

Wiltshire Council

**The Winterbournes
Neighbourhood Plan
2019-2026**

Independent Examiner's Report

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Summary

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

The Parish is about 3.5 miles north east of Salisbury. It has three contiguous villages of Winterbourne Dauntsey, Winterbourne Earls and Winterbourne Gunner which are collectively known as The Winterbournes and the small hamlet of Hurdcott. A large part of the Parish area is farmland or otherwise rural and a golf course. There are a number of services and facilities including a nursery and two public houses. According to the Census 2011 there are some 1238 residents.

The Plan has a clear vision underpinned by a number of objectives. It has four policies including two site allocations and the designation of Local Green Spaces.

It has been necessary to recommend some modifications. In the main these are intended to ensure the Plan is clear and precise and provides a practical framework for decision-making as required by national policy and guidance. These do not significantly or substantially alter the overall nature of the Plan.

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

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

Ann Skippers MRTPI
Ann Skippers Planning
25 September 2020



1.0 Introduction

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

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

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

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

2.0 The role of the independent examiner

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

The basic conditions¹ are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

and referred to in the paragraph above. Only one is applicable to neighbourhood plans and was brought into effect on 28 December 2018.² It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check³ whether the neighbourhood plan:

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

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.⁴

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

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

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

² Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018

³ Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act

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

3.0 The examination process

I have set out my remit in the previous section. It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).⁵

PPG confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.⁶ Where I find that policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required. However, some representations make useful suggestions and I feel sure the Parish Council will wish to take account of these in any future review of the Plan.

PPG⁷ explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.⁸

I wrote to WC and the Parish Council on 16 June 2020 to outline a number of issues which had arisen during the course of the examination and also sought clarification on a number of matters. My note and list of questions is attached to this report as Appendix 2. I am very grateful to both Councils who have provided me with comprehensive answers to my questions. The responses received (all publicly available) have enabled me to progress the examination and to examine the Plan without the need for a hearing.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so. The Parish Council made comments and I have taken these into account.

I am very grateful to everyone for ensuring that the examination has run so smoothly.

I made an unaccompanied site visit to familiarise myself with the Plan area on 25 August 2020.

⁵ PPG para 055 ref id 41-055-20180222

⁶ Ibid

⁷ Ibid para 056 ref id 41-056-20180222

⁸ Ibid

Where modifications are recommended they appear in **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics***.

As a result of some modifications consequential amendments may be required. These can include changing section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these as primarily matters of final presentation and do not specifically refer to such modifications, but have an expectation that a common sense approach will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

4.0 Neighbourhood plan preparation

A Consultation Statement has been submitted. It meets the requirements of Regulation 15(2) of the Neighbourhood Planning (General) Regulations 2012.

A Steering Group was established to lead work on the Plan after a public meeting to introduce the concept of neighbourhood planning in late 2012.

Building on work carried out for the Parish Plan, the Parish newsletter, 'The Village Link' invited all villagers to comment on objectives in Spring 2014. Later that year, work was carried out on the housing sites put forward to WC as part of their work on land availability.

A meeting in 2015 cemented the decision to produce a Plan. Updates were produced in the 'Village Link', a Housing Needs Survey was undertaken, a public meeting was held in April 2016 to present the vision statement and policies.

In 2016, a questionnaire was sent to all households and businesses in the Parish area. A public meeting was held to discuss the results and present sites.

Pre-submission (Regulation 14) consultation took place between 4 March – 15 April 2019. Two drop in events were held during the consultation period. The consultation was advertised via a flyer, posters and on the Parish Council website.

During the whole process, updates have been given in the Parish magazine and on the Parish Council website. Meetings have been held with specific groups or organisations such as the primary school.

I consider that the consultation and engagement carried out is satisfactory.

Submission (Regulation 16) consultation was carried out between 6 January – 28

February 2020.

The Regulation 16 stage resulted in 13 representations. I have considered all of the representations and taken them into account in preparing my report.

5.0 Compliance with matters other than the basic conditions

I now check the various matters set out in section 2.0 of this report.

Qualifying body

Winterbourne Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

Plan area

The Plan area is coterminous with the administrative boundary for the Parish. WC approved the designation of the area on 9 December 2015. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. The Plan area is shown clearly on page 3 of the Plan.

Plan period

The Plan period is 2019 – 2026. This is clearly stated in the Plan itself and confirmed in the Basic Conditions Statement. The requirement is therefore satisfactorily met.

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because 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.⁹

⁹ PPG para 004 ref id 41-004-20190509

Sometimes the reverse happens; a number of development and use of land related issues or statements appear in the Plan, but are not included in the Plan as planning policies. I believe this also leads to confusion about the status of such statements.

In this case a number of development and use of land matters have been included but are not presented as formal planning policies. A number of modifications have been made to address this point in the interests of clarity and to ensure regard has been made to national policy and guidance.

6.0 The basic conditions

Regard to national policy and advice

The Government published a National Planning Policy Framework (NPPF) in 2012. A revised NPPF was first published on 24 July 2018. This revised NPPF was further updated on 19 February 2019. When published, it replaced both the 2012 and 2018 documents.

