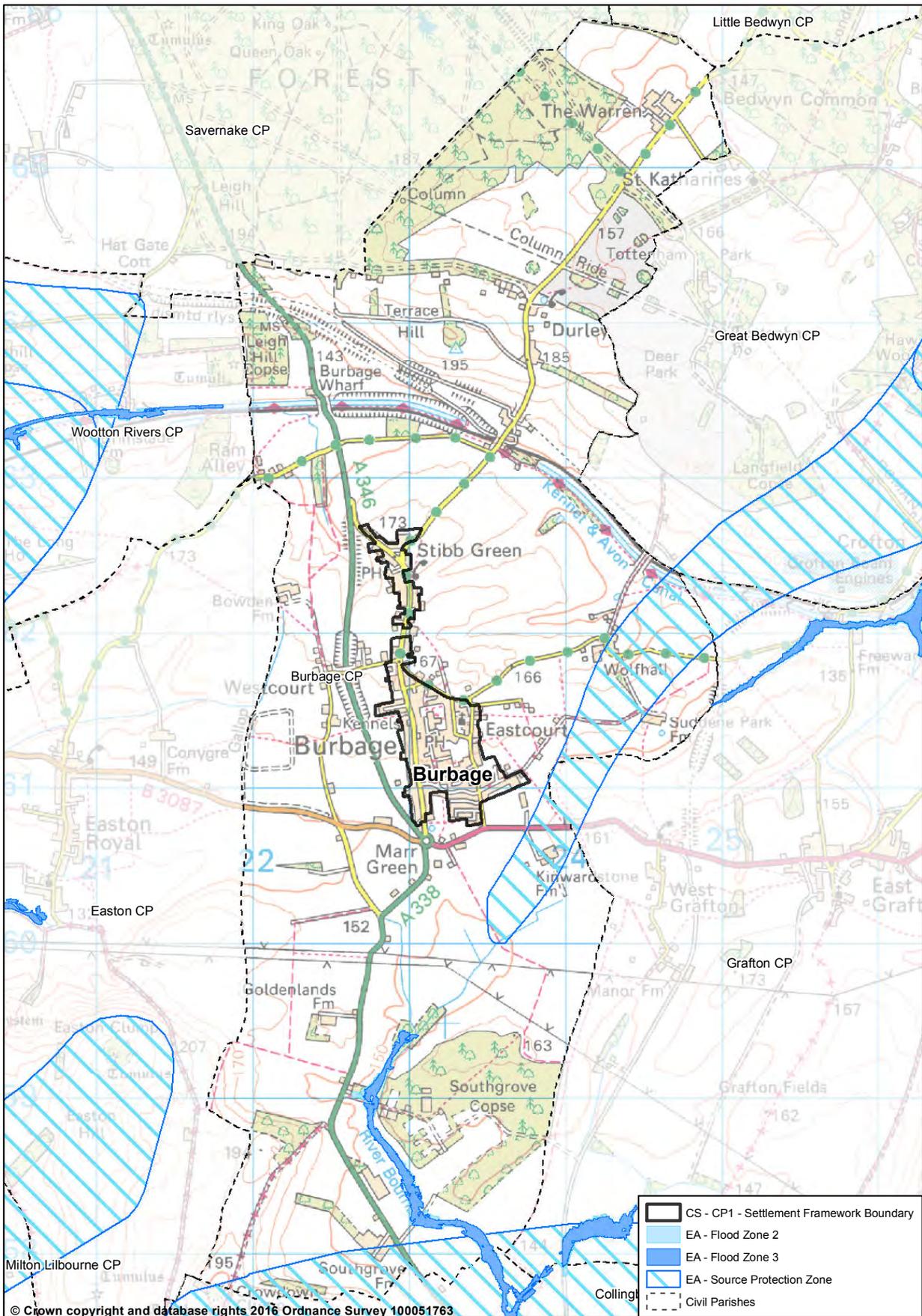
ii. The AONB



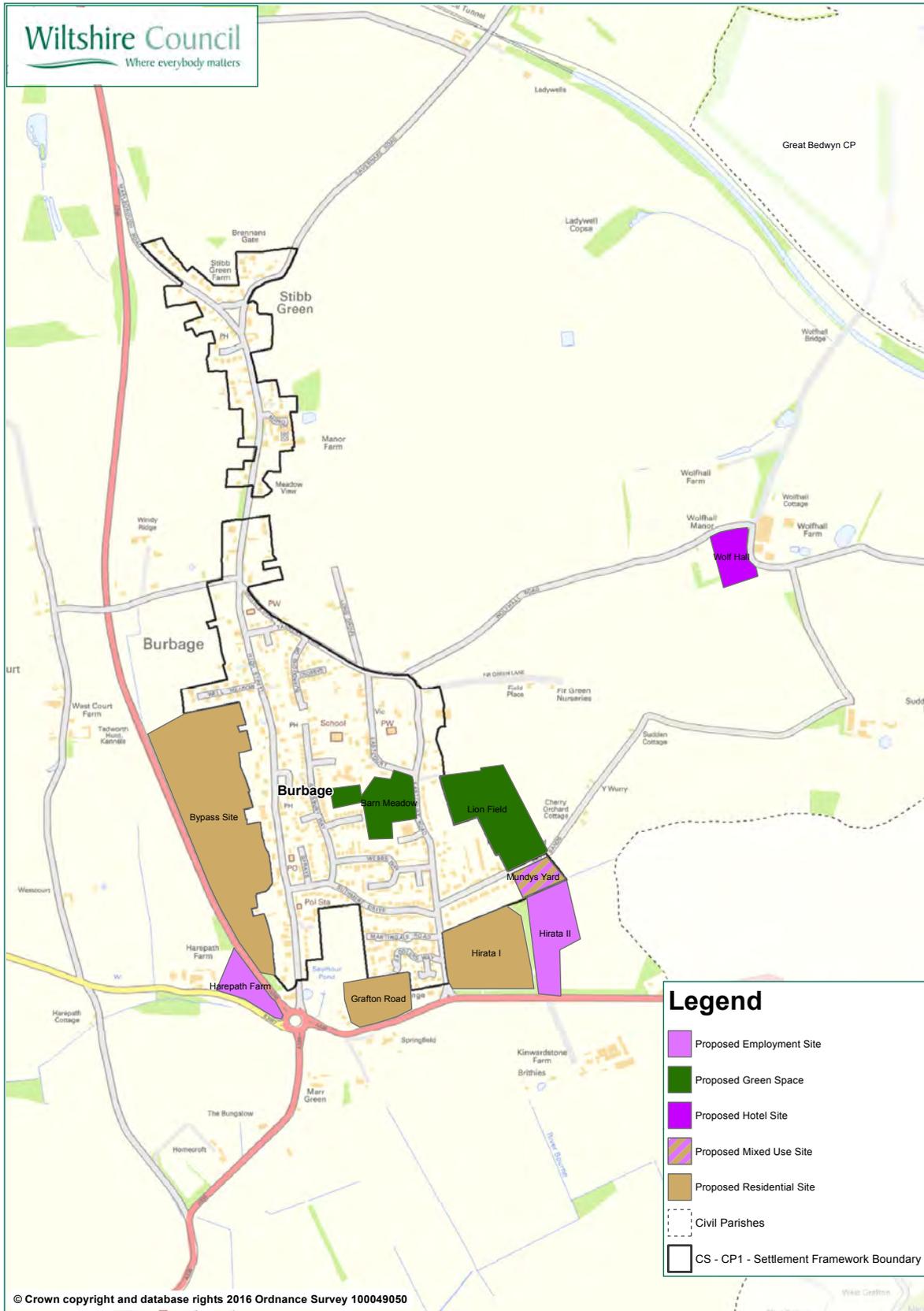
iii. Map of Heritage Assets



iv. Flood Risk Map



Appendix 4: Sites Proposed in Reg 14 Consultation



**Appendix 5: Scoring methodology for SA**

1.0 The assessment of policy options used the following scoring system.

1.1 Assessment of Effects: This layer of assessment was divided into 4 sub categories each of which is assessed using abbreviations

Time (How long will effects last?)	ST = Short Term, MT = Medium Term, LT = Long Term
Rev? (Reversibility of effects)	R = Reversible, I = Irreversible
Scale? (Spatial Scale of effects)	A = Local Area Specific, C = County wide, B = Cross county border
Perm? (Permanence of Effects)	P = Permanent, T = Temporary

1.2 Assessment of Significance (Scoring)

Each option for the policy is judged against the following scoring system.

