

APPENDIX II: SEA OF SITE OPTIONS

Strategic Environmental Assessment: Categories of Significance		
Symbol	Meaning	Sustainability Effect
- -	Major Negative	Problematical and improbable because of known environmental sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential environmental sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No environmental sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing environmental sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect
-?	It is possible to have two symbols for an SA Objective. For example, a development could have negative effects for noise/odour but neutral effects on air quality for SA Objective No 4; part of a site option could be neutral for landscape, whilst another part could be negative.	

SA Objectives ¹	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
Housing Site Options												
N1 Adjacent Rose Farm	+?	-	0	0	0	0	-?	++	+	+	+	0
N2 Opposite Hurdcott Lane	+?	-	0	0	0	0	-?	++	-?	0?	+	0
N3 Adjacent Marsh Motors	-?	-	0	0	0	-?	--	++	+	+	-?	-?
S26; S122; S1045 Portway	+?	-	0	0	0	-?	0 -?	++	+	+?	+	0
S90 Adjacent School	+?	-	0	0	0	0?	-?	++	+	+	+	0
S91 Adjacent Summerlug	+?	-	0	0?	0	0	-?	++	+	+	-?	-?
S92 Figsbury Road	+?	-	0	0	0	-?	+ -	++	+	+?	+	0
S118 Black Horse Lane	0	-	0	-?	0	0	-?	++	-?	-?	-?	-?
S1055 East Farm	+?	-	0	0	0	-?	-?	++	+	+	+	0
3222 Gaters Lane	+?	-	0	0	0	-?	--	++	+	+	+	0
3529 Rear of Tel Exchange	0	-	0	0	0	-?	--	++	+	+	+	0
3553 Garden End Cottage	-?	-	0	0	0	-	-?	++	+	+	+	0

¹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

SA Objectives ² Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
N1 Adjacent Rose Farm	+?	-	0	0	0	0	-?	++	+	+	+	0

Description: 0.5 ha site currently used as pastoral agricultural land sited on the southern end of Winterbourne Earls, adjacent to the A38 & Summerlug to the east, Rose Farm to the west, housing to the north and fields to the south. Option assessed for 2 dwellings.

Assessment:

The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC³, a large lowland river system with the primary reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option N1 is approximately 230m⁴ from the nearest area of the R Avon SAC to

² Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

³ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁴ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

the west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England⁵ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 230m to the north-west of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there are footpaths radiating to the south-west from the site option suggesting that new development could contribute to and link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded⁶. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

⁵ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁶ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁷ – neutral effects.

The site option is not within the designated Winterbournes Conservation Area⁸ and is located about 280m from the nearest designated heritage asset Grade II listed Hurdcott House to the west. It is unlikely that up to 2 dwellings would result in any significant adverse effects on the house or its setting.

The site option would relate well to the existing ribbon development on the west side of the A338, although there is some concern regarding the erosion of the gap between Winterbourne Earls and Hurdcott. These factors have been mitigated by proposing only the northern part of the site and limiting housing numbers to 2 dwellings⁹ to a minor negative effect with some uncertainty for effectiveness of mitigation through design to achieve a residual neutral effect.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Primary School and a bus stop are within 200m; the village shop, play park and village pubs are within 800m walking¹⁰ indicating minor positive effects for access. Provision of affordable and good quality housing will contribute to health and well-being; also contributing to sustaining rural communities.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Services and facilities are within walking distances for site option N1 – positive effects indicated. Council Highway Officers have indicated that adequate visibility is attainable¹¹ – positive effects for highways and safe access.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

⁷ <https://flood-map-for-planning.service.gov.uk/>

⁸ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁹ Draft Assessment Site Option N1 (WPC, August 2018)

¹⁰ Distances approximated through measurement on Magic Maps <https://magic.defra.gov.uk/MagicMap.aspx>

¹¹ Draft Assessment Site Option N1 (WPC, August 2018)



SA Objectives ¹² Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
N2 Opposite Hurdcott Lane	+?	-	0	0	0	0	-?	++	-?	0?	+	0
<p>Description: 1.6 ha site adjacent to the A338 and to the east in Hurdcott, currently in pastoral agricultural use; bounded by the railway line to the south-east and residential buildings to the north.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC¹³, a large lowland river system with the primary</p>												

¹² Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

¹³ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option N2 is approximately 300m¹⁴ from the nearest area of the R Avon SAC to the west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England¹⁵ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 400m to the north-west of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there is a footpath adjacent to the south from the site option suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded¹⁶. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

¹⁴ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

¹⁵ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

¹⁶ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding¹⁷ – neutral effects.

