

ROYAL WOOTTON BASSETT NEIGHBOURHOOD PLAN 2017-2026

Royal Wootton Bassett Neighbourhood Plan Examination,
A Report to Wiltshire Council

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Introduction

The Neighbourhood Plan

- 1 This Report provides the findings of the examination into the Royal Wootton Bassett Neighbourhood Plan (referred to as the Neighbourhood Plan).
- 2 Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.” (Paragraph 183, National Planning Policy Framework)

- 3 The Neighbourhood Plan was prepared by a Steering Group established by Royal Wootton Bassett Town Council. This was made up of individuals representing interests around the town and members and staff of the Town Council.
- 4 As noted on page 4 of the Neighbourhood Plan and set out in paragraph 1.2 of the Basic Conditions Statement, submitted alongside the Neighbourhood Plan, Royal Wootton Bassett Town Council is the *Qualifying Body*, ultimately responsible for the Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).
- 5 This Examiner's Report provides a recommendation with regards whether the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by Wiltshire Council. The Neighbourhood Plan would thus form part of the development plan and be used to determine planning applications and guide planning decisions in the Royal Wootton Bassett Neighbourhood Area.

Role of the Independent Examiner

- 6 I was appointed by Wiltshire Council, with the consent of the Qualifying Body, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.
- 7 I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.
- 8 As the Independent Examiner, I must make one of the following recommendations:
 - that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
 - that the Neighbourhood Plan, as modified, should proceed to Referendum;
 - that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
- 9 If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether the Referendum Area should extend beyond the Royal Wootton Bassett Neighbourhood Area to which the Plan relates.
- 10 Where modifications are recommended, they are presented as bullet points and highlighted in **bold print**, with any proposed new wording in *italics*.

Neighbourhood Plan Period

- 11 A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan specifies that the document covers the period:

"2017 to 2026."

- 12 Further to the above, paragraph 1.1 of the Neighbourhood Plan, on page 1, states that:

"The Neighbourhood Plan follows the same time scale as the Wiltshire Core Strategy, and so sets its policy between 2017 and 2026."

- 13 This is slightly confusing, as the phrase *"sets its policy"* is not quite the same thing as the established planning reference to *"plan period."* Also, the Wiltshire Core Strategy plan period runs up to 2026, but was adopted in 2015. For clarity, to ensure that the Neighbourhood Plan satisfies the relevant requirement in respect of specifying the plan period, I recommend:

- **Page 1, Para 1.1, delete the sentence referred to in paragraph 12 of this Report, above, and change to *"To align with the Wiltshire Core Strategy, the plan period of the Neighbourhood Plan is 2017 to 2026."***

- 14 The front cover of the Neighbourhood Plan includes the Submission Version publication date, which is unnecessary and detracts from clarity in respect of the plan period. I recommend:

- **Neighbourhood Plan front cover, delete *"March 2017"***

Public Hearing

- 15 According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.
- 16 However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.
- 17 Further to consideration of the information submitted, I confirmed to Wiltshire Council that I was satisfied that the Royal Wootton Bassett Neighbourhood Plan could be examined without the need for a Public Hearing.
- 18 In making the above decision I was mindful that the Neighbourhood Plan has emerged through robust consultation (see *Public Consultation*, later in this Report) and that people have been provided with significant and appropriate opportunities to have their say.

2. Basic Conditions and Development Plan Status

Basic Conditions

- 19 It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*¹ following the Localism Act 2011. A neighbourhood plan meets the basic conditions if:
- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
 - the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.²
 - An independent examiner must also consider whether a neighbourhood plan is compatible with the Convention rights.³
- 20 In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:
- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

² Prescribed for the purposes of paragraph 8(2) (g) of Schedule 4B to the 1990 Act by Regulation 32 The Neighbourhood Planning (General) Regulations 2012 and defined in the Conservation of Habitats and Species Regulations 2010 and the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007.

³ The Convention rights has the same meaning as in the Human Rights Act 1998.

- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

- 21 Subject to the content of this Report, I am satisfied that these three points have been met.
- 22 In line with legislative requirements, a Basic Conditions Statement was submitted alongside the Neighbourhood Plan. This sets out how, in the qualifying body's opinion, the Neighbourhood Plan meets the basic conditions.

European Convention on Human Rights (ECHR) Obligations

- 23 I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.
- 24 In the above regard, I note that Information has been submitted to demonstrate that people were provided with a range of opportunities to engage with plan-making in different places and at different times. Representations have been made to the Plan, some of which have resulted in changes and the Consultation Statement submitted alongside the Neighbourhood Plan provides a summary of responses and shows the outcome of comments.

European Union (EU) Obligations

- 25 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal⁴. However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment.
- 26 In this regard, national advice states:
- “Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects.”*
(Planning Practice Guidance⁵)
- 27 National advice then goes on to state⁶ that the draft plan:
- “...must be assessed (screened) at an early stage of the plan’s preparation...”*
- 28 This process is often referred to as a screening opinion, report determination or statement. If the screening report identifies likely significant effects, then an environmental report must be prepared.

⁴ Paragraph 026, Ref: 11-027-20150209, Planning Practice Guidance.

⁵ Paragraph 027, *ibid*.

⁶ Planning Practice Guidance Reference ID: 11-028-20150209.

29 Further to screening, Wiltshire Council determined that the Neighbourhood Plan falls within the scope of the Strategic Environmental Assessment regulations and that consequently, a Strategic Environmental Assessment (SEA) was required. Subsequently, a Sustainability Assessment (SA), incorporating SEA, was undertaken. This was submitted alongside the Neighbourhood Plan.

