

Strategic Environmental Assessment (SEA) for the Dilton Marsh Neighbourhood Plan

Environmental Report to accompany the Regulation 14 version of the Neighbourhood Plan

Dilton Marsh Parish Council

January 2024

Quality information

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Table of Contents

| Non- | -Technical Summary | i |
|------------|--|----|
| 1. | Introduction | 1 |
| Back | ground | 1 |
| SEA: | screening for the Dilton Marsh Neighbourhood Plan | 2 |
| SEA | explained | 2 |
| Struc | ture of this Environmental Report | 3 |
| 2. | Local Plan Context and Vision for the Neighbourhood Plan | 5 |
| 3. | What is the Scope of the SEA? | 8 |
| Sumr | mary of SEA scoping | 8 |
| Key s | sustainability issues | 10 |
| SEA | Framework | 13 |
| 4. | Consideration of Reasonable Alternatives Through the SEA | 16 |
| Defin | ing Reasonable Alternatives | 16 |
| Hous | ing Numbers to Deliver Through the Neighbourhood Plan | 16 |
| Cons | ideration of Potential Site Options | 16 |
| Spati | al Strategy Options to Consider Through the SEA | 19 |
| Appra | aisal Findings | 21 |
| Sumr | mary of Appraisal Findings | 29 |
| Deve | loping the preferred approach | 31 |
| 5. Plan | Appraisal of the Regulation 14 Version of the Neighbourhood 32 | |
| Introd | duction | 32 |
| Diltor | n Marsh Neighbourhood Plan Policies | 32 |
| Appro | oach to the Appraisal | 33 |
| Biodi | versity | 34 |
| Clima | ate Change (Including Flood Risk) | 35 |
| Comr | munity Wellbeing | 37 |
| Histo | ric Environment | 38 |
| | , Soil, and Water Resources | |
| | scape | |
| | sportation | |
| Conc | lusions at this current stage | 41 |
| 6 | What Are the Next Stens? | 43 |

Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Dilton Marsh Neighbourhood Plan (hereafter referred to as "the DMNP"). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socioeconomic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Dilton Marsh Neighbourhood Plan?

The DMNP has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the DMNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (December 2023), which included information about the neighbourhood area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the DMNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the DMNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the DMNP has been assessed.
- The appraisal of alternative approaches for the DMNP.
- The likely significant effects of the DMNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the DMNP.
- The next steps for the DMNP and accompanying SEA process.

Consideration of Reasonable Alternatives for the Dilton Marsh Neighbourhood Plan

Introduction

In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

Housing Numbers to deliver through the Neighbourhood Plan

The WCS identifies Dilton Marsh as a 'Large Village' in the settlement hierarchy, which is the second to largest classification, below 'Market Towns'.

In the emerging Local Plan, Dilton Marsh is identified as part of the 'Trowbridge Rural Area' and has been allocated a housing requirement of 61 homes by the end of the emerging Local Plan period (2038).

As of March 2022, Dilton Marsh has 20 completions or commitments, leaving a residual housing target of 41 homes to be met through Neighbourhood Plan allocations.

Consideration of potential site options

The site selection process began by identifying a pool of potential sites, which were identified through the Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA)¹ and the Dilton Marsh Call for Sites in July 2022. In total, 27 potential sites were identified for assessment.

An independent and objective assessment process was undertaken, with the findings presented in a Site Assessment Report (SAR, 2023)². The SAR considered the pool of sites to determine which site options may be suitable in principle for allocation in the DMNP.

A total of ten sites were considered to be potentially suitable, available, and achievable for housing allocation either in full or in part, and subject to the resolution or mitigation of identified constraints.

Following the site assessment process, the Neighbourhood Group completed further public consultation on the ten potentially suitable site options. The aim of the consultation was to determine which sites would be supported in principle for a Neighbourhood Plan allocation and deliver on DMNP objectives. Criteria were considered to support this process. Specifically:

1. 'Will the site **protect the rural setting of distinct settlements** (Dilton Marsh, Penleigh, Penknap, Hisomley, Fairwood, Clearwood and Old Dilton) and **reinforce the rural landscape**, **character**, **and appearance** of the parish?

¹ Wiltshire Council (no date). 'Monitoring and evidence'. Available <u>here</u>

² Master Land and Planning (2023). 'Dilton Marsh Neighbourhood Development Plan Site Assessment Report March 2023'. Available here

- 2. Will the site **preserve or enhance the historical and cultural assets** in the Parish?
- 3. Will development on the site conflict with other proposed policies of the NDP about Local Green Space and Key Views?
- 4. Will the site conserve and enhance environmentally protected sites and species, or priority habitats, and minimise the loss of green infrastructure within the Parish?
- 5. Will the site provide **development at a scale appropriate to Dilton Marsh** that will contribute towards meeting the identified requirement, and offer scope for an **appropriate mix of dwelling sizes and tenures**?
- 6. Will the site contribute to **mitigating the impacts of climate change** through minimising sources of environmental pollution and flooding, or providing opportunity for renewable energy installations?
- 7. Will the site **protect the quality of life and amenity of residents** in terms of privacy, air quality, noise, and light pollution created by new development?
- 8. Will the site promote sustainable transport choices, and protect or enhance the footways, cycle routes and rights of way network?
- 9. Will the development retain and enhance local community services and facilities and support the local economy?
- 10. Will the site provide adequate infrastructure to meet the needs of future residents, including adequate parking for the needs of future residents?'

Following the public consultation process, six of the ten sites achieved a 'neutral' or 'positive' score³. One of these sites (Site 18) has since been withdrawn by the landowner and is no longer available in the near future due to long-term tenancy agreements. In this respect, the remaining five sites have been the focus for the SEA (see **Table NTS1** below).

Table NTS1: Sites taken forward through the SEA for further assessment

| Site reference | Name of Site, Address | Indicative Capacity |
|----------------|--------------------------------------|----------------------------|
| Site 2 | Land to the rear of 14 St Marys Lane | 3 – 7 |
| Site 9 | Five Farthings Farm | 11 - 22 |
| Site 12 | Land north of High Street | 34 – 68 |
| Site 13 | Land at High Street, east of Railway | 14 - 29 |
| Site 23 | Land at 34 Petticoat Lane | 11 - 22 |

³ DMNP Site Selection Report (2023) – provides further information on the site shortlisting process and forms part of the evidence base for the DMNP.

Spatial strategy options to consider through the SEA

To support the choice of a development strategy for the DMNP, the SEA process has assessed two spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified above, which are summarised below⁴.

- Option A: Delivery of new housing through an allocation at Site 12.
- **Option B:** Delivery of new housing through allocations at Sites 2, 9, 13, and 23.

Upon considering the indicative capacities of the shortlisted sites, the residual housing need of 41 homes could potentially be met through a single larger allocation on Site 12 (Option A), or via a combination of smaller allocations on the remaining four sites (Option B). The SEA has appraised the relative sustainability merits associated with these two options with a view to informing the plan making process.

Figure NTS1 below visually presents these two options.



Figure NTS1: Options considered as reasonable alternatives through the SEA

The options have been assessed against the SEA Framework developed during scoping and presented against the SEA themes.

For each SEA theme an assessment of the likely significant effects of the options is presented. This is accompanied by a ranking of the options, which provides an

⁴ The full areas of the sites (as put forward through the 'call for sites', and Wiltshire's SHEELA) have been considered within the site assessment process. For the purposes of the SEA, the areas of the sites which have been included within the options appraisal reflect the locations which are considered the most suitable areas to take forward for new development (i.e., the least constrained parts of the sites). This reflects the conclusions of the site assessment process, and community preferences with regards to the potential location of new development within the neighbourhood area.

indication of the relative sustainability performance of the options relating to the SEA theme being considered.

Table 4.3 to **Table 4.9** within the main body of the Environmental Report present the full findings of the appraisal of the options for each of the SEA themes. A summary of the findings is presented below in **Table NTS2** and supporting text.

Table NTS2 Summary of rankings by SEA theme

| SEA Theme | | Option A | Option B |
|----------------------|----------------------|-----------------|-----------------|
| Diadiamata | Option Rank | 1 | 2 |
| Biodiversity | Significant effects? | Yes - uncertain | Yes - uncertain |
| | Option Rank | 2 | 1 |
| Climate Change | Significant effects? | No | No |
| | Option Rank | =1 | =1 |
| Community Wellbeing | Significant effects? | Yes - positive | Yes - positive |
| | Option Rank | 2 | 1 |
| Historic Environment | Significant effects? | Yes - negative | No |
| | Option Rank | 2 | 1 |
| Landscape | Significant effects? | Yes - negative | Yes - mixed |
| Land, Soil and Water | Option Rank | 2 | 1 |
| Resources | Significant effects? | No | No |
| | Option Rank | 2 | 1 |
| Transportation | Significant effects? | Yes - uncertain | No |
| | | | |

In conclusion, both options have the potential to significantly impact upon the integrity of European and nationally designated sites for biodiversity, as they fall within at least one SAC/SPA/SSSI IRZ related to the type of development being proposed. None of the options overlap with any locally important biological designations/habitats, so their impact on these sites can be considered as equal. The only differentiating factor between the options, in relation to the Biodiversity SEA theme, is that Site 12 (Option A) may be preferable due to the benefits associated with developments on a larger sites (assuming appropriate BNG is delivered). Therefore, Option A is a slightly more favourable option in relation to the Biodiversity SEA theme.

Potential impacts relating to climate change are largely dependent on the extent to which mitigation and adaptation measures are incorporated into the design of new

development areas. Whilst the sites all perform favourably with respect to climate change adaptation (minus some surface water flood risk issues), Option B performs slightly better than Option A for climate change mitigation given that Sites 13 and 23 are likely to maximise opportunities for active travel.

Option A performs the least favourably in relation to the Historic Environment SEA theme, with development at this site having the potential to have significant effects on the setting of at least one Listed Building, and the linear historic settlement pattern in Dilton Marsh village. Sites associated with Option B pose relatively few potential impacts to heritage assets and areas, and therefore is considered to be the more favourable option.

Overall, the two options being assessed have their own benefits and drawbacks in relation to the Community Wellbeing SEA theme. Focussing on the differentiators, on one hand, Option A is better located for access to the neighbourhood area's sports and recreational facilities. It also benefits from the advantages of being a large site, and therefore is more likely to deliver beneficial assets to the community, such as affordable housing. On the other hand, certain sites in Option B are better located to services and facilities in both Dilton Marsh village and in Westbury. In this respect, both options perform equally favourably.

For the Landscape SEA theme, Option A would likely result in a more significant adverse impact on local villagescape character. This is because Option A proposes that the total allocation is built on one site, which would significantly alter historical development patterns, extending the village to the north-west. Option B's significant impacts come from Site 13, which is noted to alter one Local Key View and would result in the narrowing of the settlement gap between Dilton Marsh and Westbury. Sites 2, 9, and 23 for Option B are unlikely to have significant impacts to the local landscape and may assimilate fairly readily with the existing villagescape character. Overall, Option B is more likely to complement the existing development scale and form, and therefore, is the more preferable option.

