

**LAVERSTOCK AND FORD COMMUNITIES NEIGHBOURHOOD PLAN
2021 - 2036**

**The Report of the Independent Examiner to Wiltshire Council on the
Laverstock and Ford Communities Neighbourhood Plan**

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2nd July 2022**

Summary

I was appointed by Wiltshire Council, in agreement with Laverstock and Ford Parish Council, in April 2022 to undertake the Independent Examination of the Laverstock and Ford Communities Neighbourhood Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 29th May 2022 after resolving my initial enquiries of the Qualifying Body.

The Neighbourhood Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Laverstock and Ford Neighbourhood Area. There is an evident focus on safeguarding the very distinctive, local character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Wiltshire Core Strategy (adopted January 2015).

Subject to a series of recommended modifications set out in this Report, some of more significance than others, I have concluded that the Laverstock and Ford Communities Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

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Introduction

This report sets out the findings of the Independent Examination of the Laverstock and Ford Communities Neighbourhood Plan 2021 - 2036. The Plan was submitted to Wiltshire Council by Laverstock and Ford Parish Council in its capacity as the 'Qualifying Body' responsible for preparing the Neighbourhood Plan.

Neighbourhood Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in July 2021 and it is against the content of this NPPF that the Plan is examined. The changes between the 2019 and 2021 revisions of the NPPF have not been significant in the examination of Policies in this Plan.

This report assesses whether the Laverstock and Ford Communities Neighbourhood Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Laverstock and Ford Communities Neighbourhood Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Laverstock and Ford Communities Neighbourhood Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner

The Examiner's role is to ensure that any submitted Neighbourhood Plan meets the legislative and procedural requirements. I was appointed by Wiltshire Council, in agreement with Laverstock and Ford Parish Council, to conduct the Examination of the Laverstock and Ford Communities Neighbourhood Plan and to report my findings. I am independent of both Wiltshire Council and the Parish Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector Body as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Laverstock and Ford Communities Neighbourhood Plan is submitted to a referendum; or
- the Laverstock and Ford Communities Neighbourhood Plan should proceed to referendum as modified (based on my recommendations); or
- the Laverstock and Ford Communities Neighbourhood Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by Qualifying Body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this Examination I have considered the following documents:

- Laverstock and Ford Communities Neighbourhood Plan 2021 - 2036 as submitted
- Laverstock and Ford Communities Neighbourhood Plan Basic Conditions Statement (undated)
- Laverstock and Ford Communities Neighbourhood Plan Consultation Statement (undated)
- Strategic Environmental Assessment: Screening determination for the Draft Laverstock and Ford Communities Neighbourhood Plan (November 2021)
- Laverstock and Ford Communities Draft Neighbourhood Plan Habitats Regulations Assessment (August 2021)
- Content at: https://consult.Wiltshire.gov.uk/portal/spatial_planning/np/laverstock__ford_communities__neighbourhood_plan/laverstock__ford_communities_neighbourhood_plan_2021-2036_regulation_16?tab=info
- Content at: <https://www.lfcnp.co.uk/>
- Representations made to the Regulation 16 public consultation on the Laverstock and Ford Communities Neighbourhood Plan
- The Wiltshire Core Strategy (WCS) adopted in January 2015
- Wiltshire Housing Site Allocations Plan (WHSAP), adopted 25 February 2020.
- Appeal Ref: APP/Y3940/W/17/3190561 Old Sarum Airfield, Lancaster Road, Old Sarum, Salisbury, Wiltshire
- The Wiltshire Local Plan Review
- National Planning Policy Framework (NPPF) (2021)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 29th May 2022. I looked at all the various sites and locations identified in the Plan document in their rural setting. This visit gave rise to some further queries that I raised with the Qualifying Body.

The legislation establishes that, as a general rule, Neighbourhood Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Laverstock and Ford Communities Neighbourhood Plan could be examined without the need for a public hearing and I advised Wiltshire Council accordingly. The Qualifying Body and the Local Planning Authority have helpfully responded to my enquiries so that I may have a thorough understanding of the facts

and thinking behind the Plan, and the correspondence is being shown on Wiltshire Council's Neighbourhood Planning website for the Laverstock and Ford Communities Neighbourhood Plan.

Laverstock and Ford Neighbourhood Area

A map showing the boundary of the Laverstock and Ford Communities Neighbourhood Area has been provided within the Neighbourhood Plan. Further to an application made by Laverstock and Ford Communities Parish Council, Wiltshire Council approved the designation of the Neighbourhood Area on 7th December 2017. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

Consultation

In accordance with the Neighbourhood Planning (General) Regulations 2012, the Qualifying Body has prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

"A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Plan [or Order]." (Reference ID: 41-047-20140306)

The submitted Consultation Statement confirms that as long ago as November 2017 a Steering Group was formed comprising local residents and Parish Councillors and that subsequently met on a frequent basis. Between February 2018 and January 2019, a series of short talks/discussions were led by steering group members at more than a dozen events/meetings within the Parish where attendees were encouraged to give their views on, amongst other things, 'what would make the parish a better/ worse place to live'. Between September 2019 and January 2020 a more quantitative approach was taken with a series of surveys undertaken among the various community groups: residents, businesses, landowners and school students; an impressive 700+ responses were received.

The community was kept informed of progress via a website specifically for the Parish Neighbourhood Plan, containing latest news, survey results, etc. Regular updates were also provided in the bi-monthly Parish newsletter, including summaries of the results of the surveys.

The Regulation 14 minimum six-week consultation period (in this instance longer) on the Pre-Submission Laverstock and Ford Communities Neighbourhood Plan initially ran from 8th May to 2nd July 2021, extended to allow for the late receipt of responses from Wiltshire Council and Salisbury City Council. The pre-submission Draft Neighbourhood Plan was published on the Parish Neighbourhood Plan website at the start of the consultation period and hardcopies were available on request. The on-line availability of the Plan and the opportunity to comment was publicised via:

- features in the Parish Newsletter, delivered to over 4,000 local residents and businesses
- posters around the Parish
- the Neighbourhood Plan website and the Parish Council website
- posts to local Facebook groups.

Individuals, groups and organisations were invited to comment on the pre-submission version of the Plan by:

- using the comments form on Neighbourhood Plan website
- sending written comments by post
- attending either of two Q&A sessions on Zoom (which replaced public meetings and drop-in sessions due to the impact of Covid restrictions).

In addition to the general publicity given to public consultation, contact was made with:

- statutory bodies
- local businesses
- other local organisations
- local landowners.

29 comments were received as a result of the Regulation 14 Consultation and an analysis of these, together with the response and any follow-up action proposed by the Steering Group and endorsed by the Parish Council, has been included as an Appendix within the Consultation Statement.

Accordingly, overall, I am satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I will later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Body have already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

Representations Received

Consultation on the submitted Plan, in accordance with Neighbourhood Planning Regulation 16, was undertaken by Wiltshire Council from Monday 21st February 2022 to Monday 11th April 2022. The consultation was of 7 weeks' duration to enable the public sufficient time to view and respond to the documents. I have been passed the representations – 11 in total – which were generated by the consultation and which are included along with the submitted Plan on Wiltshire Council's Neighbourhood Planning website. I have not mentioned every representation individually within this Report but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not be relevant to ensuring that the Basic Conditions are met.

The Neighbourhood Plan

Laverstock and Ford Parish Council is to be congratulated on their extensive efforts to produce a Neighbourhood Plan for their area that will guide development activity over the period to 2036. I can see that a sustained effort has been put into developing a Plan around a vision that by 2036:

“Our Parish will continue to be an outstanding place in which to live, work and study. Any future development will protect and enhance, for the enjoyment of all, its semi-rural character, landscape, connected green spaces and access to the countryside. and, as a consequence, improved the health and wellbeing of those who live in or visit the Laverstock and Ford Communities Neighbourhood Plan Area.”

The Plan document is well presented with a combination of text, maps and policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a manageable length by not overextending the potential subject matter and the coverage of that.

It is an expectation of Neighbourhood Plans that they should address the issues that are identified through community consultation, set within the context of higher-level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community's intent is sustained in an appropriately modified wording for the policy. It is evident that the community has made positive use of "direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area" (Planning Practice Guidance Reference ID: 41-001-20140306).