30 The SA/SEA made some suggestions for improving the sustainability of the Neighbourhood Plan and concluded that:

“Overall, the RWBNP will have positive effects for new development with strong policies to protect the unique local characteristics and help progress the aspirations for the RWBNP communities.”

31 The statutory bodies, the Environment Agency, Natural England and Historic England, have been consulted. Of these bodies, Historic England expressed concerns that the SA/SEA fails to provide sufficient information in relation to the potential impact of the Neighbourhood Plan's land allocation Policy (Policy 10) on heritage assets. This is taken into account in the consideration of Policy 10 in more detail later in this Report.

32 A Habitats Regulations Assessment (HRA) is required if the implementation of the Neighbourhood Plan may lead to likely significant effects on European sites. Wiltshire Council issued a screening decision which concluded that a HRA was not required as the Neighbourhood Plan:

“...would have no likely significant effects upon any European designations.”

33 Whilst I acknowledge that concerns have been raised regarding European obligations, most notably in respect of the impact of the allocation of land for development, national guidance establishes that the ultimate responsibility for determining whether a draft neighbourhood plan meets EU obligations lies with the local planning authority:

“It is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of a neighbourhood plan proposal submitted to it have been met in order for the proposal to progress. The local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations” (Planning Practice Guidance⁷).

⁷ Planning Practice Guidance Reference ID: 11-031-20150209.

- 34 In its Submission stage representation, Wiltshire Council states that a number of comments were submitted to the Qualifying Body further to consideration of the SA/SEA⁸ and the Council has also made significant and substantial comments in respect of the allocation of land. In undertaking the work that it has, Wiltshire Council has considered the Neighbourhood Plan's compatibility with European obligations and has neither stated, nor suggested, that the Neighbourhood Plan is incompatible with European obligations.
- 35 Given this and taking into account the content and recommendations of this Report, I am satisfied that the Neighbourhood Plan meets the basic conditions in respect of European obligations.

⁸ Wiltshire Council commented that: A Strategic Housing Land Availability Assessment does not comprise a detailed assessment of sites; that it "*may be worth including a consideration that a 'do nothing' approach would help to meet objectives;*" and that "*the site selection process seems to have assumed there would be school capacity available.*" (Response to RWBNP, 2 June 2017)

3. Background Documents and the Royal Wootton Bassett Neighbourhood Area

Background Documents

36 In undertaking this examination, I have considered various information in addition to the Royal Wootton Bassett Neighbourhood Plan. This has included (but is not limited to) the following main documents and information:

- National Planning Policy Framework (the Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Plan Regulations (2012) (as amended)
- Wiltshire Core Strategy (2015)
- Saved Policies of North Wiltshire Local Plan (2011)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal (SA) Report incorporating Strategic Environmental Assessment (SEA)

Also:

- Representations received

37 In addition, I spent an unaccompanied day visiting the Royal Wootton Bassett Neighbourhood Area.

Royal Wootton Bassett Neighbourhood Area

- 38 The boundary of the Royal Wootton Bassett Neighbourhood Area corresponds with that of the parish of Royal Wootton Bassett.
- 39 The Neighbourhood Plan does not include any plans or Maps, although a Map is appended to the document. As this appended map refers to the "*Parish Boundary*," the Neighbourhood Plan does not make the extent of the Neighbourhood Area entirely clear. For clarity and precision, I recommend:
- **Provide a new plan within the Neighbourhood Plan entitled "*Royal Wootton Bassett Neighbourhood Area*." This should show the Neighbourhood Area and include the reference "*The Neighbourhood Area corresponds to the area of the parish of Royal Wootton Bassett*."**
- 40 Wiltshire Council formally designated Royal Wootton Bassett Neighbourhood Area on 20th March 2013. This satisfies a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

- 41 As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.
- 42 Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a 'Yes' vote at Referendum.

Royal Wootton Bassett Neighbourhood Plan Consultation

- 43 A Consultation Statement was submitted to Wiltshire Council alongside the Neighbourhood Plan. The information within it sets out who was consulted and how, together with the outcome of the consultation, as required by the neighbourhood planning *regulations*⁹.
- 44 Taking the information provided into account, there is evidence to demonstrate that the Neighbourhood Plan comprises a "*shared vision*" for the Royal Wootton Bassett Neighbourhood Area, having regard to Paragraph 183 of the National Planning Policy Framework.
- 45 Royal Wootton Bassett Town Council established a Steering Group and commenced consultation in 2013. An interactive workshop took place in February 2013, followed by engagement with younger people, through "*Postcards from the Future*" sessions and a school bag survey. A wider online survey was carried out during the summer of 2013 and 392 respondents completed the survey.
- 46 Information from the above informed the development of options and policies. Consultation with landowners and developers took place during the second half of 2014 and early 2015; and consultation on an early version of the plan took place in September 2015.

⁹Neighbourhood Planning (General) Regulations 2012.

- 47 The draft plan was produced and underwent consultation between December 2016 and February 2017.
- 48 Consultation was well-publicised. As well as making use of posters, the distribution of leaflets and questionnaires, consultation was publicised via the use of promotional beer mats in local pubs and through a variety of websites.
- 49 The Consultation Report provides evidence to show that public consultation formed an important part of the plan-making process. Matters raised were considered and the reporting process was transparent. Consequently, the consultation process was effective and robust.