The NPPF is the main document that sets out national planning policy. In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies and should shape and direct development outside of these strategic policies.¹⁰

Non-strategic policies are more detailed for specific areas, neighbourhoods or types of development.¹¹ They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.¹²

The NPPF also makes it clear that neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.¹³

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.¹⁴

Policies should also be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear

¹⁰ NPPF para 13

¹¹ Ibid para 28

¹² Ibid

¹³ Ibid para 29

¹⁴ Ibid para 31

purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.¹⁵

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at www.gov.uk/government/collections/planning-practice-guidance which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous¹⁶ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.¹⁷

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.¹⁸ It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.¹⁹

Whilst this has formed part of my own assessment, the Basic Conditions Statement²⁰ sets out how the Plan has responded to national policy and guidance.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.²¹ This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.²² The objectives are economic, social and environmental.²³

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.²⁴

¹⁵ NPPF para 16

¹⁶ PPG para 041 ref id 41-041-20140306

¹⁷ Ibid

¹⁸ Ibid para 040 ref id 41-040-20160211

¹⁹ Ibid

²⁰ Basic Conditions Statement pages 6 - 9

²¹ NPPF para 7

²² Ibid para 8

²³ Ibid

²⁴ Ibid para 9

Whilst this has formed part of my own assessment, the Basic Conditions Statement explains how the Plan aligns with the components of sustainable development outlined in the NPPF.²⁵

General conformity with the strategic policies in the development plan

The development plan relevant to this examination includes the Wiltshire Core Strategy Development Plan Document (CS), the saved and retained policies of the Salisbury District Local Plan (SDLP) identified in Appendix D of the CS and the Wiltshire Housing Sites Allocations Plan (WHSAP). The CS was adopted on 20 January 2015, the SDLP was adopted in June 2003 and the WHSAP adopted on 25 February 2020.

Salisbury District Local Plan

I could not see any policies of a strategic nature in the SDLP. None were drawn to my attention in the Basic Conditions Statement. I also raised a question about this and WC has helpfully confirmed that none are regarded as strategic insofar as the saved policies relate to this Plan.

The Core Strategy

The CS provides a framework for Wiltshire up to 2026. Its spatial vision is based around stronger, more resilient communities based on a sustainable pattern of development and it identifies six strategic objectives to help to achieve this. It is an economic-led strategy. It identifies 20 Community Areas and the Parish falls within the Amesbury Community Area.

Core Policy 1 of the CS sets out a settlement strategy identifying five types of settlements based on their role and function and how they relate to their immediate communities and wider hinterland. The Winterbournes is identified as a 'Large Village' in Core Policy 4 and these are defined as settlements with a limited range of employment, services and facilities.

In 'Large Villages', development is limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

Core Policy 2 sets out the delivery strategy; at 'Large Villages', within the limits of development, there is a presumption in favour of sustainable development. Outside the limits of development, development may be permitted in certain circumstances outlined in the development plan. Limits of development can be altered through subsequent development plan documents including neighbourhood plans.

The CS gives indicative housing requirements. In the Amesbury Community Area, the relevant figure is 345. The overall housing requirement figure in the CS is a minimum and the area strategy figures indicative. The CS is clear that Plans should not be

²⁵ Basic Conditions Statement pages 9 - 11

constrained by the housing requirements in the CS and that additional growth may be appropriate and consistent with the settlement strategy. The tenor of the CS is to enable community-led proposals to come forward.

Whilst this has formed part of my own assessment, the Basic Conditions Statement contains a table which cross-references the Plan's policies with CS policies.

Wiltshire Housing Sites Allocations Plan

The purpose of the WHSAP is to support the delivery of the new housing set out in the CS through site allocations and, where necessary, the revision of settlement boundaries. The WHSAP explains that in 'Large Villages', development is limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities.

The WHSAP has amended and updated the settlement boundary for The Winterbournes, but does not propose any allocations in the rural part of the Amesbury Community Area although there is a residual requirement of 90 homes as at April 2018.

The WHSAP was adopted during the Regulation 16 period of consultation for this Plan, just a few days before the consultation ended. I asked WC to confirm whether there are any strategic policies of relevance to this particular examination in the WHSAP. WC has confirmed there are not. In this scenario, I do not consider any further action needs to be taken.

Emerging planning policy

In Autumn 2017, WC began a review of their Local Plan, working jointly with Swindon Borough Council. In WC's case this includes a review of the CS. This work is at a relatively early stage.

There is no legal requirement to examine the Plan against emerging policy. However, PPG²⁶ advises that the reasoning and evidence informing the emerging Local Plan may be relevant to the consideration of the basic conditions against which the Plan is tested.

Furthermore Parish Councils and local planning authorities should aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging Local Plan and the adopted development plan with appropriate regard to national policy and guidance.²⁷

European Union Obligations

A neighbourhood plan must be compatible with European Union (EU) obligations. A number of EU obligations may be of relevance for these purposes including in respect of

²⁶ PPG para 009 ref id 41-009-20190509

²⁷ Ibid

Strategic Environmental Assessment, Environmental Impact Assessment, Habitats, Wild Birds, Waste, Air Quality and Water matters.

PPG²⁸ confirms that it is the responsibility of the local planning authority, in this case WC, to ensure that all the regulations appropriate to the nature and scope of the draft neighbourhood plan have been met. It is WC who must decide whether the draft plan is compatible with EU obligations when it takes the decision on whether the plan should proceed to referendum and when it takes the decision on whether or not to make the plan.

Strategic Environmental Assessment and Habitats Regulations Assessment

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

Directive 92/43/EEC on the conservation of natural habitats, commonly referred to as the Habitats Directive, is also of relevance to this examination. A Habitats Regulations Assessment (HRA) identifies whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects.²⁹ The assessment determines whether significant effects on a European site can be ruled out on the basis of objective information.