Individually, I can see that the Policies address legitimate matters for a Neighbourhood Plan as identified with the community. I will later look at the Policies in turn so as to ensure that the Basic Conditions are met, which include an obligation to be in general conformity with Core Strategy strategic policies. Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to amendment to variable degrees, proportionate and sustainable. The Plan sets out the community's priorities whilst seeking to identify and safeguard Laverstock and Ford's distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency, with input as required and support from the Wiltshire Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. This is not uncommon in a community-prepared planning document and something that can readily be addressed in most instances. Accordingly, I have been obliged to recommend modifications so as to ensure both clarity and meeting of the 'Basic Conditions'. In particular, Plan policies as submitted may not meet the obligation to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (NPPF para 16). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the 'Basic Conditions'.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Plan meets the "Basic Conditions", as set out in law following the Localism Act 2011; in December 2018 a fifth Basic Condition was added relating to the Conservation of Habitats and Species Regulations 2017. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the Plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

The submitted Basic Conditions Statement has very helpfully set out to address the issues in relation to these requirements in the same order as above and has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the local strategic policies are set out in the Wiltshire Core Strategy adopted in 2015. From the

accompanying Strategic Environmental Assessment and Habitats Regulations Assessment, I am satisfied that the making of the Plan will not breach the Basic Condition relating to the Habitats and Species Regulations 2017.

I have examined and will below consider the Neighbourhood Plan against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

The Plan in Detail

I will address the aspects of the Area Neighbourhood Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

Front cover

A Neighbourhood Plan must specify the period during which it is to have effect. I note that there is a prominent reference to the Plan period 2021 – 2036 on the front cover. The references to “Submission Plan” can now be removed.

Contents

The content listing will need to be reviewed in the light of my Recommendations below.

1 Introduction

No comment.

2 Background

No comment.

Recommendation 1:

1.1 On the front cover, and in any other locations, remove references to “Submission Plan”.

1.2 Under the heading “Contents” review the content for accuracy in the light of my Recommendations below.

3 The Neighbourhood Plan area

Figure 1

Although it is undeclared in a key, this Figure shows the boundary of the Neighbourhood Area, about which it is important that there should be clarity. The map title indicates that the map also shows “Green Corridors”; these appear to comprise all the areas between settlements. The Qualifying Body made a commitment to improving the referencing of the green corridors, in like fashion to the identification of settlements. Near the bottom of page 5 it is stated “(More detail on local heritage assets is available in the Supporting Evidence section of the Neighbourhood Plan Documents webpage)”; I believe this to be the, impressively comprehensive, collection headed “Wiltshire and Swindon Historic Environment Record (HER) Documents for L&F Parish”, which actually sits separately from the “Supporting Evidence” section on the “Documents” webpage.

Recommendation 2:

2.1 In the opening sentence replace “conurbation” with ‘urban area’ and in the second bullet point replace “much larger” with ‘larger’.

2.2 Within Figure 1:

2.2.1 Add a key to identify the ‘Neighbourhood Area’ boundary.

2.2.2 Add a referencing scheme for the green corridors in like manner to that used for the settlements.

2.3 Correct the source reference for the detail on local heritage assets near the bottom of page 5.

4 Developing our Neighbourhood Plan: Approach

In their response to Wiltshire's representation, the Qualifying Body noted: "The team was advised by Wiltshire Council officers to base our Plan on the current WCS rather than consider what might or might not be in the Emerging Local Plan". Section 4 however seems pre-occupied with the implications of the Local Plan Review and content, including an Appendix that is arguably of little relevance to the content of the Plan under Examination. The Qualifying Body explained: "We were very aware that basing our plan on the Core Strategy risked it becoming out of date very quickly and tried to engage with WC to understand their thinking on any changes to the Core Policies. Appendix 1 was part of this, ... but little progress was made." Whilst Appendix 1 was doubtless informative as part of the completed public consultation, it does not contribute to the Plan content and it will quickly date; I conclude that it is best omitted.

Recommendation 3:

Delete Appendix 1 (I will later consider the totality of the Appendices) and delete the reference to it within Section 4, paragraph 3: "Our input to the consultation was formalised in a paper covering suggested guidelines acknowledged by Wiltshire Council on June 2020 and reproduced in Appendix 1".

5 Developing our Neighbourhood Plan: Community Engagement

No comment.

6 Developing our Neighbourhood Plan: Vision, Aim and Objectives

I have noted this section as a context for the Plan and as a product from community consultation.

7 Developing our Neighbourhood Plan: the Planning Context

7.1 Recent developments in the Parish

I expressed a concern that the content of this Section suggested negativity, perhaps, rather than the expected "positive vision for the future" (NPPF para 15). The Qualifying Body responded: "The comment in this section highlights the dramatic impact of largely strategically allocated development within the parish on many aspects of the parish. This may be seen as negativity but it is, in our view, an objective assessment of the current situation. The Emerging Local Plan proposes a further strategic allocation within the parish ... We believe that these contextual issues need to be fully addressed in the detailed planning of this proposed further development." However, the Neighbourhood Plan is not allocating the proposed new site – although it could have done if that had been identified as a preferred route, but for understandable reasons it was not. Appendix 1 had already provided a context for the Emerging Local Plan. Section 7 ought to be providing a context for the policy content that follows. However, views are clearly strongly held and therefore, on balance, I am only proposing the removal of the most obviously misdirected content – the "recommendation" for Local Plan content.

7.2 Planning Context to 2036

To remove unhelpful repetition of content the Qualifying Body has suggested that the second paragraph of the opening section should be removed.

7.2.1 Assessment of Local Housing Need

This sub-section appears exclusively to address affordable housing, unlike the title. It also primarily addresses the current position rather than explicitly addressing any forecast to 2036. Accordingly, I suggest that the content would be more appropriate under the heading “7.1 Recent developments in the Parish” where it could provide some positive balance.

To acknowledge that sustainable development has an economic aspect too, I suggest that the deleted 7.2.1 sub-section is replaced with a brief review of employment matters for which wording has been provided by the Qualifying Body.

7.2.2 Wiltshire Council Housing and Employment Land Delivery Strategy

Wiltshire Council has acknowledged that there is no outstanding housing requirement to 2026: “The WHSAP [Wiltshire Housing Site Allocations Plan] does not propose any allocations within the Parish”. When a Neighbourhood Plan is being prepared in advance of a Local Plan Review – which is to cover the period to 2036 – the Planning Guidance (Paragraph: 009 Reference ID: 41-009-20190509) says: “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development” “The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.” In other words, the Local Plan can trump the Neighbourhood Plan if there are unresolved differences.

In this context sub-section 7.2.2 is pre-occupied with presenting a critique of the how part of the Local Plan Review housing requirement may be met within the Neighbourhood Area but it says nothing about what is actually in the Neighbourhood Plan. For the purposes of the latter, it would be sufficient to say that the Parish Council has noted the probability that the current Local Plan Review will allocate additional housing land within the Neighbourhood Area but it doesn't support that approach. The detail is available for those interested at the website reference provided.

Wiltshire Council has encouraged (“it might be opportune”) the identification of a site for affordable housing, including shared ownership. The Qualifying Body has responded: “This proposal was made by WC as a means to protect the Neighbourhood Plan from being made out of date by a shortfall in their housing land supply below the required 5 years (it is around 4.72 years currently – WC Briefing Note to Councillors dated 5 Apr 2022 refers). Since this would have meant a considerable delay in progressing the plan we decided it was better to proceed ‘as is’, since the plan is likely to require updating on publication of the Local Plan” The Qualifying Body is aware that the present supporting material for the Local Plan Review (Site Selection Report for Salisbury (January 2021)) suggests the allocation of a housing site to the north of the Neighbourhood Area. However, since the Neighbourhood Plan is not obliged to contain policies addressing housing supply, a proposed future review of the Neighbourhood Plan would be an acceptable way to proceed.

7.2.3 Development Constraints

I commented to the Qualifying Body that my initial impression was that all/the vast majority of the factors listed at 7.2.3 are considered/noted within the Landscape Sensitivity Assessment

that has been undertaken in conjunction with the preparation of the Neighbourhood Plan. A listing headed as “Constraints” may divert from or even be seen to undermine the better focussed Landscape Assessment. The Qualifying Body responded that “We would prefer to retain 7.2.3 as a separate section rather than subsume it within the following section on landscape sensitivity, as it contains elements which do not relate to landscape. However, on reflection, as landscape sensitivity is a potential development issue, we would propose including it as a bullet point in 7.2.3, for more detailed exposition in the following section.” They also suggested that “constraints” be replaced with ‘issues’. My recommendations respond to these suggestions.

7.2.4 Landscape Sensitivity

I consider this to be a well-chosen piece of Plan evidence that, as the response to a representation illustrates, can withstand challenge. I agree with the Qualifying Body that having the whole document (including the Summary) to accompany the Plan could be beneficial, avoiding the Summary being misrepresented.

Recommendation 4:

4.1 Under the heading “7.1 Recent developments in the Parish” correct “Salisbury Housing Market Area” to ‘Salisbury urban area’.

4.2 Under the sub-heading “7.1.3 Limited and/or delayed provision of local amenities and infrastructure” delete the second paragraph beginning “Policy S2 from the Salisbury Local Plan 2011”.

