

Holt Parish Council

Holt Neighbourhood Plan

Final Draft July 2015

Independent Examiner's Report

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15 June 2016

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Summary

I have been appointed as the independent examiner of the Holt Neighbourhood Development Plan.

The Holt Neighbourhood Plan recognises that Holt has an important role to play as a 'Large Village' within the Bradford on Avon Community Area identified by the Core Strategy. It particularly seeks to support a major opportunity to redevelop a brownfield site in the heart of Holt village with new homes, new employment and the conservation of a number of listed buildings.

It is a very well presented Plan, easy to read and digest. Policies and community aspirations or tasks are clearly identified and linked strongly to an overall vision and set of underlying objectives.

Further to consideration of the policies in the Plan I have recommended a number of modifications that are intended to ensure that the basic conditions are met satisfactorily and that the Plan is clear and consistent.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend to Wiltshire Council that the Holt Neighbourhood Development Plan go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area I see no reason to alter or extend this area for the purpose of holding a referendum.

Ann Skippers MRTPI
Ann Skippers Planning
15 June 2016



1.0 Introduction

This is the report of the independent examiner into the Holt Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

The oddly shaped Parish of Holt forms part of the Bradford on Avon Community Area and is identified as a 'Large Village' in the Core Strategy. The village of Holt has a historic central core with many listed buildings and a Conservation Area and the Courts Gardens run by the National Trust and described by the Trust as a curious English country garden.

2.0 Appointment of the independent examiner

I have been appointed by Wiltshire Council (WC) with the agreement of the Parish Council, to undertake this independent examination. I have been appointed through the Neighbourhood Planning Independent Examiner Referral Service (NPIERS).

I am independent of the qualifying body and the local authority. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over twenty-five years experience in planning and have worked in the public, private and academic sectors and have examined a number of neighbourhood plans. I therefore have the appropriate qualifications and experience to carry out this independent examination.

3.0 The role of the independent examiner

The examiner is required to check¹ whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that

¹ Set out in paragraph 8 (1) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

- Its policies relate to the development and use of land for a designated neighbourhood area.

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions² are:

- 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
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two basic conditions in addition to those set out in primary legislation and referred to in the paragraph above. These are:

- The making of the neighbourhood plan is not likely to have a significant effect on a European site³ or a European offshore marine site⁴ either alone or in combination with other plans or projects, and
- Having regard to all material considerations, it is appropriate that the neighbourhood development order is made where the development described in an order proposal is Environmental Impact Assessment development (this is not applicable to this examination as it refers to orders).

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.⁵

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or

² Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

³ As defined in the Conservation of Habitats and Species Regulations 2012

⁴ As defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007

⁵ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority, in this case Wiltshire Council. The plan then becomes part of the 'development plan' for the area and a statutory consideration in guiding future development and in the determination of planning applications within the plan area.

4.0 The examination process

It is useful to bear in mind that the examination of a neighbourhood plan is very different to the examination of a local plan. I am not examining the Plan against the tests of soundness used for Local Plans,⁶ but rather whether the submitted Plan meets the basic conditions, Convention rights and the other statutory requirements. I have set out this role in some detail earlier in this report.

The general rule of thumb is that the examination will take the form of written representations.⁷ However, there are two circumstances when an examiner may consider it necessary to hold a hearing. These are where the examiner considers that it is necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case. After consideration of the documentation and all the representations, I decided that neither circumstance applied and therefore it was not necessary to hold a hearing.

The submission (Regulation 16) consultation was carried out between 14 September – 28 October 2015. This attracted a number of representations which I have carefully considered and taken into account in preparing my report. On occasion I refer to a specific representation, but I have not felt it necessary to comment on each of them. In accordance with the statutory requirements I have focused on giving reasons for any recommendations I make.

Where I recommend modifications in this report they appear as bullet points in **bold text**. Where I have suggested specific changes to the wording of the policies they appear in ***bold italics***.

I undertook an unaccompanied site visit to Holt and the neighbourhood plan area on 30 May 2016.

⁶ NPPF para 182

⁷ Schedule 4B (9) of the Town and Country Planning Act 1990

I would also like to record my thanks for the support that the officer at Wiltshire Council (WC) and the Parish Council have given me during the course of the examination.

5.0 Compliance with matters other than the basic conditions

I now check the various matters other than the basic conditions set out above in section 3.0 of this report.

Qualifying body

Holt Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This complies with this requirement.

Plan area

The Plan area is contiguous with the Parish Council administrative boundary. Wiltshire Council approved the designation of the area on 22 May 2013. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. A Map of the Parish is to be found on page 8 of the Plan.

Plan period

The Basic Conditions Statement (BCS) states that the Plan period is 2009 – 2026 and indicates that this aligns with the Wiltshire Core Strategy, however the Core Strategy's start date is 2006. The Plan itself states that it covers the period up to 2026 at the start of the Plan. However, it is necessary for the Plan to specify the start and end dates in order to comply with this requirement. In response to my query on this it has been confirmed that the Plan period should be 2016 – 2026.

- **Include the start (2016) and end (2026) dates to which the Plan relates in the Plan and/or on the front cover**

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the development and use of land.

The Plan has a coloured coded structure; the vision is highlighted in brown, objectives in blue, policies in pale blue and tasks in green. I have taken the tasks to be community aspirations not related to the development and use of land. Therefore whilst some of the representations refer to the tasks I have regarded them as community aspirations and have not specifically commented upon them.

Where I consider a policy or proposal to be a community aspiration, I have recommended it be moved to a clearly differentiated section of the Plan; in this case to be moved to become a task highlighted in green. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but non-land use matters should be clearly identifiable.⁸

Subject to any such recommendations, this requirement can be satisfactorily met.