**Significance of effects:**

- ++** Option likely to have a major positive effect. **SIGNIFICANT**
- +** Option likely to have a minor positive effect
- ?** Effects of option uncertain
- 0** Option likely to have a neutral effect
- Option likely to have a minor adverse effect
- Option likely to have a major adverse effect. **SIGNIFICANT**

1.3 Each policy is then discussed and the assessment justified in the remaining 2 columns of the table.

## Appendix 6 - How the SEA Directive and Regulations have been met

<b>SEA Regulations Requirements</b>	<b>Location in this SA</b>
1. Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated	This requirement is covered by Sustainability Appraisal Scoping Report and the Sustainability Appraisal Report.
2. An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1, 2 and 5 of this report plus the Scoping Report and NDP itself.
3. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping Report plus section 11 of this Report
4. The environmental characteristics of areas likely to be significantly affected	The Scoping Report plus Sections 1-5 of the NDP
5. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	The Scoping Report, Sections 1-5 of the NDP and Section 5 of this Report
6. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	The Scoping Report, Sections 1-5 of the NDP and Section 5 of this Report
7. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects)	Sections 8, 9 and 10 of this Report
8. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Sections 9 and 10 of this Report
9. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 9 of this Report

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<b>SEA Regulations Requirements</b>	<b>Location in this SA</b>
<b>10.</b> <i>A description of measures envisaged concerning monitoring in accordance with Article 10</i>	<i>Section 13 of this Report</i>
<b>11.</b> <i>A non-technical summary of the information provided under the above headings</i>	<i>Section 14 of this Report</i>
<b>12.</b> <i>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment</i>	<i>Included in The Scoping report and this Report. The SA drew on the evidence base of the Wiltshire Core Strategy but also included input from statutory bodies, the LPA and the community.</i>
<b>13.</b> <i>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.</i>	<i>Informal working with the LPA and accessing expert advice has been complimented by formal consultation with appropriate bodies and with the community. Details provided in the Consultation Statement Report.</i>

## Appendix 7: Consulting on the plan and the Sustainability Appraisal Report.

- 1.0 Consultation requirements for the sustainability appraisal  
The SEA Directive requires that: “*Authorities with relevant environmental responsibilities and the public.....shall be given an early and effective opportunity within appropriate time frame to express their opinion on the draft plan... and accompanying environmental report*”
- 1.1 The SEA Directive creates the following requirements for consultation:  
Authorities which, because of their environmental responsibilities, are likely to be concerned by the effects of implementing the plan or programme, must be consulted on the scope and level of detail of the information to be included in the Environmental Report. These authorities are designated in the SEA Regulations as the Consultation Bodies. The public and the Consultation Bodies must be consulted on the draft plan or programme and the Environmental Report, and must be given an early and effective opportunity within appropriate time frames to express their opinions.
- 1.2 In England the ‘consultation bodies’ are Natural England, English Heritage and the Environmental Agency, and they have been included during the development of the NDP. It is also recommended that public and stakeholders’ involvement on the sustainability appraisal is carried out at each stage in order to ensure that policies meet the objectives of sustainability development and this has taken place throughout.
- 1.3 Burbage Council has involved a wide range of stakeholders in its consultation, including neighbouring parish councils throughout the community area, community groups, local residents and members of the local community and other key stakeholders. The consultation process has included public meetings held in Burbage parish where information on the sustainability appraisal reports has been available as direct consultation via e mail.
- 1.4 The following section (a) records first the responses of the Consultation Bodies to the Scoping of the Environmental report, and when received will also include their responses to the Full Report at regulation 14 consultation (section b).
- 1.5 **Consultation Bodies Responses to the Scoping Report and the action taken.**

**Environment Agency:**

“The Scoping Report adequately covers issues relevant to the Environment Agency. No further comment”.

*SA and Plan Response:* Noted.

1.6 **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.

1.7 **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 soil”.

*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 8. Schedule of changes made to Pre-Reg.14 Draft NDP following first SA exercise

The Sustainability Appraisal exercise described in this Environmental Report and in the SA Scoping Report have fed into the process of creating the Burbage neighbourhood Plan in two main ways.