4.3 Under the heading “7.2 Planning Context to 2036” delete the second paragraph commencing: “Of these considerations ...”.

4.4 Remove the content of the sub-section “7.2.1 Assessment of Local Housing Need” and place it between sub-sections 7.1 and 7.1.1 (and renumber the subsequent paragraphs accordingly); amend the last sentence to read: “Accordingly there is currently no requirement to plan further housing developments in order to meet local needs for Affordable Housing”; remove the related bullet point in sub-section 7.2.

4.5 Replace the heading for sub-section 7.2.1 with ‘Employment’ and add the following content provided by the Qualifying Body: ‘Our survey of businesses in the Parish indicated limited need for new commercial premises for their future plans. Where a potential need was identified the clear preference was for pre-constructed premises available for purchase or rent. The Parish Council supported a change of use of the employment land designated as part of the Longhedge development to mixed development (with a requirement to build out the commercial area without pre-agreed sales), resulting in 29 industrial units and 65 additional dwellings currently being constructed. A similar approach could be taken in Old Sarum where land allocated for employment may require an agreement to allow housing on part, on condition that commercial premises are built for sale or lease.’ Add a related bullet point in sub-section 7.2.

4.6 Reduce sub-section 7.2.2 to a simplified expression of its core concern: ‘In January 2021, Wiltshire Council published draft proposals for its emerging Local Plan (which is the Core Strategy refresh) ². This Plan includes a continuation of the existing strategy for the Salisbury Housing Market Area, with a slightly reduced housing requirement of 5,240 homes for Salisbury (excluding Wilton) for the plan period (2016-2036). Allowing for houses already completed or in the pipeline, this leaves a requirement of 940 homes to be accommodated on other sites. To meet their housing target Wiltshire Council have identified three sites within or adjacent to the Salisbury settlement boundary for strategic development, one of which (Land to the North East of Old Sarum – Wiltshire Council Local Plan Review Site

Selection Report January 2021^[add source reference] is in our Parish. On this site, a development of 275 homes is proposed. The problematic nature of this site for large scale development was highlighted by the Parish Council in its response to the draft Local Plan consultation, submitted on 12th February 2021^[add source reference]. Since Figure 2 is removed, renumber subsequent Figures accordingly.

4.7 Alter the heading of sub-section 7.2.3 to 'Development Issues' and replace "constraints" with 'issues' in its first sentence. Add a bullet point 'Landscape sensitivity – see below'.

4.8 Within sub-section 7.2.4, replace the last but one sentence beginning "An executive summary ..." with 'The Report is attached as Appendix 1'; I will comment later on the Appendices and their numbering.

8 Our Neighbourhood Plan: Basis of the Policies

8.1 Issues to be Addressed

To reduce duplication of (varying) statements of "issues" the Qualifying Body agreed that Section 8.1 should be deleted. A related amendment will then refer back to the issues set out in Section 7.

8.2 Assumptions

It is unclear to me why it is felt that being explicit about the assumptions made regarding future strategic planning can "ensure that our plan does not go out of date when [the] new Local Plan is published". As assumptions they may be proved wrong by the reality of the adopted Local Plan policies. Where assumptions are proved to be wrong, the best that may be hoped for is that they provide the bases for a subsequent review of the Neighbourhood Plan. The Qualifying Body responded that "We agree that the final sentence could be better phrased to convey our intended meaning."

I note that Wiltshire Council has indicated that it would be wrong to assume that the Local Plan will define infill as "normally large enough for not more than two dwellings". The character of individual spaces within the settlement, in conjunction with the Design Guide, may be a more relevant consideration than an (apparently) arbitrary dwelling number. The Qualifying Body noted: "Having reviewed CP2 again we note there is definition of infill contained within it ie 'For the purpose of Core Policy 2, infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling'. We therefore suggest amending the assumption to reflect the above definition. All other references to 'infill' in the plan would also require to be amended to reflect this, including the Glossary of Terms." My recommendation therefore follows this approach.

The Qualifying Body has suggested amended wording for Assumption 4 upon which my recommendation is based.

Recommendation 5:

Under the heading "8 Our Neighbourhood Plan: Basis of the Policies":

5.1 Replace the last bullet point in the opening section with: 'achieve our objectives and address the issues set out in Section 7, whilst taking full account of the planning context provided by the national and local planning policy frameworks.'

5.2 Delete Section 8.1 and renumber subsequent sections accordingly.

5.3 Under Section 8.2:

5.3.1 Within "Assumption 1" replace "normally large enough for not more than two dwellings" with 'only large enough for not more than a few dwellings, generally only

one dwelling' (and use this description for infill elsewhere in the Plan including the Glossary).

5.3.2 Amend the wording of Assumption 4 to: "No strategic development will be allocated / permitted which is not adjacent to the Salisbury Settlement Boundary other than in cases covered by the "exception policies" listed in paragraph 4.25 of the Core Strategy.'

5.3.3 Delete the last sentence.

9 Our Neighbourhood Plan: Policies

Policy 1: Protection of the distinctive settlement pattern of the parish

I note that this Policy is seeking to prevent the coalescence of settlements within the Parish and to provide a local expression of WCS Core Policy (CP) 51, Landscape (which is also consistent with the draft Place-shaping Priority IV 'Separation and Distinctiveness' in the Local Plan Review). I note that the green areas shown on the map are appropriately indicative of, rather than definitive boundaries for, their respective 'buffer'. It would appear that some buffers are more natural than others – the river flood plain (GB2) being the most obvious natural example. I looked at the buffers during my visit to the area. I also noted that Wiltshire Council has commented: "Whilst it is generally reasonable to identify local separation buffers, Wiltshire Council has [further] considerations". Looking at those considerations in turn:

"The supporting text appears to suggest that new buildings should not be constructed at all in these [buffer] areas": there seems here to be an issue about how the phrase "new buildings which, individually or cumulatively, would lead to this coalescence" might be construed. The Qualifying Body responded: "What we have in mind is that building to extend or replace an existing house or to replace or add to farm buildings or add infill where appropriate should not be unduly impeded but completely new, disconnected building plots or larger development sites should not be allowed." However, I don't feel that this distinction is clearly related to either coalescence or separation. I note that the Council's housing site assessments use the phrase 'loss of or reduction in separation' and, as 'separated' is to what Policy 1 refers, the descriptive text should not confuse.

"GB1 could be deemed a little too extensive": I noted that only a small part of Buffer 1 adjoins the settlement of Salisbury and even that could be said to be unnecessary as Wiltshire Council has accepted that separation land in this vicinity "constitutes part of the landscape setting for both the Old Sarum scheduled monument and Old Sarum Airfield Conservation Area to the immediate north-east". However, a more limited GB1 would be consistent with the Council's stated policy of protection.

"GB4 is subtly different in that it separates two parts of Salisbury rather than two distinct settlements": the issue here appears to be that Hampton Park/Riverdown Park and part of Bishopdown Farm are identified on Figure 2 as within the continuous Salisbury Settlement Boundary. Whilst a form of separation therefore seems to be intrinsic to the way that the boundary has been drawn it does not fit with the approach of Policy 1 which addresses "distinct" settlements, but then it is not included within Policy 1, only within the supporting text. Accordingly, GB4 would be better noted on Figure 4 as "Country Park" rather than GB4 since the latter implies some commonality with the other GB areas. I will later address the issue of designating the Country Park as a Local Green Space.

"GB5 should meanwhile be deleted since the area in question is already covered by Core Policy 25 - Area C, Old Sarum Airfield – the review of which will be considered through the LPR": this appears to be an issue of Policy primacy. Wiltshire Council Core Strategy is defined as a "strategic planning policy for Wiltshire". I note that GB5 is actually referenced

within Policy 2 in the Neighbourhood Plan not Policy 1. However, the question to be resolved is whether the designation of GB5 and Policy 2 are “in general conformity with the strategic policies” (NPPF Basic Condition). I note that the indicative boundary for GB5 includes areas that are annotated on Figure 5.16 in the Core Strategy as having potential for development and these could, depending on the nature of development, result in some loss of separation. That is not to say that is the intention of the Policy but there is a clear clash of policies and no evidence is presented in the Neighbourhood Plan as to how “general conformity” is being achieved. In relation to Policy 2 it is stated “It is hoped that any revision to Wiltshire Council’s Core Policy 25 reflects the objective of Core Policy 2 and resolves any potential conflict between them”, which seems to turn the Basic Condition requirement on its head and expect the new Local Plan to be in general conformity with the Neighbourhood Plan.

The Qualifying Body has drawn attention to a Planning Inspector’s Report (Appeal Ref: APP/Y3940/W/17/3190561) regarding the proposed development of parcels of land within the Airfield Conservation Area. The Qualifying Body call this in defence of a broad (whilst indicative) GB5, but my reading of the Report is that it does not rule out development entirely. Stating the principle of separation to the north and west of Ford would not offend against general conformity with strategic policies but defining even an indicative area that conflicts with a policy map within the Core Strategy cannot be said to be in general conformity. Accordingly, I conclude that GB5 should be narrowed to reflect the green airstrip alone, which is part of the Conservation Area.