6.0 Consultation

A 'Community Consultation Statement Summary' has been submitted alongside Appendices 1 and 2 and a note regarding Regulation 14 consultation. I have taken these documents together to comprise the Consultation Statement required by the Regulations.⁹

The Plan has been developed over a six year period and work on a Parish Plan with its interestingly titled 'Love it/Hate it' questionnaire has clearly influenced the Plan. Much of the groundwork for the Plan began in 2012 and of particular note is that in July 2012 a Scoping Study was published and was followed by a series of focus groups which 'corralled' all the work to date. A second Scoping Study was published in October 2012. Running in parallel with the evolution of the Plan the Parish Council has engaged with the promoters of the Tannery development site.

Pre-submission (Regulation 14) consultation took place between 12 May – 30 June 2014. A copy of the draft Plan was delivered to all households, organisations and businesses in the Parish and it was also available on the website. The consultation period was publicised in two editions of the Parish magazine and posters around the village. Two events were also held. Appendix 1 contains the responses received at this stage and any action taken as a result of it. The information indicates that over 100 individuals responded.

Submission (Regulation 16) consultation was carried out between 14 September – 28 October 2015.

⁸ PPG para 004 ref id 41-004-20140306

⁹ The Neighbourhood Planning (General) Regulations 2012 Regulation 15 (2)

It is clear that various efforts have been made to engage the community and that these efforts have taken place over a long period of time. I am confident that the submission version of the Plan has been the result of sustained effort and consultation.

7.0 The basic conditions

Regard to national policy and advice

The main document that sets out national planning policy is the National Planning Policy Framework (NPPF) published in 2012. In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the strategic development needs set out in Local Plans, plan positively to support local development, shaping and directing development that is outside the strategic elements of the Local Plan and identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with the neighbourhood plan to proceed.¹⁰

The NPPF also makes it clear that neighbourhood plans should be aligned with the strategic needs and priorities of the wider local area. In other words neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. They cannot promote less development than that set out in the Local Plan or undermine its strategic policies.¹¹

On 6 March 2014, the Government published a suite of planning guidance. This is an online resource available at www.planningguidance.planningportal.gov.uk. The planning guidance contains a wealth of information relating to neighbourhood planning and I have had regard to this in preparing this report. This is referred to as Planning Practice Guidance (PPG).

The NPPF indicates that plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.¹²

PPG indicates that a policy should be clear and unambiguous¹³ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the context and the characteristics of the area.¹⁴

¹⁰ NPPF paras 14, 16

¹¹ *Ibid* para 184

¹² *Ibid* para 17

¹³ PPG para 041 ref id 41-041-20140306

¹⁴ *Ibid*

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.¹⁵ It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.¹⁶

The BCS sets out how the Plan has responded to national policy and guidance, focusing on the core principles of the NPPF.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development. The NPPF as a whole¹⁷ constitutes the Government's view of what sustainable development means in practice for planning. The Framework explains that there are three dimensions to sustainable development: economic, social and environmental.¹⁸

The BCS includes a short section setting out how the Plan contributes to sustainable development.

General conformity with the strategic policies in the development plan

The development plan consists of the Wiltshire Core Strategy Development Plan Document (CS) which was formally adopted on 20 January 2015 and a number of policies from the former District Councils Local Plans including the saved and retained policies of the West Wiltshire District Plan First Alteration June 2004 (WWDP) which are identified in Appendix D of the CS. Of particular relevance to this examination is saved and retained WWDP Policy C41. In addition the West Wiltshire Leisure and Recreation Development Plan Document (January 2009) forms part of the development plan.

The CS provides a framework for Wiltshire up to 2026. It is an economic-led strategy and the CS has 17 key objectives. It identifies 18 Community Areas and Holt falls within the Bradford on Avon Community Area. CS Core Policy 7 contains indicative housing figures and identifies specific issues to be addressed in the area in the period up to 2026.

The CS identifies Holt as a Large Village; as set out in CS Core Policies 1 and 2 these are defined as settlements which have a limited range of employment, services and facilities where development is limited to that needed to help meet their housing need and improve employment opportunities, services and facilities. Amongst other things, CS Core Policy 2 prioritises the reuse of previously developed land to minimise development on greenfield sites.

¹⁵ PPG para 040 ref id 41-040-20160211

¹⁶ *Ibid*

¹⁷ NPPF para 6 which indicates paras 18 – 219 of the Framework constitute the Government's view of what sustainable development means in practice

¹⁸ *Ibid* para 7

CS Core Policy 7 seeks the provision of some 780 new homes over the Plan period in the Community Area. Of this figure, the CS indicates that some 595 dwellings will be directed to Bradford on Avon leaving approximately 185 elsewhere in the Community Area. WC directs me to the latest published information available¹⁹ which indicates that the figure is now 57. There are two other Large Villages in the Community Area as well as Holt; these are Westwood and Winsley which fall within the Green Belt. Whilst then it might be anticipated that most of the remaining development would be directed to the Large Villages, given that much of the Community Area is covered by Green Belt designation it is clear that Holt will play an important role in delivering housing in the Area.

A Housing Sites Development Plan Document (DPD) is currently being prepared; this will identify sites and review settlement boundaries, where appropriate.

The BCS discusses the Plan's general conformity with the key objectives of the CS and rightly points out that relevant CS policies are indicated in tabular form at the end of each section in the Plan. Whilst it would have been useful for the BCS to be more comprehensive in its coverage by addressing other policies in other documents, this has formed part of my own assessment.

European Union Obligations

A neighbourhood plan must be compatible with European Union (EU) obligations, as incorporated into United Kingdom law, in order to be legally compliant. A number of EU obligations may be of relevance including Directives 2001/42/EC (Strategic Environmental Assessment), 2011/92/EU (Environmental Impact Assessment), 92/43/EEC (Habitats), 2009/147/EC (Wild Birds), 2008/98/EC (Waste), 2008/50/EC (Air Quality) and 2000/60/EC (Water).

Strategic Environmental Assessment

Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment is relevant. Its purpose is to provide a high level of protection of the environment by incorporating environmental considerations into the process of preparing plans and programmes. This Directive is commonly referred to as the Strategic Environment Assessment (SEA) Directive. The Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004.

