

John Slater Planning Ltd

Great Somerford (incorporating Startley) Neighbourhood Plan 2016-26

Submission Version

A Report to Wiltshire Council on the Examination of the Great Somerford Parish Neighbourhood Plan

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The Examination of the Great Somerford (incorporating Startley) Parish Neighbourhood Plan

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Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Wiltshire Core Strategy. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been led by Great Somerford Parish Council. A Steering Group was appointed to undertake the plan preparation led by the Chairman of the Parish Council and a small group of residents. Great Somerford Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.
3. This report is the outcome of my examination of the Submission Version of the Great Somerford Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by Wiltshire Council which is the respective Local Planning Authority for the neighbourhood plan area.

The Examiner’s Role

4. I was formally appointed by Wiltshire Council in December 2016, with the agreement of Great Somerford Parish Council, to conduct this examination. My role is known as an Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS).
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 39 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a

Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Wiltshire Council, and Great Somerford Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

6. Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:
 - That the plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the plan should proceed to referendum if modified
 - That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
7. Furthermore, if I conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Great Somerford Parish Neighbourhood Plan.
8. In examining the Plan, the Independent Examiner is expected to address the following questions
 - a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
 - c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body?
9. I am able to confirm that the Plan, if amended in line with my recommendations, does relate to the development and use of land. It covers the area designated by Wiltshire Council, for the Great Somerford Neighbourhood Plan on 15th April 2014. It has been submitted by Great Somerford Parish Council, which is the Qualifying Body(QB).
10. I can confirm that it does specify the period over which the plan has effect, namely the period between 2016 and 2026.
11. I can confirm that the plan does not cover any “excluded development”.
12. There are currently no other neighbourhood plans covering the area covered by the Plan designation.

The Examination Process

13. The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.
14. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.
15. I carried out an unaccompanied visit to the Plan area on 25th January 2017 to familiarise myself with the two villages within the Plan area and the surrounding countryside.
16. Following that visit and having carried out an initial review of the documentation, I took the decision that I needed to call a public hearing in order for me to hear submissions on a range of issues, which I identified in a document entitled *Initial Comments of the Independent Examiner* dated 1st February 2017. Arrangements were made to hold the hearing in the village hall of the neighbouring village, Upper Seagry, and I issued a document entitled *Guidance Notes and Agenda for Public Hearing to be held on 22nd March 2017* on 10th February 2017.
17. The hearing was held in the Goss Croft Hall and it lasted a full day. The session was very well attended by residents of Great Somerford. The main participants were Wiltshire Council, members of the Neighbourhood Plan Steering Group, representatives of Gleeson Developments Ltd who were promoting Broadfield Farm and Savills, who represented the owners of Brook Farm. I also allowed contributions from the audience throughout the two sessions, including at least two from promoters of other allocation sites. One of the contributors was a planning consultant, who it transpired, was representing the owner of Site NP1 on Seagry Road. That consultant, Mr Donahue, is a former colleague of mine, a number of years ago we worked for the same local authority. At the start of the hearing I made all those attending aware that I knew Mr Donahue and that I had not been aware, prior to the hearing, that he represented an interested party. No parties raised any objections my receiving his verbal contributions. I am making this declaration again, in this report, only in the interests of openness and transparency.
18. I will discuss in the relevant sections of my report, where the answers and submissions made at the hearing have informed my conclusions. However, during the course of the debate, the possibility of the inclusion of

a further allocation site, at Broadfield Farm emerged and the Qualifying Body accepted the possibility of it becoming a new allocation, but one based upon the extent of the built-up area of the site and its curtilage, which it was acknowledged, constituted previously developed land. The proposed new allocation site was smaller than the site originally being promoted by Gleeson Developments Ltd, in its Regulation 16 representations. As this was a possible new allocation, I considered that it was beyond the scope of my role as Examiner, to include a site in my recommendations, without the necessary criteria for any future planning application to be considered against. I therefore proposed, with the agreement of Gleeson Development's team, Wiltshire Council and the Steering Group, that off line discussions should take place, to seek to achieve as much agreement as possible, and in particular, to formulate a suitable form of wording for the policy, that I could then consider including in my recommendations. Furthermore, as that new allocation had not been the subject of public consultation, I required that the QB's proposed wording should be the subject of a separate, new round of public consultation. Wiltshire Council responded to say that they were happy to facilitate both the meeting and the consultation exercise. I wish to place on record my appreciation for the courtesy and cooperation shown to me at the hearing and the positive and constructive approach taken by all parties.

19. I understand that the meeting took place on 5th April 2017, between the 3 parties and I have received a copy of the minutes and, whilst agreement was not reached in terms of the quantum of development, progress appears to have been made on the principle of the site's allocation. The Qualifying Body's proposals for a policy covering Broadfield Farm was the subject of a 3-week consultation exercise organised by Wiltshire Council. This ran from 5th June to 26th June 2017. I was sent the results of that consultation by email and post on 4th July 2017. I will refer to the results of the consultation in later sections of this report.

The Consultation Process

20. The Steering Group began its work in 2013 and in early 2014, it circulated a questionnaire to all residents in village. This was accompanied by a rural housing needs survey, which it had commissioned to be carried out by Wiltshire Council. This had a 40% response rate. The Steering Group questionnaire asked a total of six questions, of which two asked about land to be protected by the Plan. There was one important question on whether

residents preferred site allocations to be “all new houses in new estates” or “small groups on suitable areas within the physical limits of the village”. It also asked about what local facilities were valued and if residents supported “a neighbourhood plan influenced by the community”.