I agree with the Qualifying Body, in relation to a challenge within the representations, that “discrete” is an appropriate word in context within the Policy. However, the use of “existing” before each reference to a Green Buffer seems superfluous and may be thought to imply that an existing designation is being reconfirmed. I note that, for clarity, the Qualifying Body has suggested a revision to the wording of Policy 1 supporting text.

Recommendation 6:

6.1 Within Policy 1:

6.1.1 Delete “existing” from each Policy element.

6.1.2 In element c of the Policy replace “by the provisions of Policy 2 below” with ‘Green Buffer 4’ (see also Figure 4 recommendations below regarding numbering).

6.2 Within the supporting text:

6.2.1 Replace “In these Green Buffers, new buildings should not be constructed which, individually or cumulatively, would lead to this coalescence” with ‘It is the purpose of these Buffers to assure the retention of an open separation between individual settlements’.

6.2.2 Replace “which this Plan defines as the filling of a small gap within the developed area of the villages with a maximum of two dwellings” with ‘which is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling’.

6.2.3 Replace the final paragraph with: ‘It is important to note the implications of existing Wiltshire Council Core Policy 2 for Bishopdown Farm/Hampton Park/Riverdown Park and Old Sarum/Longhedge which are situated within the Salisbury Settlement Boundary. Core Policy 2 makes a presumption in favour of sustainable development within the Salisbury Settlement Boundary. Development outside this Boundary is not permitted other than in defined exceptional circumstances. Strategic allocations within Wiltshire Council’s future Local Plans could, however, extend this Boundary by identifying development sites adjacent to it.

Castle Hill Country Park lies adjacent to but outside this Boundary around Hampton Park/Riverdown Park and part of Bishopdown Farm and is protected by its community ownership and designation as a Local Green Space in Policy 4. Consequently, development beyond the Country Park would not be permitted, other than in the defined exceptional circumstances in the Core Strategy.'

6.3 Within Figure 4:

6.3.1 Add boundaries for the Neighbourhood Area and the Salisbury Urban Area (including related entries in the key); ensure that no indicative Green Buffer encroaches outside of the Neighbourhood Area.

6.3.2 Reduce Green Buffer 1 to the area below the Ford Road (shown on the OS map as "Roman Road").

6.3.3 Replace the legend "Green Buffer 4" with 'Country Park'.

6.3.4 Narrow Green Buffer 5 to the width of the airfield landing/take off area (i.e. to exclude the areas annotated "potential areas for development" on map 5.16 attached to Core Strategy Core Policy CP25) and renumber it as Green Buffer 4.

6.3.5 Amend the title to exclude reference to Policy 2.

As amended Policy 1 meets the Basic Conditions.

Policy 2: Old Sarum Airfield Conservation Area

I note that the Qualifying Body has started: "The NP team were advised by WC during the preparation of the Plan that this policy could be included if it added something over and above CP25 which it does." However, it is not clear that Policy 2 says anything "over and above" as distinct from differently. And the differences are not explained or justified with evidence in the supporting text. In addition, as noted above, there would appear to be a breach of "general conformity" with the reference to GB5. I note that the Basic Conditions Statement says: "Policy 2 is consistent with and supplements CP25 (and with the Planning Inspectorate's decision in July 2019 on proposed housing development on the Airfield) and with CP58, in its emphasis on the need for an approved Management Plan". But alerting the local authority to an obligation sits outside the requirement for Neighbourhood Plans that "the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004". Other (unexplained) differences of wording and sequencing between the two Policies are likely to give rise to confusion, thus not ensuring "it is evident how a decision maker should react to development proposals" (NPPF paragraph 16). The Qualifying Body has commented that "we feel it would be useful to signal the PC's views in the NP", but "views" are not the basis for planning policies. For these reasons I must conclude that Policy 2 should be deleted as the Basic Conditions are not met.

Recommendation 7:

Delete Policy 2 and its supporting text; renumber subsequent Policies accordingly.

Policy 3: Protection and enhancement of the distinctive landscape character, wildlife habitats and heritage assets

Section 15 of the NPPF assures protection and enhancement of the natural environment. It is therefore appropriate that Policy 3 should apply that principle to the Neighbourhood Area. The Qualifying Body has acknowledged that some rewording of elements of this Policy are required. The Policy wording seems to make a presumption that every development proposal at whatever scale:

- will have an impact on the landscape – but that is not necessarily true of infill developments,
- will have an ecological impact – but that is probably not the case with a building change of use,
- and will have an impact on a heritage asset – but that will not always be the case.

Accordingly, something along the lines of ‘where appropriate to the scale and location of the development’ is required to maintain the scale of obligations in line with the NPPF.

In element c, the granting or withholding of a planning permission cannot be held dependent on non-site-specific recommendations in the Landscape Sensitivity Assessment. Since this document helps to define areas where a Landscape and Visual Appraisal will be appropriate, element b may also be regarded, in large part, as duplication.

I note the comment in a representation that the Policy should contain all the wording upon which it will rely, but it is legitimate for the Policy to refer to further supporting, specialist documents, although these should be named so that their significance can readily be appreciated.

I note that the “green corridors” referenced within the Policy have not been defined specifically for the Neighbourhood Plan and at the indicative scale they are identified, “encroachment” would be very hard to establish. The references to local features are however helpful.

As an emerging Policy area, I agree with the local authority that a reference in the supporting text to the need to reference Wiltshire Policy as it is developed would avoid unhelpful overlap with strategic level Policy.

Recommendation 8:

8.1 Within Policy 3 – now renumbered as Policy 2:

8.1.1 Add an introductory sentence as follows: ‘Development proposals shall, appropriately to their scale and location.’; amend the opening wording of subsequent Policy elements to follow on accordingly.

8.1.2 From element a delete “but is expected to enhance”.

8.1.3 Merge elements b & c as follows: ‘have regard to the Landscape Sensitivity Assessment (2020) (see Appendix 1) and in High and Medium/High sensitivity landscapes, as identified in the Assessment, and in other locations where the scale of impact requires, be accompanied by a Landscape and Visual Impact Appraisal.’

8.1.4 In element d (now renumbered element c), reword the second bullet point as: ‘avoid significant encroachment into the green areas on either side of the River Bourne, along Ford Down/Cockey Down/Laverstock Down and around Ford, including the Bat corridor along Green Lane’.

8.1.5 Reword the opening of element e (now renumbered element d) as follows: ‘where heritage assets are impacted (including but not restricted to any sub-surface archaeological remains), provide a heritage statement that should include.’.

8.2 Within the supporting text to the now renumbered Policy 2, add:

‘The heritage statement should, as a minimum, set out the findings from consulting Wiltshire Council’s [Historic Environment Record](#). The level of detail in a heritage statement should be proportionate to the assets’ importance and sufficient to understand the potential impact of the proposal on their significance’, and

'As part of the Wiltshire Local Plan Review a Consultation Paper was prepared on "Addressing climate change and biodiversity net gain" the content of and responses to which will inform policies in the draft Local Plan: [see here for fuller details.](#)'

As amended Policy 2 – renumbered from Policy 3 - meets the Basic Conditions.

Policy 4 Designated Local Green Spaces

The supporting text to Policy 4 appears to confuse the value of green infrastructure in general with the specific requirements for the designation of Local Green Spaces as set down in the NPPF (paragraphs 101 – 103). It is also unclear where the interpretation of NPPF Policy provided in Appendix 10 has come from. Appendix 10 is incorrect in stating that LGS is a designation by the local planning authority – Neighbourhood Plans are perhaps the primary source of designations – and incorrect in implying that the boundaries to the designated area should be sourced elsewhere; the Neighbourhood Plan defines the area to be designated and the plans must be drawn accordingly. Direct attention to each criterion as well as the expectations referenced in the Planning Guidance is required. Further, a NPPF criterion states that designation requires a space to be “demonstrably special to a local community *and* [my emphasis] holds a *particular* [my emphasis] local significance” rather than the truncated version shown in the Appendix. Whilst it is evidenced that many of the NPPF criteria are met, this latter requirement must also be met. Other broader designations, for instance as local green infrastructure, may be more appropriate for many green spaces.

From my visit to each site my assessments, based on the NPPF criteria, are:

Castle Hill Country Park: In NPPF criterion terms this space might easily be regarded as “an extensive tract of land”. The explanatory text does not address this aspect of the NPPF criteria. Planning Guidance says: “blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name” (Paragraph: 015 Reference ID: 37-015-20140306). However, from my visit, it is evident that the Country Park is not “open countryside” but a managed space for the local community which has been scaled proportionately to the new developments which are adjacent or nearby. The open space has been created as part of a sustainable development and is now owned by the Parish Council. Whilst the space is variable in character, since the whole has been planned and is managed together, I accept that it is appropriate to designate the whole as a Local Green Space.