A Screening Determination for the Plan, dated March 2018 and prepared by WC, concluded that the Plan would require a SEA.

Accordingly, an Environmental Report (ER) dated November 2019 has been submitted.

The ER confirms that a Scoping Report was sent to the statutory consultees in August 2018. Responses were received from Natural England and Historic England.

A draft ER of February 2019 was sent to the statutory consultees and was also available on the Parish Council's website alongside the pre-submission, Regulation 14, consultation.

The ER concludes the Plan "...will have positive effects for new development...".³⁰

It was published for consultation alongside the submission version of the Plan.

²⁸ PPG para 031 ref id 11-031-20150209

²⁹ Ibid para 047 ref id 11-047-20190722

³⁰ ER para 5.16

The ER is a comprehensive document that has dealt with the issues appropriately for the content and level of detail in the Plan. This in line with PPG advice which confirms the SEA does not have to be done in any more detail or using more resources than is considered to be appropriate for the content and level of detail in the Plan.³¹ In my view, it has been prepared in accordance with Regulation 12 of the Regulations.

In relation to HRA, a HRA dated 27 February 2020 has been provided to me. At the screening stage, it was determined that two policies which allocate sites (Policies 1 and 2) have the potential to give rise to significant effects and were therefore taken forward to Appropriate Assessment (AA). This was because the Parish includes areas of the River Avon Special Area of Conservation (SAC) and the location, scale and nature of the proposed site allocations give rise to potential effects on this SAC.

An AA was carried out. This explains that the key issue is that the integrity of the SAC should be maintained or restored. As part of this, all development should be phosphate neutral. An Interim Delivery Plan signed by a number of signatories, including Wiltshire Council, sets out various mitigation measures in this respect.

The AA considers that any planning applications resulting from Policies 1 and 2 are likely to comply with the current requirements. The AA therefore concludes that the Plan will have no adverse effects on the integrity of the River Avon SAC either alone or in combination with other plans and projects.

Natural England was consulted on this and their response of 1 April 2020 concurs with this conclusion.

This sequence of events means that the most recent AA was carried out after the ER was produced. Those undertaking the ER did not have knowledge of this latest AA. There is then a discourse that can be put forward to say that the ER should be updated.

Technically, I believe this to be the case. However, the AA concludes that no adverse effects will occur and so the conclusions of the ER would not materially alter in my view should it be updated. WC confirm their view that the ER does not require further work.³² WC has, in effect, reviewed the SEA work in the light of the Plan requiring an AA however informally this has been done, and WC has reached the conclusion that no further work or implications arise.

It should also be noted that the HRA provided is dated one day before the submission (Regulation 16) stage of consultation ended. Therefore no consultation has been carried out on the AA apart from Natural England. WC rightly advises that Regulation 63(4) of the Conservation of Habitats and Species Regulations 2017 makes it clear that it is not mandatory to consult with the public or other bodies and that it is the competent authority's decision as to whether it is appropriate to do so [consult the public or other bodies].

³¹ PPG para 030 ref id 11-030-20150209

³² Answers to my Note A

Taking account of the characteristics of the Plan and the characteristics of the areas likely to be affected, I am of the view that EU obligations in respect of SEA have been satisfied.

Given the nature, characteristics and distance of the European sites and the nature and contents of the Plan, I consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

Conclusion on EU obligations

National guidance establishes that the ultimate responsibility for determining whether a plan meets EU obligations lies with the local planning authority.³³ WC does not raise any concerns in this regard including in relation to publicity and consultation requirements.

European Convention on Human Rights (ECHR)

There was no reference to Convention rights in the Basic Conditions Statement. I therefore requested a note from the Parish Council on this matter to help me in my assessment. A statement has been sent to me and comprehensively covers the ECHR and the Equalities Act 2010. Having regard to this statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

7.0 Detailed comments on the Plan and its policies

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

The Plan contains four policies. There is an eye catching front cover which gives a real flavour of the local area. There is a helpful contents page at the start of the Plan.

Chapter 1 - Introduction

This is a helpful introduction to the Plan. It contains a map of the Plan area. It explains how the Plan fits with national and County level policies. It refers to other documents and signposts key evidence and sets out how the Plan is organised. There are five sections based on themed topics and objectives; landscape and countryside, housing,

³³ PPG para 031 ref id 11-031-20150209

community facilities and services, recreation and open spaces and transport and infrastructure.

The long, but well articulated vision statement for the area is:

“The Winterbournes will still be an inclusive village community conserving and enhancing its natural and built heritage whilst promoting a safe, family friendly and invigorating environment enabling growth and quality of life for all, including both the young and the elderly. The Winterbournes will continue to flourish as three conjoined villages, together with Hurdcott, in a rural setting that will offer the advantages of easy access to the cities of Salisbury, Winchester and Southampton. Local developments will have been carefully managed so as not to disrupt the heart and character of the community. Overall, The Winterbournes will be a sustainable, vibrant and thriving community in harmony with its environment.”

WC has asked for two amendments to the text in this chapter in the interests of clarity. I agree these are both needed for this reason. Modifications are therefore made.