Wiltshire Council issued a screening opinion dated February 2015 which confirmed that the Plan is unlikely to result in significant environmental effects. The screening statement appears to have been prepared with the requirements set out in Regulation 9 of the Regulations. This included the requirement to consult the three statutory bodies namely the Environment Agency, Historic England and Natural England; all three bodies concur with the conclusion a SEA is not needed. I have taken the screening

¹⁹ The Housing Land Supply Statement September 2015

statement to be the statement of reasons. I am therefore satisfied that the requirements in this respect have been satisfactorily met.

Habitats Regulations Assessment

Directive 92/43/EEC on the conservation of natural habitats, commonly referred to as the Habitats Directive, is also of relevance to this examination. A Habitats Regulations Assessment (HRA) identified whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects.²⁰ The assessment determines whether significant effects on a European site can be ruled out on the basis of objective information.

WC has screened the Plan and confirms there are no European sites within the Plan area. However, the River Avon Special Area of Conservation (SAC) is within 5km of it and the Salisbury Plain SAC and Special Protection Area (SPA) within 15km and the Bath and Bradford on Avon Bats SAC is also of relevance.

The HRA screening confirms that the Plan would have no likely significant effects alone or in combination and no appropriate assessment is required. However, this is dependent on a number of recommendations for mitigation in relation to the Bath and Bradford on Avon Bats SAC that require the addition of certain phrases to Policies H1.1, H3.3, CE.2 and CE.4 and Tasks T.2, GS.2 (it should be noted that the relevant element now falls under Task GS.1 I think) and CA.2 to ensure no likely significant effects will occur.

I note Natural England²¹ concur with the conclusions of the HRA screening provided that the recommendations are incorporated into the Plan.

Given that the HRA screening was carried out after the Plan had been submitted and after the Regulation 16 period of consultation these recommendations have not been incorporated into the submission version of the Plan or publicised.

I concur with the conclusions of both the HRA screening and Natural England and so provided the recommendations are incorporated I am satisfied the Plan is not likely to have a significant effect on a European site. I have therefore indicated what these modifications should be in my assessment of each of the relevant policies. I am also mindful that ultimately PPG advises that it is the responsibility of the local planning authority to decide whether the Plan is compatible with EU obligations.²²

The tasks highlighted in green boxes are not related to development and use of land matters and are largely aspirational in nature. As such I would not usually comment on them. However, the HRA Screening Report indicated that these tasks could potentially have an impact on foraging habitat or commuting routes used by bats linked to the Bath and Bradford on Avon SAC and recommended that wording be added to these tasks to

²⁰ PPG para 047 ref id 11-047-20150209

²¹ Natural England letter dated 16 February 2016

²² PPG para 032 ref id 11-032-20140306

ensure that no likely significant effects arise. As explained above, the need or otherwise for appropriate assessment was dependent on inclusion of these matters. Therefore it is important that the recommendations put forward for these tasks are brought forward as in the HRA Screening Report are included for tasks T.2, GS.1 and CA.2. In order to assist the qualifying body I note here what additional wording I consider would be appropriate for each task.

For Task T.2 this means adding the following wording; *“The hedgerow could be a flight path for horseshoe bats and will be retained. However, if the hedgerow needs to be moved or translocated to a new position, or if additional lighting is required, the Council Ecologist will be contacted for advice as a bat survey may be necessary to inform appropriate mitigation, having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Special Area of Conservation.”*

For Task GS.1 this means adding the following wording: *“The River Avon is an important commuting route for bats linked to the Bath and Bradford on Avon Special Area of Conservation and a County Wildlife Site. The riverside walk will therefore be sensitively designed to ensure bats can continue to use the river corridor and to minimise impact on the County Wildlife Site. The Council Ecologist will be contacted for advice as an ecological survey may be necessary to inform appropriate mitigation, having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Special Area of Conservation and Core Policy 50 of the Wiltshire Core Strategy.”*

For Task CA.2 this means adding the following wording: *“Disused and underused buildings within the village and surrounding area could become occupied by roosting bats, therefore applications for demolition and reuse or redevelopment of such buildings should be accompanied by a bat survey and appropriate mitigation provided where necessary, having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Special Area of Conservation.”*

I am not aware of any other European Directives which apply to this particular neighbourhood plan and in the absence of any substantive evidence to the contrary, I am satisfied that the Plan is compatible with EU obligations.

European Convention on Human Rights (ECHR)

The BCS indicates that an Equalities Impact Assessment has been drafted, but in response to a query as this had not been forwarded to me in my bundle of documents, the Parish Council has confirmed that in fact such an assessment has not been prepared and the reference in the BCS is incorrect.

The Plan has had regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998. There is nothing in the Plan that leads me to conclude there is any breach of the Convention or that the Plan is otherwise incompatible with it.

8.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions. As a reminder, where modifications are recommended they appear as bullet points in **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics***.

The Plan is presented to a very high standard. The front cover is eye catching and there is a useful contents page. Policies are clearly differentiated throughout and are clearly linked to the vision and objectives.

Background to the Holt Neighbourhood Plan

This is a well-written, informative section that sets out the background to the Plan's production. Building on a Parish Plan and taking into account the changes to the Tannery site and the opportunity that the Localism Act 2011 brought, the decision to develop a neighbourhood plan was taken by the community.

A plan of Holt is to be found on page 2 of the Plan and a map of the Parish is found on page 8. WC make the point that the plan on page 2 appears to be from the WWDLP policies maps which were superseded by the adoption of the CS. WC considers the map should be updated and a new map showing the sites referred to in the Plan could be created. I agree that this would help to provide the more practical framework required by national policy and would ensure the Plan does not contain out of date or potentially misleading or confusing material.

The Plan covers the Parish area and it would be useful to just add a note to the map on page 8 to confirm that the Parish area is also the geographical extent of the area covered by the Plan.