The site option N2 is not within the designated Winterbournes Conservation Area¹⁸ and is about 250m from the nearest designated heritage asset Grade II listed The Poplars to the north-west. It is unlikely that small residential development here would result in any significant adverse effects on the asset or its setting.

The site has a rural feel with its distance and screening from the main part of the villages; visual impact/landscape impact considered to be relatively incongruous¹⁹ with minor negative effects indicated but some uncertainty until design mitigation is investigated.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. However, site option N2 is one of the more remote sites from village facilities/amenities, although it is next to a bus stop, some distance to walk with no direct access to pavements although a public footpath does link the site to Winterbourne Earls²⁰ – negative effects indicated. A new access towards the centre or northern third of the site would be likely to provide the best visibility, although given the 50mph limit it would be necessary to ensure that this could be achieved since the sight lines would need to be quite long – potential neutral effects with some uncertainty of significance.

¹⁷ <https://flood-map-for-planning.service.gov.uk/>

¹⁸ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

¹⁹ Draft Assessment Site Option N2 (WPC, August 2018)

²⁰ Ibid

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

SA Objectives ²¹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
N3 Adjacent Marsh Motors, Winterbourne Gunner	-?	-	0	0	0 0	-?	--	++	+	+	-?	-?
<p>Description: 0.5 ha site currently used for pastoral agricultural; adjacent to the A338 to the south-east with residential to either side and greenfield floodplain to the north-west.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC²², a large lowland river system with the primary</p>												

²¹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

²² <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option N3 is adjacent is approximately 370m²³ from the nearest area of the R Avon SAC to the north-east beyond the A338. It may be noted that the nature conservation regulator Natural England²⁴ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 450m to the north-east of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed. The site is within the Winterbourne Gunners County Wildlife Site²⁵ (CWS) and a locally designated Area of High Ecological Value such that there is the potential for minor negative effects but some uncertainty at this stage as effectiveness of any mitigation measures is unknown.

The site option is on greenfield and the agricultural land classification is not recorded²⁶. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

²³ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

²⁴ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

²⁵ <https://www.wiltshirewildlife.org/local-wildlife-sites-wiltshire>

²⁶ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding²⁷ – neutral effects.

The site option N3 is located within the designated Winterbournes Conservation Area²⁸ and is about 60m from the nearest designated heritage asset Grade II listed Mellow Thatch to the north-east beyond several other residential properties along the main road A338. It is unlikely that small residential development here would result in significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements –therefore potential minor negative effects but some uncertainty at this stage as mitigation possibilities not known.

The site is within the Conservation Area and is visually related to the open space of the Bourne Valley meadows/river corridor such that development here could erode the rural character to this part of the village and be highly visible from the valley floor²⁹, indicating potential for major negative effects.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. However, there is a footpath dissecting the site option N3 – this would need to be diverted to avoid restricting the development viability – but then would provide positive effects through linkages to the sustainable transport network and could encourage healthier lifestyles. Site option N3 is well placed for good access to village services and facilities with positive effects. Current access is a field through the garage forecourt where there is poor visibility so some uncertainty about effects on the highway and the need to divert the footpath to a different route may have uncertain effects; overall likely neutral effects for sustainable transport but some uncertainty at this stage.

²⁷ <https://flood-map-for-planning.service.gov.uk/>

²⁸ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

²⁹ Draft Assessment Site Option N3 (WPC, August 2018)

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. However, any new vehicular access would need to remove the forecourt area of the garage as parked vehicles would block visibility – therefore potential minor negative effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – minor negative effects due to loss of garage forecourt but some uncertainty of significance at this stage of assessment.

SA Objectives ³⁰ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience		Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment	
	1	2	3	4	5	6	7	8	9	10	11	12		
S26; S122; S1045 Adjacent Portway & Down Barn Road	+?	-	0	0	0	0	-?	0	/- ?	++	0	+?	+	0
Description: S26 (2.05 ha), S122 (0.66 ha), S1045 (0.3ha) on agricultural land with Manor Farm on the opposite side of Portway and residential properties to the north on the opposite side of Down Barn Road.														
Assessment:														

³⁰ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); spilt cells presented in this SEA report

The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC³¹, a large lowland river system with the primary reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. Site Options S26/S122/S1045 are between approximately 240m to 440³² from the nearest area of the R Avon SAC to the north-east. It may be noted that the nature conservation regulator Natural England³³ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the north. There are Priority Habitats of Broadland and Deciduous Woodlands on the further side of Manor Farm to the south-east and beyond the junction with the A338 to the north-east. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed. Therefore at least neutral effects indicated for biodiversity and possibilities for minor positive effects as there is an adjoining hedgerow that offers scope for enhancing biodiversity and GI.