21. This had a 31.5% response and 99 of the 104 responses wanted to retain the villages’ open spaces and 88 out of the 104 respondents preferred “small groups of housings” rather than “new estates”. I have some reservations about the binary nature of these initial questions, which has heavily influenced the plan, which would have been answered without any consideration of the scale of development that the plan would be needing to accommodate, or the sites that may or may not be available, which could have influenced residents’ choices.
22. The first public meeting took place on April 2014 with a second held in July 2014, following proposals being put to the Steering Group by landowners for sites.
23. Two further meetings were held in September 2014 within individual proposals for sites being exhibited, along with proposals for protected open space. These were attended by 160 residents. The exercise allowed attendees to say whether they agreed with the steering groups proposals, which at that time were looking at 5 preferred sites, out of 8 being considered. It appears that the sites being recommended had been selected without any site selection criteria being published or their comparative merits being set out or scored. I do not know what basis the 5 sites were chosen over the other 3 at that stage.
24. In January 2015, voting slips were sent to all households in the plan area basically asking the question “Do you agree or disagree with the Steering Group’s proposal?” This generated 278 responses, of which 65% agreed with the recommendation of the Steering Group 12% disagreed with the whole proposal and 21% disagreeing with particular sites. This survey was followed up by two further consultation sessions which were held in March 2015 allowing residents to ask questions and clarify the various matters.
25. In addition to the above, the work of the Steering Group was featured in the Signpost publication, as well as letter drops and regular reports were given to the Parish Council on the work of the Steering Group.
26. Consultation with residents on the Pre-Submission Version of the plan was carried out over a six-week period between 6 July and 16 August 2015. It appears that statutory bodies had a different consultation period, namely between 14th July and 25 August 2015. Whilst the regulations do not allow for a split consultation period for the Regulation 14 version of the plan, I do not consider there is any prejudice caused as all stakeholders had a six-

week period to give their views. 21 responses were received from residents and landowners.

27. Following the hearing in March I requested that a new round of public consultation be carried out on the proposed new policy for Broadfield Farm. This generated 51 responses, which were almost unanimously in favour of the inclusion of Broadfield Farm as an allocation site in the neighbourhood plan. It is fair to say that a large number of residents expressed a view that the overall number of units to be allocated to Great Somerford should not be increased by a corresponding amount. Only a handful of residents stated they were happy for the overall housing numbers to be increased in line with an additional allocation. Many residents put forward suggestions of various allocation sites which they felt should be removed from the plan. The site which had the highest number of references to their removal from the plan following the inclusion of Broadfield Farm was Site NP1– Seagry Road, followed by a Site NP5 – Land to the rear of the Old Police House. All the responses are available on Wiltshire Council’s consultation portal website.
28. A number of residents have criticised the way that the Steering Group has prepared the plan and the consultation undertaken. I share some of the residents’ concerns regarding the way the plan has been prepared. I would venture to suggest that it may have been better if the Steering Group had had access to independent planning advice, for which full funding would have been available. However, whilst individual aspects of the consultation exercise can be criticised, nevertheless, I consider that the village as a whole has been able to give their views on how they wish to see the village developed and in particular have been influential in identifying what land is of importance to the village, and worthy of protection as local green space.
29. I have to say that I found the Steering Group’s reaction to the emergence of Broadfield Farm somewhat disappointing. Whilst I appreciate that the availability of site as a development option may have come forward late in the day and that it did not fit within the plan’s timeline, I do feel that some of the expressed criticism made by residents in the Regulation 16 responses, are valid, namely that the Group did not, at least, consult the village on the implications of the site becoming available. A significant number of residents have expressed the view that the availability of Broadfield Farm would have changed their views and their preferences, as to what sites should be developed. It was almost the case that the neighbourhood plan under preparation had been overtaken by events. I personally would have recommended that the late availability of a new brownfield site should have been the moment to take stock of the overall neighbourhood plan’s proposals and the villagers should have been

consulted, by the neighbourhood plan group, on whether the emergence of this possible development affected their preferences regarding the five identified sites that the Steering Group had initially put to the village in 2014/15. As a result, that village consultation exercise, on the inclusion of Broadfield Farm, has had to take place, post my hearing, and the outcome has significantly affected the proposals in the plan.

Regulation 16 Consultation

30. Once the Neighbourhood Plan was formally submitted under Regulation 15, Wiltshire Council carried out the formal Regulation 16 consultation. This ran initially from 11th October until 21st November 2016 but the period for making comments was extended to 23rd December 2016. This was after Gleeson Developments Ltd had carried out a pre-application consultation on their proposed planning application in September 2016. In total, 38 representations were received including 19 separate representations from one local resident. 12 of the submissions came from local residents and the remainder came from organisations namely English Heritage, Wiltshire Council, National Farmers Union, New Forest District Council (who, not unsurprisingly, offered no comments), Gleeson Development Ltd, Wolfe Securities – RHK Seelig Ltd and the Environment Agency, who initially objected to Site NP4 but later withdrew their objection.
31. I have had regard, in carrying out this examination, to all the comments made at the Regulation 16 stage as well as previous and subsequent consultations.

The Basic Conditions Test

32. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.
33. The six questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Has had regard to the national policies and advice contained in the guidance issued by the Secretary of State and it is appropriate to make the Plan?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- The making of the Plan does not breach or is otherwise incompatible with EU obligations or human rights legislation?
- Whether prescribed conditions are met and prescribed matters have been complied with?
- Whether the making of the Plan will have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects?

Compliance with the Development Plan

34. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Wiltshire Core Strategy, which was adopted in January 2015.
35. Core Policy 1 sets out a Settlement Strategy which identifies “Large Villages” as “settlements with a limited range of employment, services and facilities and where development will be limited to that needed to help meet the housing needs of the settlement and to improve employment opportunities”. These villages will have a settlement boundary which is known as the “limits of development” and the Core Strategy elsewhere states that these can be reviewed by neighbourhood plans. Great Somerford is identified as being a “Large Village” but Startley is not listed as one of the “Small Villages” and so is treated as countryside. There are no policies in the neighbourhood plan that relate to Startley although it is within the neighbourhood area. Paragraph 4.15 of the Core Strategy states that development at large villages will predominantly take the form of small housing or employment sites within settlement boundaries, and “small housing sites” are defined sites involving fewer than 10 dwellings.
36. Core Policy 2 is the delivery strategy of the plan and this allocates for the Malmesbury Community Area, within which the plan area lies, an indicative housing requirement of 510 dwellings outside Malmesbury town. It says that within the limits of development, “there will be a presumption in favour

of sustainable development in large villages”. The detailed policies for the Malmesbury area are set out in Core Policy 13.