- **Replace the plan of Holt on page 2 of the Plan and include notations to identify the sites subject of policies in the Plan i.e. the Tannery, the Midlands and the Star Ground sites**
- **Add a note to confirm that the area covered by the Plan is the Parish area shown on the map on page 8 of the Plan**

The Development of the Holt Neighbourhood Plan

This short section again provides a balance between giving a flavour of how the Plan developed whilst referring the reader to more details in other documents.

Monitoring and Review

It is good to see a short statement about monitoring and review included. It is not mandatory for neighbourhood plans to undertake monitoring, but I regard this as good practice.

Creating the Vision, A Vision for Holt and Turning the Vision into Objectives

The vision for Holt is found on page 10 of the Plan. It is articulated well. The vision has been based on core themes that have emerged from engagement with the community. However, one phrase in particular has generated various comments from representors; that is “the village will have the same settlement boundary as now and will preserve the green spaces within that boundary.”

The settlement boundary is shown on a map on page 14 of the Plan and is the same as the settlement boundary defined in the WWDP. The CS indicates that settlement boundaries defined by former District Local Plans will be carried forward by the CS and Appendix E confirms that the settlement boundary for Holt is retained. The map then portrays the current settlement boundary. However, settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations DPD to ensure boundaries are up to date and reflect changes since they were first established. It is also the prerogative of communities to review such boundaries through neighbourhood plans.

I agree that the statement could potentially give the impression that the Plan takes a restrictive approach to development and this would not take sufficient account of national policy and guidance or the CS or help to achieve sustainable development. Therefore I suggest that the wording of this part of the vision is altered; this would also deal with my concern that the actual wording of the vision reads a little oddly given the ten year lifetime of the Plan by referring to the settlement boundary “as now”.

I also consider that it would be helpful and provide a more practical framework for decision-making if the settlement boundary were to be updated to include the sites referred to in policies of the Plan namely the Tannery and the Midlands. I do not consider that updating to the settlement boundary in this way would prejudice any party as it is simply a pictorial reflection of policies contained in the Plan.

A number of objectives sit underneath the vision and reflect the themes of housing, transport and associated issues, the economy, environmental issues and community amenities. All sixteen objectives are clearly worded. Housing objective 3 in line with my comments about keeping the settlement boundary “as now” in the vision refers to the “current” settlement boundary and this will quickly become out of date and is potentially confusing. To improve clarity I recommend a modification in this respect.

Whilst one or two others such as the desire to work with WC and Wessex Water are not development and use of land issues they will contribute to a planning issue of importance to the community.

- **Replace the sentence in the vision that reads: “The village will have the same settlement boundary as now and will preserve the green spaces within that boundary” to “*Development within the settlement boundary will be encouraged and green spaces within the boundary will be preserved.*”**
- **Update the settlement boundary to include any sites subject of policies in the Plan and identify those sites by name/notation/key i.e. the Tannery and The Midlands site**
- **Change the wording of housing objective 3 to read: “*Ensure that the settlement boundary and green spaces within it are protected.*”**
- **Consequential amendments will be needed to the footnote on page 10 (it should be noted the current footnote does not reflect the modification recommended for updating the boundary), the vision on page 18 and to housing objective 3 on pages 11 and 21 of the Plan and the rest of the Plan should be checked to make sure it reflects these modifications**

Strategic Environmental Assessment

This short section confirms that a SEA is not required and again helpfully points readers in the direction of where to find more information on this matter.

Structure of the Plan

This explains an interesting colour coding approach to the Plan as a document and is again representative of the generally high quality of the document.

Section 1: Housing

The policies in this section are preceded by a number of paragraphs that ably explain the context for the policies. I have also set out the strategic context for Holt in an earlier section of my report.

Policy H1.1

This policy supports development on the Tannery site subject to a number of criteria. The site is shown shaded on a map on page 17 of the Plan and forms part of a larger area notated as an “Area of Opportunity”. This language seems to reflect WWDP Policy C41 which supports land at the Midlands being used for light industrial, workshops, offices and residential. The CS²³ retains the “Area of Opportunity” as “it continues to

²³ Core Strategy page 83

offer a suitable location for mixed use development in accordance with Core Policy 1. Development of this site should be delivered through a comprehensive masterplanning process, and should be focused on providing live/work or local employment opportunities to help reduce the need for commuting.”. The difference then appears to be between the subdivision of the “Area of Opportunity” into two sites; the Tannery and the Midlands (subject of Policy CE.1). It would be clearer if the map on page 17 was amended to only show the Tannery site.

The premise of the Plan’s strategy for housing relies on the redevelopment of the Tannery site. Indeed some of the impetus for embarking on the Plan has clearly resulted from the potential redevelopment of this site. It is a brownfield site. As well as containing a number of listed buildings it is likely to have a number of constraints including potential contamination before it can be satisfactorily redeveloped. I agree with the community that this site is suitable for redevelopment and that it should form a key part of the Plan’s strategy. The site presents a major opportunity to redevelop this historic site and provide homes and employment opportunities in line with national policy and guidance, the CS and will help to achieve sustainable development. Policies should therefore support this and do so flexibly.

On the face of it the policy is positively worded, but it includes a number of criteria which may inadvertently hinder the redevelopment of this important site. Indeed some representations express concerns about the deliverability of the site and consider the requirements of the Plan will further jeopardise its deliverability putting forward other sites for inclusion in the Plan. There is no requirement for the Plan to allocate any sites at all and there is always the possibility that planning applications on other sites may come forward.

The policy begins by supporting new housing on the Tannery site provided it reflects the “wishes of the village” and various sections and other policies of the Plan. The Plan as a whole should reflect the wishes of the village and the policy should not refer to supporting text as if it were policy; rather the policy needs to stand on its own two feet.

Criterion a) restricts the development to the shaded part of the Area of Opportunity map. Further to my comments above, it is not clear to me why this is necessary or desirable and I am mindful of the need to take account of national policy and guidance that indicates that the benefits of an enabling development which would otherwise conflict with planning policies, but would secure the future conservation of a heritage asset outweigh the disbenefits of departing from those policies.²⁴ In addition there is no hint as to what the benefits to the village that would allow development to cross those boundaries might be. Furthermore those benefits are to be agreed with the Parish Council which is not the determining authority for any planning application.