The site option is on greenfield and the agricultural land classification is not recorded³⁴. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

³¹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

³² Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

³³ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

³⁴ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding³⁵ – neutral effects.

The site options S26, S122, S1045 are outside the designated Winterbournes Conservation Area³⁶ but adjacent to the boundary to the south-east on the other side of the road, where the Grade II Listed Manor Farm and associated buildings are located. Some concern was expressed³⁷ by Historic England regarding potential negative effects on the setting of the Conservation Area and impacts on non-designated heritage assets nearby. Accordingly, a Heritage Assessment^[4] was undertaken by specialists and this concluded that development of site option S26/S122/S1045 would have a negative impact on the designated and non-designated heritage assets within the locality due to the erosion of the predominantly open rural qualities of the area. However, a smaller scale development of 3 dwellings has now been proposed, relating predominantly to just S1045, which is the furthest part of the site from the Conservation Area. The Heritage Assessment suggested that this smaller site option would have 'less than substantial' harm on the designated and non-designated heritage assets within the locality, and suggested mitigation could be considered in order to reduce the impact of development, such as the proposal for housing of one-and-a-half storeys maximum, the replication of the narrow plot widths of the existing houses in the row, and the introduction of native hedgerow planting on the south-west boundary to screen the development from the south-west approach on The Portway. Therefore, due to the mitigation measures provided by the small size and distance from the heritage assets and their settings, the SEA identified that residual effects are likely to be neutral.

The expansion of the existing line of bungalows off The Portway could relate well to existing development, although expansion to the north-east and opposite Down Barn/Mill Close would be more exposed and more prominent given its higher elevation and poorer visual relationship with existing development³⁸. Any development to the east of the bungalows would be situated directly opposite the Winterbournes Conservation Area and nearby heritage assets and their

³⁵ <https://flood-map-for-planning.service.gov.uk/>

³⁶ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

³⁷ Email correspondence April- August 2017 in response to the initial SEA Screening by Wiltshire Council

[4] Heritage Assessment for WPC by Elaine Milton Heritage & Planning Ltd (January 2018)

³⁸ Draft Assessment Site Option S26/S122/S1045 (WPC, August 2018)

settings. Therefore, some uncertainty with parts of the options neutral and other parts potentially negative effects and mitigation possibilities unknown at this stage.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The site option benefits from a paved footpath which connects to the centre of the village, as well as a much shorter route via public footpaths across fields and is well located for access to the allotments and cricket pitch which are situated at this end of the village – positive effects indicated.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

SA Objectives³⁹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
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³⁹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

	1	2	3	4	5	6	7	8	9	10	11	12	
S90 Land between Primary School and Railway Line	+	-	0	0	0	0	0?	-?	++	+	+	+	0

Description: 4.56 ha site currently arable agricultural use located towards the southern end of Winterbourne Earls; bounded to the east by the railway line, the primary school to the west and various residential properties to the north and north-west.

Assessment:

The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁴⁰, a large lowland river system with the primary reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin’s whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option S90 is approximately 460m⁴¹ from the nearest area of the R Avon SAC to the south-west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England⁴² considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 300m to the west of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there is a footpath at the north-western edge of the site option suggesting that new development could contribute to and link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded⁴³. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most

⁴⁰ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁴¹ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

⁴² Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁴³ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects. It may be noted that much of the site option is within 400m of the pig farm with the potential for negative effects on odour; however, the part of the site selected for allocation is outside of the 400m thus providing mitigation measures through size and location of development – overall neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁴⁴ – neutral effects.

The site option S90 outside of the designated Winterbournes Conservation Area but adjacent to the north-east boundary with the built environment including Glebe Hall and the non-designated heritage asset of St Michael's House. There are number of Listed Buildings along the main road to the west some 200m distance. Some concern was expressed⁴⁵ by Historic England regarding potential negative effects on the setting of the Conservation Area and impacts on designated and non-designated heritage assets nearby. Accordingly, a Heritage Assessment⁴⁶ was undertaken by specialists and this concluded that the site makes only a low contribution to the setting of the Conservation Area; given the low inter-visibility and physical separation, development is unlikely to result in harm to the setting of the Grade II listed church or other heritage assets identified – mitigation measures were suggested with likely neutral effects but some uncertainty at this stage.