- **Change the second sentence in the second paragraph on page 4 of the Plan to read: “The policy designates *The Winterbournes* as a ‘Large Village’ where it may be expected that some of the indicative housing numbers for the community area are provided in accordance with Core Policies 1 and 2 of the *Wiltshire Core Strategy*.”**
- **Change the last sentence in the second paragraph on page 4 of the Plan to read: “Our Neighbourhood Plan will provide *local policies that reflect the community’s wishes with respect to the location of new housing and their general design*.”**

Chapter 2 – Landscape & countryside

The Plan identifies seven objectives for this theme. All are articulated well, but WC suggests that the three villages are named and I agree this would be useful in the interests of clarity and completeness. In addition, reference to a further CS policy should be added for the same reasons.

The Plan refers to some of the relevant CS policies. It is refreshing that the Plan’s policies do not seek to repeat those at a higher level, but seek to work in tandem with them adding a local layer of detail.

There are no specific Plan policies in this section. This is acceptable in principle and the chapter is clearly written and presented to link with the higher tier policies.

- **Change the second bullet pointed objective in section 2.1 on page 5 of the Plan to read: “Retain The Winterbournes as three villages of *Winterbourne Gunner, Winterbourne Dauntsey and Winterbourne Earls* with a distinct identity sitting in a rural setting.”**
- **Add a reference to Core Policy 52 (Green Infrastructure) to the last paragraph on page 5 of the Plan**

Chapter 3 - Housing

This section begins by referring to the development plan. For accuracy and completeness the saved policies of the SDLP and the recently adopted WHSAP should also be included as both these plans form part of the development plan.

The housing requirements should be made clear.

Seven objectives are then identified for this theme; all are clearly worded. WC has suggested some revision to the sixth bullet point and I agree this would be useful in the interests of additional clarity and completeness.

In addition this bullet point requires a drainage strategy to be submitted. The NPPF is clear that information requirements should be kept to a minimum.³⁴ A change is therefore recommended to increase flexibility on this point.

The NPPF³⁵ is clear that neighbourhood plans should support the delivery of strategic policies and should shape and direct development in their area that is outside of these strategic elements.

However, within this broad context, neighbourhood plans do not need to have policies addressing all types of development. However, where they do contain policies relevant to housing supply, then account should be taken of the latest and up to date evidence.³⁶ There is an expectation that local planning authorities will set housing requirement figures for designated neighbourhood areas through strategic policies or when requested by a qualifying body.³⁷

Neighbourhood planning bodies are encouraged to plan to meet their housing requirement and, where possible, exceed it.³⁸ PPG continues that plans do not have to make specific provision for housing or seek to allocate sites to accommodate the

³⁴ NPPF para 44

³⁵ Ibid para 13, PPG para 004 ref id 41-004-20190509

³⁶ PPG para 040 ref id 41-040-20160211

³⁷ Ibid para 101 ref id 41-101-20190509

³⁸ Ibid para 103 ref id 41-103-20190509

requirement.³⁹ Housing requirement figures are not binding as there is no requirement to plan for housing.⁴⁰

The Parish falls within the Amesbury Community Area identified in the CS. There is a requirement to provide around 345 new houses in the rural areas of this Community Area according to CS Core Policy 4. Since the CS was adopted, the residual requirement is now around 90 (as at April 2018). In response to a query, WC has helpfully confirmed this figure remains the current figure.

Given this, I asked whether WC considered the provision in the Plan for some 15 units was appropriate. WC explained there are five 'Large Villages', of which The Winterbournes is one, and 16 'Small Villages'. 'Large Villages' are considered to be capable of meeting a larger share of the indicative housing requirement and 'Small Villages' expected to deliver limited infill development. On this basis, WC considers this level of housing provision to be a reasonable proportion of the remaining housing requirement to be accommodated in this Plan area.

A Parish Housing Needs Survey of January 2016 identified the need for nine affordable homes.

15 units are provided for across two proposed site allocations. Based on CS Core Policy 43 which requires at least 30% provision on sites of five or more dwellings, this would generate three or possibly four affordable homes at best. This would not meet the known affordable housing requirement which is a few years old. The Plan recognises this though and suggests a rural exception site will need to be brought forward.

I asked WC for a view in relation to how this approach might generally conform to the strategic policies in the development plan. WC confirm that in order to meet the affordable housing need the Plan would have to allocate at least 30 units, "twice as many than judged reasonable" for the Plan to deliver against the indicative housing requirements. In addition the Parish Council, WC and I accept the affordable housing need is a snapshot in time. WC confirm it is their view that the use of a rural exception site route is "a valid and reasonable approach".

Therefore, taking all these reasons together, I consider that the level of housing provision made by the Plan is in line with strategic requirements.

Map 3 on page 11 of the Plan provides a useful overview of the two site allocations.

- **Change the first sentence on page 6 of the Plan to read: "The Wiltshire Core Strategy, which was adopted by Wiltshire Council in January 2015, the Wiltshire Housing Sites Allocations Plan adopted in February 2020 and the saved policies of the Salisbury District Local Plan, adopted in 2011, as listed in Appendix D of the Wiltshire Core Strategy, provide the current Development Plan for our area."**

³⁹ PPG para 104 ref id 41-104-20190509

⁴⁰ Ibid

- **Change the third sentence of the first paragraph on page 6 of the Plan to read: “Our Parish is located in the rural part of the Amesbury Community Area where there is *an indicative* requirement of 345 new homes over the plan period.”**
- **Change the sixth bullet pointed objective on page 6 of the Plan to read: “Prevent harmful impacts of flooding *and reduce flood risk, where possible*, by requiring all new housing development in the Parish *to be* accompanied by a *proportionate* drainage strategy (*and flood risk assessment where required by national policy and guidance*).”**

Policy 1 – Site allocation: Land between Glebe Hall & Primary School

The first site allocation is land between Glebe Hall and the primary school. The site is shown clearly on page 7 of the Plan. The policy allocates the site for 13 dwellings.