Criterion b) then indicates an approximate 50:50 split between commercial and housing development. It is not clear to me whether the shaded area within the Area of Opportunity is supported only for housing or whether it is this shaded area that both

²⁴ NPPF para 140

housing and commercial development is sought on. As a result I think it would be better for the reference to new housing in the first sentence of the policy to be removed in the interests of clarity assuming it is the case that both residential and commercial uses are sought on the shaded area and this assumption is also supported by criterion b). Of course it may be the case that this criterion seeks to align with WWDP Policy C41 which supports land at the Midlands being used for light industrial, workshops, offices and residential at the Tannery site is included in that site notation. On this basis it may be the 50:50 includes the existing industrial estate. Either way though it is not clear and therefore does not provide the clarity sought by national policy and guidance.

The desire for a mixed use development accords with national policy and guidance and WWDP Policy C41, but there is little information in the Plan about how this split has been arrived at or evidence to support that such a split would be viable or deliverable. As a result it might hamper any redevelopment. Given the nature of the site, a better scheme would result if a bespoke approach was taken and this would also be more reflective of the comprehensive masterplanning process sought by the CS. Therefore the specific split should be removed from the policy.

Criterion c) seeks specific types of housing on the site which reflect the community's preferences. A mix of housing can help to create sustainable and inclusive communities. However, to ensure there is sufficient flexibility to respond to the characteristics of the site and market conditions in line with national policy and guidance and the CS's emphasis on a masterplanning process, the criterion should encourage rather than require and I make a modification on this basis.

Criterion d) read alongside Policy H1.2 seems to aim to secure the Parish's affordable housing needs on this site. It refers to Housing Para 1.2 for figures; the policy needs to be future proofed so that it provides a practical framework for decision making as some of the figures referred to in the Plan may become out of date during its lifetime. WC also point to CS Core Policy 43 which requires 40% affordable housing provision. That policy does however recognise that provision will vary depending on the site, evidence of local need, the mix of housing proposed and viability. The criterion then needs to reflect these concerns and constraints.

Criterion e) requires any development to be a mix of houses to buy and to rent. WC note the difficulty in securing this for market housing. Nevertheless I consider it reasonable for such a preference to be set out as this will help to create mixed and inclusive communities and provide a wide range of housing. However, to ensure there is sufficient flexibility to respond to market conditions and the characteristics of this site, the criterion should encourage rather than require and I make a modification on this basis.

Criterion h) deals with infrastructure and refers to Policies T1, T2 and T3. Should I recommend any modifications to those policies it will be necessary to modify this policy in the interests of consistency. This also applies to criterion f). Various surveys are required by criterion h); these would normally be undertaken as part of any planning

application or be conditions attached to any grant of permission. I therefore add in some flexibility to this criterion to reflect this.

The HRA Screening Report indicated that the redevelopment of this site has the potential to impact on bats linked to the Bath and Bradford on Avon SAC and recommended that wording be added to the Plan and this particular policy to require a bat survey to be undertaken. To ensure that the policy meets EU obligations I therefore bring forward those recommendations although I have altered their wording in the interests of brevity and providing a practical framework.

Therefore in order to ensure the policy meets the basic conditions I recommend the following modifications:

- **Change the map on page 17 of the Plan to (only) show the Tannery site subject of this policy**
- **Delete the words “provided it reflects the wishes of the village (see Housing Para 1.5) and” from the first sentence of the policy**
- **Delete the words “...there is a demonstrable benefit to the village which is agreed by the Parish Council” from criterion a) and replace with the words; “...the benefits of an enabling development that might otherwise be in conflict with planning policies would secure the future conservation of the heritage assets and the proper planning of the site as a whole;”**
- **Delete the words “...new housing on...” from the first sentence of the policy**
- **Reword criterion b) to read; “the site will be a mixed use development comprising both housing and commercial uses;”**
- **Add the words “as far as possible and subject to viability and other considerations” after the word “will” in criterion c)**
- **Reword criterion d) to read: “affordable housing in accordance with Core Policy 43 of the Wiltshire Core Strategy and based on the most up to date local housing needs information available will be provided;”**
- **Replace the word “will” in criterion e) with the words “is encouraged to”**
- **Undertake any consequential amendments to criteria f) and h) which refer respectively to Policies H2.1 and T.1, T.2 and T.3**
- **Change the second bullet point in criterion h) to read: “Developers will undertake any surveys as necessary to ensure that the development will have an acceptable impact on flooding, drainage and sewage and ensure that any necessary measures or mitigation are carried out.”**

- **Add a new criterion i) to the policy that reads: *“a bat survey should be undertaken and any appropriate mitigation measures be provided as necessary, having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation.”***
- **Add new supporting text to read: *“The redevelopment of the Tannery site has the potential to impact on bats linked to the Bath and Bradford on Avon Bats Special Area of Conservation. Existing buildings within the Tannery site could become occupied by roosting bats and a bat survey carried out at the site by Engain in 2014 recorded Greater and Lesser Horseshoe bats foraging and commuting through the site. It is therefore important that any redevelopment of this site recognises the potential impact on bats and that appropriate mitigation is agreed as part of any planning application which will include sensitive layout and design, landscaping and lighting.”***
- **Add the Bat Survey Report by Engain dated 30 October 2014 to the list of “Key supporting evidence” and include a reference to Policy CP 50 Biodiversity and Geodiversity in the section titled “Relevant policies from the Wiltshire Core Strategy relied upon for this section”, both on page 22 of the Plan**

Policy H1.2

Policy H1.2 restricts affordable housing to the Tannery site and if needed, then to the Jephson (Star Ground) site. The policy needs to be consistent with Policy H1.1.

I agree with WC that the policy appears to be safeguarding the Jephson site for future affordable housing and that this would be in line with CS Core Policy 44.