⁴⁴ <https://flood-map-for-planning.service.gov.uk/>

⁴⁵ Email correspondence April- August 2017 in response to the initial SEA Screening by Wiltshire Council

⁴⁶ Heritage Assessment for WPC by Elaine Milton Heritage & Planning Ltd (January 2018)

The site is reasonably well related to existing development, being surrounded by development on three sides and the railway line on the fourth. However, the site is in an elevated position, considerably higher than the A338 and the valley to the west⁴⁷. Mitigation is available through concentrating new development towards the lower parts of the site in the north-west corner where it would be seen in conjunction with existing buildings. This part of the site is adjacent to the Conservation Area and reasonably well-screened but further mitigation measures may be available through careful landscaping and screening – potential minor negative effects on landscape but uncertainty at this stage until effectiveness of mitigation is investigated and stage and could be included in any site-specific requirements.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. The site option S90 has direct links through a footpath at the western edge to the sustainable transport network with positive effects. The site is well situated in relation to accessing most village services and facilities; the Primary School adjoins the site and a bus stop is less than 300m away. The village shop, play park and pubs are all within 550m⁴⁸.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

⁴⁷Draft Assessment Site Option S90 (WPC, August 2018)

⁴⁸ Ibid

SA Objectives ⁴⁹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
S91 Land between Summerlug & Railway Line	+?	-	0	0	0	0	-?	++	+	+	-?	-?
<p>Description: 2.9 ha site currently used for arable agricultural use on the southern edge of Winterbourne Earls; bounded to the west by the A338 and to the east by the railway line and adjacent to the existing housing in the Summerlug.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁵⁰, a large lowland river system with the primary reason for designation of habitats being the aquatic <i>Ranunculus</i> species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option S91 is approximately 300m⁵¹ from the nearest area of the R Avon SAC to the west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England⁵² considered that the WNP is unlikely to have significant environmental effects on the natural environment.</p>												

⁴⁹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); spilt cells presented in this SEA report

⁵⁰ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁵¹ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

⁵² Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 260m to the west of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there is access across the A338 in the west to the footpaths radiating to the south-west suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded⁵³. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. However, much of the site option is within 400m radius of a pig farm and Environmental Health Officers have confirmed⁵⁴ that there is a risk of odour problems and compliance with the farm's Environment Agency permit for any new homes close to the farm – potential for minor negative effects.

⁵³ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

⁵⁴ Draft Assessment Site Option S91 (WPC, August 2018)

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁵⁵ – neutral effects.

The site option S91 is outside of the designated Winterbournes Conservation Area⁵⁶ and separated from it and the built urban area by greenfield land. There are number of Listed Buildings along the main road to the west at least 200m distance. It is unlikely that small residential development here would result in any significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements.

The site option is well related to existing residential development bounded by the Summerlug Estate to the north and a large private house/garden to the south. The site is hidden from the village by dense boundary hedging with the A338 and is set back from the road⁵⁷ – indicating positive effects. However, there would still be longer distance views of the southern part of the site from across the other side of the valley to the west; also, long views from the higher ground to the east⁵⁸. Therefore, potential for negative effects but uncertainty as effectiveness of mitigation measures unknown at this stage.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. The site option S91 has direct links to footpaths opposite the A338 at the western edge to the sustainable transport network with positive effects. The site is well situated in relation to accessing most village services and facilities; the Primary School adjoins the site and a bus stop is less than 300m away. The village shop, play park and pubs are all within 850m⁵⁹.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. Some concern was recorded that new housing development in the vicinity of the existing pig farm could cause some issues for odour and compliance with environmental permitting through the Environment Agency – any

⁵⁵ <https://flood-map-for-planning.service.gov.uk/>

⁵⁶ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁵⁷ Draft Assessment Site Option S91 (WPC, August 2018)

⁵⁸ Ibid

⁵⁹ Draft Assessment Site Option S91 (WPC, August 2018)

requirement to install further odour abatement technology could adversely affect the viability of the farm⁶⁰, so some uncertainty of effects for the SEA objective to protect existing employment areas and this site option. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

SA Objectives ⁶¹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
S92 Figsbury Road	+	-	0	0	0 0	-?	0?	++	+	+	+	0
<p>Description: 0.46 ha site currently in arable agricultural use towards eastern edge of Winterbourne Dauntsey; bounded by the railway line to the east and Figsbury Road to the north, with residential properties to the north and west.</p> <p>Assessment:</p>												

⁶⁰ ibid

⁶¹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁶², a large lowland river system with the primary reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option S92 is approximately 780m⁶³ from the nearest area of the R Avon SAC to the south-west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England⁶⁴ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 500m to the south-west of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there is a footpath to the north-east and a bridleway to the south-east from the site option suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded⁶⁵. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

⁶² <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁶³ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

⁶⁴ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁶⁵ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁶⁶ – neutral effects.

The site option S92 adjoins the designated Winterbournes Conservation Area⁶⁷. There are number of Listed Buildings along the main road to the west at least 200m distance. It is unlikely that small residential development here would result in any significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements. Potential for minor negative effects but uncertain until mitigation measures are investigated.

The site option S92 is bounded by Figsbury Road and surrounded by residential development on two sides with the railway embankment to the south-east, making it very well contained within the landscape⁶⁸ – with the potential for positive effects. However, there would be some impacts on views of the Conservation Area from the railway bridge with the potential for negative effects. Therefore, both negative and positive effects at this stage.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. The site option S92 has direct links to footpaths and to the sustainable transport network via Figsbury Road (although no pavement, this is a quiet no-through road so relatively safe) with positive effects. However, the narrow nature of Figsbury Road caused by on street parking and less than ideal visibility onto its junction with the A338, indicate that the site could only support very limited development. The site is well situated centrally to accessing village services and facilities⁶⁹.

⁶⁶ <https://flood-map-for-planning.service.gov.uk/>

⁶⁷ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁶⁸ Draft Assessment Site Option S92 (WPC, August 2018)

⁶⁹ Ibid

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

SA Objectives ⁷⁰ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment		
	1	2	3	4	5	6	7	8	9	10	11	12		
S118 Land at Black Horse Lane, Hurdcott	0	-	0	- ?	0	0	0	-?	-?	++	+	+?	-?	-?
<p>Description: 0.45 ha site currently used as field/paddock; adjacent to Darby Su Cottage to the north with the Black Horse Pub to the south, bounded by Black Horse Lane to the east and greenfield to the west.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁷¹, a large lowland river system with the primary</p>														

⁷⁰ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

⁷¹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

reason for designation of habitats being the aquatic *Ranunculus* species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option S118 is approximately 50m⁷² from the nearest area of the R Avon SAC to the west and comprising the tributary – the River Bourne. It may be noted that the nature conservation regulator Natural England⁷³ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 450m to the north of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed. Therefore at least neutral effects indicated for biodiversity.

The site option is on greenfield and the agricultural land classification is not recorded⁷⁴. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The site option is near to the Black Horse Pub and there could be issues for noise, light and odour pollution – potential for mitigation but uncertainty at this stage for the minor negative effects. The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects for air quality.

⁷² Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

⁷³ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁷⁴ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁷⁵. However, this part of Black Horse Lane is known⁷⁶ to have historically suffered from surfacewater flooding and groundwater inundation of the sewerage system – potential for minor negative effects that could be mitigated through layout/design but uncertainty at this stage.

The site option S118 is not within the designated Winterbournes Conservation Area⁷⁷ and is located about 100m from the nearest designated heritage asset Grade II listed The Poplars to the north. It is unlikely that low density development would result in any significant adverse effects on the house or its setting.

The site option is on Black Horse Lane with its pleasant semi-rural character; mitigation through limiting numbers and size/scale of any housing could preserve an element of the spacious and green character of this part of the Lane⁷⁸ – potential minor negative effects but with uncertainty until potential mitigation measures investigated further.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Site option S118 is one of the more remote sites from village facilities/services but is near to a bus stop on the main road, within 450m of the primary school and within 300m of the Black Horse public house. However, no direct access to pavements and although a public footpath does link the site to Winterbourne Earls, these sections comprise unmade footpaths which may not be suitable for all users and involve greater distances than other sites to most facilities⁷⁹. Therefore, likely negative effects but some uncertainty.

Also, for access to sustainable transport with some uncertainty due to the poorer quality of the footpath and whether this could be improved as part of mitigation – this could provide an opportunity to resolve an existing environmental problem with potential positive effects.