37. The affordable housing policies are found in Policy 43 and it sets a threshold of 5 units above which a requirement for 40% affordable housing contributions will be sought, in this part of the county.

Compliance with European and Human Rights Legislation

38. Wiltshire Council, as the responsible body, has screened the Plan to determine whether it should be the subject of a Strategic Environmental Assessment (SEA) as required by EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”.
39. It confirmed, by way of a Screening Determination dated August 2016, having consulted with the three statutory consultees, to the effect that an SEA was not required and a copy of that screening determination is within the Basic Conditions Statement.
40. Also on 29th September Wiltshire Council, as competent authority, carried out a Habitat Regulation Assessment and concluded that there was no need to carry out an Appropriate Assessment under the Habitats Regulations as the plan would have no potential impacts on European protected sites.
41. I have received no representations that there is any incompatibility with the European or Human Rights legislation and I am satisfied that this element of the Basic Conditions test is met.
42. As there will be significant changes to the Plan as a result of my recommendations, the LPA will need to undertake a new Screening exercise before the Decision Statement is issued.

The Neighbourhood Plan: An Overview

Introduction

43. This has proved to be a challenging plan to produce, no doubt as it must have appeared to the Steering Group, that the goalposts were constantly

changing. That is a reality of the planning system which a number of neighbourhood plans have had to grapple with.

44. The plan has two main focuses which are set out in its stated objectives:
- To seek to provide additional housing, which is a mix of affordable housing and open market housing. All such housing to be in walking distance of the centre of the village and to be low-density in order to provide adequate garden and vehicle space.
 - To protect identified local green spaces by ensuring that no development takes place there and to clarify the settlement boundaries.
45. My usual practice, in my reports, is to examine each policy in turn, before coming to a view on whether the plan as a whole should pass basic conditions and should proceed to referendum. The circumstances surrounding this plan and the interrelated nature of the policies have led me to consider the plan as a whole in some detail, and coming to a conclusion as to whether it should proceed to referendum before looking at the detailed wording of the individual policies. I will be discussing the issues under a number of separate headings.
46. Whilst the legislation required me to look at all basic conditions set out in Section 8(2) of Schedule 10 of the Localism Act as referred to in an earlier section, there are three of the basic conditions that I have had to focus on, in my examination of this neighbourhood plan, which I will summarise as follows:
- Whether the plan delivers sustainable development
 - Relationship with national policy and advice
 - Relationship with strategic policies of the development plan.

Consideration of Overall Level of Housing

47. This section is relevant to the consideration of all three of the above basic conditions. Part of the requirement of delivering sustainable development is for the plan to meet the future needs of the area, as well as neighbourhood plan to be seen to be delivering on the strategic policies of the local plan, in this case the Wiltshire Core Strategy and to have regard to national policy, which are found primarily in the National Planning Policy Framework (NPPF), the online Planning Practice Guidance (PPG) and Written Ministerial Statements.
48. Policy GSNP1 of the neighbourhood plan addresses the total amount of housing to be provided in the neighbourhood area and Policy GNSP2 is the proposed affordable housing policy. The plan then deals with the allocation of these housing numbers, in a series of policies addressing individual sites before a concluding policy designating Local Green Space.

The plan also looks to amend the Great Somerford's settlement boundary – known as the Limits of Development.

49. Firstly, addressing the question of the total number of housing, the Wiltshire Core Strategy does not allocate a specific housing number to Great Somerford. However, it does identify the village as one of five settlements, which are termed "Large Villages". Core Strategy Core Policy 13, which looks at housing in Malmesbury Community Area, refers to the need to provide approximately 1395 new homes over the plan period, of which 756 had been completed by 2014 and 572 had permission at the time of the plan's adoption. This left a balance of 151 to be provided within the Community Area, outside Malmesbury town.
50. The plan started by proposing that Great Somerford should make a pro rata 20% contribution to that requirement, based on an equal division of the total requirement across all 5 villages. This figure has subsequently been uplifted to 35 units. Wiltshire Council in its responses to my questions, consider that this is a reasonable figure and indeed commented at the hearing that the overall requirement has now reduced since the publication of the Core Strategy, through the grant of planning permissions. They commented that by adopting this higher figure, the Steering Group showed that it had been planning positively. I received representations from the Gleeson Developments Ltd that the figures contained in the forthcoming Strategic Housing Market Assessment (SHMA) would be a more up-to-date assessment of housing need in the county. However, the neighbourhood plan is required to be prepared having regard to the strategic policies of the *adopted* local plan – this is one of the basic conditions, and it may well be that the SHMA, when it is published, could be the basis for a review of the Core Strategy in due course. It would be a matter for the Council to come up with a policy for responding to any new housing requirement. I am also aware that, following the Housing White Paper, the Government is proposing a new methodology for assessing housing need although the consultation on it has been delayed until the autumn. In overall terms, I am content that this overall quantum of development would be appropriate for the plan period and it will assist in meeting the housing requirements, as set out in the Core Strategy.
51. At the hearing, there was a discussion as to whether the figure of "35" should be expressed as an exact figure, being the sum of specific proposals for the individual sites allocated in the plan. Under my questioning, the Qualifying Body accepted that some flexibility could be extended and they suggested that I could refer to this being an "approximately 35", but they were opposed to an amendment that referred

to “at least 35” which was the approach promoted by Gleeson Developments Ltd.

