

Sutton Benger and Draycot Cerne Neighbourhood Development Plan 2020-2035

**A report to Wiltshire Council on the Sutton
Benger and Draycot Cerne Neighbourhood
Development Plan**

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Executive Summary

- 1 I was appointed by Wiltshire Council in July 2024 to carry out the independent examination of the Sutton Benger and Draycot Cerne Neighbourhood Plan.
- 2 The examination proceeded by written representations. I visited the neighbourhood area on 31 July 2024.
- 3 The Plan seeks to bring forward positive and sustainable development in the neighbourhood area. It also includes policies to safeguard the built and historic environment and proposes the designation of a package of local green spaces. The Plan is commendably focused on a clear set of locally-distinctive issues.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
10 October 2024

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Sutton Benger and Draycot Cerne Neighbourhood Development Plan 2020-2035 ('the Plan').
- 1.2 The Plan was submitted to Wiltshire Council (WC) by Sutton Benger Parish Council (SBPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021 and 2023. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by WC, with the consent of SBPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WC and SBPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 41 years' experience in various local authorities at either Head of Planning or Service Director level, and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan, I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (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); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Design Code.
- the Character Appraisal
- the Local Green Space Assessment.
- the WC Strategic Environmental Assessment screening report.
- the WC Habitats Regulations Assessment screening report.
- the representations made to the Plan.
- SBPC's responses to the clarification note.
- the adopted Wiltshire Core Strategy.
- the adopted Wiltshire Housing Allocations Local Plan
- the National Planning Policy Framework (December 2023).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 31 July 2024. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I concluded that the Plan could be examined by way of written representations and that a hearing was not required.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development management decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), SBPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies.
- 4.3 Section 3 of the Statement records the various activities that were held to engage the local community and the feedback from each event. They also comment on the consultation processes that took place on the pre-submission version of the Plan (January to March 2023).
- 4.4 A linked report advises about the way in which the Plan was refined because of the comments received at the pre-submission stage. This analysis helps to describe how the Plan has evolved and progressed to the submission stage.
- 4.5 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I conclude that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. WC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by WC. This exercise generated representations from the following organisations:
 - Gladman Development Limited
 - Historic England
 - Natural England
 - National Grid
 - National Highways
 - Persimmon Homes
 - Canal and River Trust
 - Environment Agency
 - Network Rail
 - Wiltshire Council
- 4.7 Two representation were received from residents, one of which was prepared by a planning consultant.

- 4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5. The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Sutton Benger. It includes the villages of Sutton Benger and Draycot Cerne and the wider rural area. It is bordered on the north side by the M4 motorway and on the east by the River Avon. Its population in 2011 was 1045 persons living in 403 households. It was designated as a neighbourhood area on 9 December 2015.
- 5.2 Sutton Benger is the largest settlement in the parish. It includes a designated conservation area. As the Plan describes, the medieval village layout of a High Street and parallel Back Lane (now Chestnut Road) and a staggered crossroads beside All Saints Church, formed by Seagry Road and Bell Lane is still clearly visible. Draycot Cerne is a smaller settlement approximately a mile to the west of Sutton Benger (and to the immediate west of the junction between the B4069 and the B4122).
- 5.3 The remainder of the parish is attractive countryside.

Development Plan Context

- 5.4 The Wiltshire Core Strategy was adopted in January 2015. The Core Strategy defines the spatial vision for the whole of the administrative area of Wiltshire Council and sets out a development strategy to meet its objectives. It includes strategic planning policies to guide and control the overall scale, type and location of development including the allocation of strategic sites. The submitted Plan comments that it has taken all the policies and allocations contained in the Wiltshire Core Strategy, as 'strategic' policies for the purposes of preparing the First Review of the Plan.
- 5.5 The parish is part of the defined Chippenham Community Area (as identified in the Core Strategy). Sutton Benger is one of a series of Large Villages in the Community Area. The Core Strategy comments that over the plan period (2006 to 2026), 26.5 ha of new employment land (in addition to that already provided or committed at April 2011) and approximately 5,090 new homes will be provided at least 4,510 of which should occur at Chippenham. Finally, it advises that approximately 580 homes will be provided in the rest of the Community Area over the plan period.
- 5.6 WC is now well-advanced in the preparation of a Local Plan review. It will set out a vision for the future of Wiltshire up to 2038. Consultation took place on the Regulation 19 version of the Plan between September and November 2023. It is anticipated that the Plan will be adopted by the end of the third quarter of 2025/2026. The submitted neighbourhood plan advises that at the time of its pre-submission version it had chosen an end date of 2036 to accord with the housing figures for the individual settlements at that point in the emerging Local Plan Review. However, it goes on to comment that it was appropriate to revise its Plan period to 2038 to reflect the emerging housing figures for the individual settlements as set out in the emerging Local Plan Review.

