

# **Wiltshire Local Plan Review Statement of Common Ground**

**As agreed between:**

**Wiltshire Council**

**And**

**Environment Agency**

**concerning**

**Wiltshire Local Plan Review**

**Date: March 2025**

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## 1. Introduction and Context

- 1.1 The purpose of this Statement of Common Ground (SoCG) is to set out the strategic matters being addressed, and progress made towards cooperating on these matters between Wiltshire Council and the Environment Agency relating to the preparation of the Wiltshire Local Plan review (hereafter referred to as the draft Plan).
- 1.2 The statement sets out areas of agreement and, where necessary, areas of disagreement, as appropriate.
- 1.3 Wiltshire Council is the Local Planning Authority for Wiltshire's administrative area. Environment Agency (EA) is a Prescribed Body as defined in part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is the government's adviser for the water environment, responsible for:
  - Regulating major industry and waste management
  - Treatment of contaminated land
  - Water quality and resources
  - Fisheries
  - Inland river, estuary and harbour navigations
  - Conservation and ecology
- 1.4 In line with the National Planning Policy Framework (NPPF)/ Planning Practice Guide (PPG) EA are an important consultee in the context of plan making and decision making, particularly in respect of the sequential approach to managing flood risk from certain sources.
- 1.5 Wiltshire Council and EA are obliged under the Duty to Cooperate to engage and work together on relevant strategic matters in a proportionate and meaningful manner.
- 1.6 Wiltshire Council is currently undertaking a review of the Wiltshire Core Strategy (WCS) and saved policies. The emerging Wiltshire Local Plan review will, once adopted replace the WCS and the saved policies from former District Council Local Plans (i.e. Appendix D of the WCS).
- 1.7 The review largely updates the vision and framework for delivering sustainable growth across Wiltshire for the period 2020 until 2038 addressing strategic priorities<sup>1</sup> such as - meeting forecast housing/employment needs and other economic, social and environmental matters, including meeting the legal duty to tackling the effects of climate change.

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<sup>1</sup> [Section 19 1B-C, Planning and Compulsory Purchase Act 2004 \(as amended\)](#)

- 1.8 The evidence to support the draft Plan has assessed forecast levels of need for new homes, employment land and associated infrastructure, as well as reviewing extant development management policies.
- 1.9 For the avoidance of doubt, the needs of Gypsies and Travellers are being addressed in a separate development plan document. Minerals and Waste planning is also covered in separate planning documents which will be comprehensively reviewed in due course.
- 1.10 This statement is structured to provide a summary of the strategic matters, and how cooperation has progressed, between Wiltshire Council and EA in relation to the preparation of the draft Plan. This SoCG is a written record of the key matters addressed to date.

## 2. Governance Arrangements and Ongoing Engagement

- 2.1 Wiltshire Council and EA have worked constructively throughout the production of the Plan review including the preparation of the 2019 Strategic Flood Risk Assessment and more recent documents. This has been through the consultations outlined above and, where necessary, meetings to discuss the scope of additional work prepared post-Regulation 19 consultation.
- 2.2 Liaison has included the following meetings and correspondence between EA and Wiltshire Council:

Date	Purpose/type of engagement and outcome(s)
07/08/17	Correspondence following a meeting to confirm that the Council intended to publish an Issues and Options paper in the autumn of 2017. Matters in relation the Nutrient Management Plan also discussed, including the likelihood of success in judicially challenging the Nutrient Management Zones imposed by the UK Government.
15/08/17	Correspondence covering the proposed establishment of a 'water group' to help inform the prepare the then titled Wiltshire Core Strategy review. In addition, advice provided on the preparation of an update to the Strategic Flood Risk Assessment
14/11/17	Meeting note covering cross-boundary water quality and nutrient management matters. The meeting included representatives from New Forest District Council (NFDC), Wessex Water (WW), Natural England (NE) and EA.
17/01/18	Meeting note on water quality, Habitats Regulations Assessment and preparation of Local Plans. Meeting attendees included NFDC, Christchurch and East Dorset Council (CEDC), WW, EA and Wiltshire Council.