52. I have given this matter some thought and I would ordinarily recommend policies based on minimum figures, and indeed Gleeson Development’s planning consultant has drawn my attention to one of my early examinations at Littlehampton, where I had adopted this approach. Notwithstanding, there are specific factors surrounding this neighbourhood plan that lead me to recommend the overall requirement being referred to as, an “approximate figure”. Firstly, that is the term used in the Core Strategy when it refers to housing numbers in its policies, so there will be a degree of consistency. Secondly, I am aware that the village of Great Somerford is facing a significant increase in new housing, which of course is consistent with one of the objectives of the NPPF, for the planning system to be delivering at this time. However, in addition to the overall number proposed by the neighbourhood plan for the 10-year plan period, the village will also be facing the construction of an additional 30 homes on the Brook Farm site. I heard, at the hearing, that all the pre-commencement planning conditions have been discharged and a commencement had been made on the site, which has been acknowledged by the local planning authority. This means that the original 2007 consent (which was extended) cannot now lapse and I heard from Savills at the hearing, that discussions were taking place to select a housebuilder. Accordingly, there will be a significant increase in the overall levels of new housing being delivered in the village and I accept that there is a limit as to how much a community can be expected to accept and indeed vote for, through the neighbourhood plan process. The Steering Group had noted that this level of increase would amount to a 24% increase in the housing stock in Great Somerford.
53. I will place on record that I am not satisfied that the QB has provided any compelling evidence that supports their assertion in the plan that there are highway capacity reasons that place a limit on housing numbers in the village.
54. I do also make the point that the Policy GSNP1, which is entitled *Proposed new development*, refers to a total of 35 new dwelling being supported. However, the wording needs to be explicit that this is a figure for the amount of development which is allocated on sites by the plan. It is likely that additional homes will be granted planning permission, as windfall within the settlement boundary, throughout the plan period, under the terms of Core Strategy Policy 2. A figure of 5 was quoted at the hearing, as a possible windfall figure for the village, but it will be what it will be, so long as the proposals are delivering sustainable development.

Affordable Housing Policy

55. Turning now to the issue of affordable housing, which again has implications for all three of the cited basic condition tests. I have a lot of sympathy with the position that the Steering Group found itself in. There is Core Strategy Core Policy 43 which has a threshold for schemes of five or over where a 40% affordable housing contribution will be sought. That must be considered a strategic policy of the development plan. When the neighbourhood plan was being prepared, the original judgement of the Secretary of State v Reading B.C. and West Berkshire D.C. case, had led to the withdrawal of the Secretary of State's policy, as set out in the online Planning Practice Guidance in the section dealing with planning obligations, which stated that affordable housing should not be sought on schemes of 10 units or under and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area), unless they related to designated rural areas (which are not affecting the plan area). That judgement was subsequently overturned by the Court of Appeal and the revised guidance has been reintroduced.
56. One of the driving forces behind the neighbourhood plan, is the need to secure more affordable housing in the village. It was on that basis, and having regard to the national policy position that existed, that the steering group negotiated an affordable housing component with all but one of the individual landowners, and which are now enshrined within the individual plan policies. However, I do need to consider this issue in the context of the basic conditions, and in particular, the test as to whether the plan has had regard to the Secretary of State's policy and advice. I take that to be the policy context as it exists at the time of my examination, rather than as it existed at the time when the policy was being drafted.
57. In making my judgement on this issue I have, on the one hand, to balance the existence of an adopted local plan policy, Core Policy 43; the fact that the landowners have agreed to these numbers and on the other hand to consider it against the national policy position as set out in the PPG. In making that balanced judgement, I reflect that the adoption of the Core Strategy policy predated the change in national policy. I heard that the Council was taking a pragmatic approach and was using the figure of 11 or which have a maximum combined gross floorspace of more than 1,000 square metres (gross internal area), as the threshold for requiring affordable housing, elsewhere in their area, recognising that the local plan policy had predated the new national policy.
58. Secondly Government advice places great weight on smaller housing schemes not being subject to affordable housing provisions or other

financial obligations. I was referred to a fellow examiner's recommendations report on the Potterne NP, who had faced a similar dilemma on whether to change an affordable housing policy. I am under a different obligation than that imposed upon decision-makers looking at the determination of planning applications and appeals, where affordable housing thresholds are also relevant. I have noted the Planning Inspectorate's 7th March letter to the London Boroughs of Richmond and Wandsworth, which has been widely circulated, which refers to the weight to be given to the national threshold of over 10 (or over 1000 sq.m. combined floorspace) against adopted development plan policy, but I do not consider that it is directly relevant to my task, which relates to assessing the specific legislative requirements for dealing with the examination of neighbourhood plans, in the form of the basic conditions.

59. In part, one of the driving force behind the Steering Group wanting to retain the lower affordable housing threshold was the responses to an early questionnaire, where the villagers overwhelmingly said they wanted to see development on "small groups on suitable areas within physical limits of the village" as opposed to "all new houses on new estates". However, that would run contrary to the reality that generally affordable housing will now only be delivered on sites which have developments of 11 units or over (or greater than 1000 sq.m. combined floorspace).
60. I am therefore placing less weight on that stated desire for smaller housing developments, in my assessment of the site allocations and their affordable housing content. I do this on the basis that the village is already having to accept a housing development of 30 units at Brook Farm, which the neighbourhood plan is now proposing to be extended, to a scheme of 38 units. Furthermore, this neighbourhood plan is itself promoting a site which is over the 10 dwellings which is the threshold for the definition of small sites referred to in Paragraph 4.15 of the Core Strategy. The Council also indicated that the paragraph referred to, will have to be reviewed in the next version of the Local Plan. I am also swayed by the fact that the overwhelming majority of residents in their "post hearing representations" have expressed support for a scheme of up to 18 units at Broadfield Farm.
61. On balance, I have not been convinced by the Qualified Body's argument set out in their response to my Initial Comments document, that I should place no weight on the Secretary of State's reintroduced policies regarding the threshold for affordable housing and rely entirely on the expressed community preferences. I appreciate that the Steering Group had managed to secure agreement to the affordable housing components with site owners, but it is possible that ownership of the sites could change or

owners' personal circumstances or ambitions could change, also during the lifetime of the plan and new owners would not necessarily be bound by the agreements of their predecessors.