The policy as worded would not prevent any affordable housing coming forward on (other) exception sites, but I am concerned that it could be construed as excusing any other development sites from providing an element of affordable housing and I am sure this was not the intention of the policy. As a result it requires some modification to make sure that affordable housing is still provided to take account of national policy and guidance, the strategy in the CS and CS Core Policy 43 and to help achieve sustainable development as well as being consistent with other policies in the Plan.

The suggested modifications are:

- **Delete the words “...(see Housing Para 1.2)...” from criterion a)**
- **Add the words *“in line with Policy H1.1. criterion d)”* at the end of criterion a)**
- **Add a third criterion c) to read: *“Other development sites will be expected to meet any affordable housing requirements in line with Core Policy 43 of the Core Strategy and up to date and evidenced local housing needs.”***

Policy H1.3

This policy sets out local connection criteria for affordable houses in the Parish. WC point out there is an allocations policy “New Homes4Wiltshire” which came into effect in January 2015 and that this policy would be inconsistent with that. The policy is significantly more onerous than the allocations policy’s definition of a connection to live in the Wiltshire Council area and the local connection criteria for the allocation of housing. However, section 9.0 of the allocations policy gives priority to those with a local connection based on criteria within that document or as defined in a neighbourhood plan. Given WC’s concern on this matter and national policy’s objective of creating mixed and balanced communities and the need to identify a range of housing that reflects local demand, I recommend a modification that will prioritise affordable housing for people with a local connection as defined in this policy, but ensures that any affordable housing provided in the Parish can also contribute to the wider strategic needs across the County.

- **Replace the words “shall only be occupied by...” in the first sentence of the policy with the words: “*shall, whenever they become available, be first allocated to those persons...*”**

Policy H2.1

This is a well-written and clear policy that seeks to ensure new housing development is of a high quality and is appropriate in its setting and takes its lead from the existing characteristics of the Parish. It is in line with national policy and guidance which recognises good design as a key aspect of sustainable development, is in general conformity with the CS, most notably Core Policy 57 which supports high quality design and protects local character and will help to achieve sustainable development. It therefore meets the basic conditions and no modifications are recommended.

Policy H3.1

New infill housing is supported by this policy subject to a number of criteria. All are well written and are clear. The policy will ensure that infill development takes place in appropriate locations, that existing green spaces are retained and that the living conditions of the occupiers of neighbouring properties are considered and acceptable. All reflect the principles of good planning and will help to ensure that local distinctiveness is respected whilst ensuring a high quality of development.

My only concern relates to criterion e) which seeks to prevent the loss of small properties through conversions of smaller houses into one house. Whilst this is a laudable aim, this does not usually require the submission of a planning application. To

reflect this position I suggest a modification which will address my concern which adds clarity to the policy.

- **Add “*insofar as planning permission is required*” after the first element of criterion e)**

Policy H3.2

This policy seeks to prevent new housing on greenfield sites. This statement is then followed by three criteria; the first is not a statement of policy but a viewpoint; the second seeks to retain the existing settlement boundary and preserve green spaces which I have discussed earlier in the report and indeed have recommended the settlement boundary be amended and includes another viewpoint that sufficient housing can be delivered on brownfield sites; the third repeats support for the Jephson Star Ground site. There is then some overlap with Policies H1.1 and H1.2.

However of greater import, is that the policy’s blanket ban on development on greenfield sites does not accord with national policy and guidance. This policy runs counter to the NPPF’s stated purpose for the planning system as contributing to the achievement of sustainable development and its presumption in favour of sustainable development. In the rural areas and even in the Green Belt some development is permitted. This negatively worded policy does not take account of national policy and guidance or the strategy in the CS. It will not help to achieve sustainable development. It therefore does not meet the basic conditions and should be deleted.

- **Delete Policy H3.2 in its entirety**

Policy H3.3

The conversion of redundant farm buildings to residential use is supported by this policy. It recognises the ‘permitted development’ rights associated with agricultural buildings. It is a positively worded policy that takes account of national policy and guidance and is in general conformity with the CS and its Core Policy 48 which supports the conversion of rural buildings for employment, tourism, cultural and community uses subject to a number of criteria and allows residential use in certain circumstances.

The HRA Screening Report indicated that this type of development may potentially impact on roosting bats where buildings are suitable for horseshoe access and recommended wording was added to this policy. To ensure that the policy meets EU obligations I therefore bring forward that recommendation although I have altered the wording in the interests of brevity and providing a practical framework.

- **Add a new sentence/paragraph/criterion to Policy H3.3 which reads: “Any planning application for the reuse or redevelopment of buildings will be accompanied by a bat survey and appropriate mitigation provided where necessary having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation.”**
- **Add a new paragraph/section to the supporting text that reads: “Disused and underused farm buildings could become occupied by roosting bats linked to the Bath and Bradford on Avon Bats Special Area of Conservation. The Plan therefore includes a requirement in Policy H3.3. that the potential impact on roosting bats where buildings are suitable for horseshoe access is recognised.”**

Section 2: Traffic, Parking and Transport

Policy T.1

A detailed map showing proposed traffic improvements is found on page 28 of the Plan. Measures include the relocation of a footpath, village gateways and junction improvements. This policy seeks to support those changes portrayed on the map and also refers to changes identified in a general plan produced in a traffic workshop.

Most of the measures shown on the plan on page 28 are not development and use of land related, but traffic management related measures. Many are also aspirational in nature preceded by words “consider scope for junction improvements” or refer to possibilities. They may not then be the most appropriate measures or the only ones that would mitigate the impact of traffic on the village. In addition, the policy as worded is unclear as little information is given about the traffic workshop referred to in the policy.

Therefore whilst the intention of the policy is to be welcomed and the measures seem to be based on earlier preparatory work, the contents of this policy are aspirational in nature and should be moved to the relevant tasks section of the Plan. This will also allow further discussion to take place with the relevant authorities to ensure that the measures are appropriate and will help to address WC’s concern that whilst the principle of improving safety and reducing the impact of traffic on the B3107 is supported, some of the measures would not be considered to be appropriate.