14/03/18	Meeting note on the River Avon SAC - Interim Position on Nutrient Management. Meeting attended by officers from NFDC, WW, NE, EA and Wiltshire Council. The meeting covered matters in relation to nutrient management and the heads of terms for Memorandum of Understanding (MoU) in relation nutrient management and membership.
09/05/18	Meeting note covering discussion between EA, NE and Wiltshire Council regarding the preparation of the MoU.
18/01/22	Meeting note of discussions between EA and Wiltshire Council. Matters discussed included an update on the draft Plan preparation, site selection process, flood risk evidence, ground water protection, ground water resources, nutrient management, canals, infrastructure.
September 2022	Draft Statement of Common Ground (SoCG) prepared and submitted to EA covering matters in relation to the preparation of the draft Plan and comments received to that point in time.
16/11/23	Meeting to discuss EA's response to the Regulation 19 consultation materials. EA confirmed that they had concerns with the draft Plan and its evidence on flood risk matters.
24/09/24	Meeting with JBA, EA and Council to discuss EA comments on Level 1 SFRA and progress on Water Cycle Study.
15/11/24	Meeting to discuss the Level 1 and draft Level 2 SFRAs. To conclude on the review of the Level 1 SFRA and to determine a way forward in respect of commenting on the draft Level 2 SFRA material. It was agreed that JBA have addressed EA's comments on the Level 1 SFRA, subject to Wiltshire Council being satisfied that the document is fit for purpose until the publication of NaFRA2 and the revised Flood Map for Planning in 2025. In terms of the Level 2 reports (8 in total), it was agreed that EA would review and comment in a sequential manner to expedite the process of finalising the reports.

### **3. Strategic Matters in relation to the preparation of the Wiltshire Local Plan review**

- 3.1 Wiltshire Council notified EA and all other Prescribed Bodies of the intention to review the adopted Wiltshire Core Strategy and consulted on the subject and scope of the review in 2017. Representations were received from Environment Agency on this early-stage consultation, but no substantive issues were raised.

3.2 Wiltshire Council consulted on key components of the then emerging plan proposals, along with accompanying evidence through a 'Regulation 18' type consultation from 13th January to 9th March 2021. In response to the Regulation 18 consultation, representations were received from EA. The comments received were summarised in the Consultation Statement and included:

- Weave Water Sensitive Urban Design throughout the Local Plan.
- Undertake the Sequential Test for all the proposed site allocations against the flood risk criteria identified in the Wiltshire SFRA Level 1, i.e. all sources of flooding.
- Recommend that SFRA Level 2 is considered for the large strategic allocations which are in proximity to flood zones 2 and 3.
- Advise for those sites where there is a current flood risk shown within the potential development boundary that the housing numbers are stated as '*up to xxxx dwellings*'.
- Recommend that the main rivers in the county should be considered as part of linear country park / open space.
- When allocating new development sites advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution.
- Strongly encourage the Council to be specific about water use standards in new development.
- Wiltshire Council should ensure sufficient water resource supply headroom exists for development to take place, without having an adverse impact on the water environment and Hampshire Avon SAC.
- Encourage a requirement of 20% biodiversity net gain.
- Include reference to Nature Recovery Networks – major commitment in the government's 25 Year Environment Plan.
- Core Policy 69 needs to be updated to reflect the most recent agreement made between Wiltshire Council, the Environment Agency, and Natural England in respect of water resources and the management of phosphorous.

3.3 These comments and recommendations were acknowledged and analysed. Wiltshire Council then published the Pre-Submission draft Wiltshire Local Plan review (the draft Plan), along with accompanying evidence, for a formal consultation from 27th September to 22nd November 2023. In response to this Regulation 19 consultation, representations were received from Environment Agency (representation number 2245). The full representation will be before an appointed Planning Inspector during the examination and hence in the interests of conciseness, this SoCG focuses on the substantive matters that resulted in Wiltshire Council undertaking further work.

3.5 The Regulation 19 consultation response commented generally on the Council's evidence relating to flood risk from surface and main watercourses; and specifically in terms of certain policies/policy wording.

3.6 EA advised that the existing SFRA level 1 (dated July 2019) is dated and requires updating to appropriately support the draft Plan in terms of the decisions made to allocate land for

future development. It was highlighted within EA's response that there have been national policy changes, including climate change allowances, and new flood modelling in some catchments across the Plan area since the publication of the 2019 SFRA 1, which led to their request for an updated SFRA. Consequently, based on what was published at the Regulation 19 stage, EA took the view that proposed site allocations which include areas of flood risk are unsound until they are supported by an updated SFRA Level 1 (and Level 2, where identified as necessary by the Level 1).