⁷⁵ <https://flood-map-for-planning.service.gov.uk/>

⁷⁶ Draft Assessment Site Option S118 (WPC, August 2018)

⁷⁷ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁷⁸ Draft Assessment Site Option S118 (WPC, August 2018)

⁷⁹ Draft Assessment Site Option S118 (WPC, August 2018)

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. Some concern was recorded that new housing development in the vicinity of the existing public house could cause some issues for noise/odour and compliance with environmental permitting through the Environment Health – any requirement to curtail noise/odour could adversely affect the viability of the pub⁸⁰, so some uncertainty of effects for the SEA objective to protect existing employment areas and this site option.
The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

SA Objectives⁸¹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12

⁸⁰ ibid

⁸¹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

1055 Land adjacent to East Farm, Winterbourne Gunner	+	-	0	0	0	0	0?	-?	++	+	+	+	0
<p>Description: 3.3 ha site currently in agricultural use; bounded by the A338 to the west, the farm to the north, residential to the south-west, and greenfield land to the east and south.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁸², a large lowland river system with the primary reason for designation of habitats being the aquatic <i>Ranunculus</i> species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option S1055 is approximately 400⁸³ from the nearest area of the R Avon SAC to the north. It may be noted that the nature conservation regulator Natural England⁸⁴ considered that the WNP is unlikely to have significant environmental effects on the natural environment.</p> <p>Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the north. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 100m to the north-east of the site option on the opposite side of the A338. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed. Therefore at least neutral effects indicated biodiversity; there is a footpath to the south-east from the site option suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.</p> <p>The site option is on greenfield and the agricultural land classification is not recorded⁸⁵. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil</p>													

⁸² <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁸³ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

⁸⁴ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁸⁵ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding⁸⁶ – neutral effects.

The site option S1055 is located outside the designated Winterbournes Conservation Area⁸⁷ but adjacent to the boundary at the north-eastern edge of the site along the main road the A338. It is about 40m from the nearest designated heritage asset Grade II listed Mellow Thatch to the north-west beyond several other residential properties along the main road A338. It is unlikely that small residential development here would result in any significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements – therefore potential minor negative effects but some uncertainty at this stage as mitigation possibilities not known.

The north-west corner adjacent to the A338 of this site option is reasonably well related to the existing residential development; however, it is also significantly elevated above the A338 with potential for negative effects. The south side of the site has a strong rural character and existing buildings are well screened⁸⁸. Also adjacent to the Conservation Area boundary - therefore, some minor negative effects but with uncertainty until potential mitigation measures investigated further.

⁸⁶ <https://flood-map-for-planning.service.gov.uk/>

⁸⁷ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁸⁸ Draft Assessment Site Option S1055 (WPC, August 2018)

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Site option S1055 is well situated in relation to accessing village services/facilities, located adjacent to the A338 on the southern edge of Winterbourne Gunner. Footpaths are shown along the A338 and the south-western boundary of the site, although it is noted that there is currently no direct access to pavements and footpaths⁸⁹. Minor positive effects indicated for accessibility, inclusivity and health/well-being objectives. If direct access to footpaths/pavements, this could increase to a major positive for sustainable transport as the location would clearly reduce the need to travel by car.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

⁸⁹ Draft Assessment Site Option S1055 (WPC, August 2018)

SA Objectives ⁹⁰ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
3222 Gaters Lane, Winterbourne Dauntsey	+?	-	0	0	0	0?	--	++	+	+	+	0
<p>Description: 5.5 ha site currently in agricultural use and located on the western edge of the village with a footpath to the west and the floodplain to the east.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC⁹¹, a large lowland river system with the primary reason for designation of habitats being the aquatic <i>Ranunculus</i> species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option 3222 is approximately 200m⁹² from the nearest area of the R Avon SAC to the south-west and comprising the tributary – the River Bourne; and some 920m to the area of SAC to the north-east. It may</p>												

⁹⁰ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

⁹¹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

⁹² Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

be noted that the nature conservation regulator Natural England⁹³ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the south-west and north-east. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 200m to the south of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

Therefore at least neutral effects indicated for biodiversity; there is a footpath adjacent to the north-west from the site option suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is on greenfield and the agricultural land classification is not recorded⁹⁴. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, a small part of the site is within Flood Zone 3 indicating higher risk of flooding⁹⁵ – potential for negative effects but some uncertainty as effectiveness of mitigation measures not known at this stage.

⁹³ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

⁹⁴ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

⁹⁵ <https://flood-map-for-planning.service.gov.uk/>

The site option 3222 is located in Winterbourne Dauntsey outside the designated Winterbournes Conservation Area⁹⁶ but adjacent to the boundary at the north-western edge of the site. It is about 80m from the nearest designated heritage asset Grade II listed Bourne Cottage to the north-east. It is unlikely that small residential development here would result in any significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements – therefore potential minor negative effects but some uncertainty at this stage as mitigation possibilities not known.