5. The Neighbourhood Plan – Introductory Section

- 50 Generally, the Introductory Section to the Neighbourhood Plan provides a clear and concise introduction to the Policies that follow.
- 51 However, part of the Introduction is confusing in respect of the making, purpose and use of neighbourhood planning policies. Also, as set out earlier in this Report, meeting the basic conditions is a legal requirement for any neighbourhood plan and it is therefore important that they are not mis-interpreted.
- 52 For clarity, I recommend:
- **Page 1, Para 1.1, line 9, delete “and making policy”**
 - **Para 1.1, line 10, change to “...must *be in general conformity with the strategic policies of the development plan*, in this case...”**
 - **Para 1.1, line 15, change to “...must *have regard to the National Planning*...”**
 - **Para 1,1, delete last sentence, “However...review.” (which is not necessarily the case)**
- 53 Paragraph 1.6 states that the plan-making process began in March 2013. This conflicts with the evidence provided in the Consultation Statement and on page 5 of the Neighbourhood Plan.
- 54 I recommend:
- **Para 1.6, change to “...was started in 2013...”**

6. The Neighbourhood Plan – Neighbourhood Plan Policies

Services, Facilities and Retailing

Policy 1: Services and Facilities

- 55 Chapter 8 of the National Planning Policy Framework (the Framework) recognises the role that the planning system can play in creating healthy, inclusive communities and it requires positive planning for the provision of services and facilities.
- 56 As worded, Policy 1 requires every new residential development proposal to demonstrate how future needs will be met in respect of community, medical, educational, infrastructure and social facilities. However, no substantive evidence is provided to demonstrate that it would be necessary or even relevant for every proposal for residential development – for example the development of a single dwelling – to provide this information.
- 57 The Policy fails to have regard to Paragraph 195 of the Framework, which requires information supporting a proposal to be limited to that which is:
- “...relevant, necessary and material to the application in question.”*
- 58 The Policy goes on to require all new development, regardless of its type, scale or nature, to *“make appropriate contributions to local infrastructure, services or facilities.”* It is not clear why all development might need to contribute to local infrastructure, facilities or services, having regard to Paragraph 173 of the Framework, which states that:
- “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.”*

- 59 Also, in respect of planning obligations, national policy is explicit. Paragraph 204 of the Framework states that obligations should only be sought where they are:

"...necessary to make the development acceptable in development terms; directly related to the development; and fairly and reasonably related in scale and kind to the development."

- 60 No substantive evidence is provided to demonstrate that Policy 1 has regard to Paragraph 204 of the Framework in respect of how it seeks to treat all new residential development in the Neighbourhood Area.

- 61 In addition, this part of the Policy fails to provide any indication of what might be *"appropriate."* Consequently, it does not provide a decision maker with a clear indication of how to react to a development proposal, having regard to Paragraph 154 of the Framework:

"Only policies that provide a clear indication of how a policy maker should react to a development proposal should be included in the plan."

- 62 However, to some degree, Policy 1 does attempt to reflect the importance of local services and facilities to the community, as identified in the Neighbourhood Plan and its supporting evidence. Taking this and the above into account, I recommend:

- **Policy 1, change to *"The provision of new, or improved, community services and/or community facilities to meet the needs of existing and future residents will be supported."***

Policy 2: Convenience and comparison retail

- 63 Chapter 2 of the Framework, *“Ensuring the vitality of town centres,”* recognises town centres as comprising the heart of their communities and promotes policies that support their viability and vitality.
- 64 However, Policy 2 is both ambiguous and restrictive, resulting in a Policy that could serve to prevent sustainable development from coming forward to support town centre viability and vitality.
- 65 The Policy is vague in respect of its aim of increasing *“the scope and range on offer”* in the town centre. It is not clear what this would actually comprise. For example, the Neighbourhood Plan does not set out what the precise nature of the current scope and range on offer in the town centre is and consequently, there is no base-line for assessing an increase.
- 66 Further to the above, the Policy does not indicate who might be responsible for determining whether a proposal increases this undefined scope and range on offer, or on what basis such a determination might take place. In this respect, the Policy is unclear and ambiguous, contrary to Planning Practice Guidance¹⁰ which states that:
- “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”*
- 67 Further to the above, it is not clear how a retail proposal might make a *“positive contribution to the character and appearance of the town”* and again, who might judge this, or on what basis.
- 68 The Policy goes on to require retail development not to *“exacerbate town centre congestion and on-street parking issues.”* The Neighbourhood Plan does not set out precisely what these issues are and consequently, it is difficult to understand precisely what issues relate to what location, or in what way a specific proposal might exacerbate them. The Policy thus fails to provide a decision maker with clarity, having regard to Paragraph 154 of the Framework referred to earlier in this Report.

¹⁰ Paragraph: 042 Reference ID: 41-042-20140306.

- 69 In addition to the above, Paragraph 32 of the Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. There is no substantive evidence to demonstrate that retail development proposals impacting on car parking in the town centre, for example, would have severe residual cumulative impacts.
- 70 Taking the above into account, the first part of Policy 2 does not meet the basic conditions.
- 71 Policy 2 goes on to set out a less precise version of Wiltshire Core Strategy Core Policy 38 (*"Retail and Leisure"*). It is not the role of neighbourhood planning policies to repeat, or seek to précis, existing adopted planning policy and in this case, in providing less information than that already established in District-wide planning policy, Policy 2 appears imprecise.
- 72 However, I note above that national planning policy seeks to ensure the vitality of town centres. In this respect, the supporting text to Policy 2 states that:
- "The policy aims to support ground floor units remaining in Class A and D uses keep (sic) the town centre strong and vibrant."*
- 73 As set out, there is nothing in Policy 2 that would achieve this (as an aside, I also note that Policy 2 is a retail Policy and Class D uses apply to non-residential institutions and not retail uses) and taking this, Policy 3 (considered below) and all of the above into account, I recommend:

- **Policy 2, change to *"The development of new and the retention of existing shops in the town centre will be supported, subject to such development respecting the character and appearance of the town centre."***
- **Page 11, supporting text, last sentence, change to *"...uses to keep the town..."***