For the avoidance of any doubt then the map and accompanying measures on page 28 of the Plan should be clearly labeled “suggested”.

- **Delete Policy T.1, but move the contents of the policy to the Traffic Tasks section of the Plan**

- **Add the word “Suggested” to the title of the map on page 28 of the Plan so that the title reads “Suggested Proposals for traffic improvements”**
- **Consequential amendments to the (existing) Tasks T.1 – T.8 will be needed together with renumbering of the policies and revisions to the supporting text**

Policy T.2

This policy seeks to mitigate traffic impacts associated with any redevelopment of the Tannery site. It is clearly worded and recognises that both the local planning authority and the Highways Agency will need to be involved in any such measures. It meets the basic conditions and no modifications are recommended.

Policy T.3

Heavy Goods Vehicles (HGV) have been highlighted as a particular issue of concern in Holt for the community. As this policy gives support for proposals that re-route HGVs away from the village. This is in line with encouraging such vehicles to use roads where community and environmental impacts will be minimised reflecting CS Core Policy 65 and is in line with the principles of attaining a high standard of environmental and amenity. It meets the basic conditions and no modifications are suggested.

Policy P.1

Off-street parking provision for both commercial and housing development is sought by this policy. The CS standards are cross-referenced and maximum provision sought; if the existing level of off-street parking is reduced it must be replaced nearby and parking should be remain available. It reflects the circumstances found in the village that I experienced first-hand during my visit and the conditions described in the Plan and takes a locally distinctive approach. It meets the basic conditions and no modifications are recommended.

Policy P.2

This policy seeks to ensure that opportunities for enhanced parking outside the village shop are taken. It reflects local circumstances and provided some flexibility is included, it will meet the basic conditions.

- Add the words *“take every opportunity available to”* after *“...the Tannery should...”*

Policy OT.1

Policy OT.1 seeks to encourage cycling routes and greater connectivity. Its current wording would support any proposal that achieves safe cycling routes and contributes to the provision of links to other communities and the National Cycling Network. Community Infrastructure Levy (CIL) and the possibility of using this for this purpose is also referred to. The sentiment behind the policy is supported by national policy and guidance, policies in the CS and will help to achieve sustainable development. However, the wording of the policy will potentially lead to difficulty and unintended consequences and for these reasons I recommend some changes to it in the interests of clarity and precision.

- **Reword Policy OT.1 to read: *“All new development proposals should take every available opportunity to provide and enhance safe cycling routes within the village. Where appropriate developments will also be expected to make contributions towards the provision of cycle and pedestrian links to other villages and communities and the National Cycling Network.”***

Section 3: Commercial and Economic Development

Policy CE.1

The basic premise of the policy aligns with the NPPF’s core planning principle to drive and support sustainable economic development and one of the CS’s strategic objectives is to deliver a thriving economy. The CS identifies the reduction of out-commuting as perhaps the most important strategic challenge and the improvement of self-containment to ensure that a range of employment opportunities are available.

The Midlands is a light industrial estate which the Plan indicates has some twenty units housing about ten businesses. This policy seeks to encourage Class B1 uses on the site subject to two criteria. The first is such uses offer opportunities for more manufacturing based industries which offer employment to a wide range of people and the second seeks to ensure there is an acceptable relationship with residential neighbours. Class B1 uses by definition are those appropriate to residential areas. Manufacturing based businesses may well fall outside Class B1. As a result this policy is a little confused. To add clarity and precision the following modification is recommended:

- **Reword Policy CE.1 to read as follows: *“New Class B1 uses on the Midlands Light Industrial Site shown on Plan XXXX will be supported. New employment***

opportunities including manufacturing and warehousing will be particularly encouraged provided they do not harm residential amenity with particular regard to traffic generation, noise, odour, refuse and litter and hours of operation.”

Policy CE.2

This policy refers to the Tannery site, reiterating the 50:50 residential and commercial use sought on the site found in Policy H1.1 and indicating a range of preferred uses which include creative/studio space, retail, offices and light industrial. To ensure the Plan is internally consistent, the following modifications are recommended in line with those discussed in Policy H1.1.

As previously mentioned in relation to Policy H1.1, the HRA Screening Report indicated that the redevelopment of this site has the potential to impact on bats linked to the Bath and Bradford on Avon SAC and recommended that wording be added to this particular policy to require a bat survey to be undertaken. To ensure that the policy meets EU obligations I therefore bring forward those recommendations although I have altered their wording in the interests of brevity and providing a practical framework.

- **Delete the words “provided it reflects the wishes of the village and” from the first sentence of the policy**
- **Reword criterion a) to read; *“the site will be a mixed use development comprising both housing and commercial uses; and”***
- **Add a new criterion c) to the policy that reads: *“a bat survey should be undertaken and any appropriate mitigation measures be provided as necessary, having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation.”***
- **Add new supporting text to read: *“The redevelopment of the Tannery site has the potential to impact on bats linked to the Bath and Bradford on Avon Bats Special Area of Conservation. Existing buildings within the Tannery site could become occupied by roosting bats and a bat survey carried out at the site by Engain in 2014 recorded Greater and Lesser Horseshoe bats foraging and commuting through the site. It is therefore important that any redevelopment of this site recognises the potential impact on bats and that appropriate mitigation is agreed as part of any planning application which will include sensitive layout and design, landscaping and lighting.”***
- **Add the Bat Survey Report by Engain dated 30 October 2014 to the list of “Key supporting evidence” and include a reference to Policy CP 50 Biodiversity and**

geodiversity in the section titled “Relevant policies from the Wiltshire Core Strategy relied upon for this section”, both on page 38 of the Plan

Policy CE.3

Infrastructure including telecommunications, transport links and adequate surface water drainage and sewage is sought to accompany any business development in this policy. There may be certain types of development that do not require any of the named items. However, it is reasonable to seek infrastructure which is required as a result of that development and this policy has sufficient flexibility whilst sending a clear signal. It meets the basic conditions and therefore it is not necessary for me to suggest any modifications.