- 3.7 Additionally, EA commented that the current wording of Policy 95 (Flood Risk) was disproportionately focused on surface water flood risk, identifying that all sources of flooding must be represented within the Policy to accord with the changes made to the Planning Practice Guide (PPG) in 2022. Additional minor wording alterations were suggested to Policies 4 (Climate Change) 6 (Chippenham Principal Settlement), 88 (Biodiversity and Geodiversity), 89 (Biodiversity Net Gain), 90 (Trees, Hedgerows and Woodland), 93 (Green and Blue Infrastructure). Additionally, site specific comments were made on a variety of Policies.
- 3.8 In respect of the suggested changes, the Council has reviewed the proposed wording and considers that changes could be made to policies to address EA's position should the examining Inspector considers it necessary to do so in the interests of soundness and/or legal compliance. These matters are addressed in more detail in **Appendix A**.
- 3.9 Finally, EA reiterated a water cycle study should have been undertaken as part of the evidence base supporting the draft Plan, specifying that this should cover the whole Plan area. Without this water cycle study, EA stated that the associated risks of developing in the Marlborough Sewage Treatment Works (STW) catchment and Hampshire Avon have not been adequately assessed. The knock-on effect of this is that there is a lack of evidence that existing river and groundwater water quality status and wastewater infrastructure have been evaluated when determining if the locations of new development allocations are appropriate.

#### **4. Post Regulation 19 consultation - additional work**

- 4.1 The Council recognise and acknowledge that site selection decisions were based upon the 2019 Level 1 Strategic Flood Risk Assessment and advice received from the Lead Local Flood Authority. However, considering the time it has taken to prepare the draft Plan, the Council considers it acted reasonably in terms of its reliance on the information it had at the time the pool of potential sites was assessed - i.e. from 2019 to 2020. Clearly, since the informal consultation in early 2021, further time has elapsed and there have been updates to PPG (August 2022), local models and climate change allowances. As such the Council understood the approach taken by EA when setting out their comments on the Regulation 19 draft Local Plan.
- 4.2 In addressing the representation submitted through the Regulation 19 consultation, the Council recognised the importance of working through the concerns raised by EA to ensure

such matters were resolved, or capable of being resolved, for the purposes of examining the draft Plan. Therefore, a decision was taken to undertake additional work to reach agreement with EA on matters relating to evidence, draft policy and decision making.

#### 4.3 JBA Consulting were appointed to undertake the following tasks:

##### Wiltshire Level 1 SFRA Update and Review:

- Conduct a review of the current Level 1 SFRA produced in 2019, identifying key areas for enhancement.
- Update the existing flood risk models and data in respect of all sources to reflect the latest information held by the Environment Agency, relevant water utilities companies and the council, as Lead Local Flood Authority.
- Incorporate the latest climate change projections, assessing their impact on flood risk from all sources, as well as providing guidance to the council as Lead Local Flood Authority, Local Planning Authority and Minerals and Waste Planning Authority on technical and policy matters, particularly in respect of ground water flood risk, as this is often challenged by applicants for new development.

Sub-task: responding to EA consultation comments on the application of the sequential and exception tests.

- To review the decisions made through the Wiltshire Local Plan Site Selection process in respect of flood risk from all sources, including:
  - the identification of the sequential test area of search as defined by the settlement strategy within the existing and emerging Local Plan policies
  - a review of Stages 1 and 2 of the site selection methodology to include the 'pool of sites' within the context of the sequential and, where necessary, exception tests
  - the likelihood of successful mitigation as defined through Stage 3 of the assessment process (the Sustainability Appraisal).

##### Level 2 SFRA Preparation (where necessary)

- In response to advice from the Environment Agency, to prepare detailed Level 2 SFRAs (based on the findings of the updated Level 1 SFRA) for the following locations/sites
  - Draft allocation: Land south of Chippenham and East of Showell Farm (Policy 7)
  - Chippenham Town Centre (Policy 8)
  - Draft allocation: Land off Spitfire Road, Calne (Policy 10)
  - Draft allocations at Salisbury (potential groundwater and surface water issues, Policies 24, 25, 26, 27 and 28)
  - Review and update of the Maltings/Central Carpark Level 2 SFRA to incorporate updated modelling data from the [Salisbury River Park Project](#)



- Employ up to date data and advanced modelling techniques to assess detailed flood risk scenarios for Wiltshire, considering topography, proposed/existing land use, existing flood defences and the latest climate change assumptions.