Policy 3: Town centre uses

- 74 As set out, Policy 3 simply sets out a list of uses that would be supported in the High Street. This could give rise to inappropriate forms of development, for example, the Policy could support the replacement of all shops on the High Street with drinking establishments, casinos or non-residential institutions. This could result in support for development that does not contribute to the achievement of sustainable development.
- 75 The second part of the Policy is imprecise. It includes ambiguous phrases, including "*priority will be given*" and "*already well-provided.*" It is not clear how the provision of A1 uses might be prioritised, for example who by and on what basis, as no information is provided in this respect. Similarly, it is not clear who might determine what is and what is not "*already well-provided*" and on what basis such a determination might be made.
- 76 The Policy is ambiguous and does not meet the basic conditions. However, in making the recommendation below I note that the proposed recommendations in respect of Policy 2, above, reflect the identified community aim of supporting the vitality of the town centre by promoting appropriate retail development.
- 77 I recommend:
- **Delete Policy 3**

Policy 4: Community Infrastructure

- 78 Policy 4 presents a list of things that the Town Council would like to see come forward in the Neighbourhood Area. However, no evidence is provided to demonstrate that it comprises a deliverable and viable land use planning policy, having regard to Paragraph 173 of the Framework, as referred to on page 17 this Report.
- 79 It is also noted earlier in this Report that planning obligations should only be sought where they meet all of the tests set out in Paragraph 204 of the Framework. No evidence has been provided to demonstrate that Policy 4 has regard to national policy in this respect.
- 80 Consequently, Policy 4 simply appears as something of a “*wish-list*.” However, I note that the various “*priorities*” set out are reflective of community aspirations and this is a matter addressed in the recommendations below.
- 81 Parts of the supporting text to Policy 4 are worded as though they comprise policy requirements, which they do not. This is also a matter addressed in the recommendations below.
- 82 Taking the above into account, I recommend:
- **Delete Policy 4**
 - **Replace Policy 4 with “*Community Action: The Town Council considers Royal Wootton Bassett’s infrastructure requirements to comprise the following: (list of eight bullet points here). The Town Council will seek to work with third parties to deliver as much of the above as possible.*”**
 - **The Community Action may be presented in a box, for clarity. However, it should not appear the same as a Policy (ie, use a differently coloured shading to the Policies or no shading).**
 - **For clarity, a Community Action is not a land use planning policy.**
 - **Page 13, Para 3.6, line 10, change to “...developments *may* be required...”**

- Page 14, Para 3.7, line 3, change to “...development *may present the opportunity to help* meet the need for additional allotment space.”
- Page 14, Para 3.7, line 9, change to “...but *should such a facility be provided, it will be important to ensure that it is* in a safe place with...”
- Page 14, Para 3.7, line 20, change to “The *Town Council will seek* to ensure that future residential development...”

Policy 5: Town Park and Row-de-Dow and Country Park

- 83 In recognition of their important contribution to the health and well-being of communities, national policy promotes access to high quality open spaces and opportunities for sport and recreation (Paragraph 73, the Framework).
- 84 In addition, Paragraph 75 of the Framework states that:
- “Planning policies should protect and enhance public rights of way and access.”*
- 85 Generally, Policy 5 promotes the protection and enhancement of public rights of way and public open spaces for recreation.
- 86 However, as set out, the Policy is unclear. No plan is provided in the Neighbourhood Plan to show the areas of land referred to in the Policy, which simply refers to an appended plan, upon which, in any case, the detailed boundaries of the land are not clear to see. I note that the Country Park referred to already has planning permission.
- 87 No clarity or precision is provided in respect of how *“opportunities”* will be *“sought for the implementation”* of the *“facilities”* referred to. Consequently, the Policy is imprecise.
- 88 There is also an element of confusion in the wording of the Policy as a whole, as it seeks to safeguard land from any development, whilst at the same time it proposes a change from agricultural to recreational land, with the supporting text referring to the development of a park that adds to the facilities available to people in the town centre, as well as the development of footpaths and cycle-paths.
- 89 In the above regard, Wiltshire Council has commented that the proposal for the Town Park has not been supported by the provision of substantive evidence that might serve to demonstrate that landscape character would be protected or that the area's ecology would be protected. As a consequence, the Policy, as set out, runs the risk of safeguarding land for a use that may fail to contribute to the achievement of sustainable development – as without any evidence, it cannot be certain that the proposal would safeguard local character or protect, or enhance, biodiversity.

90 Also, part of the supporting text is worded as though it comprises a Policy, which it does not. This is a matter addressed in the recommendations below.

91 Taking all of the above into account, I recommend:

- **Change Policy 5 to “*Subject to respecting local character and safeguarding nature conservation interests, the provision of a Town Park and the improvement of public rights of way in the areas shown below and at the adjacent Row-de-Dow footpath, will be supported.*”**
- **Provide a new plan below the Policy, on an Ordnance Survey base, clearly denoting the boundaries of the Town Park and the Row-de-Dow footpath**
- **Supporting text, Page 14, Para 3.7, last sentence in second column, delete “The Neighbourhood Development Plan...maintenance.”**
- **Supporting text, Page 14, third column, last sentence, change to “...maintenance. *The Town Council will seek to prevent disturbance to, and promote the preservation and enhancement of a reptile and amphibian relocation area within the Town Park site.*”**

Policy 6: Integrated community facilities

- 92 Paragraph 70 of the Framework supports the delivery of the services and facilities the community needs. To some considerable degree, Policy 6 is a positive Policy that promotes the delivery of community facilities and has regard to national policy.
- 93 However, as set out, Policy 6 could result in unforeseen circumstances, whereby any type of development within the town would be supported, as long as it also makes some provision for integrated community facilities. This could result in support for inappropriate forms of development and result in a Neighbourhood Plan that fails to contribute to the achievement of sustainable development.
- 94 Taking the above into account, I recommend:
- **Change start of Policy 6 to “*The provision of integrated community facilities including health...*”**