The site option 3222 has a strong rural character comprising open fields surrounded by belts of woodland. It is poorly related to existing development, being separated from the village by the floodplain⁹⁷ – likely major negative effects.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Site option 3222 is well situated in relation to accessing village services/facilities and is fairly centrally located⁹⁸. There are footpaths around the site but the parts farthest from Gaters Lane are only accessible by unmade footpaths. Minor positive effects indicated. The current access is an existing field directly onto Gaters Lane which is a narrow road with poor visibility onto The Portway to the north. However, with footpaths into the village to the east of the site, positive effects are indicated for sustainable transport.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

⁹⁶ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

⁹⁷ Draft Assessment Site Option 3222 (WPC, August 2018)

⁹⁸ Ibid

SA Objectives ⁹⁹ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment
	1	2	3	4	5	6	7	8	9	10	11	12
3529 Orchard/Paddock rear of Telephone Exchange	0	-	0	0	0 0	-?	--	++	+	+	+	0
<p>Description: 0.29 ha site currently used as orchard/paddock connecting into the wider meadow pasture to the west; dwellings to the east along the A338 and to the south with St Edwards Meadow.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC¹⁰⁰, a large lowland river system with the primary reason for designation of habitats being the aquatic <i>Ranunculus</i> species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option 3529 is adjacent is approximately 600m¹⁰¹ from the nearest area of the R Avon SAC to the north-east beyond the A338 and approximately 800m from the R Avon SAC designated area to the south. It</p>												

⁹⁹ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); split cells presented in this SEA report

¹⁰⁰ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

¹⁰¹ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

may be noted that the nature conservation regulator Natural England¹⁰² considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the west and south. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 500m to the north-east of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed. Therefore at least neutral effects indicated for biodiversity.

The site option is on greenfield and the agricultural land classification is not recorded¹⁰³. However, it is noted that the Winterbournes are within the Environmental Stewardship Target Area administered by Natural England aiming for the most appropriate management where environmental outcomes are likely to be greatest. Minor negative effects for loss of soil resource and greenfield land that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (please see also SA No 5 Flooding). Neutral effects.

The Winterbournes are in a rural environment and with no designated Air Quality Management Area (AQMA), indicating that there are no significant problems associated with traffic emissions. The levels of development proposed are only 18 dwellings and it is considered that this will not give rise to any significant effects on air quality or environmental pollution. Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne; however, all the site options are located in Flood Zone 1 indicating low risk of flooding¹⁰⁴ – neutral effects.

¹⁰² Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

¹⁰³ <https://magic.defra.gov.uk/MagicMap.aspx> [accessed November 2018]

¹⁰⁴ <https://flood-map-for-planning.service.gov.uk/>

The site option 3529 is located within the designated Winterbournes Conservation Area¹⁰⁵, adjacent to the Listed Box Cottage, and is about 250m from the next nearest designated heritage asset Grade II listed Mellow Thatch to the north-east beyond several other residential properties along the main road A338. It is unlikely that small residential development here would result in significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements –therefore potential minor negative effects but some uncertainty at this stage as mitigation possibilities not known.

The site is not readily visible, hidden behind frontage buildings that line the A338 to the east; however, the site constitutes an open paddock which links visually to the open space of the Bourne Valley meadows/river corridor¹⁰⁶, indicating potential negative effects.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Site option 3529 is well placed for good access to village services and facilities with positive effects. Current access is through a field gate off the access that serves nearby Box Cottage and some uncertainty about suitability of this access and any effects on the highway but overall positive effects for sustainable transport.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

¹⁰⁵ Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

¹⁰⁶ Assessment Site Option 5329 (WPC, January 2019)

SA Objectives ¹⁰⁷ Housing Site Option	Biodiversity & Green Infrastructure	Land & Soil Resources	Water Resources	Improve Air Quality	Minimise Climate Change; Improve Resilience	Historic Environment	Landscape Quality	Housing	Healthy & Inclusive Communities	Sustainable Transport	Economy	Employment	
	1	2	3	4	5	6	7	8	9	10	11	12	
3553 Large Garden to End Cottage	-?	-	0	0	0	-	-?	--	++	+	+	+	0
<p>Description: 0.44 ha large garden site at End Cottage off Gaters Lane and located on the western edge of the village with a footpath to the west and the floodplain to the east.</p> <p>Assessment: The Winterbournes Parish area is over 8km from the Pewsey Downs SAC to the south, over 10km from the Kennet & Lambourn Floodplain SAC to the east, and over 16 km from the Salisbury Plain SPA to the south, indicating that significant effects are not likely on the European designated sites due to distance and the small amount of development (some 18 dwellings) being proposed. However, the Parish does include areas of the River Avon SAC¹⁰⁸, a large lowland river system with the primary reason for designation of habitats being the aquatic <i>Ranunculus</i> species, and the water-crowfoot species – particularly in certain winterbourne reaches. Species that are the primary reason for designation include Desmoulin's whorl snail, seas lamprey, brook lamprey, Atlantic salmon and bullhead. The R Avon system is also designated a SSSI recorded as being in an unfavourable condition but recovering. Site Option 3222 is approximately 150m¹⁰⁹ from the nearest area of the R Avon SAC to the south-west and comprising the tributary – the River Bourne; and some 970m to the area of SAC to the north-east. It may</p>													