62. The Steering Group could, if it had chosen to, have promoted affordable housing on small sites on the edge of, but outside of the limits of development, as *exception sites* which can be specifically reserved to meet local housing need, in line with paragraph 54 of the NPPF and Core Policy 44 of the Wiltshire Core Strategy.
63. It is always open to the landowners to decide in the future, whether to honour their previously made commitments to provide social housing for the village, on their sites of less than 11 (or under 1,000 sq.m. cumulative floorspace), if they so choose, but I maintain that it would not be in line with the basic conditions to require such provision as part of a development plan policy.
64. I have considered the implications of the proposed modifications, that I am minded to make, on the delivery of affordable housing on the allocation sites. Notwithstanding my overall conclusions regarding thresholds, I am minded to recommend specifically that a requirement be imposed to deliver 40% affordable housing on the Brook Farm extension site NP4, because it will be, in effect, an allocation which will provide for the extension to an extant consented site, which is already over the 10-unit threshold. To exclude affordable housing from an extension to a major housing proposal would encourage the arbitrary subdivision of sites, which are capable of delivering developments over the affordable housing threshold, in an attempt to avoid having to provide affordable housing.
65. As a result of my recommendations, only the Broadfield Farm and Brook Farm sites will be delivering affordable housing in line with my recommendations for Policy GSNP2. This is likely to generate 10 affordable homes compared to the 12 that the submitted plan indicated could be delivered. I do not feel that the shortfall is likely to be so significant as to change my conclusion, because when the main Brook Farm development proceeds, then that will also be contributing another 7 affordable homes to the village's affordable housing stock. Under questioning the Steering Committee representative stated that the "figure of 12 was well ahead of what was needed" and the figure was to get closer to the Wiltshire average.

Site Selection Methodology

66. I now turn to discussing the site selection methodology. The question that is uppermost in my mind is the basic condition test as to whether the allocation sites will deliver *sustainable development*. The process started

with looking at the SHLAA sites and then went on to consider sites that were put forward by land owners into the neighbourhood plan process. It then appeared that all residents were invited to indicate whether they agreed with the recommendations of the steering group. It is apparent that the site scoring was done only by the steering group and it was done subsequent to the village responding to the question as to whether it supported the steering groups recommendation i.e. when the choices of sites had been made.

67. There appears to be disagreement as to when Broadfield Farm was considered to be available as a potential site for the neighbourhood plan. It had been a SHLAA site and had been assessed by Wiltshire Council as being a deliverable housing site in the second five-year period, i.e. 6 to 10 years, due to the fact that the site was at that time occupied. The assessment stated that it had a development potential, over what was an enlarged site, of some 40 units. At the hearing, we reached no agreement as to when Gleeson's intentions regarding the site became known. It is not my intention to pass judgement as it does not affect my conclusions, but the upshot is that Broadfield Farm was never one of the sites put to residents, when the Steering Group's consultation took place. Many of the representations that I have seen, both at Regulation 16 and in response to the "post hearing" public consultation stated that residents were not aware that Broadfield Farm could be a potential housing site and that, when made aware of its availability, expressed the view that they would have preferred development on that site rather than on some other greenfield sites, that were being put forward by the Steering Group for inclusion in the emerging neighbourhood plan.

68. Once the Steering Group became aware that development was being promoted on the Broadfield Farm, it faced a dilemma, because public consultation on its preferred sites had already taken place and the Plan was being firmed up. The Group did however decide to assess the site using its own scoring methodology. I have received representations from Gleeson Developments Ltd regarding the whole scoring methodology and the exercise's objectivity. I have looked at these comments and I concur with much of their conclusion, that some of the scoring of sites carried out by the members of the Steering Group, appears somewhat inconsistent. I note that the scoring was done on a most favoured / least favoured basis rather than on an objective basis scoring against objectively assessed factors, would lead to a certain score being given. It was a very crude approach. I am conscious that the Council used the term "adequate" to describe the scoring process. I have some concerns at the scoring criteria,

which did not have regard to some well-established planning principles, as to what constitutes sustainable development. I will give some examples, such as whether the development of land would “preserve and enhance conservation areas”, whether the development involves the loss of good quality agricultural land, whether the proposal was for greenfield as against brownfield site development and whether the proposals protects the countryside.

The Merits of Broadfield Farm

69. Reading the Regulation 16 representations before my initial site visit, I began to appreciate that the Broadfield Farm site could be a possible sustainable location for new development. This was reinforced by my visit. It was almost as if the timing of the plan making exercise had dictated the response of the Steering Group to Broadfield Farm, as to whether it should be considered, at least as a possible development option for accommodating new housing within the village. I believe that the Steering Group were naive to expect the future of an important site like Broadfield Farm to stand empty and derelict for at least 5 years so that it could be looked at in terms of a review of the neighbourhood plan, which is an argument referred to in a circulated newsletter. It would have been reasonable for the Steering Group, once the availability of Broadfield Farm for development was known, to have sought the views of residents on whether they would have supported new development on this site, perhaps in preference to the sites which were being promoted by the plan.
70. At the hearing, we explored the planning merits of the Broadfield Farm site in some detail. It seemed to me that there were a number of factors that weigh in favour of allocating Broadfield Farm in its own right. Indeed, it could be argued to be a more sustainable site than some of the other proposed allocations. It was accepted by the Qualifying Body that as some of the site was within the settlement boundary, development of that part of the site would already accord with Core Policy 2 of the Core Strategy, the policy that allowed developments within the settlement boundary. It was also agreed that the buildings on the site have planning permission for employment use and accordingly fall within the definition of *previously developed land* as set out in the Glossary to the NPPF. The Core Strategy Policy 2 seeks to encourage 35% of all new residential development on brownfield sites.
71. One of the issues with the Broadfield Farm site, as being promoted by Gleeson Developments Ltd, was that its boundary extended beyond the proposed limits of development of the village settlement and incorporated

some of the adjoining arable field, which was last classified as Grade 1 quality. At the hearing, I explored with the Qualifying Body, its views on a reduced Broadfield Farm allocation. Representatives of the Steering Group indicated that, in principle, they were prepared to consider including into the neighbourhood plan proposals, the Broadfield Farm site, based on the reduced area within the proposed settlement boundary and coinciding with the extent of the brownfield site, including its curtilage. Gleeson's team also indicated a willingness to proceed on that basis. At the time, this felt like a major step forward in resolving major objections to the neighbourhood plan, and I was encouraged by the pragmatic approach taken by all parties.