Development and Housing

Policy 7: Restricted/infill development

- 95 Generally, Policy 7 is a positive land use planning policy that supports the development of infill sites. As such, it has regard to the national policy principle of actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing development in locations which are sustainable, as referred to in Paragraph 17 of the Framework.
- 96 Whilst the Policy does not necessarily preclude other types of development elsewhere, I am mindful that it could be taken as setting out a relatively restrictive approach, in that the Policy does not provide explicit support for the development of non-infill sites. However, in this regard, I am mindful of the supporting text in the Development and Housing Chapter and of Wiltshire Council's comments in respect of Royal Wootton Bassett having already met its indicative housing requirement, as established in the development plan. Taking this information into account, the Policy is in general conformity with the Core Strategy.
- 97 The development plan should be considered as a whole. Therefore, there is no need for Policy 7 to refer to other policies in the Neighbourhood Plan or to the Wiltshire Core Strategy.
- 98 The Policy is concerned with infill development. It does not refer to "*restrictive*" development and consequently, the title of the Policy appears confusing.
- 99 I recommend:
- **Policy 7, delete "...provided they accord...Strategy"**
 - **Policy 7, change title to "*Infill development*"**
 - **Provide plan underneath Policy showing the settlement boundary referred to**

Policy 8: High quality mixed development

100 The first part of Policy 8 is ambiguous. No indication is provided of what constructing residential development to “*a high standard*” actually means, for example, what are the standards, how will they be measured, who by and on what basis.

101 As an aside, I am also mindful that, in referring to new technical standards for development, a recent Ministerial Statement¹¹ was explicit in requiring that:

“Neighbourhood plans should not be used to apply the new technical standards.”

102 The Policy then goes on to seek to apply Core Policy 43 (“*Providing Affordable Homes*”) of the Wiltshire Core Strategy. It is not the role of the Neighbourhood Plan to simply repeat or seek to apply existing adopted policies.

103 National planning policy encourages the effective use of land by reusing land that has been previously developed (brownfield land), as long as it is not of high environmental value (Paragraph 17, the Framework). Consequently, there is a strong policy presumption in favour of the reuse of brownfield land.

104 As set out Policy 8 is much more restrictive than national policy. It seeks to restrict the reuse of brownfield land to “*suitable*” sites and goes on to limit these to sites that are “*well related*” to services and facilities in the town centre and within the settlement boundary. However, in the absence of any definition in respect of “*well related*,” this part of the Policy is ambiguous and imprecise, contrary to Planning Practice Guidance, as referred to earlier in this Report. It fails to provide a decision maker with a clear indication of how to react to a development proposal, having regard to Paragraph 154 of the Framework.

¹¹ Ref: Secretary of State for Communities and Local Government, Written Statement HCWS488 made on 25 March 2015.

- 105 The Policy goes on to state that “*preference*” will be given to residential schemes that offer some, or all, of a wide range of housing types and tenures. No indication of how this “*preference*” might operate is provided and consequently, this part of the Policy is imprecise. In this regard, I am also mindful that national policy does not require the provision of affordable housing on sites of ten dwellings or less, so there is no policy requirement for any “*preference*” to be given to schemes that provide different tenures on such smaller residential sites.
- 106 The final sentence of the Policy continues the ambiguous nature of the Policy and consequently, it does not provide a decision maker with a clear indication to how to react to a development proposal.
- 107 Taking the above into account, I recommend:
- **Policy 8, change to “*The redevelopment of brownfield sites for residential use will be supported, provided that such sites are not of high environmental value.*”**

Policy 9: Design

108 Good design is recognised by the Framework as comprising:

“a key aspect of sustainable development...indivisible from good planning.”
(Paragraph 56)

109 Furthermore, national policy requires good design to contribute positively to making places better for people (Chapter 7, The Framework) and Paragraph 58 of the Framework goes on to require development to:

“...respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation...”

110 In addition to the above, Wiltshire Core Strategy Core Policy 57, *“Ensuring High Quality Design and Place Shaping,”* requires all development to contribute to a high quality sustainable built environment.

111 Policy 9 seeks to promote high quality design. However, as set out, the Policy effectively requires all development to enhance Royal Wootton Bassett's identity as an historic market town. The requirement for all development to *“enhance”* is onerous and goes well beyond the requirements of national or local planning policy.

112 No justification is provided for the above departure from existing policy and there is no substantive evidence to demonstrate that such an approach would be deliverable or viable in all cases, having regard to Paragraph 173 of the Framework; or that it would, in all cases, have regard to Paragraph 193 of the Framework, which requires information supporting a planning application to be:

“...relevant, necessary and material to the application in question.”

113 The Policy goes on to refer to heritage assets. National policy requires that all heritage assets are conserved in a manner appropriate to their significance (Paragraph 126, the Framework). However, whereas national policy recognises the importance of the settings of heritage assets, such as those of Conservation Areas, Policy 9 is only concerned with the settings of Listed Buildings.