Option B performs slightly more favourably than Option A for the Land, Soil, and Water Resources SEA theme as it is less likely to result in the loss of productive agricultural land and supports the most efficient reuse of previously developed land in some locations.

Finally, in relation to the Transportation SEA theme, it can be concluded that Option B is more preferable to Option A as it contains more allocations closer to both bus and rail networks. By spreading allocations in several smaller sites across the village, this may reduce impacts on local traffic. The delivery of all new homes on one larger site through Option A has the potential to exacerbate traffic impacts on the High Street, which is already noted to have congestion issues.

Developing the preferred approach for the DMNP

The residual housing requirement of 41 homes is to be met through the combination of sites proposed through **Option B** (i.e., Site 2, Site 9, Site 13, and Site 23). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the DMNP (to date), responses from community consultation events, and the SEA findings. In addition to residential allocations, the DMNP also supports opportunities to retain and enhance community infrastructure

and support local employment opportunities through safeguarding existing employment sites.

Specifically, the DMNP states:

"The housing strategy for Dilton Marsh aligns with the Core Strategy and the Local Plan Review to focus limited development at the Large Village and within the settlement boundary. For the purposes of monitoring the policy, all sources of housing supply within the designated neighbourhood area contribute towards the delivery of the housing requirement so that it is capable of being met by 2038.

"Evidence on the availability of land has demonstrated that the housing requirement is not capable of being met within the existing settlement boundary, which continues to offer potential for windfall development. The NDP is a community-led planning framework to determine a sustainable choice of suitable, deliverable, and achievable sites to accommodate housing, as informed by the Site Assessment Report and community consultation. The site selection process is explained within the Site Selection Topic Paper. The Topic Paper also demonstrates the continued role of windfall development in meeting the housing requirement in the plan period; with an estimated 12 new dwellings on windfall sites in the first 5-years of the plan.

"Four sites are proposed for allocation, which can deliver approximately 48 dwellings. Planning applications for the development of the four sites proposed for housing allocation should be made in accordance with Policies DM13 to DM16 and other policies of the development plan.

"The NDP would meet the housing requirement in full through policies and allocations. Allocating four sites, and producing housing policies that promotes windfall development, demonstrates that the neighbourhood plan is planning positively for new homes, and provides greater certainty for developers, infrastructure providers and the community. In turn this also contributes to the local authorities' housing land supply, ensuring that the right homes are delivered in the right places. Exceeding the housing requirement will also provide flexibility if circumstances change, such as a reduced quantum of development on allocated sites to address Habitat Regulations under Policy DM05 and allows plans to remain up to date over a longer time scale."

The site-specific policies for the proposed site allocations within the DMNP contain further detail with respect to design and mitigation considerations which aim to address potential constraints to (and opportunities for) development. These aspects are further discussed within the plan appraisal section of the Environmental Report (presented in **Chapter 5** in the main body of the report).

Appraisal of the Regulation 14 version of the Neighbourhood Plan

The Regulation 14 version of the DMNP presents 24 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the DMNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier

scoping stage of the SEA, the Environmental Report presents the findings of the assessment as a commentary of effects under the SEA themes.

A summary of the appraisal findings is presented below.

Long-term significant positive effects are expected in relation to community wellbeing, through the delivery of local housing; the safeguarding of existing community services, facilities, and employment areas; and the designation of ten Local Green Spaces.

Minor positive effects are considered most likely in relation to biodiversity, and climate change and flood risk. This reflects the avoidance of impacts expected by the spatial strategy (site allocations), and additional policy measures which seek to protect and improve biodiversity and increase climate resilience.

Minor negative effects are predicted in relation to the historic environment, due to the proximity of a non-designated asset adjacent to the boundary of one of the site allocations.

Uncertain effects are anticipated for land, soil, and water resources as potential impacts depend on the implementation of design measures, and the location of new housing within the site boundaries.

Mixed effects are anticipated for the landscape theme. Whilst high-quality is encouraged through the site allocation policies, there is potential for negative effects from one site allocation on a potential Local Key View.

Neutral effects are anticipated for the transportation theme. Whilst new development is likely to result in an increased number of vehicles on the road network, the DMNP includes a suite of policies that aim to facilitate (and encourage) the uptake of public transport and active travel.

The SEA puts forward the following recommendations for consideration by plan makers to inform policy development:

- Whilst Policy DM05 indicates a preference for achieving biodiversity net gains onsite in new development areas, where this is not possible, the policy could potentially encourage developers to identify key local areas that could benefit from off-site enhancement measures. Linked to this, development proposals could be expected to provide a proportionate green infrastructure assessment detailing how local wildlife and habitats will be protected and enhanced during the construction and operational phases of development, and how net gains will be delivered.
- The protection for local heritage afforded in Policy DM07 could be strengthened by requiring development proposals to undertake a proportionate heritage assessment to provide further detail about the significance of any heritage assets within or within the setting of the site. Additionally, as a condition attached to any planning approval for the site, an archaeological clerk-of-works could be expected to be on site during the construction phases of development to ensure that any non-designated heritage assets are appropriately preserved and recorded in line with the best practice guidance.

Next Steps

Plan finalisation

Following Regulation 14 consultation, responses will be considered in finalising the DMNP and SEA for submission. Following submission, the DMNP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the DMNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the DMNP will then be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the DMNP, then it will be 'made'. Once 'made', the DMNP will become part of the Development Plan for Wiltshire, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the DMNP will be undertaken by Wiltshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DMNP that would warrant more stringent monitoring over and above that already undertaken by Wiltshire Council.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Dilton Marsh Parish Council's emerging Neighbourhood Plan.
- 1.2 The Dilton Marsh Neighbourhood Plan (the 'DMNP') is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.
- 1.3 The DMNP is being prepared in the context of Wiltshire Council's Core Strategy to 2026 (adopted in 2015) (henceforth known as the 'WCS'). As the Local Plan is over five years old, work is now progressing to review the WCS. In September 2023, the Wiltshire Local Plan Regulation 19 (henceforth known as the 'emerging Local Plan') was submitted for consultation. The DMNP will have due regard to the emerging Local Plan.
- 1.4 It is currently anticipated that the DMNP will be submitted to Wiltshire Council in 2024. Key information relating to the DMNP is presented in **Table 1-1**.

Table 1-1: Key Facts Relating to the DMNP

| Name of Responsible Authority | Dilton Marsh Parish Council | |
|-------------------------------|---|--|
| Title of Plan | Dilton Marsh Neighbourhood Plan ("the DMNP") | |
| Subject | Neighbourhood planning | |
| Purpose | The DMNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with Wiltshire Core Strategy, with due regard given to the emerging Wiltshire Council Local Plan Review. | |
| | The DMNP will be used to guide development within the neighbourhood area. | |
| Timescale | To 2038 | |
| Area covered by the plan | The neighbourhood area covers the parish of Dilton Marsh, in Wiltshire. | |
| Summary of content | The DMNP will set out a vision, strategy, and range of policies for the neighbourhood area. | |
| Plan contact point | Nicola Duke (Parish Clerk): clerk@diltonmarsh-pc.uk | |

SEA screening for the Dilton Marsh Neighbourhood Plan

- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if both the following apply:
 - 1) the Neighbourhood Plan is being prepared within an area with significant environmental constraints, such as, for example, Sites of Special Scientific Interest (SSSI) and designated heritage assets; and
 - 2) the Neighbourhood Plan is likely to allocate sites for development.5
- 1.6 The DMNP has been screened in by Wiltshire Council as requiring a Strategic Environmental Assessment (SEA). The Neighbourhood Plan will allocate new development in the parish. This includes potentially in environmentally sensitive locations, such as:
 - Locations with sensitivity for European and nationally designated sites for biodiversity, including Salisbury Plain Special Protection Area (SPA), Bath & Bradford on Avon Bats Special Area of Conservation (SAC), and Westbury Ironstone Quarry Site of Special Scientific Interest (SSSI); and
 - Locations with sensitivity for the historic environment.
- 1.7 In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).⁶

SEA explained

- 1.8 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the DMNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 - i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft DMNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant

⁵ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 'Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening' accessible here.

⁶ UK Government (2004) 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed here.

effects' that would result from plan implementation) and reasonable alternatives.

1.10 This 'Environmental Report' is concerned with item 'ii' above.

Structure of this Environmental Report

1.11 This document is the SEA Environmental Report for the DMNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1-2: Questions that Must be Answered by the SEA Environmental Report to Meet the Regulatory⁷ Requirements

| Environmental Report question | | In line with the SEA Regulations, the report must include ⁸ | |
|---|---|---|--|
| ı | What is the plan seeking to achieve? | An outline of the contents and main objectives of the plan. | |
| What's | What is the sustainability 'context'? | Relationship with other relevant plans and programmes. The relevant environmental protection objectives , established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. | |
| the scope of the SEA? | What is the sustainability 'baseline'? | The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. | |
| | What are the key issues and objectives? | Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment. | |
| What has plan-making/SEA involved up to this point? | | Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives . Outline reasons for selecting the preferred approach inlight of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan. | |

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

⁸ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

| Environmental Report question | In line with the SEA Regulations, the report must include ⁸ |
|---|---|
| What are the assessment findings at this stage? | The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan. |
| What happens next? | The next steps for the plan making / SEA process. |

2. Local Plan Context and Vision for the Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 In January 2015, Wiltshire Council adopted their Local Plan, which sets out the long-term planning and land use policies within Wiltshire. The Local Plan includes the following documents:9
 - WCS (adopted January 2015) incorporating saved policies from district local plans;
 - Chippenham Site Allocations Plan;
 - Wiltshire Housing Site Allocations Plan;
 - Minerals and Waste Plans; and
 - Made Neighbourhood Plans.
- 2.2 Work is now progressing to review the WCS, as it is now over five years old. In September 2023, the Wiltshire Local Plan (the 'emerging Local Plan') was submitted for Regulation 19 consultation. Once adopted, the emerging Local Plan will set-out a vision and framework for Wiltshire for the period to 2038, addressing housing needs and other economic, social, and environmental priorities.
- 2.3 Neighbourhood plans will form part of the development plan for Wiltshire, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Wiltshire, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Vision, Aims, and Objectives for the Neighbourhood Plan

- 2.4 The vision for the DMNP captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.
- 2.5 The vision is as follows:

'By 2038 Dilton Marsh will be a parish with an enhanced rural environment; a protected and distinct rural landscape setting, protected green spaces and

⁹ Wiltshire Council (no date). 'Planning Policy'. Available here.

¹⁰ Wiltshire Council (2023). 'Local Plan'. Available here.

valued assets; and a commitment to the protection and enhancement of wildlife and habitats.

Limited and sympathetic development at Dilton Marsh will have been managed to meet the needs of our community ensuring that high quality, beautiful and sustainable buildings and places are created. New housing will have reflected the downsizing and ageing of the community and addressed the need for smaller and affordable homes.