- 5.7 WC adopted the Wiltshire Housing Site Allocations Plan in February 2020. Whilst that Plan allocated several housing allocations across Wiltshire, it did not allocate a site in the neighbourhood area. The Plan defines a settlement boundary for Sutton Benger.
- 5.8 The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 31 July 2024. I approached it from the M4 (Junction 17) to the north. This helped me to understand its position in the wider landscape and its accessibility to the road network.
- 5.10 I looked initially at the overall form and layout of Draycot Cerne. I saw the importance and status of The Grey House
- 5.11 I paid particular attention to the separation between Draycot Cerne and Sutton Benger.
- 5.12 I then drove to Sutton Benger and parked by the School. I walked to the Church and then along Seagry Road. In doing so I saw a series of interesting buildings including Old School House, Church Farmhouse and Church Barn. I looked at the proposed local green space (Church Piece) in this part of the village. Also looked at this green space from Barratt Lane (and the well-used footpath).
- 5.13 I walked through Recreation Ground into the proposed local green space at Big Field (LG-5) along the connecting footpath. I saw that it was in agricultural use. I also noted its relationship to the wider agricultural landscape to the south. I walked into Queens Drive along the other footpath through the Field.
- 5.14 I walked back to the School. In doing so I saw the significance of Village Hall and the GP Surgery
- 5.15 I then walked along High Street and into Heath Avenue. I saw the way in which the new houses had been incorporated into the fabric of the village. I also saw the significance and importance of the Wellesley Arms public house.
- 5.16 I left the neighbourhood area and drove along the B4069 to Chippenham. This highlighted the relative proximity of the neighbourhood area to the higher-level services in that town.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 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. To comply with 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 development plan in the area;
 - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Sutton Benger and Draycot Cerne Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the development plan context as described in Section 5 of this report;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination, I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area and includes a series of policies that address a range of development and environmental matters. It has a focus on safeguarding its built and natural environments and designating a package of local green spaces.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance (ID:41-041-20140306) which indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Planning practice guidance also advises that planning policies should be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with these practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for infill development (Policy SB10), and for rural economic development (Policies SB6.1 and SB17). In the social dimension, it includes a policy on affordable housing (Policy SB11), local green spaces (Policy SB14) and rights of way (Policy SB15). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment in Policies SB1-9. This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in this part of Wiltshire in paragraphs 5.4 to 5.8 of this report.

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, WC undertook a screening exercise in October 2022 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that it is unlikely that significant environmental effects will arise from the implementation of the Plan and that SEA is not needed.

Habitats Regulations Assessment

- 6.15 WC prepared a Habitats Regulations Assessment (HRA) of the Plan in February 2023. It assesses the potential impact of the Plan on protected sites outside the parish.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns regarding either neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. However, in some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and SBPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on all the policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1-5)

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 Section 1 sets out a clear background to the Plan. It identifies the neighbourhood area (in Figure 1) and the Plan period (in paragraph 1.8). It also comments about the way in which the Plan relates to other elements of the development plan and how it will be monitored and reviewed. In the round, it is a very good introduction to a neighbourhood plan.
- 7.10 Section 2 comments about the national and the local planning policy context within which the Plan has been prepared. It also sets out key planning policy matters that are addressed in the Plan.
- 7.11 Section 3 comments about the processes which underpinned the Plan. Figure 4 describes this matter in a straightforward way. The community engagement element of this section overlaps with the Consultation Statement.
- 7.12 Section 4 comments about the vision and objectives of the Plan and how they provide a structure for the resulting policies. The Vision neatly summarises the approach taken as follows:

'To maintain the rural character and landscape of the Parish (Plan Area), whilst supporting sustainable development that is of an appropriate scale and design to benefit the local community.'