- 114 Also, taking into account the requirements set out in Chapter 12 of the Framework, *“Conserving and enhancing the historic environment,”* it may not be sufficient for a development to simply be *“sensitive to local context.”* There is no indication of what *“sensitivity”* or *“local context”* might be, resulting in an ambiguous requirement which – in the absence of any substantive evidence to the contrary - could result in unsustainable forms of development, to the harm of heritage assets.
- 115 Similarly, no indication is provided of what *“actively enhancing the street scene”* might comprise, or why this would be appropriate for development relating to heritage assets. Taking this and the above into account, the Policy is imprecise and fails to provide a decision maker with a clear indication of how to react to a development proposal, having regard to Paragraph 154 of the Framework.
- 116 Much of the supporting text to Policy 9 reads as though it comprises a land use planning policy, which it does not.
- 117 I recommend:
- **Change Policy 9 to *“Development must respect local character and conserve or enhance heritage assets in a manner appropriate to their significance.”***
 - **Supporting text, page 18, second Para, line 5, change to *“The Town Council expects development within the town centre to respect the...found here and would like to see signage to be simple and non-illuminated.”***
 - **Page 18, third Para, change to *“The Town Council expects development beyond the town centre to be sensitive...distinctiveness. A way to achieve this is to use materials...”***
 - **Page 18, second column, line 4, change to *“The Town Council would like to see development planned with...”***
 - **Page 18, second column, line 12, change to *“...a supplement to the Neighbourhood Development Plan. The Town Council would like this document to help support the Neighbourhood Development Plan.”***
 - **Delete last Para of Supporting text (*“Appropriate...Strategy”*)**

Policy 10: Land off Maple Drive

118 There is no requirement for the Neighbourhood Plan to allocate land for development. I note earlier in this Report that the Neighbourhood Area has met its indicative housing land requirement for the plan period.

119 Notwithstanding the above, Policy 10 of the Neighbourhood Plan seeks to allocate land for the development of 110 dwellings. In this regard, I am mindful that there is a national policy assumption in favour of sustainable development and the supporting text to Policy 10 states that the allocation:

“...will deliver community benefit in the form of land for community facilities.”

120 However, Policy 10 does not require that such land must be provided and nor does it specify precisely where it will be provided, or how much land will be provided. Rather, the Policy simply states that it *“is expected”* that such land will be provided. This part of the Policy is imprecise.

121 Further to the above, it is not clear why the provision of an unspecified amount of land in an unspecified location is a *“community benefit,”* or that the allocation of land for the development of 110 houses in the location identified is the most appropriate way of achieving this benefit (whatever it might be).

122 It is therefore important to understand the process through which potential land for residential development over and above that required by the development plan was considered for inclusion in the Neighbourhood Plan. In this regard, I note that that the Sustainability Appraisal for the Neighbourhood Plan, referred to earlier, states that:

“2.14...there is no outstanding amount of housing development to be allocated through the Neighbourhood Plan.”

123 It then goes on to state that:

124 *“2.15...18 site options were investigated for potential site allocation policies.”*

- 125 The SA then establishes, in Paragraphs 2.18 to 2.20, that the 18 sites were taken from Wiltshire Council's Strategic Housing Land Availability Assessment (SHLAA) and were weighed against various criteria. Page 19 of the Neighbourhood Plan sets out these criteria and Appendix V of the Sustainability Appraisal presents the findings of these assessments in more detail.
- 126 Whilst the SHLAA comprised a completely separate process to the Neighbourhood Plan and was undertaken by a different organisation for different reasons, I note that the suitability of land for development was subsequently considered through the Neighbourhood Plan consultation process.
- 127 However, in the absence of substantive evidence, it is unclear why a site has been allocated for 110 dwellings and not for, say, any other number of dwellings. Essentially, the number of dwellings (110) appears as a simple function of the size of a site that has emerged through the process. As a consequence, Policy 10 is not underpinned by substantive evidence establishing, for example, that an allocation of 110 dwellings is the right amount to meet the objectives of the Neighbourhood Plan. Returning to the earlier point made above, the Policy does not even specify the amount of community land to be provided alongside the allocation.
- 128 Consequently, it is not clear why the allocation in Policy 10 will result in sustainable development and I cannot therefore reach the conclusion that the Policy will contribute to the achievement of sustainable development.
- 129 In addition to the above, I am also mindful that Wiltshire Council has expressed concerns about the absence of information pertaining to the impacts that development of the allocated site might have on the protected "*County Wildlife Site, Jubilee Wood and Local Nature Reserve.*"
- 130 Wiltshire Council notes that there are possible long term unacceptable impacts on these sensitive sites. The Neighbourhood Plan provides no substantive evidence to demonstrate that unacceptable impacts will not arise and consequently, this is a matter that contributes to the recommendations below.
- 131 I also note, in Paragraph 31 of this Report, that Historic England has expressed concerns about the absence of relevant, detailed supporting evidence to support assertions made in the Evidence Base in respect of the proposed allocation's impact on heritage assets.

- 132 In summary, the allocation in Policy 10 has not emerged through an identified need to identify land for a certain number of dwellings. There is no substantive evidence to demonstrate that the size of the allocation is appropriate in respect of meeting the objectives of the Neighbourhood Plan. There is no substantive evidence to demonstrate that it will, necessarily, contribute to the achievement of sustainable development.
- 133 Policy 10 states that land is allocated "*in order to achieve the Strategic Objectives of the Neighbourhood Plan.*" However, no detailed information is provided in respect of how the allocation will meet the six Strategic Objectives set out on page 8 of the Neighbourhood Plan. The Policy is ambiguous in its proposed allocation of land for "*up to 110 dwellings of mixed sizes and tenures.*"
- 134 The development of the allocated site may result in "*long term unacceptable impacts*" on sensitive wildlife sites and there is an absence of detailed information in respect of its potential impacts on heritage assets.
- 135 Taking all of the above into account, the Policy is imprecise and does not contribute to the achievement of sustainable development.
- 136 I recommend:
- **Delete Policy 10 and supporting text on Page 19 and adjacent to the Policy on page 20**
 - **Delete third Para of text on page 16**