Firstly, the Scoping Report revealed key problem areas and therefore indicated areas for policy to tackle. This helped with policy selection. Secondly, the SA exercise itself, recorded in this Report fed directly back into the wording of the policies.

The following schedules indicate concrete examples of how this worked in practice.

### Key Issues and Problems Revealed by the Scoping Report

Issue /Problem	Subsequent Policy
Development threat to green areas in village	Designate most important as Local Space – Policy...
Maximise Brownfield Land Use	Policy ....
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 also.	WCS policy and Policies 2 and 3
Green spaces currently help prevent a ‘heat island’ effect in summer. These need to be preserved and landscaping required including trees from new developments.	Policy 6
Heritage at risk from inappropriate development	Policy 8
Community infrastructure needs upgrading – e.g. village Hall	Policy 4
Local services are valued as is local employment	Policies 2,3,4
There is a recognised need for safety features such as pedestrian crossings as well as better footpaths / cycle ways.	Policy 4, Policy 7
Relocating bad neighbour uses away from housing could improve local air quality (e.g. dust at Mundy’s yard).	Policy 3
The important special individual quality of the landscape is a tourist attraction which supports the local economy. This should be exploited, though with care.	Policies 4, 5
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.	Policies 4, 5
Balance housing growth with employment	Policies 4, 5
Local employment is welcomed as it reduces the need to travel. Existing road journeys are long and journey times unreliable.	Policies 4, 5

**Changes to Pre-Reg. 14 draft NDP policy as a result of the formal SA exercise**

Section	SA Comment	Policy / Objective Change or Influence
Objectives 1 and 3	Consider requiring tree planting in developments	
Objective 4	Make clear that part of this aim is to improve self-containment and hence sustainability of Burnage as a whole.	Change to Objective wording.
Objective 6 / 7	Careful design of footpaths in proximity to heritage, and in prime landscape areas. Make sure paths connect to retail and work sites.	Change to Objective wording
Objective 7	Hedgerows and landscaping around green spaces would improve habitat value. Add pathway enhancement to link living areas with green spaces in developer contributions policy.	Change to Objective wording
Objective 8	Careful wording of polices attempting to secure high quality design and protection of landscape and heritage. Must not go so far as to impact negatively on viability.	Change to wording of Policy 8.
Objective 9	Revise provision of car parks by adding SUDS and biodiversity enhancement as mitigation  Amend this Objective so that congestion is tackled but car use is not increased. Overall, as drafted, negative impacts are likely to come close to outweighing benefits.	Objective 9 amended.
Policy 1.	Consider enhancement of requirements to landscape and plant trees to help mitigate climate change, landscaping and biodiversity impacts.	Text of Policy 1 amended to reflect this.  Element 'g' added to Developer Contributions Policy requiring more tree planting etc.
Policy 2	Consider adding requirement for disabled access properties to draft policy to more closely match local needs.	'd' added to draft Policy 2
Policy 3b Mundy's Yard / Scout Hut	Developer contributions for hut may be limited if scheme has to be mixed use. Ensure policy is reasonable in this respect.	Wording amended and explanatory text added to Policy 3. See also Policy 4 below
Policy 3c Bypass site	Revise policy to require master plan given scale of site.	Policy and supporting text revised.
Policy 3d Hirata II	Revise Policy to emphasise need for high quality landscaping, views of the village from the road and provision of sustainable transport links.	Policy revised.
Policy 4	Developer Contributions	Add Scout Hut for clarity. Amend car park element to include SUDS. Amend car park element to indicate a moderate size of facility only.

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Section	SA Comment	Policy / Objective Change or Influence
Policy 5 Employment Sites	<p>Hirata I Improve sustainability through several changes to policy</p> <p>Harepath Farm</p> <p>Wolf Hall</p>	<p>Incorporate: Habitat creation, renewable energy use, landscaping and specify non-polluting land uses.</p> <p>Incorporate: Habitat creation, renewable energy use, landscaping and specify non-polluting land uses. May require road crossing?</p> <p>Incorporate: Renewable energy use, Landscaping and habitat creation strategy, and sustainable travel plan.</p>
Policy 7 Transport	Specify level of public parking to be provided and keep to a minimum.	Wording of 'b' revised to this effect.