It is a long criteria based policy that covers access, archaeology, noise, design and landscaping. All are appropriate given the site’s context. Amongst other matters, I saw and noted at my visit the site’s access, the footpaths, its topography and the proximity of the railway line and pig farm.

I am informed by the Parish Council that the land is owned by a Trust; I understand the Trust has confirmed their support for the allocation and willingness to address issues such as safety, parking and access. They have also confirmed that development would not adversely affect a pig unit business located in the Plan area.

This is an issue subject of representation. I therefore asked WC to confirm whether any issues with the pig farm can be satisfactorily resolved without adversely affecting the existing pig farm operation.

WC advised in response to my query on this matter that the boundary of the site allocation had been drawn to ensure it is at least 400m from the operational area of the piggery. WC consider any issues arising can be satisfactorily managed through the development management process.

However, at fact check stage⁴¹ it came to light that, depending on where a 400m line is taken from, some of the site falls within 400m. The 400m is often used as a benchmark in planning because the General Permitted Development Order 2015 excludes agricultural buildings, structures or excavations for livestock or storage of slurry or sewage sludge within 400m of a dwelling.

⁴¹ This is a stage in the examination process when the examiner issues a draft report for fact checking purposes only to the local planning authority and the qualifying body; it is a short period of time set aside to correct any factual errors in the report

It is clear to me that any development on the proposed site should not adversely affect the existing pig farm because of the agent of change principle outlined in the NPPF.⁴²

Essentially, this means that where the operation of an existing business could have a significant adverse effect on new development in the vicinity, the applicant for the new development should be required to provide suitable mitigation before the development is completed. I consider this principle applies here; any residential development proposed should ensure that the relationship between the new residential development, and in particular any concerns relating to the living conditions of future occupants, and the continued operation of the pig farm is compatible.

There are many ways of doing this including through odour dispersion modeling for example. There is also no prohibition on livestock units within 400m of sensitive receptors such as dwellings. The 400m referred to earlier simply means that a planning application must be submitted for livestock buildings, i.e. it would not be permitted development, and the planning application would then take into account all relevant considerations specific to that proposal. There are other checks including guidance issued by DEFRA and the Environment Agency and of course WC's own Environmental Health officers.

There is also currently no automatic permission granted with a site allocation. Any planning application for residential development would be considered enabling all material considerations specific to this site and proposal to be taken into account. Careful siting and design of dwellings would also assist. If the proposed residential development was found to be incompatible with the pig farm operation and mitigation could not satisfactorily resolve this, my expectation is that any residential scheme would not go ahead.

Any concerns I had in relation to both the availability and deliverability of this site have been resolved by the answers received to my queries and can be dealt with through the planning application process.

There are some modifications to ensure the policy is flexible to help achieve sustainable development. It is not possible to impose a cap on the number of dwellings as until detailed design work is carried out, a specific number might well lead to an unacceptable scheme or not achieve the best quality development. More flexibility is made to any requirements for information set out for the reasons given earlier in this report to ensure regard is made to national policy and guidance.⁴³

With these modifications, the policy will meet the basic conditions. In particular it will help to meet housing needs as required by national policy and guidance, generally conform to CS Core Policies 1, 2, 4 and 57 and help to achieve sustainable development.

- **Add the word “around” before “...13 dwellings...” in the first sentence of the policy**

⁴² NPPF para 182

⁴³ Ibid para 44

- Add the word “*proportional*” before “...archaeological evaluation.” in criterion c) of the policy
- Add the word “*proportional*” before “...noise assessment.” in criterion d) of the policy

Policy 2 – Site allocation: Land on The Portway

This policy allocates a site for two dwellings on land shown on Map 2 on page 9 of the Plan. The site extends a line of existing properties. Given this character, the specified number of units and the criteria in the policy are appropriate.

WC has raised a concern that the site might be regarded as isolated development. Whilst this site is not adjacent to the settlement boundary, it is adjacent to an existing linear group of houses and is opposite the cricket ground. It is therefore not isolated in the sense that it is remote or away from any built or other development. By its very nature, development in the Plan area is spread out. I consider the site to be appropriate for the level of development promoted in this policy.

Other representations raise a number of points. I have already set out why I consider the level of growth provided for in the Plan and its approach to be acceptable.

However, I understand that the owners of Misselfore would have preferred to have their site assessed separately and on its own merits rather than in tandem with sites S26, S122 (of which the site in question forms part carried over from the SHELAA 2017) and S1045 as well as treated separately in the Questionnaire. I note that the combined sites scored very highly in the Questionnaire as the first and second preference (as detailed in the Summary Table in Appendix 1 Housing Site Assessments) so it is hard to see how this might have been bettered. It is clear from Appendix 1, despite some shortcomings that report may have, and from the SEA Environmental Report that consideration was given to the various elements of these three sites. I accept that more work has been carried out by the owners of Misselfore to support development of the site from highways, ecology and heritage perspectives particularly, but it seems to me that the assessments carried out were reasonable and the area of land now subject of this policy was preferred.