¹⁰⁷ Please note that No 5 is split and numbered 5a & 5b in the Wiltshire Local Plan Review SA Draft Scoping Report (November 2017); spilt cells presented in this SEA report

¹⁰⁸ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013016>

¹⁰⁹ Measured through Magic Maps <https://magic.defra.gov.uk/magicmap> [accessed November 2018]

be noted that the nature conservation regulator Natural England¹¹⁰ considered that the WNP is unlikely to have significant environmental effects on the natural environment.

Priority Habitats of Lowland Fens and Grazing Marsh are located with the R Avon SAC and extend wider to the south-west and north-east. There are also Priority Habitats of Deciduous and Broadleaved Woodlands approximately 250m to the south of the site option. The site option does not involve any land take of the SAC or Priority Habitats, indicating no significant effects on loss or fragmentation. Potential significant effects on water, disturbance or air quality to habitats are unlikely due to the relatively small amount of development being proposed.

The site is within the locally designated Area of High Ecological Value such that there is the potential for minor negative effects but some uncertainty at this stage as effectiveness of any mitigation measures is unknown.

There is a footpath adjacent to the north-west from the site option suggesting that new development could link with the green infrastructure network of the parish with potential for positive effects – uncertain at this stage but could be included in any site-specific requirements.

The site option is currently used as a garden. Minor negative effects for loss of soil resource that will be permanent; possibilities for some mitigation if green infrastructure provided to link to the GI network.

The Winterbournes are not within a groundwater vulnerability area and therefore risk of pollution to the aquifer is low. The site option does not include any surfacewater course and therefore risk of pollution or negative effects on water quality or levels is negligible (Please see SA objective No 5 for flooding). Neutral effects.

All development can promote renewable and low carbon sources of energy – neutral effects. The Winterbournes Parish includes significant areas of Flood Risk Zone 2&3 along the route of the River Bourne - the eastern part of the site is within the this designated higher flood risk zone¹¹¹ – potential for negative effects.

The site option 3553 is located in Winterbourne Dauntsey within the designated Winterbournes Conservation Area¹¹². It is about 60m from the nearest designated heritage asset Grade II listed Bourne Cottage to the north-east. It is unlikely that small

¹¹⁰ Letter NE to Wiltshire Council April 2017 in response to WNP SEA Screening Decision

¹¹¹ <https://flood-map-for-planning.service.gov.uk/>

¹¹² Replacement Salisbury District Local Plan (2003) Map 109. Winterbournes

residential development here would result in any significant adverse effects on the asset or its setting, but consideration would need to be given to Conservation Area requirements – therefore potential minor negative effects but some uncertainty at this stage as mitigation possibilities not known. End Cottage is not a Listed Building but may be regarded as a locally important heritage asset that contributes to the Conservation Area character¹¹³.

The site option 3553 contributes to the rural character in this part of the village and there is concern that development of the site would erode the spacious and green feel to this part of the village¹¹⁴ – likely major negative effects.

All site options will contribute to meeting the identified Parish needs for modest new housing including affordable housing – with major positive effects indicated.

The Winterbournes area is well served by a network of footpaths and bridleways to support sustainable transport and encourage a healthier lifestyle. Site option 3553 is well situated in relation to accessing village services/facilities and is fairly centrally located¹¹⁵. There is a footpath to the west of the site, but accessibility is unknown. Minor positive effects indicated. The current property has a separate access for an outbuilding directly onto Gaters Lane; positive effects are indicated for sustainable transport.

Provision for identified local housing needs will contribute to supporting the vitality and viability of village services/facilities with minor positive effects. The WNP does not propose allocation of any new employment land but does seek to support existing businesses – neutral effects.

¹¹³ Assessment Site Option 3553 (WPC, January 2019)

¹¹⁴ Assessment Site Option 3553 (WPC, January 2019)

¹¹⁵ Ibid