Policy 11: Employment Land

- 137 As set out, Policy 11 would support the provision of new development for employment anywhere in the Neighbourhood Area, including the open countryside, as long as it could be demonstrated that existing employment land was unsuitable, or unavailable, and as long as it was “*well related*” to the built-up area of the town.
- 138 As the phrases “*unsuitable*” and “*well related*” are undefined, the Policy appears ambiguous. There could be any number of reasons why an existing employment site might be regarded as “*unsuitable*” for a new development. Further, a site on a main road within say, a five minute drive of the built-up area – which amounts to much of the Neighbourhood Area - might be considered well-related to the town. If so, the proposal would simply be required to mitigate the negative impacts of any “*transport implications.*”
- 139 Further to the above, a site immediately adjacent to the built-up area of Royal Wootton Bassett, would be likely to be “*well related*” to it. Policy 11 would therefore support employment development anywhere on the outskirts of the town. Most of the outer edge of Royal Wootton Bassett comprises housing and consequently, the Policy could support the construction of factories, offices and warehouses in the open countryside immediately adjacent to housing. No evidence has been provided to demonstrate that such an approach would contribute to the achievement of sustainable development.
- 140 Taking the above into account, Policy 11 could result in support for inappropriate forms of development and fails to contribute to the achievement of sustainable development.
- 141 Chapter 1 of the Framework, “*Building a strong, competitive economy,*” requires pro-active planning to:
- “*...support sustainable economic growth.*”

142 Whilst mindful of all of the above, I note that, to some degree, Policy 11 is a positive Policy that seeks to encourage economic growth. Further, to a lesser extent, by supporting growth in addition to, or instead of, unsuitable employment sites, it could be considered as having regard to Paragraph 22 of the Framework, which states that planning policies:

"...should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose."

143 Taking this and all of the above into account, I recommend:

- **Change Policy 11 to *"Employment development within Royal Wootton Bassett (B1, B2, B8) that respects local character, residential amenity and highway safety, will be supported."***

Policy 12: Visitor accommodation and facilities

- 144 Wiltshire Core Strategy Core Policy 40 (*"Hotels, bed and breakfasts, guest houses and conference facilities"*) provides a positive strategic policy framework for the development of tourist facilities in market towns such as Royal Wootton Bassett.
- 145 Policy 12 supports the development of visitor accommodation within the built-up area and is in general conformity with Core Policy 40.
- 146 However, whilst the supporting text clearly refers to local support for the development of a new theatre in the town, Policy 12 simply includes an ambiguous reference to visitor *"facilities."* Without definition, this reference could relate to any number of things and it fails to provide a decision maker with a clear indication of how to react to a development proposal.
- 147 Similarly, no detail is provided in respect of what *"adequate highway/parking mitigation measures"* might be and this part of the Policy is also, therefore, imprecise.
- 148 I recommend:
- **Policy 12, change to *"Within the built-up area, proposals for visitor accommodation and/or a new theatre will be supported, subject to there being no significant harm to residential amenity or highway safety."***

Policy 13: Landscape Setting

- 149 Wiltshire Core Strategy Core Policy 51 ("*Landscape*") requires development to protect, conserve and where possible, enhance landscape character, including the locally distinctive character and separate identity of settlements.
- 150 Generally, the first part Policy 13 seeks to protect local character and has regard to Core Policy 51. However, the Policy is worded negatively ("*will only support*") and a requirement to "*safeguard separate identity*" may not be relevant to many development proposals in the Neighbourhood Area and there is no substantive evidence to the contrary.
- 151 Further to the above, Policy 13 requires development to be in accordance with Core Policy 51 and it is not the role of neighbourhood planning policies to simply repeat or be reliant upon existing adopted policies in other plans.
- 152 Policy 13 goes on to seek to designate an area of land which it states must remain "*open and agricultural.*" Such an approach is far more onerous than, for example, Green Belt policy, or planning policy as it applies to National Parks. It would fail to allow for sustainable development to come forward – for example, necessary infrastructure, or development where the benefits arising might greatly outweigh any harm.
- 153 Further to the above, no evidence is provided to demonstrate that the proposed approach has regard to national policy or is in general conformity with the strategic policies of the development plan. Also, no evidence is provided to demonstrate that a requirement to retain the land in open, agricultural use can be sustained – what might happen, for example, if agricultural use was no longer viable, or the landowner simply chose not to farm the land? In this regard, there is an absence of substantive evidence to demonstrate that the Policy contributes to the achievement of sustainable development.
- 154 Part of the supporting text is worded as though it comprises a land use planning policy, which it does not.

155 I recommend:

- **Policy 13, change to “*Development should safeguard the separate identity and locally distinctive character of Royal Wootton Bassett and its unique landscape setting.*” (delete rest of Policy)**
- **Supporting text, page 21, second column, line 7, change to “...new development *must take into consideration the gap between Royal Wootton Bassett and Swindon. Community consultation...*”**
- **Supporting text, page 22, delete the last Para and replace with “Policy 13: Landscape Setting *seeks to reinforce the...Assessment.*”**

Transport

Policy 14: Railway station

156 Paragraph 28 of the Framework states that the:

“...transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.”

157 Policy 14's aim of supporting the development of a railway station to serve Royal Wootton Bassett has regard to national policy.

158 However, the Policy then goes on to state that the Town Council will actively seek opportunities to bring forward *“this project.”* This is not a land use planning policy, but simply a proposed action for the Town Council.

159 The Policy also seeks to safeguard six areas of land and states that the railway station will be located at one of them. Notwithstanding that none of the six sites are shown in the Neighbourhood Plan and that a plan appended to the document does not show the precise boundaries of the land to be *“safeguarded”* (but simply shows indicative dots on a plan), the Neighbourhood Plan does not provide any certainty in respect of the railway station coming forward. Background evidence (contained in the Feasibility Report identified below) states that a station might cost between £4.68m and £7.35m. There is nothing in the Neighbourhood Plan to suggest that funding is available for the project.