72. The meeting that had been held subsequent to the hearing could not reach a consensus on the amount of development capable of being achieved on the site. Accordingly, the Steering Group has proposed a form of wording, "for up to 18 units" that it is comfortable with, and I have received a separate detailed submission from Gleeson's planning consultants proposing a housing figure of "at least 28 units", although with the caveat "that actual numbers to be informed by material submitted in support of a planning application."
73. If I were to support, in my recommendations, the higher figure of 28 +, being suggested by Gleeson Development Ltd, I would need to be satisfied that the site could satisfactorily accommodate that number, as it could have implications as to how I deal with other sites. I have had particular regard to the appraisal layout, submitted in Gleeson's post hearing representations. Frankly, the proposed layout does not convince me that the site can satisfactorily achieve that level of development. Indeed, I would go further and say that it could reinforce some of the views expressed against larger scale residential developments. By way of illustration I would highlight a number of concerns that I have with the submitted scheme.
- There has been no attempt to pepperpot the affordable housing throughout the site, which is generally considered good practice.
 - The layout does not properly respond to the context of the site, for example, it does not maximise views across open countryside.
 - The area of public open space is tucked into the far corner of the site by the pumping station rather than being incorporated as a feature of the site.
 - The layout pays no regard to the existing characteristics of the village.
 - The houses have minimal garden areas and in some cases their amenity space is completely dominated by large trees.

- The mid terrace affordable units have no rear access so wheelie bins etc. would have to be brought through the house or kept at the front of the properties which will be unsightly.

74. I appreciate that this layout has not been designed for a planning application and is to assist me by proving a development capacity. However, I am not persuaded that the site can achieve a number of units proposed in a way that will integrate well into the village. Indeed, Gleeson's plan showing 40 units, on what was a much larger site, appeared a lot less cramped. I therefore propose not to go so far as Gleeson's representations would want me to go, but similarly, I will not follow the Steering Group suggested use of "up to 18 units". Rather, I propose to use the "approximately 18 units" description, which gives an indication as to what would be a more appropriate scale of development, but which would also allow some flexibility at the development management stage in response to a specific scheme. This then is a good basis for moving forward in terms of the consideration of the remaining need for other site allocations.

75. The results of the "post hearing consultation" did show that there was overwhelming support for the inclusion of Broadfield Farm as an allocation site in the plan. However, a number of the representations expressed a fear that allowing 18 dwellings on Broadfield Farm would be additional to the 35 already proposed in the proposed plan's allocations. A considerable number were urging me to replace some of the other sites already allocated in the plan.

Implications for other proposed housing allocations

76. In view of my earlier conclusion that "approximately 35" was an acceptable figure for the total number of units to be allocated, I now have to consider whether any of the other sites are less sustainable locations for development, than the Broadfield Farm site. At the hearing, I asked a number of questions regarding Site NP1, which is the largest allocation site on Seagry Road. I am aware that the site is within a conservation area. I have seen no real assessment as to whether the development of this open parkland would "preserve or enhance the conservation area", which is a requirement of both national planning policy and indeed planning legislation. The Council states in their response to my Initial Comments that it is "satisfied that any *harmful effects of development in the Conservation Area can be minimised*". I do not believe that approach is consistent with the positive requirement to "preserve or enhance" the

Conservation Area. A late submission made I believe, on behalf of the owner of the site responded to my question on this issue by saying “There is no conservation area appraisal and there is nothing of architectural or historic interest adjacent to site NP1. Consequently, the reason for including the land between the driveway to the Manor House and the land to the east, in terms of its contribution to the heritage asset is unclear”. That does not address the fact that for a proposal to proceed it must pass the test of actually “preserving or enhancing the Conservation Area.”

77. Whilst I am aware that the Conservation Officer of the Council, appears comfortable with the allocation, to my view, this area of open paddock plays an important role in establishing the setting of the village and the Manor House, as one approaches Great Somerford from the south. The extent of the allocation site appears somewhat arbitrary and it was confirmed that the boundary was set by the extent of the land being offered by the land owner. It strikes me that very little analysis has been given as to what the landscape impacts of a residential development, beyond the ability to provide new planting. I would ordinarily have expected to see a more rigorous assessment of a proposal, in what is a sensitive location in a Conservation Area. Discussions took place at the hearing as to whether a development of 12 units on a 1.75-acre, greenfield site actually constituted an “effective use of development land”. It appears that number has been arrived at, as a result of the discussions between members of the steering group and the site owner, without any proper assessment of how this land could be effectively developed, beyond general comments about landscaping and the planting of belts of trees.
78. My conclusion is that this greenfield site is not as sustainable location compared with the brownfield, Broadfield Farm development. I appreciate that it initially scored highly in the residents’ questionnaire responses, but that may have been because it was the only large site available and it was certainly before Broadfield Farm was known to be available. I consider that the proposed allocation development would have a detrimental impact on the open parkland which makes an important contribution to the setting of the village. Had Broadfield Farm not come forward and this site had been required to achieve the housing requirement, I would have recommended a site area that would have minimised the impact on the Conservation Area. However, my view, which appears to be shared by a number of residents expressed in the post hearing consultation, is that this allocation should be removed from the neighbourhood plan, now Broadfield Farm is to be included.
79. The other site, where I had concerns regarding its suitability for residential development, arose from my initial site visit where I walked the site, and

this relates to the proposal for 6 units at Site NP5 (Land to the rear of the Old Police House). This would have been involved putting a new access road down the route of a public footpath and the residential development of a corner of an open arable field. The boundary appears arbitrary again, as there are no physical features on the site and would appear to be an incongruous incursion of development into the open countryside. There appears to be no logic as to its inclusion other than it was land promoted for development by the landowner. I consider that it would be entirely out of character with the surrounding form of development in this part of the village and be akin to a backland form of development. By creating a new built edge along the open space to the west, which is proposed as Local Green Space, it would detrimentally affect that open space and indeed the setting of the conservation area.