The policy meets the basic conditions and no modifications to it are recommended.

Chapter 4 – Community facilities & services

There are a number of various facilities and services in the Parish. It is clear that the community value these greatly.

There are no planning policies specifically identified in this section, but the section does contain some development and use of land related statements. I consider these could have formed the basis for planning policies and to retain them in their current form would be confusing.

To compound this lack of clarity, these are presented as aspirations. These include the safeguarding of these amenities through CS Core Policy 49, support for the expansion of the Post Office and Village Shop and support for existing and new businesses.

I invited the Parish Council, working alongside WC, to suggest how this lack of clarity might be addressed through modifications. However, this invitation was not taken up. The following modifications are therefore recommended in the interests of clarity and to ensure there is clear differentiation between policies which must relate to the development and use of land and those more aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the development and use of land.⁴⁴

- **Change the second sentence on page 12 of the Plan to read: “The Parish Council *seeks to ensure* that they continue to meet the needs of the community.”**
- **Delete the sub section 4.2 heading “Aspirations” on page 12 and replace with “Objectives”**
- **Delete the second sentence in the first bullet point under section 4.2 which begins “This includes protecting these amenities...”**
- **Add reference to two further Core Strategy policies CP34 and CP48**
- **Delete the second and third bullet points on page 13**

Chapter 5 – Recreation & open spaces

Policy 3 – Local Green Space designations

Nine areas of Local Green Space (LGS) are proposed.

The NPPF explains that LGSs are green areas of particular importance to local communities.⁴⁵ The effect of such a designation is that new development will be ruled out other than in very special circumstances.

⁴⁴ PPG para 004 ref id 41-004-20190509

⁴⁵ NPPF paras 99, 100, 101

The identification of LGSs should be consistent with local planning of sustainable development and complement investment and be capable of enduring beyond the Plan period. The NPPF makes it clear that this designation will not be appropriate for most green areas or open space. Further guidance about LGSs is given in PPG.

A Local Green Space Assessment has been undertaken and I saw all the areas on my site visit. All are identified clearly on maps on pages 15 and 16 of the Plan and an overview is given on Map 4 on page 17 of the Plan.

Winterbourne Earls Churchyard is consecrated ground. It is valued for its historical associations.

Winterbourne Dauntsey Churchyard is consecrated ground and a wildlife garden valued for its history, ecology and tranquility. Located in the heart of the village, it seemed to me to be a quiet oasis.

Summerlug Field is an open grassed area with some mature trees. It is central to the setting of the properties around this area and is valued for its recreational purposes.

Glebe Field is a flat, grassed area with clear boundaries located between the Church and the Vicarage on Figsbury Road. It is used and valued for its recreational functions and is home to the Village Fete.

Glebe Hall Lawn is located to the rear of the Glebe Hall. It is used by community groups and is valued for its recreational purposes.

The Allotments are valued for their amenity. I saw that this area is well used and well kept.

Amenity Field and Playground has a childrens' playground and basketball area and an area of woodland close to the River Bourne. It is a Field in Trust. It is valued for its recreation function.

The Cricket Pitch is valued as an amenity area both for cricket, but also other community events. It is grazed by the landowner for part of the year.

Land by White Bridge is an area of land with a bench close to the river and enjoyed for its recreational and relaxation as well as access to the riverbank and its wildlife.

In my view, all the proposed LGSs meet the criteria in the NPPF⁴⁶ satisfactorily.

The policy is clearly worded and meets the basic conditions. No modifications are therefore suggested.

⁴⁶ NPPF paras 99, 100, 101

Chapter 6 – Infrastructure & transport

This chapter deals with a number of issues; some do not have planning policies alongside them as the Parish Council rightly does not wish to duplicate those policies at the higher tier level which cover the issue satisfactorily. This is refreshing. However, as previously explained it is important that there is a clear differentiation between planning related issues and non-planning issues. Some modifications are therefore made to ensure this is the case.

The Plan explains that flood risk is of concern to the community. One of the measures outlined in the Plan is to ensure effective management of manmade and natural drainage infrastructure.

The Plan then refers to road and pedestrian safety and includes Policy 4 which I will deal with later.

The Plan then refers to pedestrian and cycle links in subsection 6.4. WC and Sustrans are considering the possibility of a cycleway from Salisbury to Porton/Porton Down. The Plan refers to the proposal on page 19 and includes a proposed route of it on page 20. The route is a long-term project by WC which seems to me from the information provided to be at a consultation stage and still under discussion. In the light of this uncertainty, the inclusion of the route map is inappropriate as it is likely to change and to include it in the Plan gives it a status that it does not have potentially leading to confusion.

As the section is a community aspiration this should be made clear.

Turning now to subsection 6.5, this needs some revision.

Finally, a consequential amendment is needed.