All new development will have employed a high level of flood resilient, sustainable design and energy efficiency as we adapt to climate change.

Our vibrant small business community will have been supported to develop and grow and more people will be working from home. The village will continue to offer a good range of services and community facilities with existing ones maintained and encouraged to improve to cater for all.

To make Dilton Marsh accessible and a safe place for everybody our public transport options, footways, cycle routes and bridleway will have been maintained and enhanced to encourage their use. Measures will have been introduced to improve traffic movements, safety and parking to the benefit of all road users'.

- 2.6 The vision is accompanied by 14 objectives:
 - 'Ensure all new development is of high-quality design, sustainably constructed and reinforces the parish's rural landscape, character and appearance.
 - 2. Ensure development protects the rural setting of Dilton Marsh, Penleigh, Penknap, Hisomley, Fairwood, Clearwood and Old Dilton as distinct settlements.
 - 3. To celebrate, protect and manage our key views, heritage, local green space and other valued environmental assets so that they can continue to be used and enjoyed by future generations.
 - 4. To ensure the conservation of protected sites, species and priority habitats and the delivery of biodiversity net-gain which supports the rich biodiversity across the Parish.
 - 5. To respect and maintain the rural character by delivering new development at a scale no larger than is appropriate to Dilton Marsh's status as a Large Village, in appropriate locations that will enhance and maintain the vitality of the rural community.
 - 6. Provide a limited amount of new housing to meet local needs, including smaller dwellings for young single people, couples, families needing their first home and the elderly wishing to downsize their homes yet stay within the village. A proportion of these will be affordable housing.

- 7. To contribute to tackling the causes and effects of climate change in Dilton Marsh, including encouraging sustainable design and energy efficient buildings and appropriate renewable energy installations.
- 8. To protect the quality of life and amenity of residents in terms of privacy, air quality, noise, light pollution created by new development.
- 9. Protect and enhance our footways, cycle routes and rights of way network while improving access to our surrounding countryside.
- 10. To retain and enhance community services and facilities.
- 11. To retain and enhance local employment and commercial services.
- 12. To ensure that new development meets the infrastructure needs arising from future residents.
- 13. Ensure that new developments have enough car parking to meet current and future needs.
- 14. Enable safer pedestrian and cyclist movement around our networks'.

3. What is the Scope of the SEA?

Summary of SEA scoping

- 3.1 The SEA Regulations require that: 'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.¹¹ These authorities were consulted on the scope of the SEA between December 2023 and January 2024.
- 3.3 The purpose of scoping was to outline the 'scope' of the SEA through setting out the following information:
 - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the DMNP;
 - Baseline data against which the DMNP can be assessed;
 - The key sustainability issues for the DMNP; and
 - An 'SEA Framework' of objectives against which the DMNP can be assessed.
- 3.4 The full SEA Scoping Report is available on the Neighbourhood Plan website and accompanies the evidence base for the DMNP at Regulation 14 consultation.¹²
- 3.5 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3-1: Consultation responses received on the SEA Scoping Report

Consultation Response

How the Response was Considered and Addressed

Historic England

Historic Places Adviser (response received on 4th January 2024)

'...In our response to the previous associated SEA Screening consultation we drew attention to the potential of the proposed site allocations to create impacts on designated heritage assets. On this basis we advised that this in itself may have the potential to

Comment noted. Recommended amendment added to paragraph 1.8.

¹¹ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'.

¹² Including the context review and baseline data for the neighbourhood area, for each SEA theme.

Consultation Response

How the Response was Considered and Addressed

generate significant environmental effects sufficient to require the need for a full SEA in its own right, regardless of the need prompted by the HRA process.

Accommodating this consideration within the reasons for a full SEA being required would help ensure that the process paid due account to the assessment of relevant heritage assets. To this end we believe it would be helpful to add this additional consideration to para 1.8 (p3) of the Scoping Report.

Otherwise, we are pleased to see reference to the various guidance we have produced which is relevant to this SEA in section 6 on the Historic Environment (p37). Using this will help ensure that the significance of relevant heritage assets is fully understood and applied in the assessment of the proposed Plan policies, especially those relating to site allocations'.

Environment Agency

Planning Specialist (response received on 5th January 2024)

'... We have no objection to the contents of the report, however we request the removal of the words 'comprehensive and robust' in section 4.3 in relation to the Wiltshire SFRA level 1. We have raised concern with Wiltshire Council that the SFRA, as evidence base for the Wiltshire Local Plan review, is not up to date and therefore not robust enough. It would be best to keep the wording of the Dilton Marsh NP SEA scoping report factual (by removing the above words)'.

Comment noted. Recommended amendment added to paragraph 4.3.

Natural England

N/A

No response received

N/A

3.6 The key sustainability issues and SEA Framework are presented below.

Key sustainability issues

Air Quality

- There are no Air Quality Management Areas (AQMA) within the neighbourhood area.
- Emissions associated with road transport (primarily NO₂) and trains are the main pollutant of concern in the neighbourhood area.
- 3.7 Due to the absence of any significant air quality issues within the neighbourhood area, the air quality theme has been scoped out for the purposes of the SEA process.

Biodiversity

- The nearest European designated sites are located to the east and northwest of the neighbourhood area, namely: Salisbury Plain SPA, and Bath and Bradford on Avon Bats SAC, respectively.
- There is one SSSI within Dilton Marsh: Westbury Ironstone Quarry, located in the central-eastern region of the neighbourhood area. There are six other SSSI within 5 km of the neighbourhood area: Upton Cow Down SSSI, Salisbury Plain SSSI, Picket and Clanger Wood SSSI, Bratton Downs SSSI, Cley Hill SSSI, and River Avon System SSSI.
- The whole of the neighbourhood area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward (i.e., residential, rural-residential or rural non-residential development types).
- There are eight County Wildlife Sites in the neighbourhood area.
- There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the neighbourhood area, including areas of Deciduous Woodland, and Wood-pasture and Parkland.
- Some of the areas of deciduous woodland BAP Priority Habitat are identified as areas of ancient semi-natural woodland, including Black Dog's Wood North, Tennis Corner Wood, and Chalcot Wood.

Climate Change

- Any increases in the built footprint of the neighbourhood area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the neighbourhood area.
- The largest sector for CO₂ emissions in 2017 was the Transport sector.
- Wiltshire Council declared a climate emergency in 2019 and has resolved to support local authorities (and, by extension, neighbourhood groups) to help tackle climate change through plan-making where possible.

- The areas at highest risk of fluvial flooding (Flood Zone 3) are those surrounding the River Biss which Is located in the north of the neighbourhood area.
- Surface water flood risk is prevalent in the neighbourhood area, with areas of medium-high risk also associated with areas near the River Biss, in the north.
- The Neighbourhood Plan should seek to increase the resilience of the neighbourhood area to the effects of climate change by supporting and encouraging adaptation strategies.

Population and Community

- Population growth within the neighbourhood area has been modest between 2011-2021 (1%).
- The neighbourhood area contains at least one Lower Super Output Area (LSOA) within the 50% most deprived LSOA in England for the following Index of Multiple Deprivation domains: Barriers to Housing and Services; Living Environment Deprivation; Employment Deprivation; and Education, Skills and Training.
- In 2021, the majority of households within the neighbourhood area owned their property outright or with a mortgage/loan (at 73.7%), with an additional 0.4% under shared ownership. Private rent and social rent accounted for 13.6% and 12.3% of the area's tenure mix, respectively.
- The neighbourhood area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the neighbourhood area's sense of identity.
- As the neighbourhood area is predominantly rural, there is a good supply
 of local woodland and rivers, many of which can be accessed by the
 extensive local public footpath network.

Historic Environment

- There are a total of 28 listed buildings (25 Grade II, two Grade II*, and one Grade I) which are protected through the Listed Buildings and Conservation Areas Act 1990. None of the these are known to be at risk.
- There is one Scheduled Monument within or within proximity to the neighbourhood area, which is protected under the Ancient Monuments and Archaeological Areas Act 1979.
- There are no Conservation Areas or Registered Parks and Gardens within Dilton Marsh.
- There are 76 features within neighbourhood area based on a high-level review of the Wiltshire and Swindon Historic Environment Record (HER).

Landscape

- There are no nationally protected landscapes within the neighbourhood area. However, there are two National Landscapes (formerly 'Areas of Outstanding Natural Beauty') within 10 km: Cranborne Chase & West Wiltshire Downs, and Cotswolds.
- The neighbourhood area is entirely within Avon Vales National Character Area (NCA). The NCA profiles list several key characteristics and statements of environmental opportunities for these areas.
- Reflecting the results of the South Wiltshire Landscape Character
 Assessment (LCA), the neighbourhood area is within the 'North Bradley
 Rolling Clay', 'Haywood Rolling Clay Lowland' and the 'Chapmanslade
 Greensand Hills' Landscape Typologies. The LCA describes the key
 characteristics, key forces for change, and land management guidelines
 for these three areas.
- In terms of the topography of the neighbourhood area, it is recognised there is a broad incline to the south; therefore, any future growth within the southern area of the neighbourhood area is likely to be relatively elevated in the landscape in comparison to the surrounding areas.
- The views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

Land, Soil, and Water Resources

- The provisional Agricultural Land Classification (ALC) dataset provided by Natural England indicates that the neighbourhood area is mostly underlain by Grade 3 'Good to Moderate' agricultural land, with small pockets of Grade 2 'Very Good' agricultural land (in the south-eastern region) and areas of Grade 4 'Poor' agricultural land (found north of the A3098 and in the central-western region).
- In the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e., best and most versatile land) or Grade 3b land.
- The water resources located within and within proximity to the neighbourhood area include the River Biss (including its tributaries), alongside a network of drainage ditches.
- The neighbourhood area (along with the entirety of Wessex Water's supply area) is identified as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.

Transportation

 There is one train station in the neighbourhood area – Dilton Marsh Train Station

- There are two bus services within the neighbourhood area: the 47 service and the X47 service.
- The neighbourhood area's road network consists mostly of lanes and country roads; however, there are also two A Roads (A36 and A3098) and one B road (B3099).
- The A3098 and B3099 have been identified by NPSG as the two roads where the neighbourhood area experiences its highest volumes of congestion.
- NPSG also note that availability of parking is an issue in the neighbourhood area, with there being limited spaces available. This results in parking within the carriageway being an issue in the village of Dilton Marsh, when the existing limited number of parking spaces have been filled.
- There is an extensive PRoW network (comprised of footpaths and bridleways) across the entirety of the neighbourhood area.

SEA Framework

3.8 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the Regulation 14 version) of the DMNP will be assessed consistently using the framework.

SEA Objective

Assessment questions to consider for the allocations / proposals within the DMNP

Biodiversity

Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the neighbourhood area.