## Wiltshire Strategic Water Cycle Study

- Conduct a strategic study of the water cycle in Wiltshire, including rainfall patterns, surface water runoff, groundwater levels and water quality to bolster the council's evidence base underlining the draft allocations within the draft Local Plan
  - Assess the known and predicted interdependencies between flood risk, water resources, wastewater drainage/treatment capacity and ecological considerations relating to phosphorous (direct and indirect) and nitrates (direct and indirect) on a county-wide basis, but with particular reference to critical and European protected river catchments.
  - To propose strategic measures for sustainable water management (potable and wastewater), as well as flood resilience.
- 4.4 EA have been engaged in this commission, as have water utility companies and Natural England, in terms of data sharing and advice. Indeed, EA have been invited to review draft submissions and their advice/comments. The further work undertaken on the sub-task in relation to sequential and exception tests has been completed and is set out in Appendix S of SFRA Level 1, as discussed further below.

## 5. Strategic Flood Risk Assessment

### SFRA Level 1

- 5.1 In their letter<sup>2</sup> in response to the draft Level 1 SFRA, EA set out a series of detailed comments that have now been addressed by JBA with input from the Council (Strategic Planning and Lead Local Flood Authority).

### SFRA Level 2

- 5.2 Following completion of the Level 1 SFRA and in the light of the comments submitted by EA at the Regulation 19 stage of consultation, JBA advised the Council that eight of the proposed site allocations in the draft Plan would benefit from detailed Level 2 assessments. The sites screened for Level 2 assessments are:

- Policy 7 - Land South of Chippenham and East of Showell Farm
- Policy 10 - Land off Spitfire Road, Calne
- Policy 18 - Land East of Melksham
- Policy 19 - Land off Bath Road, Melksham

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<sup>2</sup> Letter dated 9 August 2024, reference WX/2022/136266/SF-

- Policy 20 - Land North of the A3102, Melksham
- Policy 25 - Land North of Beehive Park and Ride, Salisbury
- Policy 33 - The Maltings and Central Carpark, Salisbury
- Policy 61 - Land West of Mane Way, Westbury

5.3 The draft SFRA Level 2 material was submitted to EA for comment on 5 November 2024. The material is set out in several sections and bound by an overarching report. The detailed assessments have been reviewed by the Council (Strategic Planning and Lead Local Flood Authority officers). Comments have been sent to JBA for review.

5.4 At this stage, EA are reviewing this material and intend to provide comments. Once all comments are received JBA will need to make all necessary changes to ensure the evidence can be positioned to support the Council through the examination of the draft Plan.

### **Water Cycle Study**

5.5 The Water Cycle Study (WCS) has been refined to address comments from EA, Natural England and water utilities companies. It provides further evidence to support the growth scenario set out in the draft Plan and policies relating to water efficiency, water stress and nutrient management.

5.6 The WCS was undertaken in accord with [EA guidance](#) and was initially set out over two documents referred to as the Stage 1 and Stage 2 reports. The Stage 1 report covers evidence and context for the WCS. The Stage 2 report assesses the growth scenario set out in the draft Plan and provides evidence in respect of two basic points: 1) can the level of planned growth be supplied with water and 2) is there sufficient wastewater treatment capacity to manage projected needs.

5.7 The drafts of both documents were sent to EA, along with Natural England, water utility companies operating across Wiltshire. JBA have incorporated all the comments received from EA and other consultees. The Council have received the final draft of the WCS report which is now set out as a single, comprehensive document and will be submitting the material alongside the draft Local Plan.

## **6. Post submission engagement**

6.1 Whilst the Duty to Cooperate applies up to the point of submission, Wiltshire Council and the Environment Agency continue to engage on matters of strategic interest. This SOCG will continue to be kept under review and updated with information that may facilitate and inform the examination. Any such updates, post submission, can be found within this section.

### **SFRA Level 2**

6.2 The draft SFRA Level 2 material was submitted to EA for comment on 5 November 2024. The material is set out in several sections and bound by an overarching report. The

detailed assessments were reviewed by the Council (Strategic Planning and Lead Local Flood Authority officers) and comments sent to JBA for review.