Old Sarum Community Green Spaces (three areas): From the map alone these spaces, or some of them, might be regarded as incidental green spaces, breaking up the developed areas, rather than being of a “particular” local significance. However, from my visit it is evident that the spaces are well planned, host a range of community activities and are well used by residents. Accordingly, the Local Green Space designation is appropriate.

Hampton Park Green: From the description and from the evidence of my visit, this area would appear to function as a traditional village green and therefore the NPPF criteria are met.

Longhedge Village Community Green Space: Although this is a new green space and may not have yet established its full significance, the fact that it is adjacent to and planned as part of a new community as well as providing access to the Monarch’s Way is a reasonable basis for establishing that it is “demonstrably special to a local community and holds a particular local significance”.

Ford Green on Manor Farm Road: The Ministry of Defence (MoD), as owners, objected to this designation, noting that there is no public right of access and questioning whether the

space is of any “particular” local significance. However, it is important to note that “designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.” (Planning Policy Guidance Paragraph: 017 Reference ID: 37-017-20140306). Planning Guidance also says that “If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space” (Paragraph: 011 Reference ID: 37-011-20140306). I note that the space is already a designated Asset of Community Value but, since this is a renewable designation, I don’t believe it is of relevance here. From my visit I assess the space as more of a pleasant verge than a space which “holds a *particular* local significance” (*my emphasis added*). The Qualifying Body has provided me with evidence that the site was used for a Platinum Jubilee celebration, but I don’t believe that establishes significance. As a representation notes, there are other spaces similarly incidental to the layout of the housing. I note also that, whilst the space is adjacent to the airfield and the Airfield Conservation Area, it is these latter that hold the “*particular* local significance” not the space itself. Accordingly, I cannot conclude that the NPPF criteria, which are crucial here, are met in full.

However, I note that the MoD in their representation acknowledges that “This site is an MOD maintained green parcel of land used for amenity purposes only”. The evidence provided by the Qualifying Body also confirms that the site does have amenity value to and use by the residents, albeit falling short of the NPPF criteria for a Local Green Space. Accordingly, I propose that the site is given a lesser designation as a ‘amenity green space’ - a term used in the explanatory text for Core Strategy Core Policy CP52 and the latter has provided the wording for my recommendation.

Whitebridge Spinney: This area has a demonstrable recreational and wildlife value and thus meets the NPPF criteria.

Recommendation 9:

9.1 *Within Policy 4 – now renumbered as Policy 3A:*

9.1.1 *Delete “Ford Green on Manor Farm Road (5)” and renumber Whitebridge Spinney accordingly.*

9.1.2 *Amend the reference to “Appendix 10” to read ‘Appendix 2’ – I will later address the Appendices in general.*

9.2 *Within the Supporting text:*

9.2.1 *Add to the first paragraph: ‘Appendix 2 provides full details of the boundaries for these spaces and how each meets the criteria set out at paragraphs 101 – 103 of the NPPF’.*

9.2.2 *I suggest that the paragraphs subsequent to paragraph 1 and the accompanying Figure 7 are relocated to the supporting text for Policy 2 (as renumbered).*

9.3 *On Figure 6 delete space 5 and renumber Whitebridge Spinney accordingly; renumber Figure 6 as 6A.*

9.4 *Within Appendix 10 – to be renumbered Appendix 2, as above:*

9.4.1 *Amend the fourth paragraph to read: ‘LGS is designated through Neighbourhood and Local Plans and once it is in place’.*

9.4.2 In the listing of the NPPF criteria quote the second in full: ‘demonstrably special to a local community and holds a particular local significance’ and replace “The land must fulfil one or more of the following criteria” with ‘The following are examples’.

9.4.3 At the foot of page 1 replace “1 to 6” with ‘1 to 5’ and delete: “The maps should be taken as indicative. For definitive mapping of the indicated areas please refer to land registry and other official sources.”

9.4.4 From the listing of the proposed LGSs delete space 5 and amend the overview map and its numbering accordingly.

9.4.5 To the entry for Castle Hill Country Park add: ‘The residents’ survey undertaken in 2019 showed that the Country Park was highly valued by local residents as an amenity. Furthermore, the Park is used extensively throughout the day by both residents of the parish and visitors from other parishes. It has an accessibility infrastructure which for example makes it wheelchair and disability scooter compatible. The Park is not just an amenity with natural green areas and wild life and but also provides recreational facilities such as the outdoor gymnasium and a picnic area. In addition, it contains a very popular dog play/training area.’

9.5 After Figure 6 insert a new Policy 3B as follows:

9.5.1 Word the Policy as: ‘Policy 3B Ford Amenity Green Space

The area of Ford outlined in Figure 6B shall be retained as an amenity green space adjacent to the residential area. If damage or loss of this green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.’

9.5.2 Add supporting text derived from the related entry now deleted from Appendix 10, omitting “, and it is therefore believed appropriate to also designate it as a Local Green Space” and add a map outlining the amenity area as a new Figure 6B.

As amended Policies 3A & 3B – renumbered from Policy 4 - meet the Basic Conditions.

Policy 5: Design of future development

The revised 2021 NPPF places new emphasis on “The creation of high quality, beautiful and sustainable buildings and places [which] is fundamental to what the planning and development process should achieve” (paragraph 126). Paragraph 129 adds: “Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents”. Policy 5 therefore has general NPPF support.

However, I note that the local authority has questioned the nebulous nature of element a in Policy 5. That element appears effectively to be a pre-amble to element b where the specifics of how “improve the quality” might be judged. To the existing national (now 2021) and local design expectations is added the Laverstock & Ford Parish Design Guide 2021.

Some confusion appears to have arisen because the Design Guide has been included amongst what might be regarded generally as supporting evidence documents, as opposed to being part of the Plan document. Since the application of Policy 5 is dependent upon the use of the Design Guide, it should form an Appendix within the Plan document (as per NPPF paragraph 129) – I will address the collective Appendices later. Since the persons making an objection in their representation found the Guide amongst the submitted documents, I don’t find it material to the consultative process that the Design Guide has been presented as

detached. However, there is a related issue about the extent to which it is a legitimate *Design Guide*.

Whilst I note that the title says it is a *Guide*, in line with NPPF expectations “[its] level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety”. The Guide seems most successful where locally-specific illustrations of what is preferred are provided. Looking at some of the detail:

Paragraph 3.1 includes an expectation of “A rated EPC energy efficiency”. Government Policy has made it clear that the way in which an energy efficient building is defined and rated is a matter for the Building Regulations, not the planning system.

Paragraphs 3.4 & 3.5: No justification is provided for this level of detail in a local document, particularly when national standards are referenced. The expectation that “all parts of [every] cupboard should be a minimum of 2m high internally” is certainly over-prescriptive.

Paragraph 4.1 says, without explanation, that “‘Island developments’ with limited or single access routes in and out of the development should be avoided”. The Qualifying Body has provided more detail on this expectation.

I note that Core Strategy Policy CP55 is significantly more nuanced than that part of element d that relates to air quality; Policy CP55 may be relied upon to address the issue appropriately.

Recommendation 10:

10.1 Within Policy 5 – now renumbered as Policy 4:

10.1.1 Amend element (a) to be an introductory sentence, with the addition of ‘In particular proposals shall:’ and the subsequent criteria renumbered and reworded to follow on.

10.1.2 In element (b) replace “2019” with ‘2021’, “comply with” with ‘address’, and “Appendix 11” with ‘Appendix 3’.

10.1.3 Replace element (c) with: ‘As stated in the NPPF (paragraph 132) “Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

10.1.4 In element (d) delete the first bullet point.

10.2 Within Appendix 10 – to be renumbered Appendix 3, as above:

10.2.1 On page 2 update the reference to the National Design Guide to 2021.

10.2.2 In paragraph 3.1 replace “of A rated EPC energy efficiency” with ‘are encouraged to ensure an energy efficiency in excess of that required by the Building Regulations’.

10.2.3 Delete the content of paragraph 3.4 after “....Nationally Described Space Standard (March 2015)”.

10.2.4 Amend paragraph 4.1 to read: ‘Culs de sac should be avoided for more than 25 dwellings and single access loops for more than 50 dwellings, and below these limits emergency secondary access should be provided where possible.’

10.2.5 In paragraph 7.2 replace “All development proposals” with ‘Proposals impacting on heritage assets’.

As amended Policy 4 – renumbered from Policy 5 - meets the Basic Conditions.