- Protect and enhance nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?
- Protect and enhance priority habitats and the links between them?
- Achieve a net gain in biodiversity?
- Support habitat restoration or new habitat creation within the identified Network Enhancement or Expansion Zones?
- Support enhancements to multifunctional green infrastructure networks and the network of open spaces?

Climate Change

Reduce the contribution to climate change made by activities in the neighbourhood area.

- Reduce the number of journeys made by polluting vehicles?
- Promote the use of sustainable modes of transport, including walking, cycling and public transport?
- Improve or extend local footpaths, cycle paths or strategic green infrastructure routes?

SEA Objective

Assessment questions to consider for the allocations / proposals within the DMNP

- Increase the number of new development meeting or exceeding sustainable design criteria?
- Generate energy from low or zero carbon sources?
- Reduce energy consumption from non-renewable resources?
- Support the transition to electric vehicles?

Support the resilience of the neighbourhood area to the potential effects of climate change, including flood risk.

- Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change?
- Improve and extend green infrastructure networks in the neighbourhood area?
- Sustainably manage water runoff?
- Increase the resilience of the local built and natural environment?
- Ensure the potential risks associated with climate change are duly considered in the design of new development in the neighbourhood area?

Community Wellbeing

Ensure growth in the neighbourhood area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.

- Provide everyone with the opportunity to live in good quality and affordable housing?
- Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs?
- Provide flexible and adaptable homes that meet people's changing needs?
- Improve the availability and/ or accessibility of local services and facilities?
- Encourage and promote social cohesion and active involvement of local people in community activities?
- Contribute to improving aspects of deprivation in the neighbourhood area?
- Maintain or enhance the quality of life of existing and future residents?

Historic Environment

Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.

- Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings?
- Conserve and enhance the special interest, character and appearance of locally important features and their settings?
- Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Wiltshire and Swindon HER?
- Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?

SEA Objective

Assessment questions to consider for the allocations / proposals within the DMNP

 Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?

Landscape

Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.

- Protect and/ or enhance local landscape character and quality of place?
- Conserve and enhance local identity, diversity, and settlement character?
- Identify and protect locally important viewpoints which contribute to character and sense of place?
- Protect and extend/ enhance green infrastructure corridors?
- Protect visual amenity?
- Retain and enhance landscape features that contribute to the rural setting, including trees and hedgerows?

Land, Soil, and Water Resources

Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.

- Avoid the loss of high-quality agricultural land resources?
- Promote any opportunities for the use of previously developed land, or vacant / underutilised land?
- Avoid impacts on water quality?
- Support improvements to water quality?
- Ensure appropriate drainage and mitigation is delivered alongside development?
- Protect the neighbourhood area's waterbodies?
- Maximise water efficiency and opportunities for water harvesting and/ or water recycling?

Transportation

Promote sustainable transport use and reduce the need to travel.

- Support the objectives within the Wiltshire Local Transport Plan to encourage the use of more sustainable transport modes?
- Encourage the uptake of active travel opportunities?
- Extend or improve active travel networks?
- Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area?
- Improve road safety?
- Reduce the impact on residents from the road network?
- Improve parking facilities?

4. Consideration of Reasonable Alternatives Through the SEA

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
 - An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the DMNP.

Defining Reasonable Alternatives

- 4.3 Whilst work on the DMNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.4 In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the DMNP.

Housing Numbers to Deliver Through the Neighbourhood Plan

- 4.5 The WCS identifies Dilton Marsh as a 'Large Village' in the settlement hierarchy, which is the second to largest classification, below 'Market Towns'.
- 4.6 In the emerging Local Plan, Dilton Marsh is identified as part of the 'Trowbridge Rural Area' and has been allocated a housing requirement of 61 homes by the end of the emerging Local Plan period (2038).
- 4.7 As of March 2022, Dilton Marsh has 20 completions or commitments, leaving a residual housing target of 41 homes to be met through Neighbourhood Plan allocations.

Consideration of Potential Site Options

4.8 The site selection process began by identifying a pool of potential sites, which were identified through the Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA)¹³ and the Dilton Marsh Call for Sites in July 2022. In total, 27 potential sites were identified for assessment.

¹³ Wiltshire Council (no date). 'Monitoring and evidence'. Available here.

- 4.9 An independent and objective assessment process was undertaken, with the findings presented in a Site Assessment Report (SAR, 2023)¹⁴. The SAR considered the pool of sites to determine which site options may be suitable in principle for allocation in the DMNP.
- 4.10 The assessment concluded that none of the sites are considered to be free of any substantive constraints and therefore immediately suitable, available, and achievable for a housing allocation.
- 4.11 A total of ten sites were considered to be potentially suitable, available, and achievable for housing allocation either in full or in part, and subject to the resolution or mitigation of identified constraints.
- 4.12 The ten sites identified as potentially suitable for housing allocation in the SAR are listed in **Table 4-1**.

Table 4-1: Sites Identified as Potentially Suitable for Housing Allocation by the SAR

| Site ref: | Name of Site, Address | Indicative Capacity |
|-----------|---|---------------------|
| Site 2 | Land to the rear of 14 St Marys Lane | 3 – 7 |
| Site 5 | Land at Fairwood Industrial Estate | 12 - 24 |
| Site 7 | Barn at Five Farthings Farm | 3 - 5 |
| Site 9 | Five Farthings Farm | 11 - 22 |
| Site 10 | Land to the south of Petticoat Lane | 15 - 30 |
| Site 12 | Land north of High Street | 34 – 68 |
| Site 13 | Land at High Street, east of Railway | 14 - 29 |
| Site 18 | Land at High Street and St Marys Lane Junction | 6-12 |
| Site 22 | Land south of Clivey | 75 - 100 |
| Site 23 | Land at 34 Petticoat Lane | 11 - 22 |

- 4.13 Following the site assessment process, the Neighbourhood Group completed further public consultation on the potentially suitable site options. The aim of the consultation was to determine which sites would be supported in principle for a Neighbourhood Plan allocation and deliver on DMNP objectives. Criteria were considered to support this process. Specifically:
 - 1. 'Will the site protect the rural setting of distinct settlements (Dilton Marsh, Penleigh, Penknap, Hisomley, Fairwood, Clearwood and Old Dilton) and reinforce the rural landscape, character and appearance of the parish?

¹⁴ Master Land and Planning (2023). 'Dilton Marsh Neighbourhood Development Plan Site Assessment Report March 2023'. Available here.

- 2. Will the site preserve or enhance the historical and cultural assets in the Parish?
- 3. Will development on the site conflict with other proposed policies of the NDP about Local Green Space and Key Views?
- 4. Will the site conserve and enhance environmentally protected sites and species, or priority habitats, and minimise the loss of green infrastructure within the Parish?
- 5. Will the site provide **development at a scale appropriate to Dilton Marsh** that will contribute towards meeting the identified requirement, and offer scope for an **appropriate mix of dwelling sizes and tenures**?
- 6. Will the site contribute to **mitigating the impacts of climate change** through minimising sources of environmental pollution and flooding, or providing opportunity for renewable energy installations?
- 7. Will the site **protect the quality of life and amenity of residents** in terms of privacy, air quality, noise, and light pollution created by new development?
- 8. Will the site promote sustainable transport choices, and protect or enhance the footways, cycle routes and rights of way network?
- 9. Will the development retain and enhance local community services and facilities and support the local economy?
- 10. Will the site provide adequate infrastructure to meet the needs of future residents, including adequate parking for the needs of future residents?'
- 4.14 Following the public consultation process, six sites achieved a 'neutral' or 'positive' score¹⁵. Site 18 has since been withdrawn by the landowner and is no longer available in the near future due to long-term tenancy agreements. In this respect, the remaining five sites have been the focus for the SEA (see **Table 4.2** below).

Table 4-2: Sites Taken Forward for Assessment in the SEA

| Site ref: | Name of Site, Address | Indicative Capacity |
|-----------|--------------------------------------|---------------------|
| Site 2 | Land to the rear of 14 St Marys Lane | 3 – 7 |
| Site 9 | Five Farthings Farm | 11 - 22 |
| Site 12 | Land north of High Street | 34 – 68 |
| Site 13 | Land at High Street, east of Railway | 14 - 29 |
| Site 23 | Land at 34 Petticoat Lane | 11 - 22 |

¹⁵ DMNP Site Selection Report (2023) – provides further information on the site shortlisting process and forms part of the evidence base for the DMNP.

Spatial Strategy Options to Consider Through the SEA

- 4.15 To support the choice of a development strategy for the DMNP, the SEA process has assessed two spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified above, which are summarised below¹⁶.
 - Option A: Delivery of new housing through an allocation at Site 12.
 - **Option B:** Delivery of new housing through allocations at Sites 2, 9, 13, and 23.
- 4.16 Upon considering the indicative capacities of the shortlisted sites, the residual housing need of 41 homes could potentially be met through a single larger allocation on Site 12 (Option A), or via a combination of smaller allocations on the remaining four sites (Option B). The SEA has appraised the relative sustainability merits associated with these two options with a view to informing the plan making process.
- 4.17 **Figure 4-1** visually presents these two options.

¹⁶ The full areas of the sites (as put forward through the 'call for sites', and Wiltshire's SHEELA) have been considered within the site assessment process. For the purposes of the SEA, the areas of the sites which have been included within the options appraisal reflect the locations which are considered the most suitable areas to take forward for new development (i.e., the least constrained parts of the sites). This reflects the conclusions of the site assessment process, and community preferences with regards to the potential location of new development within the neighbourhood area.

Figure 4-1: Options Considered as Reasonable Alternatives Through the SEA

Options considered as reasonable alternatives through the SEA



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland TI/NASA, USGS Contains public sector information licensed under the Opertibutors, Esri UK, Esri, HERE, Garmin, Foursquare, GeoTechnologies, Inc, METI/NASA, USGS Contains public sector information licensed under the Open Government Licence v3.

Appraisal Findings

- 4.18 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through seven SEA Themes, as follows:
 - Biodiversity;
 - Climatic Change (Including Flood Risk);
 - Community Wellbeing;
 - Historic Environment:
 - Landscape;
 - Land, Soil and Water Resources; and
 - Transportation.
- 4.19 The appraisal considers the relative sustainability merits of the spatial strategy options. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA Theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the two options in relation to each theme considered.
- 4.20 Sources of information to support the appraisal has included (amongst others): Ordnance Survey maps, MAGIC Interactive Map, 17 the Environment Agency's Flood Risk Maps for England, 18 Natural England's Agricultural Land Classification maps, ¹⁹ Google Earth, ²⁰ reports and interactive mapping layers available on Wiltshire Council's webpages, 21 the Wiltshire and Swindon HER,²² and baseline studies provided by the Neighbourhood Group.
- 4.21 **Table 4-3** to **Table 4-9** below present the appraisal findings.