Review of Settlement Boundary (Limit of Development)

80. The Steering Group has carried out a review of the settlement boundary and is proposing a number of changes. I heard at the hearing, that it followed the methodology proposed by Wiltshire Council and I have no concerns regarding the conclusions, as it affects the basic conditions. Also at the hearing I asked what the Steering Group would feel is appropriate if I was to remove certain allocation sites and the response was that they would not wish to retain the extensions of the boundary proposed to include the allocation sites. That is the logical position and I am therefore recommending that the proposed boundary in Appendix D2 be amended to remove the sites of Sites NP1 and NP5 from within the "Limit of Development".

Overall Conclusions on the Plan

81. At the hearing, the submissions on behalf of Gleeson Developments were that the plan did not pass the basic conditions test and I should not be recommending that the plan proceed to referendum. That was before the discussions led to the possibility of the inclusion of Broadfield Farm. Indeed, my own early conclusions tended to the view that I would be having to make a recommendation that the plan did not pass basic conditions, as it would not be delivering sustainable development and its affordable housing policy, which was a major plank of the plan's strategy, was out of line with national policy and advice. However I am now satisfied, following the hearing, that with my recommendations to now

include Broadfield Farm as the largest single housing site (albeit smaller than Brook Farm) and the deletion of two greenfield sites, NP1 and NP5, plus the amendment of the affordable housing Policy GSNP2 to align it with the national threshold, I will be able to conclude that the plan, if it is amended in line with my recommendations, will meet the basic conditions and I will be able to recommend that the neighbourhood plan does go forward to referendum.

82. My recommendations concentrate upon the wording of the policies themselves. It is beyond my scope as examiner to rewrite the supporting text that accompanies the plan policies. Much of this supporting text sought to justify the submitted policies in the plan that I have either had to delete or amend significantly, such as the affordable housing threshold. It is important for the neighbourhood plan to read as a coherent document as it will, if voted on by the residents, become part of the development plan. It is therefore important for future users of the plan including decision makers that the supporting text is amended by the Parish Council to bring it in line with my recommended policy changes. It will also be necessary for the policies in the plan to be renumbered as a result of my deletion and addition of sites. That is a matter for the respective parties to address in preparing the post examination version of the plan.

The Neighbourhood Development Plan Policies

Policy GSNP1 Proposed New Development

83. In view of my conclusions relating to Sites NP1 and NP5 I propose to remove reference to both sites from this policy and also refer to the overall allocation provision to be “approximately 35” and also remove the individual reference to the two sites from this policy and insert Broadfield Farm as the new site NP1.

84. As the title of the policy relates to *Proposed New Development* and not *Proposed Allocations* I consider that it would provide greater clarity to decision makers and to all parties if the policy would include reference to windfall sites being in addition to that number.

85. I do not consider that it is necessary to include the level of affordable housing, as this will be driven by my proposed revisions to Policy GSNP2 and the proposed level of affordable housing will be referred to in the site-specific policy for those sites where required.

Recommendation

Replace the wording of the policy with:

“Land for approximately 35 new dwellings will be allocated within Great Somerford on the following sites:

Site Allocation	Approximate number of dwellings
NP1 Broadfield Farm	18 dwellings
NP2 Dauntsey Road	7 dwellings
NP3 Frog Lane	2 dwellings
NP4 Land adjacent to Brook Farm	8 dwellings

There will be a presumption in favour of sustainable development on non-allocated sites that fall within the revised Limit of Development boundaries shown on Appendix D2 subject to compliance with other relevant policies in the development plan”.

The Map on Appendix D2 Proposed Limits of Development be amended to exclude Site NP1 Seagry Road and Site NP5 Land rear of the Old Police House.

Policy GSNP2 Affordable Housing

86. Following my analysis in the Overview section of the report having particular regard to Secretary of State policy, I am recommending that the threshold should be increased to 11 dwellings (or schemes with a cumulative floorspace greater than 1,000 sq.m.), in line with national policy and advice and in view of my changes to the wording of Policy GSNP1. I do not need to refer to that policy but I will incorporate the wording of Policy GSNP 6 dealing with Site NP4 instead, where I am recommending 40% affordable housing in accordance with Core Strategy 43 as this allocation is an extension to a site already over the threshold limit.

Recommendations

Replace the first paragraph with

“Proposals for developments that result in a net gain of 11 dwellings, or more than a gross residential floor space of 1,000m², or as required by Policy GSNP6 in respect of Site NP4 Land adjacent to Brook Farm, will be expected to provide at least the percentage of affordable housing on the site in accordance with Wiltshire Core Strategy Core Policy 43.”

Policy GSNP3 – Seagry Road

87. In view of my conclusions previously referred to, I am proposing that this site be deleted from the plan as in my opinion its inclusion does not meet the basic conditions. I do not consider that it is a sustainable location for development. It is a greenfield site within the Conservation Area whose open parkland nature forms an attractive setting for the entrance to Great Somerford.

Recommendation

That Policy GSNP3 of the Submission Version be deleted.

Policy GSNP4 – Dauntsey Road

88. I do not have any concerns regarding this allocation, apart from the precision of reference to “7” dwellings. To be consistent with my other recommendations I will be proposing that the allocation be referred to “approximately 7 dwellings”. I consider that this is development which reflects the character of the development on the opposite side of the road.

Recommendation

Insert “approximately” before “7 dwellings”.

Policy GSNP5 – Frog Lane

89. This is a small development site set behind an established hedge line which will fall within the revised “limits of development”. I understand it was formerly a vehicle dismantling yard, which would have qualified as previously developed land except for the fact that all evidence about its former use has disappeared. In line with my general approach to housing numbers proposed in Policy GSNP1 to allow some flexibility I will again refer to the “approximate” number of units.