Policy 6 Development of a comprehensive, attractive network of footpaths and cycleways within the Parish

Unlike the earlier Policies, Policy 6 appears to be a statement of intent by the Parish Council, what some might call a “Supporting Action”. Element c appears to be an aspiration for negotiation with developers, but apparently for developments beyond the scale indicated as ‘preferred’ in the Design Guide. I agree with the representation that comments: “It is difficult to comprehend how this policy is capable of being implemented where there is no indication of what any agreed scheme might be, the relevant greenspace and whether the requirement for implementing such a scheme would accord with the tests identified in Article 122 of the Community Infrastructure Levy (*sic*) Regulations (as amended)”. It is vital that Plan Policies make it “evident how a decision maker should react to development proposals” (NPPF para 16): as written Policy 6 does not involve the decision maker.

Planning Policy Guidance says: “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, [but] actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.” (Planning Policy Guidance Paragraph: 004 Reference ID: 41-004-20170728). The Qualifying Body agreed “that Policy 6 is most probably a Community Action as it sits squarely with the PC. However, we believe that the thrust of this should not be lost from the Plan and is an initiative which is strongly supported by our neighbouring parish – Salisbury City. We therefore believe that this, with some restructuring, should form a new section immediately following the current Policy 7 and before the section on Implementation, Monitoring and Review.” This therefore is incorporated within my recommendations.

The Qualifying Body agreed to a suggestion of additional wording from Wiltshire Council.

Recommendation 11:

11.1 Amend Policy 6 to become ‘Community Action 1’, move to after Policy 7 with a distinctly different appearance from the Policy Box e.g. a different colour and no boxing; renumber subsequent Policies accordingly.

11.2 With criterion (a), bullet point 3 replace “lanes” with ‘route’.

11.3 Add to criterion (a): ‘To maintain Monarch’s Way as a green route for horses and leisure cycling / walking, while providing a parallel bound-surface route to LTN 1/20 standards through any adjacent development to accommodate walking and cycling as a means of transport.’

11.4 In the supporting text replace the first sentences with: ‘Community Action 1 is consistent with Wiltshire Council’s most recent draft Local Cycling and Walking Infrastructure Plan for the Salisbury area (itself currently under review). It is designed to help achieve the objective of improving foot/cycle ways/route links within and between the Parish and key destinations (Objective J) and reducing the adverse impact of vehicular traffic (Objective K).’

Policy 7: Improvements to infrastructure and amenities appropriate to the scale of specific future housing development

Again, this appears largely to be an aspirational Policy about what the Parish Council will seek; what is and can be included in a Section 106 Agreement or other undertaking must be a matter for planning judgement at the point that specific proposals for a specific site are presented. As noted in the supporting text, it is largely about the Parish Council working with Wiltshire Council and other agencies to secure improvements to local infrastructure, facilities

and amenities. The local authority has commented: “infrastructure proposals within the Parish need in any case to comply with WCS CP3 Infrastructure Requirements”. The Qualifying Body has commented: “This policy was included as our contribution to address a major shortcoming in the implementation of local planning decisions on recent major housing developments within the parish”. I propose therefore that the content is divided between element (a) that is retained as a Policy, and the other content that becomes ‘Community Action 2’.

Recommendation 12:

12.1 Reduce Policy 7 – now renumbered as Policy 5 – to the following:

‘Major development proposals shall include a phasing plan that assures the delivery of the related, supporting infrastructure and amenities prior to, or in phases during, the development.’

12.2 Move the balance of Policy 7 to a new ‘Community Action 2’ which:

- *like ‘Supporting Action 1’, is to follow the (now) Policy 5 supporting text with a distinctly different appearance from the Policy Box e.g. a different colour and no boxing.*
- *should commence with: ‘The Parish Council will seek to ensure that ...’*

As amended Policy 5 – as renumbered - meets the Basic Conditions

10 Implementation, Monitoring and Review

Contrary to what is stated in the opening paragraph, the Plan is not “Subject to approval by Wiltshire Council and Central Government”. Subject to the outcome of this Examination and then the referendum of local residents, the Plan will be “made” by Wiltshire Council and thus form part of the development plan for Wiltshire.

I note the comments in a representation that “it would be prudent to reduce the time period of the Neighbourhood Plan to 2026 (or at most 2031) to avoid having policies which may become unnecessarily out-of-date”. But there is a commitment here in Section 10 to keep the Plan and its progress under review. The most pertinent reason for review may be a Wiltshire-advised change in housing requirements; as the points at which this may occur are not fixed, an earlier end date would simply suggest a preparedness for change. A commitment to review achieves the same end.

Recommendation 13:

At the opening of Section 10 replace “, Wiltshire Council and Central Government” with ‘at a referendum’.

Glossary of Terms

As noted earlier, the definition of “Infill” needs to be amended. Further, as advised by the local authority, the definition for “Affordable Housing” and for “Heritage Assets” need correction.

Recommendation 14:

Within the Glossary:

14.1 Under the heading “Affordable Housing” replace “affordable rents are 80% of the market rent in that area” with ‘Affordable Rents are at least 20% below local market rents and are therefore no more than 80% of local market rents’.

14.2 Under the heading “Heritage Assets” correct “Heritage Environment Record” to ‘Historic Environment Record’ and add an additional, bullet point: ‘Scheduled Monuments (e.g. The

medieval pottery kilns at Milford Farm, The 'Ende Burgh' long barrow, north-east of Old Sarum and Milford Mill Bridge, which is also Grade I listed).

Appendices

It seems to me that the extensive Appendices fall into two distinct groups: those that provide supporting evidence for statements or content included in the Plan and those that are required for the appropriate implementation of particular Policies e.g. Policy 5 requires that the content of the Laverstock & Ford Parish Design Guide 2021 is addressed. It is important therefore that the latter Appendices are readily available and the easiest way to achieve that is to include these with the content of the Plan (renumbered appropriately). Looking at the Appendices in turn:

Appendix 1 Submission to Wiltshire Council – *not required*

Appendix 2 Community engagement in the Neighbourhood Plan process – *not required*

Appendix 3 Community engagement summary of survey results – *not required*

Appendix 4 Development of the parish – *not required*

Appendix 5 Transport issues - – *not required*

Appendix 6 Assessment of local housing needs – *not required*

Appendix 7 SHELAA Site Assessments - – *not required*

Appendix 8 Development Constraints – *not required*

Appendix 9 Landscape Assessment Executive Summary – *required for Policy 3 (preferably in full)*

Appendix 10 Designated Local Green Spaces – *required for Policy 4*

Appendix 11 Design Guide 2021 – *required for Policy 5.*

Recommendation 15:

15.1 Renumber Appendices 9, 10 and 11 as 1, 2 & 3 respectively and included these as attachments to the Plan; extend and retitle the new Appendix 1 to include the full Landscape Sensitivity Assessment.

15.2 Retain the other Appendices as 'Supporting Evidence', signposted on the Parish's Neighbourhood Plan webpage.

Other matters raised in Representations

A few representations, to the Plan consultation in accordance with Neighbourhood Planning Regulations, included suggestions of other matters that the Plan might address. However, a neighbourhood plan must specifically address the development and use of land (Planning Practice Guidance ref: 41-004-20140306). And within that constraint there is no checklist of content that a Neighbourhood Plan must contain or subject matter that it must address; the range of content is entirely at the discretion of the local community and the local issues as they see them. It is not my role as Examiner to test the soundness of a Plan in terms of its coverage but rather to consider the content presented against the Basic Conditions. I cannot therefore recommend additional content in the manner that some representations have suggested.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Laverstock and Ford Communities Neighbourhood Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

Wiltshire Council in its screening opinion of November 2021, following a consultation period with the Statutory Bodies, confirmed that a Strategic Environmental Assessment (SEA)

under the Environmental Assessment of Plans and Programmes Regulations 2004 was not required. The Report concluded (in summary): “Wiltshire Council considers that the Draft Laverstock and Ford Neighbourhood Plan is not likely to have significant environmental effects and accordingly a Strategic Environmental Assessment is not required.”

Wiltshire Council’s Habitat’s Regulations Assessment (HRA) Screening of March 2022 concluded, in relation to the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Conservation of Habitats and Species Regulations 2010 (as amended), that “Taking into consideration the location, scale and nature of proposals in the NP, there is a potential mechanism for effect upon two European sites, namely the River Avon SAC and the New Forest SPA/SAC, on account of three policies. These comprise Policies 1, 2 and 7 which have the potential to give rise to significant effects upon the European sites in combination with other plans and projects and are therefore taken forward to appropriate assessment.” The result of the appropriate assessment was: “It is concluded beyond reasonable scientific doubt that the NP will have no adverse effects on the integrity of the River Avon SAC either alone or in-combination with other plans and projects” and “It is concluded beyond reasonable scientific doubt that the NP will have no adverse effects on the integrity of the New Forest SPA/SAC either alone or in-combination with other plans and projects.” Wiltshire Council confirmed to me that the conclusion of the earlier SEA was unaltered by the findings of the HRA.