¹⁷ MAGIC (2021): 'Interactive Map', [online] available to access via this link

¹⁸ Environment Agency (2021): 'Flood Map for Planning', [online] available to access via this link
19 Natural England (2021): 'Regional Agricultural Land Classification Maps and Likelihood of Best and Most Versatile Land', [online] available to access via this link

²⁰ Google (2021): 'Google Earth', [online] available to access via this link

²¹ Wiltshire Council (no date): 'Maps', [online] available to access via this link

²² Wiltshire Council (no date): 'Wiltshire and Swindon Historic Environment Record', [online] available to access via this link

Option A

1

Option B

2

Table 4-3: Appraisal Findings (Biodiversity)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

There are no European designated sites directly within the neighbourhood area, but in the wider context, the Salisbury Plain SPA and the Bath and Bradford on Avon Bats SAC are located to the east and north-west, respectively. These sites contain habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). Specifically, the neighbourhood area falls within the Bath and Bradford-on-Avon Bat SAC consultation zone, being a core area for the Greater Horseshoe species. Future development has the potential for significant impacts on this species' habitats; therefore, potential impacts at all of the sites should be considered at an early stage in regard to physical changes, lighting, noise and vibration, recreational disturbance, and pollution. The DMNP has also been accompanied by a Habitats Regulations Assessment (HRA)²³ to further consider potential impacts to European sites.

Regarding national designations, there is one geological SSSI, Westbury Ironstone Quarry, located within the neighbourhood area, to the north of Dilton Marsh village. This designation contains geological features protected under the Wildlife and Countryside Act (1981) (as amended). There are six other SSSI within 5 km of the neighbourhood area.

It is important to highlight that the potential site allocations considered through all options overlap with either one or multiple SAC/SPA/SSSI Impact Risk Zones (IRZ) for the types of development likely to be taken forward during the plan period. The IRZ threshold is associated with 'all planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings / structures'.

As all the potential site allocations are located outside (but adjacent to) the settlement of Dilton Marsh, consultation with Natural England will be required to determine whether the applications will have any significant impacts to the integrity of these sites. In this respect, both options perform similarly in terms of potential impacts to European and nationally designated sites.

With regard to locally designated sites for biodiversity conservation (i.e. without statutory protection) and important habitats, the neighbourhood area contains eight County Wildlife Sites (CWS) and several important habitat sites (including Biodiversity Action Plan (BAP) Priority Habitat and Ancient Woodland). However, none of the sites proposed through either option are in proximity of any of these designations / habitats.

Proposals for larger sites have the potential to be designed to incorporate green infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. In this context, Option A is perhaps more likely to enhance ecological networks through new development areas, providing proposals are designed to deliver measurable, proportionate, and appropriate biodiversity net gains (BNG) in line with national and local policy.

²³ The HRA Report accompanies the DMNP at Regulation 14 consultation. The findings and recommendations of the HRA have been considered through the SEA process and presented in the plan appraisal (see Chapter 5 of this Environmental Report).

Table 4-4: Appraisal Findings (Climate Change [Including Flood Risk])

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

In response to the UK Government's commitment to tackling the climate crisis, Wiltshire Council declared a Climate Emergency in February 2019 and at the same time, are committed to making the authority net-zero carbon by 2030. In the context of this, it will be important for the DMNP to encourage proposals which seek to mitigate and adapt to climate change.

Option A Option B
2 1

In terms of climate change mitigation, road transport is a significant contribution to emissions within Wiltshire. Therefore, development in proximity of Dilton Marsh village and neighbouring Westbury (i.e., locations within/in proximity of the neighbourhood area with the greatest variety of services and facilities) will, to an extent, help limit greenhouse gas emissions from private transport by making amenities and public transport networks as close as possible to the new developments. Sites through both options are within a 10-minute walking distance from a bus stop and Dilton Marsh's High Street (where the majority of the village's facilities and services can be found). Site 13 is the only site within a 10-minute walking distance from services and facilities in Westbury. Site 13 also benefits from being located adjacent to Dilton Marsh train station. Whilst both options perform favourably with respect to climate change mitigation efforts, Option B it is considered as to be a slightly more favourable option, given the proximity of Site 13 to the train station.

New development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. In relation to adapting to the effects of climate change, Dilton Marsh village (and its immediate surroundings) is wholly located within Flood Zone 1 which represents areas of England which have a low fluvial flood risk potential. Given that all potential site allocations are within Flood Zone 1, fluvial flood risk is unlikely to comprise a significant constraint to development through either option. It is also considered that the provisions of the NPPF and local policy (including relating to the sequential / exception test) will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented.

Regarding surface water flood risk issues, all the potential site allocations comprise areas of 'Very Low' risk. However, allocations at these locations are likely to increase areas of hardstanding and potentially increase the surface water flood risks to surrounding locations. Nonetheless, it is anticipated that surface water flood risk issues could largely be contained to all sites via the use of appropriate drainage systems which would minimise the risk of surface water run-off to surrounding areas. It is noted that there is a small unnamed stream that runs along the boundary of Sites 2 and 12, so surface water flood risk at these sites may be considered as more sensitive to development. As Site 12 would result in the development of a larger area of greenfield land when compared to Site 2, development at this site has more potential to exacerbate surface water flood risks to this unnamed stream. Therefore, in regard to surface water flood risk, Option B is more favourable than Option A.

Table 4-5: Appraisal Findings (Community Wellbeing)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

Accessibility to services and facilities is a key determinant of residents' quality of life. With regards to community assets, Dilton Marsh village contains two community venues, four Places of Worship, a pub, and schools (one pre-school, one primary school, and a college). Neighbouring Westbury, to the east of the neighbourhood area, has a wider offering of services and facilities, including convenience stores and supermarkets. Whilst both options perform favourably for accessibility to local services and facilities in Dilton Marsh, Option B performs slightly better than Option A, given that Site 13 is best placed of all the options to access to services and facilities in Dilton Marsh village and Westbury.

Proposals for larger sites have the potential to generate developer contributions which could provide significantly more additional (or expand the existing) services and facilities offered within the neighbourhood area, positively contributing to community vitality and wellbeing. Development of larger sites also increases the viability of providing housing of an appropriate type and tenure (including affordable housing) to meet local needs. In this respect, Site 12 (Option A) has the greatest potential to deliver wider benefits for the community in this respect.

The benefits to wellbeing and mental health resulting from close contact with the natural environment are well-documented. In this regard, the land surrounding Dilton Marsh village is predominantly rural; therefore, there is a good supply of local woodland and rivers near all of the considered sites, many of which can be accessed by the extensive local public footpath network. The Local Green Space Topic Paper²⁴ recommends a total of eight areas for designation as Local Green Spaces (LGS) in the emerging DMNP. All sites would be within a 10-minute walking distance of at least one of these proposed LGS.

Active lifestyles are also associated with wellbeing and mental health benefits. In additional to being located near the natural environment (which may promote walking as a recreational activity) the neighbourhood area also contains one sports/recreation area: Dilton Marsh Playing Fields (containing a children's play area and football pitches), located in the west of Dilton Marsh village. Of the sites being assessed, Site 12 (Option B) is best placed to benefit from Dilton Marsh Playing Fields, given its proximity to the fields.

Option A Option B
=1 =1

²⁴ Dilton Marsh Neighbourhood Plan (2023) 'Dilton Marsh Neighbourhood Development Plan Local Green Space Topic Paper' can be accessed here.

Table 4-6: Appraisal Findings (Historic Environment)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

In relation to historic environment constraints, the neighbourhood area contains one Grade I, two Grade II*, and 25 Grade II Listed Buildings, along with one Scheduled Monument. Given the concentration of heritage assets within the centre of Dilton Marsh village, potential impacts to the historic environment are more likely at sites in this area (as proposed through both options). Whilst none of the sites directly contain any nationally designated heritage assets, an overview of the potential sensitivities is provided below:

| Option A | Option B |
|----------|----------|
| 2 | 1 |

- Site 12 is 30 m west of '6 and 8, St Mary's Lane' (Grade II Listed Building) and 40 m west of '73 and 75, St Marys Lane' (Grade II Listed Building). Development at Site 12 is unlikely to affect the setting of '73 and 75, St Marys Lane' due to the presence of dense vegetation between the Listed Building and the application site boundary. However, there is potential for the setting of '6 and 8, St Mary's Lane' to be significantly impacted by development at Site 12 given the proximity of application site boundary and the designation, and the absence of screening between the two.
- All of the other sites are at least 100 m from a Listed Building / Scheduled monument. The nearest of these designations to each site is also screened from view by existing built-up areas within the village boundary.

Reflecting the above, consultation with Historic England is encouraged to ensure that development proposals seek to implement sensitive design which respects and enhances the setting of nationally designated heritage assets. This is particularly relevant if Option A is taken forward as the preferred approach.

With reference to non-designated heritage assets and features, the Wiltshire and Swindon HER²⁵ contains a total of 76 locally important heritage features which contribute to the character and setting of the neighbourhood area. Following a high-level review of the HER, Site 9 and Site 12 are the most likely to have the greatest potential to contain undiscovered archaeological remains as they are the only sites with a recorded asset within/adjacent to their application boundary (asset MWI71467, 'site of outfarm south of Dilton Marsh Old Vicarage' for Site 9; asset ST84NW610, 'undated earthworks' for Site 12). Therefore, it is recommended that applications for new development within the neighbourhood area (particularly associated with Site 9 and Site 12) should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

Certain stretches of Dilton Marsh village's High Street still retain their historical linear settlement pattern, with dwellings being constructed in lines along the High Street. Development at Site 12 would alter an existing stretch of linear development along the High Street, which also contains buildings of local historical value (locally known as the Weavers' Cottages). Development at all the other sites would pose less of an issue in this regard.

²⁵ Wiltshire Council (no date). 'Wiltshire and Swindon Historic Environment Record'. Available here.

Table 4-7: Appraisal Findings (Landscape)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

The neighbourhood area is not within or in proximity of a National Park, National Landscape, or Green Belt land. In this context, neither option would adversely impact the integrity of any nationally protected landscapes.

Option A Option B
2 1

part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms.

At the local level, landscape and villagescape character play an important

All of the sites being considered are within local landscape type F3: Chapmanslade Greensand Hills. Sensitivities within this landscape type that could be impacted development include: peaceful, rural setting; and traditional field pattern. Whilst all of the sites being considered could have the potential to impact the peaceful/rural setting, Site 12 is the only site that is likely to have the potential to impact the traditional field pattern as it is the only site that spans multiple fields.

A summary of additional sensitivities, unique for each option, is provided below:

- Option A an allocation at Site 12 would not be in keeping with the existing built-form and development patterns (i.e. linear development along the High Street), significantly extending the built-up area of the village to the north-west. However, given the size of the site, there might be opportunities to deliver a landscaping / green infrastructure scheme alongside new housing. Nonetheless, this is dependent on the design of the scheme. Additionally, to the north and west of the application site is open countryside (with some shielding from trees to the north); therefore, development at this site also has the potential to alter views looking into Dilton Marsh from the east and (to a lesser extent) the north.
- Option B development at Site 13, which currently comprises an open plot of land with trees and grassland, would narrow the settlement gap between Dilton Marsh and Westbury. Site 13 is also disadvantaged by being separated from Dilton Marsh settlement by a train line, which may also make development at this site seem separate to the rest of the village. Finally, for Site 13, development at this site could potentially have a significant impact on a proposed Local Key View (LKV1). Developments in the remainder of the sites associated with Option B are less likely to have impacts on the landscape as they are all located on sites that already have some degree of development within them. Sites 9 and 23 back onto open fields to the south, however they are shielded by trees, so views looking south towards the village are unlikely to be significantly affected by development at these sites.