Recommendation

Insert “approximately” before “2”

Policy GSNP6 – Land adjacent to Brook Farm

90. I am satisfied that Brook Farm is a committed housing site with planning permission granted for 30 dwellings. The inclusion of this allocation is a

means of extending that development site. I do not consider that the configuration of the site lends itself to independent development in its own right. As such I consider that as the policy requires integration into the remainder of Brook Farm site it should be covered by the normal affordable housing requirements, covering sites of over 11 units. In this respect, I believe it should provide 40% affordable housing in line with Core Policy 43 of the Core Strategy rather than the 23 % proposed by the Plan as submitted. In this case, it would generate an additional affordable unit (based on rounding down of the requirement) in addition to the 2 units already accounted for in the Plan. I am aware that there was a flooding objection from the Environment Agency that has been removed upon closer consideration of the flood zone maps by the Agency. I will again refer to the level of development being “approximately” eight units allowing greater flexibility when site layouts are finalised.

Recommendations

Insert “approximately” before “8 dwellings”.

Insert after “adopted development plan.” the following sentence “Development will provide affordable housing in accordance with Core Policy 43 of the Wiltshire Core Strategy.”

Policy GSNP7-Land behind the Old Police House

91. This allocation received the second highest number of suggestions that the site should be removed from the list of allocation sites, when they were consulted on the Broadfield Farm amendments, so as to keep the overall housing numbers close to the neighbourhood plan’s originally proposed number. The highest number of suggestions for sites to be deleted, identified the Site NP1 Seagry Road.

92. As I have previously discussed, I do not consider that this to be a sustainable location for development when compared to its alternatives, as this is a greenfield site, part of a good quality arable field which is still actively farmed. There are no logical boundaries or landscape features to define the extent of development and in my opinion it would be an unnecessary incursion of residential development into the countryside. This is contrary to one of the planning principles set out in the NPPF. The creation of the new access road will radically change the rural nature of the footpath. I am recommending this policy be deleted primarily as it does not deliver sustainable development.

Recommendation

That the policy be deleted.

Policy GSNP 8 Broadfield Farm

93. I am using the above title Policy GSNP8 as that was the proposed heading used in the post- hearing consultation. As the plan's largest allocation, I propose that it becomes the new Policy GSNP3, instead of the Seagry Road allocation.
94. I am generally content with the proposal as put forward by the Steering Group including the proposed figure of 18 dwellings. I have carefully considered the additional evidence from Gleason, including their highways and historic environment consultants' assessment, but I am not convinced that I should be necessarily agreeing to the quantum of the proposed development being "at least 28 houses". I have already explained my reasons for coming to this conclusion.
95. Again, I will be using the figure of as an "approximate" number of houses rather than the "up to" as suggested by the Steering Group. That gives some flexibility at the development management stage. At 18 units, it will deliver 7 affordable units whilst 20 houses would deliver 8. I do not propose to adopt the suggested caveat from Gleason's that "final dwelling numbers will be determined during assessment of the detailed information included with a planning application". It is both unnecessary and it is implicit by the use of the word "approximate" that there is a degree of flexibility available to the decision maker in any event. Equally I do not consider the policy needs to refer to the justification for the allocation for it to be limited to the previously developed land. The allocation relates to the land which is shown as being allocated.

Recommendations

Change "GSNP8" to "GSNP3" and replace "up to" by "approximately".
Delete the second sentence.

Policy GSNP7 Local Green Space

96. I note that this policy has the same policy number as The Land behind the Old Police House. This obviously is an error which can be resolved with the general renumbering of the plan policies which will be required to be carried out.
97. I have visited all the proposed Local Green Spaces. I have also had regard to the full justification shown in Appendix G. I can find no stated reason for the different treatment of the Free Garden site on the map shown before

Appendix G and I will be recommending that all sites should be indicated using the same shading. I know the criticisms made by Gleeson as it relates to the methodology of the site selection for local green space. I have reflected on the comments but I have enough information before me to conclude that in this case all the proposed local green spaces, in my opinion, do meet the criteria set by paragraph 77 of the NPPF and the additional online guidance in the PPG. I have received no representations from residents that they disagree with the inclusion of any of the sites. The Planning Practice Guidance states that within the criteria given, designation is a matter for local discretion. The guidance affirms that LGS designation should not be a blanket measure for the protection of open countryside adjacent to settlements. I consider that all the sites identified are considered as important by the villagers of Great Somerford and this warrants protection.

Recommendation

Show the designation of Free Gardens on the map in the same shading as other LGS sites.

The Referendum Area

98. If I am in a position to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Neighbourhood Plan as designated by Wiltshire Council on 15th April 2014 would be the appropriate area for the referendum to be held and the area does not need to be extended.

Summary

99. I am sure that the neighbourhood plan making process has been a difficult issue for the Great Somerford community and reading some of the correspondence, it looks that it has been quite divisive. Whilst I have made some criticisms of the plan in this report, I must pay tribute to the obvious hard work and stamina of the Steering Group and I am sure that they will have learnt a lot over the past few years about the complexities of plan making.

100. The plan that has emerged from this examination process is one that is quite different to the submission version. I hope that the majority of residents will at least understand my reasoning behind bringing in Broadfield Farm in place of two of the original allocation sites. The overall amount of development proposed by the Plan has not changed significantly, which I know will be important to many people. Without my proposed changes to the affordable housing policy threshold, I would not have been able to recommend that the neighbourhood plan goes forward as it was central to the overall strategy being advanced. It would not have been in accordance with basic condition of having regard to Secretary of State advice. As the plan is different to the plan that was screened for SEA at an earlier stage, it will be necessary for the LPA to undertake a new Screening exercise before the Decision Statement is issued.
101. Reading some of the recent post hearing correspondence, I got a strong sense that there was a degree of consensus emerging at least from those that submitted their views offering support for the proposed change, and I even noted that the proposed change had the support of the Steering Group members. I hope that the residents of Great Somerford (and to a lesser extent Startley who are not as directly affected by the plan proposals), will maintain their support for having their own neighbourhood plan and that all this effort will culminate in a successful vote at referendum
102. Finally, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and it is appropriate that the Plan, as amended, if successful at referendum, be made.

I am therefore delighted to recommend to the Wiltshire Council that the Great Somerford (incorporating Startley) Parish Neighbourhood Plan, as amended by my recommendations, should now proceed to referendum.

JOHN SLATER BA(Hons), DMS, MRTPI

John Slater Planning Ltd

21st August 2017