In regard to the European Convention on Human Rights, the Basic Conditions Statement that accompanies the Area Neighbourhood Plan does not specifically address this matter. However, no evidence has arisen or been put forward to demonstrate that the Qualifying Body has not been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in process of preparing the Neighbourhood Plan.

Taking all of the above into account, I am satisfied that the Laverstock and Ford Communities Neighbourhood Plan, as modified, is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body.

I therefore conclude that, subject to the modifications recommended, the Laverstock and Ford Communities Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the Plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations;
- does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d).

On that basis I *recommend* to Wiltshire Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Laverstock and Ford Communities Neighbourhood Plan to proceed to referendum.

Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by Wiltshire Council on 7th December 2017.

Recommendations: (this is a listing of the recommendations exactly as they are included in the Report)

Rec	Text	Reason
1	<p>1.1 On the front cover, and in any other locations, remove references to “Submission Plan”.</p> <p>1.2 Under the heading “Contents” review the content for accuracy in the light of my Recommendations below.</p>	For clarity and accuracy
2	<p>2.1 In the opening sentence replace “conurbation” with ‘urban area’ and in the second bullet point replace “much larger” with ‘larger’.</p> <p>2.2 Within Figure 1: 2.2.1 Add a key to identify the ‘Neighbourhood Area’ boundary. 2.2.2 Add a referencing scheme for the green corridors in like manner to that used for the settlements.</p> <p>2.3 Correct the source reference for the detail on local heritage assets near the bottom of page 5.</p>	For clarity and accuracy
3	Delete Appendix 1 (I will later consider the totality of the Appendices) and delete the reference to it within Section 4, paragraph 3: “Our input to the consultation was formalised in a paper covering suggested guidelines acknowledged by Wiltshire Council on June 2020 and reproduced in Appendix 1”.	For clarity and accuracy and to meet Basic Condition 1
4	<p>4.1 Under the heading “7.1 Recent developments in the Parish” correct “Salisbury Housing Market Area” to ‘Salisbury urban area’.</p> <p>4.2 Under the sub-heading “7.1.3 Limited and/or delayed provision of local amenities and infrastructure” delete the second paragraph beginning “Policy S2 from the Salisbury Local Plan 2011”.</p> <p>4.3 Under the heading “7.2 Planning Context to 2036” delete the second paragraph commencing: “Of these considerations ...”.</p> <p>4.4 Remove the content of the sub-section “7.2.1 Assessment of Local Housing Need” and place it between sub-sections 7.1 and 7.1.1 (and renumber the subsequent paragraphs accordingly); amend the last sentence to read: “Accordingly there is currently no requirement to plan further housing developments in order to meet local needs for Affordable Housing”; remove the related bullet point in sub-section 7.2.</p> <p>4.5 Replace the heading for sub-section 7.2.1 with ‘Employment’ and add the following content provided by the Qualifying Body: ‘Our survey of businesses in the Parish indicated limited need for new commercial premises for their future plans. Where a potential need was identified the clear preference was for pre-constructed premises available for purchase or rent. The Parish Council supported a change of use of the employment land designated as part of the Longhedge development to mixed development (with a requirement to build out the commercial</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>area without pre-agreed sales), resulting in 29 industrial units and 65 additional dwellings currently being constructed. A similar approach could be taken in Old Sarum where land allocated for employment may require an agreement to allow housing on part, on condition that commercial premises are built for sale or lease.’ Add a related bullet point in sub-section 7.2.</p> <p>4.6 Reduce sub-section 7.2.2 to a simplified expression of its core concern: ‘In January 2021, Wiltshire Council published draft proposals for its emerging Local Plan (which is the Core Strategy refresh) ². This Plan includes a continuation of the existing strategy for the Salisbury Housing Market Area, with a slightly reduced housing requirement of 5,240 homes for Salisbury (excluding Wilton) for the plan period (2016-2036). Allowing for houses already completed or in the pipeline, this leaves a requirement of 940 homes to be accommodated on other sites. To meet their housing target Wiltshire Council have identified three sites within or adjacent to the Salisbury settlement boundary for strategic development, one of which (Land to the North East of Old Sarum – Wiltshire Council Local Plan Review Site Selection Report January 2021^[add source reference]) is in our Parish. On this site, a development of 275 homes is proposed. The problematic nature of this site for large scale development was highlighted by the Parish Council in its response to the draft Local Plan consultation, submitted on 12th February 2021^[add source reference]. Since Figure 2 is removed, renumber subsequent Figures accordingly.</p> <p>4.7 Alter the heading of sub-section 7.2.3 to ‘Development Issues’ and replace “constraints” with ‘issues’ in its first sentence. Add a bullet point ‘Landscape sensitivity – see below’.</p> <p>4.8 Within sub-section 7.2.4, replace the last but one sentence beginning “An executive summary ...” with ‘The Report is attached as Appendix 1’; I will comment later on the Appendices and their numbering.</p>	
5	<p>Under the heading “8 Our Neighbourhood Plan: Basis of the Policies”:</p> <p>5.1 Replace the last bullet point in the opening section with: ‘achieve our objectives and address the issues set out in Section 7, whilst taking full account of the planning context provided by the national and local planning policy frameworks.’</p> <p>5.2 Delete Section 8.1 and renumber subsequent sections accordingly.</p> <p>5.3 Under Section 8.2:</p> <p>5.3.1 Within “Assumption 1” replace “normally large enough for not more than two dwellings” with ‘only large enough for not more than a few dwellings, generally only one dwelling’ (and use this description for infill elsewhere in the Plan including the Glossary).</p> <p>5.3.2 Amend the wording of Assumption 4 to: “No strategic development will be allocated / permitted which is not adjacent to the Salisbury Settlement Boundary other than in cases</p>	For clarity and accuracy and to meet Basic Condition1

	<p>covered by the “exception policies” listed in paragraph 4.25 of the Core Strategy.’</p> <p>5.3.3 Delete the last sentence.</p>	
6	<p>6.1 Within Policy 1:</p> <p>6.1.1 Delete “existing” from each Policy element.</p> <p>6.1.2 In element c of the Policy replace “by the provisions of Policy 2 below” with ‘Green Buffer 4’ (see also Figure 4 recommendations below regarding numbering).</p> <p>6.2 Within the supporting text:</p> <p>6.2.1 Replace “In these Green Buffers, new buildings should not be constructed which, individually or cumulatively, would lead to this coalescence” with ‘It is the purpose of these Buffers to assure the retention of an open separation between individual settlements’.</p> <p>6.2.2 Replace “which this Plan defines as the filling of a small gap within the developed area of the villages with a maximum of two dwellings” with ‘which is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling’.</p> <p>6.2.3 Replace the final paragraph with: ‘It is important to note the implications of existing Wiltshire Council Core Policy 2 for Bishopdown Farm/Hampton Park/Riverdown Park and Old Sarum/Longhedge which are situated within the Salisbury Settlement Boundary. Core Policy 2 makes a presumption in favour of sustainable development within the Salisbury Settlement Boundary. Development outside this Boundary is not permitted other than in defined exceptional circumstances. Strategic allocations within Wiltshire Council’s future Local Plans could, however, extend this Boundary by identifying development sites adjacent to it. Castle Hill Country Park lies adjacent to but outside this Boundary around Hampton Park/Riverdown Park and part of Bishopdown Farm and is protected by its community ownership and designation as a Local Green Space in Policy 4. Consequently, development beyond the Country Park would not be permitted, other than in the defined exceptional circumstances in the Core Strategy.’</p> <p>6.3 Within Figure 4:</p> <p>6.3.1 Add boundaries for the Neighbourhood Area and the Salisbury Urban Area (including related entries in the key); ensure that no indicative Green Buffer encroaches outside of the Neighbourhood Area.</p> <p>6.3.2 Reduce Green Buffer 1 to the area below the Ford Road (shown on the OS map as “Roman Road”).</p> <p>6.3.3 Replace the legend “Green Buffer 4” with ‘Country Park’.</p>	<p>For clarity and accuracy and to meet Basic Conditions 1 & 3</p>