Policy CE.4

This policy supports the conversion of agricultural buildings for small business use subject to various safeguards. It takes a positive approach to supporting economic growth and therefore the creation of jobs and prosperity in the rural areas taking account of national policy and guidance and CS Core Policy 48. The policy will help to achieve sustainable development.

The HRA Screening Report indicated that this type of development may potentially impact on roosting bats where buildings are suitable for horseshoe access and recommended wording was added to this policy. To ensure that the policy meets EU obligations I therefore bring forward that recommendation although I have altered the wording in the interests of brevity and providing a practical framework.

- **Add a new sentence/paragraph/criterion to Policy CE.4 which reads: “Any planning application for the reuse or redevelopment of buildings will be accompanied by a bat survey and appropriate mitigation provided where necessary having regard to Wiltshire Council’s Habitats Regulations Assessment guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation.”**
- **Add a new paragraph/section to the supporting text that reads: “Disused and underused farm buildings could become occupied by roosting bats linked to the Bath and Bradford on Avon Bats Special Area of Conservation. The Plan therefore includes a requirement in Policy CE.4 that the potential impact on roosting bats where buildings are suitable for horseshoe access is recognised.”**

Section 4: Environment, Energy and Green Spaces

Policy E.1

Policy E.1 applies to all development and seeks new green spaces and play areas, retention or replacement and planting of trees and hedges, cycle and pedestrian routes and green energy. All these issues are clearly of importance to the community and relate to the development and use of land and aim to ensure that a high quality of development results. However, it would be difficult for all types of new development to include new open space for example; a minor householder development would not have the opportunity to do this or be expected to do so. Therefore the policy should include a proviso that the various requirements apply as appropriate and subject to this, it will meet the basic conditions.

- **Add “*where appropriate*” to the end of the first, third and fourth bullet points**

Policy E.2

This policy seeks to ensure that new development has a satisfactory impact on infrastructure and specifically refers to energy and water supply, drainage, waste disposal, transport issues and the school. This will help to ensure that any new development considers these issues and takes appropriate action. For clarity and precision, I suggest the addition of a word to make sure that this policy can be applied practically and has the necessary ‘bite’.

- **Add the word “*satisfactorily*” after “...provided they...” and before “...address their impact...” to Policy E.2**

Policy EN.1

This policy seeks to support renewable energy projects and measures so long as their impact is acceptable on the built environment of the village. This policy has laudable aims and takes account of national policy which recognises that planning has a key role to play in helping to shape places to secure reductions in greenhouse gas emissions and provide resilience to the impacts of climate change.²⁵ However, I feel it would be difficult for anyone wishing to undertake such projects to know how they might comply with this policy. For that reason I suggest a modification that adds clarity and precision to it to enable the policy to meet the basic conditions.

²⁵ NPPF para 17 and section 10

- Add the words “*character or appearance of the*” after “...impact on the...” and before “...built environment...” to Policy EN.1

Policy EN.2

Policy EN.2 supports renewable and low carbon energy generation proposals subject to satisfactory impacts. The policy refers to these impacts also being satisfactorily mitigated and gives a list of example impacts. It reflects national policy and guidance and CS Core Policy 42 which supports the appropriate development of standalone renewable energy development. The wording of the policy needs to be sharper to provide the practical framework for decision making that national policy requires. Subject to this modification the policy will meet the basic conditions.

- **Reword Policy EN.2 to read: “*Proposals for renewable and low carbon energy generation will be supported provided that they have an acceptable visual impact on the immediate locality and the wider area and have an acceptable effect on the living conditions of nearby residents, or that any other harmful impact can be satisfactorily mitigated.*”**

Section 5: Community Amenities

Policy CA.1

This policy seeks to identify and register a number of community buildings, areas and facilities as Assets of Community Value (ACV). The identification and listing of ACVs falls under a separate process and therefore the Plan cannot identify or list ACVs through a policy in the Plan. It can however include a list of potential assets which the Parish Council hopes to list as a community aspiration or task. There is also potential to include a policy that resists the loss of any ACV, but consideration would need to be given as to whether the inclusion of such a policy would necessitate further consultation.

- **Remove Policy CA.1 in its entirety as a planning policy and include it as a separate community aspiration**
- **Consequential amendments to this section will of course be needed**

Appendices

Four appendices are included within the Plan. The first appendix offers an excellent summary of the engagement process and the evolution of the Plan. I commend it as an example of excellent practice. Appendix 2 is an index of relevant documentation and

again is a useful collation of a lot of information in a digestible format. Appendix 3 details the membership of the Steering Group and others involved in the preparation of the Plan whilst Appendix 4 contains the terms of reference for the Plan Steering Group.

9.0 Conclusions and Recommendations

I am satisfied that the Holt Neighbourhood Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore delighted to recommend to Wiltshire Council that, subject to the modifications proposed in this report, the Holt Neighbourhood Plan should proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Holt Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion. I therefore consider that the Plan should proceed to a referendum based on the Holt Neighbourhood Plan area as approved by Wiltshire Council on 22 May 2013.

Ann Skippers MRTPI

Ann Skippers Planning
15 June 2016

Appendix List of Documents

Holt Neighbourhood Plan Final Draft dated July 2015

Basic Conditions Statement

Community Consultation Statement Summary

Holt Neighbourhood Plan Regulation 14 Consultation and Appendices 1 and 2

Index to the Audit Trail for the Holt Neighbourhood Plan Development and Consultation Process version 4/5/2016

Strategic Environmental Assessment – Screening determination for the Holt Neighbourhood Plan dated February 2015

Draft Holt Neighbourhood Plan Habitats Regulation Assessment Screening dated 17 February 2016

Wiltshire Core Strategy adopted 20 January 2015

West Wiltshire District Plan First Alteration June 2004

West Wiltshire Leisure and Recreation Development Plan Document January 2009

Various documents on the Parish Council website:
www.holtparishcouncil.gov.uk/neighbourhoodplan