160 Consequently, the Policy could result in the effective sterilisation of land for a use which might never come forward – and in respect of five of the six sites, will almost certainly not come forward.

161 Taking the above into account, the Neighbourhood Plan is imprecise and fails to have regard to Paragraph 173 of the Framework in respect of deliverability.

162 In addition, the background information provided in respect of the proposed "*safeguarding*" of six sites includes an assessment of each of the six sites, contained in the "*Royal Wootton Bassett Station Draft Feasibility Report (May 2016)*." Paragraph 19 of this Study states that:

"...3 out of 6 assessed sites are prospectively feasible for Royal Wootton Bassett Station."

163 Consequently, given that only three assessed sites are feasible, Policy 14 appears to promote the safeguarding of land for development that its own evidence base does not consider to be feasible. This is also contrary to Paragraph 173 of the Framework in respect of viability and deliverability.

164 Taking all of the above into account, I recommend:

- **Policy 14, change to "*The development of a railway station and supporting infrastructure to serve Royal Wootton Bassett will be supported.*" (delete rest of Policy)**
- **Add a new "*Community Action: Railway Station. The Town Council will actively seek opportunities to assist in bringing this project forward.*"**
- **As noted earlier in this Report, a Community Action is not a Policy. As prior, the Community Action should appear distinctive from the Policies of the Neighbourhood Plan.**
- **Page 24, supporting text, second column, line 3, delete "*The Neighbourhood Development Plan seeks to...realise a railway station.*"**

Policy 15: Road safety, traffic and transport

165 As set out, Policy 15 requires all development proposals generating traffic to provide information and to mitigate any possible negative impacts arising. It is not clear how “*negative impacts*” will be assessed, who by, or on what basis. Similarly, it is unclear how the generation of traffic will be assessed – the Policy does not distinguish between the many ways in which traffic might be generated, for example from one bicycle journey through to hundreds of Heavy Goods Vehicle journeys, and what weight might be applied to different types of traffic generated.

166 Paragraph 193 of the Framework requires information requirements for applications to be:

“...proportionate to the nature and scale of development proposals...”

167 Policy 15 does not have regard to this requirement.

168 The Policy goes on to impose an “*expectation*” on all development proposals to promote sustainable modes of transport, regardless of the nature of the proposal. This sweeping approach fails to have regard to Paragraph 204 of the Framework, referenced earlier in this Report, in respect of planning obligations.

169 Policy 15 goes on to state that the canal tow path will be protected from development. The Neighbourhood Plan does not include any detailed plans showing the precise boundaries of the area to be protected and is imprecise in this regard. Notwithstanding this, as a public right of way, the canal tow path is already protected.

170 The Policy states that contributions will be “*required where appropriate.*” This is an imprecise requirement, as no detail is provided in respect of what will be required or appropriate as a result of what kind of development.

171 Part of the supporting text is set out as though it comprises a land use planning policy, which it does not.

172 Notwithstanding all of the above, Chapter 4 of the Framework, "*Promoting sustainable transport*," promotes sustainable modes of transport and highway safety and part of the intent of Policy 15 has regard to this. National policy is clear in stating that:

"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."
(Paragraph 32, the Framework)

173 Taking this and the above into account, I recommend:

- **Policy 15, change to "*Development should not harm highway safety and must ensure that the residual cumulative impacts of development are not severe. The promotion of walking, cycling and public transport will be supported.*"**
- **Page 25, supporting text, first Para, delete last sentence ("*Developments...services.*")**

Policy 16: Pedestrians/cycleways

174 Policy 16 seeks to impose an onerous requirement on all development proposals, regardless of nature or scale. The Policy does not have regard to Paragraph 73 of the Framework in respect of deliverability or viability. It does not have regard to Paragraph 204 of the Framework in respect of the need for planning obligations to be necessary, directly related to development, and to be fairly and reasonably related in scale and kind to development.

175 Policy 16 does not meet the basic conditions.

176 I recommend:

- **Delete Policy 16 and Paragraph 5.5 of supporting text**

7. The Neighbourhood Plan: Other Matters

177 Whilst it does not form part of the Neighbourhood Plan, but is appended to it, the "*Royal Wootton Bassett Local Map*" does not reflect the content of the Neighbourhood Plan, taking into account the recommendations in this Report. I recommend:

- **Delete Appendix 1 (this Report recommends the inclusion of plans within the Neighbourhood Plan, where appropriate)**

178 The recommendations made in this Report will have a subsequent impact on Contents, Policy and page numbering.

179 I recommend:

- **Update the Contents, Policy and page numbering, taking into account the recommendations contained in this Report.**

8. Summary

180 Having regard to all of the above, a number of modifications are recommended in order to enable the Neighbourhood Plan to meet the basic conditions.

181 Subject to these modifications, I confirm that:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the neighbourhood plan contributes to the achievement of sustainable development;
- the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
- the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.

182 Taking the above into account, I find that the Royal Wootton Bassett Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

183 I recommend to Wiltshire Council that, subject to the modifications proposed, **the Royal Wootton Bassett Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

184 I am required to consider whether the Referendum Area should be extended beyond the Royal Wootton Bassett Neighbourhood Area.

185 I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

186 Consequently, I recommend that the Plan should proceed to a Referendum based on the Royal Wootton Bassett Neighbourhood Area approved by Wiltshire Council and confirmed by public notice on 20th March 2013.

Nigel McGurk, January 2018
Erimax – Land, Planning and Communities



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