	<p>6.3.4 Narrow Green Buffer 5 to the width of the airfield landing/take off area (i.e. to exclude the areas annotated “potential areas for development” on map 5.16 attached to Core Strategy Core Policy CP25) and renumber it as Green Buffer 4.</p> <p>6.3.5 Amend the title to exclude reference to Policy 2.</p>	
7	Delete Policy 2 and its supporting text; renumber subsequent Policies accordingly.	For clarity and accuracy and to meet Basic Conditions 1 & 3
8	<p>8.1 Within Policy 3 – now renumbered as Policy 2:</p> <p>8.1.1 Add an introductory sentence as follows: ‘Development proposals shall, appropriately to their scale and location.’; amend the opening wording of subsequent Policy elements to follow on accordingly.</p> <p>8.1.2 From element a delete “but is expected to enhance”.</p> <p>8.1.3 Merge elements b & c as follows: ‘have regard to the Landscape Sensitivity Assessment (2020) (see Appendix 1) and in High and Medium/High sensitivity landscapes, as identified in the Assessment, and in other locations where the scale of impact requires, be accompanied by a Landscape and Visual Impact Appraisal.’</p> <p>8.1.4 In element d (now renumbered element c), reword the second bullet point as: ‘avoid significant encroachment into the green areas on either side of the River Bourne, along Ford Down/Cockey Down/Laverstock Down and around Ford, including the Bat corridor along Green Lane’.</p> <p>8.1.5 Reword the opening of element e (now renumbered element d) as follows: ‘where heritage assets are impacted (including but not restricted to any sub-surface archaeological remains), provide a heritage statement that should include:’.</p> <p>8.2 Within the supporting text to the now renumbered Policy 2, add: ‘The heritage statement should, as a minimum, set out the findings from consulting Wiltshire Council’s Historic Environment Record. The level of detail in a heritage statement should be proportionate to the assets’ importance and sufficient to understand the potential impact of the proposal on their significance’, and ‘As part of the Wiltshire Local Plan Review a Consultation Paper was prepared on “Addressing climate change and biodiversity net gain” the content of and responses to which will inform policies in the draft Local Plan: see here for fuller details.’</p>	For clarity and accuracy and to meet Basic Condition 1

9	<p>9.1 Within Policy 4 – now renumbered as Policy 3A:</p> <p>9.1.1 Delete “Ford Green on Manor Farm Road (5)” and renumber Whitebridge Spinney accordingly.</p> <p>9.1.2 Amend the reference to “Appendix 10” to read ‘Appendix 2’ – I will later address the Appendices in general.</p> <p>9.2 Within the Supporting text:</p> <p>9.2.1 Add to the first paragraph: ‘Appendix 2 provides full details of the boundaries for these spaces and how each meets the criteria set out at paragraphs 101 – 103 of the NPPF’.</p> <p>9.2.2 I suggest that the paragraphs subsequent to paragraph 1 and the accompanying Figure 7 are relocated to the supporting text for Policy 2 (as renumbered).</p> <p>9.3 On Figure 6 delete space 5 and renumber Whitebridge Spinney accordingly; renumber Figure 6 as 6A.</p> <p>9.4 Within Appendix 10 – to be renumbered Appendix 2, as above:</p> <p>9.4.1 Amend the fourth paragraph to read: ‘LGS is designated through Neighbourhood and Local Plans and once it is in place’.</p> <p>9.4.2 In the listing of the NPPF criteria quote the second in full: ‘demonstrably special to a local community and holds a particular local significance’ and replace “The land must fulfil one or more of the following criteria” with ‘The following are examples’.</p> <p>9.4.3 At the foot of page 1 replace “1 to 6” with ‘1 to 5’ and delete: “The maps should be taken as indicative. For definitive mapping of the indicated areas please refer to land registry and other official sources.”</p> <p>9.4.4 From the listing of the proposed LGSs delete space 5 and amend the overview map and its numbering accordingly.</p> <p>9.4.5 To the entry for Castle Hill Country Park add: ‘The residents’ survey undertaken in 2019 showed that the Country Park was highly valued by local residents as an amenity. Furthermore, the Park is used extensively throughout the day by both residents of the parish and visitors from other parishes. It has an accessibility infrastructure which for example makes it wheelchair and disability scooter compatible. The Park is not just an amenity with natural green areas and wild life and but also provides recreational facilities such as the outdoor gymnasium and a picnic area. In addition, it contains a very popular dog play/training area.’</p> <p>9.5 After Figure 6 insert a new Policy 3B as follows:</p> <p>9.5.1 Word the Policy as: ‘Policy 3B Ford Amenity Green Space</p>	For clarity and accuracy and to meet Basic Condition 1
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	<p>The area of Ford outlined in Figure 6B shall be retained as an amenity green space adjacent to the residential area. If damage or loss of this green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.'</p> <p>9.5.2 Add supporting text derived from the related entry now deleted from Appendix 10, omitting “, and it is therefore believed appropriate to also designate it as a Local Green Space” and add a map outlining the amenity area as a new Figure 6B.</p>	
10	<p>10.1 Within Policy 5 – now renumbered as Policy 4:</p> <p>10.1.1 Amend element (a) to be an introductory sentence, with the addition of ‘In particular proposals shall:’ and the subsequent criteria renumbered and reworded to follow on.</p> <p>10.1.2 In element (b) replace “2019” with ‘2021’, “comply with” with ‘address’, and “Appendix 11” with ‘Appendix 3’.</p> <p>10.1.3 Replace element (c) with: ‘As stated in the NPPF (paragraph 132) “Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”</p> <p>10.1.4 In element (d) delete the first bullet point.</p> <p>10.2 Within Appendix 10 – to be renumbered Appendix 3, as above:</p> <p>10.2.1 On page 2 update the reference to the National Design Guide to 2021.</p> <p>10.2.2 In paragraph 3.1 replace “of A rated EPC energy efficiency” with ‘are encouraged to ensure an energy efficiency in excess of that required by the Building Regulations’.</p> <p>10.2.3 Delete the content of paragraph 3.4 after “...Nationally Described Space Standard (March 2015)”.</p> <p>10.2.4 Amend paragraph 4.1 to read: ‘Culs de sac should be avoided for more than 25 dwellings and single access loops for more than 50 dwellings, and below these limits emergency secondary access should be provided where possible.’</p> <p>10.2.5 In paragraph 7.2 replace “All development proposals” with ‘Proposals impacting on heritage assets’.</p>	For clarity and accuracy and to meet Basic Condition 1
11	<p>11.1 Amend Policy 6 to become ‘Community Action 1’, move to after Policy 7 with a distinctly different appearance from the Policy Box e.g.</p>	For clarity and accuracy

	<p>a different colour and no boxing; renumber subsequent Policies accordingly.</p> <p>11.2 With criterion (a), bullet point 3 replace “lanes” with ‘route’.</p> <p>11.3 Add to criterion (a): ‘To maintain Monarch’s Way as a green route for horses and leisure cycling / walking, while providing a parallel bound-surface route to LTN 1/20 standards through any adjacent development to accommodate walking and cycling as a means of transport.’</p> <p>11.4 In the supporting text replace the first sentences with: ‘Community Action 1 is consistent with Wiltshire Council’s most recent draft Local Cycling and Walking Infrastructure Plan for the Salisbury area (itself currently under review). It is designed to help achieve the objective of improving foot/cycle ways/route links within and between the Parish and key destinations (Objective J) and reducing the adverse impact of vehicular traffic (Objective K).’</p>	and to meet Basic Condition 1
12	<p>12.1 Reduce Policy 7 – now renumbered as Policy 5 – to the following: ‘Major development proposals shall include a phasing plan that assures the delivery of the related, supporting infrastructure and amenities prior to, or in phases during, the development.’</p> <p>12.2 Move the balance of Policy 7 to a new ‘Community Action 2’ which:</p> <ul style="list-style-type: none"> • like ‘Supporting Action 1’, is to follow the (now) Policy 5 supporting text with a distinctly different appearance from the Policy Box e.g. a different colour and no boxing. • should commence with: ‘The Parish Council will seek to ensure that ...’ 	For clarity and accuracy and to meet Basic Condition 1
13	At the opening of Section 10 replace “, Wiltshire Council and Central Government” with ‘at a referendum’.	For clarity and accuracy
14	<p>Within the Glossary:</p> <p>14.1 Under the heading “Affordable Housing” replace “affordable rents are 80% of the market rent in that area” with ‘Affordable Rents are at least 20% below local market rents and are therefore no more than 80% of local market rents’.</p> <p>14.2 Under the heading “Heritage Assets” correct “Heritage Environment Record” to ‘Historic Environment Record’ and add an additional, bullet point: ‘Scheduled Monuments (e.g. The medieval pottery kilns at Milford Farm, The ‘Ende Burgh’ long barrow, north-east of Old Sarum and Milford Mill Bridge, which is also Grade I listed).</p>	For clarity and accuracy
15	<p>15.1 Renumber Appendices 9, 10 and 11 as 1, 2 & 3 respectively and included these as attachments to the Plan; extend and retitle the new Appendix 1 to include the full Landscape Sensitivity Assessment.</p> <p>15.2 Retain the other Appendices as ‘Supporting Evidence’, signposted on the Parish’s Neighbourhood Plan webpage.</p>	For clarity