²⁶ West Wiltshire District Council (2006) 'West Wiltshire District Landscape Character Assessment' can be accessed here.

Option A

2

Option B

1

Table 4-8: Appraisal Findings (Land, Soil, and Water Resources)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

Regarding the location of the best and most versatile land for agricultural purposes, a detailed agricultural land classification (ALC) assessment has not been undertaken within the neighbourhood area. The provisional ALC dataset provided by Natural England indicates that Dilton Marsh village is mostly underlain by Grade 3 'Good to Moderate' agricultural land, although there are areas of Grade 2 'Very Good' agricultural land and Grade 4 'Poor' agricultural land found towards the south of the village. Based on the provisional ALC dataset, it is likely that Sites 2, 12, and 13 are underlain by Grade 3 land, and Sites 9 and 23 are underlain by Grade 4 land. In this regard, Option B performs more favourably.

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Whilst none of the sites under consideration are listed on Wiltshire's brownfield register²⁷, satellite imagery can give an indication as to whether the site has previously been developed. In this regard, Sites 2, 9, and 23 already have some development within their site boundary, whereas Site 12 and Site 13 do not have any existing permanent buildings within their site boundary. In this regard, as Option B makes use of more previously developed land, Option B performs slightly more favourably than Option A in this respect through encouraging the most efficient use of land at these locations.

The water resources located within and in proximity of the neighbourhood area include an unnamed stream that runs along the border of Sites 2 and 12, and the Biss Brook, which runs 120 m east of Site 13. Limited impacts to Biss Brook are anticipated, given the distance between the waterbody and Site 13. However, there is potential for impacts to the unnamed stream from run-off at Sites 2 and 12, as the stream is within/adjacent to these sites. Given that Site 12 is significantly larger than Site 2, there might be a greater potential for new development areas to be located at further distance from the stream, and for the site to incorporate green infrastructure buffers to limit potential run-off. However, this is dependent on the design of new development areas.

Sites 9 and 23 (both Option B) are partially within/adjacent to South Wessex Nitrate Vulnerable Zone (NVZ) for groundwater. In this respect, development proposals, particularly at these sites, should be encouraged to deliver nitrate and water neutrality in line with latest guidance.

Adopted in July 2009, the Wiltshire and Swindon Waste Core Strategy identifies areas for waste safeguarding. None of the potential site allocations are within a Strategic or Local Waste Site mineral consultation area.

²⁷ Wiltshire Council (2022). 'Brownfield Register'. Available here.

Table 4-9: Appraisal Findings (Transportation)

Discussion of Potential Effects and Relative Merits of Options Rank of Preference

With reference to local public transport networks, the village of Dilton Marsh is served by its own railway station and two bus services. The village also benefits from an extensive network of public footpaths and one cycleway.

Option A Option B
2 1

Given that Dilton Marsh village is understood to have congestion issues on the A3098 and B3099 (which pass through the village), sites which are best placed to make use of the local public transport/ active transport network are better performing in relation to this SEA theme. In this respect, new development areas should be encouraged to provide connectivity and accessibility to local public transport networks and maximise opportunities for safe walking and cycling to local services and facilities. As all of the sites are within or adjacent to the village, both options perform relatively favourably with respect to proximity and accessibility to public transport options. However, as Site 13 and Site 23 are closer to the rail network (via Dilton Marsh station), Option B is likely to deliver a greater number of homes in proximity to bus and rail services.

Regarding site access by car, all of the sites are connected to the existing highways network; therefore, site access is not likely to be problematic for any of the sites. While some of these entry points might need to be widened and upgraded to accommodate additional traffic, this is likely to be possible at locations where this would be needed. Access on foot to Sites 2 and 9 are partially constrained by a lack of existing footpath access found directly outside of the proposed sites.

Whilst there is the potential to establish access into the southern section of Site 12 from High Street, this is the main route through the village. Therefore, focusing all new development at Site 12 through Option A may exacerbate local traffic issues on High Street. In contrast, Option B distributes its allocations across four sites which are in different locations around the village, which may result in a comparatively smaller impact on local traffic.

Summary of Appraisal Findings

4.22 The table below summarises the rankings of the options with regards to their relative sustainability performance in relation to each SEA Theme.

| s - uncertain |
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| s - positive |
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| s - mixed |
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- 4.23 In conclusion, both options have the potential to significantly impact upon the integrity of European and nationally designated sites for biodiversity, as they fall within at least one SAC/SPA/SSSI IRZ related to the type of development being proposed. None of the options overlap with any locally important biological designations/habitats, so their impact on these sites can be considered as equal. The only differentiating factor between the options, in relation to the Biodiversity SEA theme, is that Site 12 (Option A) may be preferable due to the benefits associated with developments on a larger sites (assuming appropriate BNG is delivered). Therefore Option A is a slightly more favourable option in relation to the Biodiversity SEA theme.
- 4.24 Potential impacts relating to climate change are largely dependent on the extent to which mitigation and adaptation measures are incorporated into the design of new development areas. Whilst the sites all perform favourably with respect to climate change adaptation (minus some surface water flood risk

- issues), Option B performs slightly better than Option A for climate change mitigation given that Sites 13 and 23 are likely to maximise opportunities for active travel.
- 4.25 Option A performs the least favourably in relation to the Historic Environment SEA theme, with development at this site having the potential to have significant effects on the setting of at least one Listed Building, and the linear historic settlement pattern in Dilton Marsh village. Sites associated with Option B pose relatively few potential impacts to heritage assets and areas, and therefore is considered to be the more favourable option.
- 4.26 Overall, the two options being assessed have their own benefits and drawbacks in relation to the Community Wellbeing SEA theme. Focussing on the differentiators, on one hand, Option A is better located for access to the neighbourhood area's sports and recreational facilities. It also benefits from the advantages of being a large site, and therefore is more likely to deliver beneficial assets to the community, such as affordable housing. On the other hand, certain sites in Option B are better located to services and facilities in both Dilton Marsh village and in Westbury. In this respect, both options perform equally favourably.
- 4.27 For the Landscape SEA theme, Option A would likely result in a more significant adverse impact on local villagescape character. This is because Option A proposes that the total allocation is built on one site, which would significantly alter historical development patterns, extending the village to the north-west. Option B's significant impacts come from Site 13, which is noted to alter one Local Key View and would result in the narrowing of the settlement gap between Dilton Marsh and Westbury. Sites 2, 9, and 23 for Option B are unlikely to have significant impacts to the local landscape and may assimilate fairly readily with the existing villagescape character. Overall, Option B is more likely to complement the existing development scale and form, and therefore, is the more preferable option.
- 4.28 Option B performs slightly more favourably than Option A for the Land, Soil, and Water Resources SEA theme as it is less likely to result in the loss of productive agricultural land and supports the most efficient reuse of previously developed land in some locations.
- 4.29 Finally, in relation to the Transportation SEA theme, it can be concluded that Option B is more preferable to Option A as it contains more allocations closer to both bus and rail networks. By spreading allocations in several smaller sites across the village, this may reduce impacts on local traffic. The delivery of all new homes on one larger site through Option A has the potential to exacerbate traffic impacts on the High Street, which is already noted to have congestion issues.

Developing the preferred approach

Choice of sites taken forward for the purposes of the DMNP

4.30 The residual housing requirement of 41 homes is to be met through the combination of sites proposed through **Option B** (i.e., Site 2, Site 9, Site 13, and Site 23). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the DMNP (to date), responses from community consultation events, and the SEA findings. In addition to residential allocations, the DMNP also supports opportunities to retain and enhance community infrastructure and support local employment opportunities through safeguarding existing employment sites.

4.31 Specifically, the DMNP states:

"The housing strategy for Dilton Marsh aligns with the Core Strategy and the Local Plan Review to focus limited development at the Large Village and within the settlement boundary. For the purposes of monitoring the policy, all sources of housing supply within the designated neighbourhood area contribute towards the delivery of the housing requirement so that it is capable of being met by 2038.

"Evidence on the availability of land has demonstrated that the housing requirement is not capable of being met within the existing settlement boundary, which continues to offer potential for windfall development. The NDP is a community-led planning framework to determine a sustainable choice of suitable, deliverable, and achievable sites to accommodate housing, as informed by the Site Assessment Report and community consultation. The site selection process is explained within the Site Selection Topic Paper. The Topic Paper also demonstrates the continued role of windfall development in meeting the housing requirement in the plan period; with an estimated 12 new dwellings on windfall sites in the first 5-years of the plan.

"Four sites are proposed for allocation, which can deliver approximately 48 dwellings. Planning applications for the development of the four sites proposed for housing allocation should be made in accordance with Policies DM13 to DM16 and other policies of the development plan.

"The NDP would meet the housing requirement in full through policies and allocations. Allocating four sites, and producing housing policies that promotes windfall development, demonstrates that the neighbourhood plan is planning positively for new homes, and provides greater certainty for developers, infrastructure providers and the community. In turn this also contributes to the local authorities' housing land supply, ensuring that the right homes are delivered in the right places. Exceeding the housing requirement will also provide flexibility if circumstances change, such as a reduced quantum of development on allocated sites to address Habitat Regulations under Policy DM05 and allows plans to remain up to date over a longer time scale."

4.32 The site-specific policies within the DMNP (see Policies DM13 to DM16) contain further detail with respect to design and mitigation considerations which aim to address any potential constraints to development. These aspects are further discussed within the plan appraisal (**Chapter 5**) below.

5. Appraisal of the Regulation 14 Version of the Neighbourhood Plan

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the DMNP. This chapter presents:
 - An appraisal of the current version (i.e., the Regulation 14 version) of the DMNP under the seven SEA theme headings;
 - Consideration of potential cumulative effects; and
 - The overall conclusions at this current stage.