- 6.3 Following reviewing this material, EA also provided comments for consideration. Having considered these comments, the Council sent further comments to JBA who made all the necessary changes to ensure the evidence is ready and positioned to support the Council through the examination of the draft Plan. The SFRA Level 2, alongside a main report, presents information in a series of site summary tables (Appendix A.1) which offer high level flood risk assessments and conclusions for each site. Appendix A.2 provides all the site summary table flood risk mapping. The SFRA Level 2 was submitted in February 2025 following the receipt of the final report.

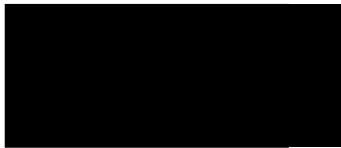
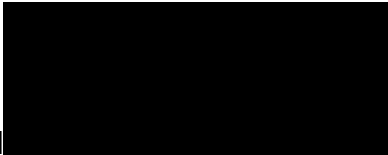
### **Ongoing engagement**

- 6.4 Wiltshire Council and EA continue to work constructively and this ongoing post submission engagement has included the following meetings and correspondence between EA and Wiltshire Council:

Date	Purpose/type of engagement and outcome(s)
17/01/25	Meeting to discuss EA comments relating to the draft SFRA Level 2 report. EA advised that, to expedite finalisation, Wiltshire Council should ensure all EA recommendations have been satisfactorily actioned by JBA. EA therefore recommended no further rounds of consultation necessary.

**7. Next steps**

7.1 Wiltshire Council and Environment Agency welcome the opportunity to continue engagement under the duty to cooperate, considering matters of strategic interest. Both bodies are committed to ongoing communication and collaboration to ensure effective plan-making that delivers positive outcomes that meet national planning policy requirements. This statement serves as a foundation for continued cooperation and will be reviewed as the draft Plan progresses through the examination process and beyond.


<b>Signed:</b>
<b>Name:</b> Georgina Clampitt-Dix, Head of Strategic Planning
<b>For and on behalf of Wiltshire Council</b>
<b>Date:</b> 14 March 2025

<b>Signed:</b>
<b>Name:</b> Ms Ellie Challans
<b>For and on behalf of Environment Agency</b>
<b>Date:</b> 14 March 2025

## Appendix A

### Suggested Changes to Policies to Address Comments from Environment Agency (EA)

Policy / Paragraph	EA Suggested Change  (new text in ' <i>bold italics</i> ', deleted text ' <del>strike</del> ' through)	Agreed Position
Policy 4 Addressing Climate Change	<p>Amend the title of Section C to read:</p> <p>C. Mitigating <del>and</del>, adapting <b><i>and building resilience</i></b> to the impacts of climate change...</p> <p>Amend bullet v of Section C to read:</p> <p>v. providing shade and green and blue infrastructure to reduce overheating of urban areas <b><i>and watercourses</i></b> during warmer summers (in accordance with Policies 90, 93 and 98 - Woodlands, hedgerows and trees, Green and blue infrastructure, and Ensuring high quality design and place shaping);</p> <p>Amend bullet viii of Section C to read:</p> <p>viii. incorporating appropriate water efficiency and water recycling measures to <del>help reduce energy demand, water abstraction and</del> contribute towards reducing the impact of nutrients on the catchment of the River Avon SAC, <b><i>help reduce energy demand and reduce abstraction</i></b> (in accordance with Policy 96 - Water resources); and</p>	The suggested changes to Policy 4 would improve its clarity and effectiveness and are therefore recommended to the appointed Planning Inspector as modifications.
Paragraph 5.128	<p>Amend Paragraph 5.128 to read:</p> <p>It is important for all watercourses, not just main rivers and ordinary watercourses, that development demonstrates how adverse impacts are to be avoided. It is anticipated that most development proposals within 20m of a watercourse <b><i>and waterbodies</i></b> should be accompanied by a Construction</p>	The suggested change to Paragraph 5.128 would improve its clarity and effectiveness in terms of supporting policy and is therefore recommended to the appointed Planning Inspector as a modification.