- **Delete the words “...as well as by directing new development away from locations prone to flooding.” from the second paragraph under subsection 6.2**
- **Add a new sentence at the end of the second paragraph under subsection 6.2 that reads: “Core Strategy CP67 Flood Risk deals with this issue.”**
- **Delete the “Proposed route alignment” map from page 20 of the Plan**
- **Delete the words “(see route map overleaf)” from page 19 of the Plan**
- **Change the title of subsection 6.4 to “Pedestrian and cycle links – *community aspirations*”**

- **Move the first bullet point under subsection 6.5 to subsection 6.2 changing it to read: “*Planning and maintaining...*”, changing the “(as supported...)” to “*is supported*” and removing the brackets**
- **Move the second bullet point under subsection 6.5 to subsection 6.3 changing it to read: “*Improving...*”, changing the “(as supported...)” to “*is supported*” and removing the brackets**
- **Move the third bullet point under subsection 6.5 to subsection 6.4 after the first paragraph, changing it to read: “*Maintaining...*”, changing the “(as supported...)” to “*is supported*” and removing the brackets**
- **Delete the words “The objectives and supporting policies in” in the second paragraph and begin this with “This section *aims...*”**

Policy 4 – Expansion of Winterbourne Primary School

The A338 runs through the Parish. There are concerns that the volume, weight and speed of traffic are increasing. One particular issue highlighted is the parking of cars on the A338 near the primary school.

This policy seeks to ensure that any proposal that results in an increase in staff or pupil numbers is accompanied by a Travel Plan. This is to help ensure that parking problems are not exacerbated or that mitigation is provided.

I am mindful that the NPPF⁴⁷ indicates that all developments which generate significant amounts of movement should be required to provide a travel plan. The implication of this is that developments which do not generate significant amounts of movement should not be required to produce a travel plan.

The Plan refers to WC’s Local Transport Plan 2011 – 2026 Smarter Choices Strategy (March 2014). This in turn refers to a Supplementary Planning Document called “Development Related Travel Plans” of July 2009. Both documents lend support for all new and expanded school facilities to be accommodated by a travel plan.

Therefore in these circumstances, the policy meets the basic conditions and is a local expression of CS Core Policies 60 and 61 which seek to encourage sustainable transport and CS Core Policy 62 which seeks to ensure any impacts on the transport network are acceptable in particular and will help to achieve sustainable development.

No modifications are put forward to the wording of Policy 4 itself.

⁴⁷ NPPF para 111

Appendices

Two appendices are included in the Plan; Appendix 1 Housing Site Assessments and Appendix 2 Local Green Space Assessments.

8.0 Conclusions and recommendations

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

I am therefore pleased to recommend to Wiltshire Council that, subject to the modifications proposed in this report, The Winterbournes Neighbourhood Development Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion.

I therefore consider that The Winterbournes Neighbourhood Development Plan should proceed to a referendum based on The Winterbournes Neighbourhood Plan area as approved by Wiltshire Council on 9 December 2015.

Ann Skippers MRTPI

Ann Skippers Planning

25 September 2020

Appendix 1 List of key documents specific to this examination

The Winterbournes Neighbourhood Plan 2019 – 2026 Submission Draft

Basic Conditions Statement undated

Consultation Statement November 2019

Appendix 1 Housing Site Assessments

Appendix 2 Local Green Space Assessments

Strategic Environmental Assessment Non-Technical Summary

Strategic Environmental Assessment Environmental Report: Submission November 2019 (Enfusion)

Habitats Regulations Assessment Screening Assessment (V2.EF_27.02.2020)

Email from Natural England to WC regarding Appropriate Assessment for Regulation 16 Consultation of 1 April 2020

Saved policies of the Salisbury District Local Plan adopted June 2003

Wiltshire Core Strategy adopted 20 January 2015

Revised Wiltshire Planning Obligations SPD October 2016

Wiltshire Housing Site Allocations Plan adopted 25 February 2020

Local Transport Plan 2011 – 2026 Smarter Choices Strategy (March 2014)

Supplementary Planning Document called “Development Related Travel Plans” (July 2009)

Comments from the Parish Council on representations received at Regulation 16 stage

Other information on www.winterbourneparishcouncil.com

List ends

Appendix 2 Questions of clarification from the examiner

The Winterbournes Neighbourhood Plan Examination

Note and questions of clarification from the Independent Examiner to the Parish Council and WC

Having completed my initial review of the Neighbourhood Plan (the Plan), in line with the guidance in the *Neighbourhood Planning Independent Examiner Referral Service Guidance to service users and Examiners*, I am writing to the Parish Council and the Local Planning Authority, to set out my initial thoughts and concerns in relation to this examination. This note will allow both parties to consider these concerns to enable us to agree a way forward.

Should the parties feel it would be helpful to hold an exploratory meeting to consider my concerns, clarify the scale of the issues and discuss options on how to proceed, this can be requested. This would be held remotely. These meetings are held in public. However, it must be noted that only process related matters can be discussed at such meetings. More information is given in the guidance referred to above.

In addition, there are some straightforward matters of clarification. These questions are at the end of this note. Please do not send or direct me to evidence that is not already publicly available.

Notes from the examiner for further consideration please

Note A. A Habitats Regulation Assessment (HRA) dated 27 February 2020 has been provided to me. At the screening stage, it was determined that two policies which allocate sites (Policies 1 and 2) have the potential to give rise to significant effects and were therefore taken forward to Appropriate Assessment (AA). An AA was carried out. It concludes that the Plan will have no adverse effects on the integrity of the River Avon SAC either alone or in combination with other plans and projects.

Natural England was consulted on this and their response of 1 April 2020 concurs with this conclusion.

However, the AA was carried out after the Plan had been submitted and was not available at the time of the public consultation. I invite comments on this situation from the Parish Council and WC. Usually the AA would be available at the same time as the Regulation 16 consultation and form part of the bundle of submission documents.