Dilton Marsh Neighbourhood Plan Policies

5.2 To support the implementation of the vision statement for the DMNP, the Regulation 14 version of the plan puts forward 24 policies to guide new development within the neighbourhood area. Specifically:

Table 5-1: Policies in the Dilton Marsh Neighbourhood Plan

| Policy Reference | Policy Name | |
|---|---------------------|--|
| Section 1: Protecting our rural landscape | | |
| Policy DM01 | Landscape Character | |
| Policy DM02 | The Biss Catchment | |
| Policy DM03 | Key Views | |
| Policy DM04 | Local Green Space | |
| Section 2: Protecting our natural environment | | |
| Policy DM05 | Biodiversity | |
| Policy DM06 | Trees | |
| Section 3: Protecting our historic environment | | |
| Policy DM07 | Heritage | |
| Section 4: Setting our design vision and expectations | | |
| Policy DM08 | High-quality Design | |

| Policy Reference | Policy Name | |
|---|---|--|
| Policy DM09 | Sustainable Design and Construction | |
| Policy DM10 | Retrofitting Existing Buildings | |
| Section 5: Delivering our housing requirement | | |
| Policy DM11 | Housing Strategy | |
| Policy DM12 | Meeting Housing Needs | |
| Section 6: Housing allocations | | |
| Policy DM13 | Housing Allocation - Land at 34 Petticoat Lane (Site 23) | |
| Policy DM14 | Housing Allocation - Land at Five Farthings Farm (Site 9) | |
| Policy DM15 | Land at High Street, east of Railway (Site 13) | |
| Policy DM16 | Land to the rear of 14 St Mary's Lane (Site 2) | |
| Section 7: Protecting our community and rural economy | | |
| Policy DM17 | Community Facilities | |
| Policy DM18 | Allotments | |
| Policy DM19 | Business Strategy | |
| Policy DM20 | Fairwood Industrial Estate | |
| Section 8: Helping us move around | | |
| Policy DM21 | Parking | |
| Policy DM22 | Traffic Management | |
| Policy DM23 | Footpaths, Bridleways and Cycleways | |
| Policy DM24 | Infrastructure | |

Approach to the Appraisal

5.3 For each theme, 'significant' effects of the Regulation 14 version of the DMNP on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, the probability,

- duration, frequency, and reversibility of the effects as far as possible. These effect 'characteristics' will be described within the assessment, as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the DMNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the DMNP to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

Biodiversity

- 5.6 Given the proximity of the neighbourhood area to European and nationally designated sites for biodiversity, a Habitats Regulation Assessment (HRA)²⁸ process has been completed for the DMNP (November 2023). This HRA screening exercise has concluded that the DMNP has the potential to result in Likely Significant Effects (LSEs) on two European sites alone and/or in combination with other plans and projects. This is due to the allocated sites in Policies DM13, DM14, DM15 and DM16 (shown as Option B in **Figure 4-1**), and Policies DM09, DM10, DM17, DM19 and DM20 due to the potential for recreational impacts on the Salisbury Plain SPA and physical damage or disturbance to bat species and/or habitats associated with the Bath and Bradford on Avon Bats SAC. Therefore, under Regulation 105 of the Habitats and Species Regulations 2017 (as amended), it was necessary for these nine policies in the DMNP to be taken forward to Appropriate Assessment.
- 5.7 The findings of the Appropriate Assessment conclude the following:

'Due diligence should be applied in assessing applications under policies DM09, DM10, DM13, DM14, DM15, DM16, DM17, DM19 and DM20 to ensure compliance with DM05 and therefore compliance with the requirements of the Habitats Regulations. However, it is considered that this would be a standard part of the development control process when planning applications are considered. Therefore no recommendations are made for changes to these policies.'

'It is considered that the Dilton Marsh Neighbourhood Plan contains an appropriate policy framework to ensure no adverse effects on the integrity of

²⁸ AECOM (2023) – HRA Report' The HRA contributes to the evidence base for the Neighbourhood Development Plan, available to view alongside the additional Regulation 14 consultation documents.

- any European sites, either alone or in combination with other plans or projects.'
- 5.8 There is one nationally designated site within the neighbourhood area: Westbury Ironstone Quarry (SSSI). There are six other SSSI within 5 km of the neighbourhood area. In this respect, the whole of the neighbourhood area overlaps with either one or multiple SSSI Impact Risk Zones (IRZ) for the types of development likely to be taken forward during the plan period in Policies DM13 to DM16. Therefore, consultation with Natural England will be required to determine whether development proposals at these locations will have any significant impacts to the integrity of these sites. However, further consideration to the potential impacts of protected sites are proactively considered through the DMNP's policy framework.
- 5.9 In light of the key sensitivities listed above, a key objective of the DMNP is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green infrastructure networks. This is further discussed below.
- 5.10 The DMNP proposes the development of four sites, which are all located adjacent to the existing Dilton Marsh settlement boundary. The sites do not contain any designated habitats; however, they are wholly or partially located on greenfield land, which contains vegetation such as grass, trees, and hedgerows. Within the allocation policies (DM13 to DM16), criteria have been set out to protect biodiversity value within the respective sites, including the need to retain trees of value, protection of core bat habitat, and net enhancement of biodiversity. The wider policy framework also provides support for biodiversity, with Policy DM05 affording protection and where possible, enhancement, of biodiversity value for the neighbourhood area's habitats, species, and wildlife corridors and ensuring that biodiversity net gains of at least 20% are achieved in development. With regards to biodiversity net gains, whilst Policy DM05 tends to indicate a preference for achieving net gains onsite, where this is not possible, it may be of benefit to identify key local areas that should be targeted for off-site measures.
- 5.11 Additional positive effects are anticipated because of wider measures such as protection for existing trees (Policy DM06), a tight settlement boundary and limitations to rural development that protects habitats (Policy DM11) and commitments to restore and enhance local biodiversity (Policy DM24).
- 5.12 Overall, no significant impacts are predicted for biodiversity, and the supportive policy framework alongside opportunities for additional ecologically sensitive design (see recommendations) are considered likely to lead to minor positive effects.

Climate Change (Including Flood Risk)

5.13 In response to the UK Government's commitment to tackling the climate crisis, Wiltshire Council declared a Climate Emergency in February 2019 and at the same time, are committed to making the authority net-zero carbon by 2030. As such, the DMNP encourages design features that help the area to mitigate and adapt to climate change and increase the resilience of the neighbourhood

- area and its community. These stipulations will help to tackle the climate crisis.
- 5.14 For example, Policy DM09 seeks to ensure that proposals for new developments minimise their carbon footprint, with the aim to achieve net zero operational carbon emissions. Additionally, Policy DM09 supports proposals for off-site renewable/low carbon energy generation provided they do not have adverse impacts on the local landscape, residents, and any other environmental impacts. Policy DM10 focuses on improving the neighbourhood area's existing buildings, supporting retrofitting measures to improve their energy efficiency and climate change adaption capabilities.
- 5.15 By facilitating better use of active transport options (e.g. walking), the neighbourhood area can reduce its carbon footprint. One way to do this is by ensuring that new development is connected to the exiting footpath network. The preferred allocations at Sites 2, 9, and 23 would all require upgrades to their local footpath network (either through improvement of existing access, or the need for new footpaths); however, the DMNP addresses this by ensuring that the policies for these sites (Policies DM16, DM14, and DM13, respectively) includes provision of pedestrian connectivity to the existing footpath network. This will support a limitation of emissions within the neighbourhood area.
- 5.16 On a wider scale, Policies DM23 and DM24 also support walking and other low carbon transport options by improving public transport, pedestrian, and cycle connectivity across the neighbourhood area. The DMNP also acknowledges that some households may still rely on private vehicles for transport, however, requires that all new parking spaces should be equipped with electric vehicle charging points (Policy DM21).
- 5.17 With reference to adapting to the effects of climate change, all of the proposed site allocations are located within Flood Zone 1 which represents areas of England which have a low fluvial flood risk potential. Fluvial flood risk, therefore, is unlikely to comprise a significant constraint to development. In relation to surface water flood risk, most of the sites are in areas of 'very low' risk; however, Site 2 has been identified as an area in proximity of 'medium' surface water risk. Any residual flood risk is likely to be mitigated through wider policies that support developments that reduce and slow run-off (Policy DM02) and, for appropriate sites, the requirement to incorporate a drainage scheme that meets Sustainable Drainage System (SuDS) principles (Policy DM16).
- 5.18 Policies such as DM05 and DM06, that encourage the protection and growth of the neighbourhood area's existing green network of trees and hedgerows, will also indirectly lead to reductions in local flood risk. They will also positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues. It is also anticipated that the provisions of the NPPF and Local Plan policy will help to guide development away from the areas at highest risk of flooding.

5.19 Overall, no significant impacts are anticipated in relation to this SEA topic, and the supporting policy framework which seeks to reduce flood risk and improve climate resilience is considered most likely to lead to **minor positive effects**.

Community Wellbeing

- 5.20 The DMNP allocates new housing at four sites with a view to meeting local needs:
 - 'Land at 34 Petticoat Lane (Site 23)', for approximately 16 dwellings;
 - 'Land at Five Farthings Farm (Site 9)', for approximately 10 dwellings;
 - 'Land at High Street, east of Railway (Site 13)', for approximately 18 dwellings; and
 - 'Land to the rear of 14 St Mary's Lane (Site 2)', for approximately four dwellings.
- 5.21 The choice of these four sites has been informed by the various surveys and evidence base documents prepared to support the DMNP, responses from community consultation events, and the SEA findings. This is further discussed within **Chapter 4** of the Environmental Report.
- 5.22 More broadly with regard to housing provision, the DMNP also supports opportunities for windfall developments within the defined village settlement boundary for Dilton Marsh and rural conversions/exception sites in accordance with the Development Plan (Policy DM11).
- 5.23 Policy DM12 supports opportunities to deliver housing of an appropriate tenure, size, and type, based on the latest housing need evidence. This will help to ensure that development is reflective of the needs of the community and is appropriate for its location. The quality of housing will also be supported by Policy DM09 which seeks to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the cost of living crisis.
- 5.24 The DMNP also contains several policies that have a strong emphasis on delivering public realm improvements, especially through green infrastructure provision. Green infrastructure provides space for recreation and relaxation; spending time in these types of outdoor spaces is evidenced to improve people's health and wellbeing. Policy DM04 specifically acknowledges the importance of green infrastructure, designating ten sites as Local Green Spaces.
- 5.25 Further supporting residents' quality of life, a key aspect of the DMNP is to safeguard existing community services and facilities, and that these are accessible to everyone in the neighbourhood area. Key policies in this respect include Policies DM17 to DM18, which seek to protect and support the provision of local services and facilities to enable people to live locally. Development proposals which would result in the loss of a key facility within the neighbourhood area will only be supported in exceptional circumstances.

- 5.26 The DMNP also seeks to promote the economic vitality of the neighbourhood area and safeguard existing employment opportunities, specifically through Policies DM19 and DM20. By safeguarding existing employment areas, facilitating opportunities for homeworking and small businesses, and supporting uses offering local employment opportunities (which do not negatively impact the neighbourhood area), this will help to maintain the local economy and positively support more flexible working arrangements / patterns as observed nationally, since the pandemic.
- 5.27 The DMNP policy framework seeks to encourage high-quality development which supports residents' quality of life, and which helps to meet key housing objectives in terms of type, tenure, and affordability. Additionally, the policy framework seeks to facilitate opportunities to support the local economy and enhance community vitality. Therefore, **long-term significant positive effects** are expected in relation to community wellbeing.