	<p>Environment Management Plan.  <b>Furthermore, development proposals should seek to provide an undeveloped ecological buffer zone at least 10m wide on all sides of all watercourses/waterbodies.</b></p>	
<p>Policy 88 – Biodiversity and geodiversity</p>	<p>Amend the third sentence of the second paragraph under the title “<b>Protection</b>” within Policy 88 to read:</p> <p>...Furthermore, development proposals must secure and implement measures, including, <b>where necessary</b>, appropriate compensatory measures <del>where necessary</del> to ensure <del>no net loss of biodiversity</del> <b>a net gain of at least 20%</b> and the local biodiversity resource, and to secure the integrity of local ecological networks and provision of ecosystem services.</p> <p>Amend the bullet points in the section titled “<b>Biodiversity in the built environment</b>” as follows:</p> <p>In the “Other features...” section, move the text at bullet 2. to the “As a minimum...” section to create a new bullet 5. Then renumber the remaining bullet points in the “Other features...” section.</p> <p>In the “As a minimum...” section, amend bullet 4 to read:</p> <p style="padding-left: 40px;">4. hedgehog highways <b>and features to support other protected species</b> integrated throughout the design of developments (e.g., suitable gaps in all garden fences) between gardens and the wider ecological network to facilitate movement of protected species.</p>	<p>The suggested changes to Policy 88 would improve its clarity and effectiveness and are therefore recommended to the appointed Planning Inspector as modifications.</p>
<p>Policy 89 – Biodiversity net gain</p>	<p>After the first sentence of the Policy add the following sentence:</p>	<p>The suggested change to Policy 89 would improve its clarity and effectiveness and</p>

	<p><b>...As outlined in the following delivery hierarchy, achieving onsite, as opposed to offsite delivery of biodiversity net gain will be supported.</b></p>	<p>is therefore recommended to the appointed Planning Inspector as modifications.</p>
<p>Policy 90 – Woodland, hedgerows, and trees</p>	<p>Please include that native tree species of UK provenance will be used where possible.</p>	<p>The Council acknowledges the importance of prioritising the planting of native tree and hedgerow species and considers the current policy wording achieves this aim. Moreover, the forthcoming Woodland, hedgerow and tree strategy will provide more guidance on this matter.</p>
<p>Policy 93 – Green and blue infrastructure</p>	<p>We recommend linking this policy with Policy 89 and vice versa. They will be stronger together as Policy 89 is all about making sure there is the least amount of harm and replacement with the same or better quality.</p>	<p>The Council acknowledges the advice of EA. However, as the Local Plan review should be read as whole, the Council considers Policies 89 and 93 can be applied together to achieve the objectives of protecting, providing and enhancing green and blue infrastructure through the development management process.</p>
<p>Policy 95 – Flood risk</p>	<p>Amend the first paragraph to read:</p> <p><b><i>Through applying the sequential test for sites at risk of flooding</i></b> the council will follow a sequential approach to flood risk management in line with national policy and guidance.</p> <p>Amend the second paragraph by adding the following bullet points to read:</p> <ul style="list-style-type: none"> <li>• <b><i>Flood Risk Assessments - A Site-Specific Flood Risk Assessment (FRA), Surface Water Drainage Strategy and Groundwater</i></b></li> </ul>	<p>The suggested changes to Policy 95 would improve its clarity and effectiveness and are therefore recommended to the appointed Planning Inspector as modifications.</p>

**Assessment should be conducted in areas identified to be at risk in the SFRA and the published flood maps. Where local evidence of flooding is provided by the community, an FRA can be requested by the LPA.**

- **Flood Alleviation Schemes - Development will not be permitted where it would adversely impact on the future maintenance, upgrading or replacement of planned flood alleviation schemes.**
- **Relocation - The council will support the relocation of existing highly vulnerable development and essential infrastructure on land at risk from flooding provided:**
  - **the existing development is lawful**
  - **the site for relocation is at a lower flood risk**
  - **the size of any replacement building, or buildings is not materially larger than existing**
  - **the type, scale and location of the replacement development is consistent with relevant planning policies**
  - **the applicant provides for the suitable restoration of the existing site.**
- **Building behind defences - Where defences are required to ensure a development is resilient for its lifetime, but there is no certainty that defences will be delivered or maintained for the lifetime of the development, applications will be refused.**
- **Where flood risk mapping does not currently exist for smaller watercourses and drains, developers**



	<p><b><i>should be expected to undertake more detailed hydrological and hydraulic assessments of the watercourses to verify flood extents.</i></b></p> <ul style="list-style-type: none"><li>• <b><i>Culverts - there will be a presumption against culverting or the building over of watercourses (not only for flood risk reasons, but for biodiversity and geomorphology benefits). Clear span bridges will be preferred in the design of any necessary culvert and opportunities should be taken to remove existing culverts wherever practicable.</i></b></li></ul>	
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