In addition this sequence of events means that the Strategic Environmental Assessment (SEA) of November 2019 and produced by Enfusion did not have the benefit or knowledge of this advice. Indeed the SEA refers to the lack of a need of an AA.

There is therefore a need to consider whether any implications arise from this sequence of events in relation to the SEA, for example whether it needs updating in the light of the AA. I invite comments on this situation from the Parish Council and WC. If the SEA requires updating, and I am likely to take the view that this is needed, then a further period of consultation would be required with the statutory consultees and the public.

Note B. I must consider whether the draft Plan is compatible with Convention rights.¹ There is no reference to this issue in the Plan or the Basic Conditions Statement. I therefore would invite a note from the Parish Council on this matter. It may be the case that further consultation is needed on this and I invite comments on this from the Parish Council and WC.

¹ The combined effect of the Town and Country Planning Act Schedule 48 para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

Note C. Please could WC confirm whether the housing need for the Amesbury Community Area is now around 90 houses? If this is not the case, or there is a different need based on up to date information, please specify what the figure is.

The Plan makes provision for 15 dwellings across two site allocations. Does WC regard this level of provision as acceptable? Please give reasons for the answer.

The Plan identifies that nine affordable housing units are needed. This is based on a Survey dated 2016, a little while ago. Assuming the same provision is needed now, the Plan seeks to rely on a rural exceptions site to provide this provision as only three units would be provided through the site allocations. Does WC regard this approach as acceptable in meeting identified local housing needs?

Turning now to the two proposed site allocations, both raise some issues.

The first, subject of Policy 1, Land between Glebe Hall and Winterbourne Primary School has been the subject of various representations. I am not clear whether this proposed allocation has landowner support. Please confirm or not.

In addition, there seems to be a potential issue with a nearby pig farm. Please could WC confirm whether they are content that any issues with the pig farm can be satisfactorily resolved without affecting the existing pig farm business (at planning application stage for example)?

In raising these two queries, I am seeking to confirm the availability and deliverability of this proposed site allocation. If this site allocation were to be deleted, what implications would this have for the Plan?

The second site allocation, subject of Policy 2, Land on The Portway, is not located close to any Limits of Development. WC has commented that this may be regarded as isolated development. If I were to reach the same or a similar view, what implications would deletion of this site have for the Plan?

Note D. Some chapters of the Plan do not contain planning policies. I consider this to be acceptable in principle. However, some parts of the Plan contain statements which relate to the development and use of land and could be interpreted and read as if they are planning policy.

The salient parts of concern in the Plan are:

- a) Chapter 4 Community facilities and Services. Section 4.2 is headed "Aspirations" and has three bullet points. All three bullet points contain planning statements. The first bullet point refers to and relies on Core Policy 49, but also contains a statement about adjacent development which is a new and valid planning matter. The second bullet point supports expansion of the Shop and Post Office and this is a valid planning matter. The last bullet point also is a valid planning matter.
- b) Chapter 6 Infrastructure and Transport. Section 6.2 refers to flood risk and is a valid planning matter. Section 6.4 refers to pedestrian and cycle links. The promotion of pedestrian links and cycle routes is a valid planning matter. The section then discusses and includes a route plan of a potential cycleway and indicates Parish Council support for this; this then is an aspiration. The next element then offers support for new development which might facilitate the proposed route; this is a planning matter. As you can see this section is rather confused. The inclusion of the route map may also quickly be outdated (indeed the representation from WC indicates it has already been superseded) and its status must be clear if retained.

I consider that the chapters outlined above are not presented sufficiently clearly. There are elements which could have been the subject of planning policies in the Plan, but are not. There is one aspiration

which arguably reads as if it might be policy. This then gives rise to potential confusion. This is largely a matter of Plan presentation, but it is an important element.

I invite the Parish Council (working alongside WC) to send me a preferred way of how these concerns might be addressed through modifications and whether such modifications would be so significant as to require further consultation?

Please also see questions 4 and 5 below.

Note E. The WHSAP was adopted during the Regulation 16 consultation period, just a few days before the period ended. If there are any strategic policies of relevance to this Plan in the WHSAP, it may be necessary to run a further period of consultation. Please also see question 2 below.

Overall, taking all these issues together, the Parish Council and WC may wish to decide whether to proceed with the examination depending on the potential resolution of the queries.

Questions of clarification

1. Please could WC confirm whether any policies in the Salisbury District Local Plan are regarded as 'strategic'?
1. Please could WC confirm whether any policies in the Wiltshire Housing Site Allocations Plan (WHSAP) are of relevance to this examination and are regarded as 'strategic'?
2. Please could WC provide me with a copy of representations which are not redacted or a list of those bodies and organisations and individuals so I can see who has made representations and also check that I have no conflicts of interest.
3. Representation 10 refers to an email of 15 April 2019. I would be grateful if a copy of this email could be made available to me please.
4. Please could WC confirm and provide me with the latest guidance on Travel Plans (referred to on page 19 of the Plan)?
5. What is the current position with regard to the Sustrans cycle route referred to on pages 19 and 20 of the Plan please?

It may be the case that on receipt of your anticipated assistance on these matters that I need to ask for further clarification or that further queries will occur as the examination progresses.

These queries are raised without prejudice to the outcome of the examination.

Please note that this note and list of clarification questions is a public document and that your answers will also be in the public domain. Both my questions and your responses should be placed on the Councils' websites.

With many thanks.

Ann Skippers MRTPI
Independent Examiner
16 June 2020