Historic Environment

- 5.28 The DMNP has taken a proactive approach to protecting and enhancing the historic environment. With reference to the proposed site allocations (see Policies DM13 to DM16), there are no nationally designated heritage assets or Conservation Areas in their proximity. However, one of the site allocations, Site 9, is adjacent to an archaeological asset listed in the Wiltshire and Swindon HER.²⁹ Protection of the neighbourhood area's historic environment is afforded in Policy DM07, which encourages the safeguarding of heritage assets and their setting. Whilst Policy DM07 provides protection to heritage assets (of both national and local importance) on a neighbourhood area level, the DMNP could be improved by providing text to reference the presence of locally important heritage assets in Site 9's allocation policy (Policy DM14) (see recommendations).
- 5.29 Consideration of the neighbourhood area's historic environment is further reflected by DMNP policies which focus on the conservation and enhancement of both designated and non-designated heritage assets and their settings, and Dilton Marsh's historic linear settlement pattern. Specifically, the design stipulations under Policies DM08 to DM10 will guide new development proposals that may come forward during the plan period to respect their surroundings. This will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features.
- 5.30 No significant effects are considered likely to result from the DMNP with regard to the historic environment as the allocations are located away from designated heritage assets and the policy framework within the DMNP has a focus on preserving and enhancing the heritage significance of the neighbourhood area. As one non-designated historic asset is located adjacent to one of the allocated sites, there is potential for **minor negative effects** in relation to this SEA theme in the absence of sensitive design which respects the setting and significance of nearby heritage assets.

²⁹ Wiltshire Council (no date). 'Wiltshire and Swindon Historic Environment Record'. Available here.

Land, Soil, and Water Resources

- 5.31 Three of the four site allocations within the DMNP (see Policy DM13, DM14, and DM16) contain partial areas of brownfield land. In this respect, redevelopment at these locations will support the most efficient re-use of land in the neighbourhood area. However, the sites also contain areas of greenfield land, and the site proposed through Policy DM15 entirely comprises greenfield land. Whilst there is the potential for the permanent loss of productive agricultural land at these locations (which cannot be mitigated), brownfield opportunities within the neighbourhood area are relatively limited due to site availability. Nonetheless, the wider policy framework has a strong focus on protecting soil and water resources. This is discussed below.
- 5.32 Neighbourhood Plan policies also work to maintain and enhance land, soil, and water resources in the neighbourhood area. Key policies in this regard include Policies DM02, DM04, DM06, and DM06, which aim to protect and expand green infrastructure networks, which help to safeguard the natural environment within the neighbourhood area.
- 5.33 Concerning the protection of water resources, for appropriate site allocations, the DMNP specifies a requirement to incorporate a drainage scheme that meets Sustainable Drainage System (SuDS) principles (see Policy DM16). This will indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off.
- 5.34 The DMNP also has a strong focus on protecting the open countryside from inappropriate levels of development. For example, several policies also seek to protect key features of landscape and biodiversity interest in the open countryside (see Policies DM01, DM03, DM17, and DM24). While these policies do not specifically seek to address land, soil, and water resources they will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the neighbourhood area and the protection and enhancement of key landscape and villagescape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.
- 5.35 Whilst the policy framework within the DMNP contains provisions which positively support and protect soil and water resources, uncertain effects are anticipated in relation to land, soil, and water resources as potential impacts depend on the implementation of design measures, and the potential location of new housing within the site boundaries (i.e., how much greenfield land and productive agricultural land may potentially be lost which is currently unknown).

Landscape

- 5.36 The neighbourhood area is not within or in proximity to a National Park, National Landscape, or Green Belt land. In this context, the proposed site allocations through Policies DM13 to DM16 are not likely to adversely impact the integrity of any nationally protected landscapes.
- 5.37 At the local level, landscape and villagescape character play an important part in understanding the relationship between people and place, identifying

- recognisable and distinct patterns which make one area different from another. Landscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms.
- 5.38 It will be important for development to consider the key characteristics of the local landscape and the key features that contribute to the special qualities of the neighbourhood area. Two key policies in this regard are Policy DM01 and DM03. The former confirms that all site allocations should maintain the rural character and separate identity of the neighbourhood area's distinct settlements, whereas the latter designates 18 Local Key Views. Additionally, design-related policies (Policies DM08 to DM10) confirm that new developments should have full regard to the rural character of the site location and seek to preserve or enhance that character. It should be noted that there is potential for a negative landscape effect from Policy DM15 (Site 13), which has the potential to impact the integrity of a proposed Local Key View. Policy DM03 states that developments which affect a key view will only be supported where it can be demonstrated that the features and values of the view can continue to be enjoyed. Policy DM15 notes that site design will be informed by a Landscape & Visual Assessment, which will be useful to determine the extent of the allocation's effect on the proposed Local Key View.
- 5.39 Policy DM11 outlines the housing strategy for the neighbourhood area and is complimented by four individual site allocation policies (Policy DM13 to DM16). The Wiltshire Core Strategy and Local Plan Review recommends that development is focused within or within proximity to settlement boundaries. This is reflected in the site allocations which are all located adjacent to Dilton Marsh village. Policy DM11 is also supportive of infill opportunities within the settlement boundary to meet an identified need. This will help to safeguard the surrounding landscape and ensure that development is sensitive to the relationship between the natural and built environment.
- 5.40 Consideration is given to the protection of the local landscape through design stipulations within the individual site allocation policies (Policies DM13 to DM16). This includes (where appropriate) measures such as retention of trees, delivery of suitable landscape buffers between the development and the surrounding countryside, and the requirement to undertake a Landscape & Visual Assessment.
- 5.41 Overall, **mixed effects** are expected in relation to the landscape SEA theme. On one hand, there is potential for new development to adversely impact a Local Key View. On the other hand, the DMNP is likely to deliver positive effects through its strategic framework and site-specific policy provisions which seek to protect and enhance local landscape character via the inclusion of high-quality and sensitive design measures.

Transportation

5.42 The main roads (the A3098 and B3099) that pass through Dilton Marsh village are known to have high volumes of congestion during certain times of the day and issues with on-street parking. The DMNP proposes development on four sites spread across Dilton Marsh village, which will likely result in additional private vehicles in the area, potentially adding to the existing congestion

- issues. However, as the housing allocations is distributed across four sites (see Policies DM13 to DM16) in different parts of the village, this may help to limit traffic impacts by spreading development at further distance from problem areas of traffic congestion. Additionally, as the sites are adjacent to the village boundary, they benefit from accessibility to public transport networks. This will support a modal shift towards sustainable transport options in the neighbourhood area which includes the rail network via Dilton Marsh station, and bus network and reduce the reliance on private vehicles for undertaking some day-to-day activities. This is further discussed, below.
- 5.43 Locally, the neighbourhood area contains some services and facilities that allow for more local daily trips, such as schools and the social club; however, residents also rely on neighbouring Westbury for key facilities and services such as a post office and supermarkets. Services and facilities across both settlements are easily accessed by public (bus and train) and private transport. All of the preferred sites have good potential to connect well with the existing public transport infrastructure (particularly the allocation in Policy DM15, which is located adjacent to the train station) and are located close to the existing community facilities within the village. This is particularly beneficial locally, as it is likely that future residents will walk or cycle to local services and facilities and not add to the existing congestion problems in the village. For this potential to be realised, footpath access at certain sites needs to be improved; however, this been addressed in the individual site allocation policies, where relevant (Policies DM13, DM14, and DM16).
- 5.44 The wider policy framework and supporting text places an emphasis on improving cycle and footpath networks in the neighbourhood area (Policy DM23), improving parking provisions and traffic management (Policies DM21 and DM22), and ensuring appropriate infrastructure improvements alongside housing growth (Policy DM24).
- 5.45 Overall, **neutral effects** are anticipated in relation to the transportation SEA topic. Despite the allocation of new housing in the neighbourhood area likely leading to additional private vehicles on the local road network, the DMNP takes a considered approach to mitigating these potential issues. This is evident by the site allocations being in proximity to public transport networks, as well as the inclusion of design-related policies which place an emphasis on improving connectivity and accessibility in the village.

Conclusions at this current stage

- 5.46 **Long-term significant positive effects** are expected in relation to community wellbeing, through the delivery of local housing; the safeguarding of existing community services, facilities, and employment areas; and the designation of ten Local Green Spaces.
- 5.47 **Minor positive effects** are considered most likely in relation to biodiversity, and climate change and flood risk. This reflects the avoidance of impacts expected by the spatial strategy (site allocations), and additional policy measures which seek to protect and improve biodiversity and increase climate resilience.

- 5.48 **Minor negative effects** are predicted in relation to the historic environment, due to the proximity of a non-designated asset adjacent to the boundary of one of the site allocations.
- 5.49 **Uncertain effects** are anticipated for land, soil, and water resources as potential impacts depend on the implementation of design measures, and the location of new housing within the site boundaries.
- 5.50 **Mixed effects** are anticipated for the landscape theme. Whilst high-quality is encouraged through the site allocation policies, there is potential for negative effects from one site allocation on a potential Local Key View.
- 5.51 **Neutral effects** are anticipated for the transportation theme. Whilst new development is likely to result in an increased number of vehicles on the road network, the DMNP includes a suite of policies that aim to facilitate (and encourage) the uptake of public transport and active travel.
- 5.52 The SEA puts forward the following recommendations for consideration by plan makers to inform policy development:
 - Whilst Policy DM05 indicates a preference for achieving biodiversity net gains onsite in new development areas, where this is not possible, the policy could potentially encourage developers to identify key local areas that could benefit from off-site enhancement measures. Linked to this, development proposals could be expected to provide a proportionate green infrastructure assessment detailing how local wildlife and habitats will be protected and enhanced during the construction and operational phases of development, and how net gains will be delivered.
 - The protection for local heritage afforded in Policy DM07 could be strengthened by requiring development proposals to undertake a proportionate heritage assessment to provide further detail about the significance of any heritage assets within or within the setting of the site. Additionally, as a condition attached to any planning approval for the site, an archaeological clerk-of-works could be expected to be on site during the construction phases of development to ensure that any non-designated heritage assets are appropriately preserved and recorded in line with the best practice guidance.

6. What Are the Next Steps?

Plan Finalisation

- 6.1 Following Regulation 14 consultation, responses will be considered in finalising the DMNP and SEA for submission. Following submission, the DMNP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the DMNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 6.2 If the examination leads to a favourable outcome, the DMNP will then be subject to a referendum, organised by Wiltshire Council. If more than 50% of those who vote agree with the DMNP, then it will be 'made'. Once 'made', the DMNP will become part of the Development Plan for Wiltshire, covering the defined neighbourhood area.

Monitoring

- 6.3 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.4 It is anticipated that monitoring of effects of the DMNP will be undertaken by Wiltshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DMNP that would warrant more stringent monitoring over and above that already undertaken by Wiltshire Council.