- 7.13 Section 5 comments about the parish to very good effect. The information helpfully supports several of the policies.
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy SB1: Landscape - The Rural Character

- 7.15 The context to this policy (and to Policy SB2) is the Plan's view of the importance of sustaining the sensitive landscape setting of the villages. It also seeks to preserve and enhance the areas of natural landscape and agriculture existing between the settlement areas, whilst conserving the existing network of trees, hedgerows, watercourses, public community spaces and rights of way.
- 7.16 This is an important policy in the Plan. It advises that development proposals should demonstrate how they preserve or enhance the features which positively define the character of the neighbourhood area, taking into consideration the recommendations of the Wiltshire Landscape Character Assessment and Sutton Benger Parish Character Appraisal (Appendix 1). In this context the policy is underpinned by recent and appropriate evidence. In general terms, I am satisfied that the policy has taken a very positive approach to this matter and has regard to Section 15 of the NPPF.
- 7.17 In their representation, BH and BJ Sealey question some of the elements of the policy and the supporting text as follows:

'From a heritage perspective, the parkland is not subject to any major or statutory features, such as a Registered Park and Garden, or a Scheduled Ancient Monument.

It is clear from assessing historic mapping, known historical events, and aerial photography, that the extent of Draycot Park has altered over time. It should not be considered that, in illustrating the extent of the former parkland at a certain point in time (historically), this means it is legible or coherent today, or that because it once existed, this affords the land any heritage interest.

The former parkland character and form is no longer legible, and clarity should be provided regarding which locations may still possess such a character rather than overlaying the former parkland boundary

In our view, echoes of the former parkland character are most noticeable around the site of the former Draycot House, with the tree lined route from the road at the western boundary to Draycot House, the lake to the south of Draycot House, and plantations to the east and west of the lake, being the most complete and legible elements of the former parkland. Their status as key parkland features is acknowledged within the wording of Policy SB1, however, this is inconsistent with the designation shown on the map at Figure 12 and also with the extent of current parkland shown at Figure 15.

Informed by the SBCA, the supporting text to draft Policy SB1 sets out a summary of the ‘issues and concerns’ relating to the character of the landscape and rural landscape, including to “encourage management and restoration of the historic parkland landscapes that are characteristic of the area” (paragraph 6.1.5). This has not been adequately justified by the draft plan or the SBCA and should therefore be deleted.

In addition, the (Plan) identifies historic parklands as a “key valued characteristic” taken from the SBCA, which is unfounded.’

7.18 I sought SBPC’s comments on this detailed representation. In its response to the clarification note, it advised that:

‘(it) has reviewed the representation made by Savills on behalf of DH and BJ Sealey and the accompanying landscape technical note and whilst they appreciate their comments, it is considered from the evidence supporting this NP and the adopted Local Plan that there is a substantive need to protect this historic landscape and prevent its total loss.

Both Savills and FCPR Environment and Design Limited appear to accept that a large part of the character of the historic parkland landscape has been diminished and eroded due to the passage of time and human intervention. As we highlighted during Regulation 14, historic parkland like this has diminished for many reasons over the last hundred, or so years. This has reached a point where sadly over thirty percent of historic estate parkland has been lost forever¹. The Draycot Parkland contains many historic buildings and views, which in our opinion gives us a valid reason to wish for its retention.

The Draycot Parkland also contains several significant historic buildings, views and footpaths, which are valued highly by the local community. The Parish Council are concerned about the change to the boundaries of the historic parkland that is proposed, as it excludes all of the existing PRowS and could lead to the complete fragmentation of this valued historic landscape.

The extents of the Draycot Parkland designation that are currently being proposed by the Parish Council were underpinned by up-to-date evidence, which comprised the Wiltshire Landscape Character Assessment 2005 and the Sutton Benger Parish Character Appraisal. The 2005 study is also considered to be relevant up until this date, which is evident from the fact that it was used to inform the landscape technical note. The Parish Council consider that both documents highlight the significance of enhancing and preserving this historic parkland. The SB Character Appraisal on page 28 also makes a specific mention on the importance of retaining the historic character and setting of the parkland.

“The condition and strength of character of the LCA is assessed as Good to Moderate. The strategy is to conserve characteristic elements, and improve elements in decline, such as the distinctive stone villages, the areas of ecological importance and the

historic parkland and to strengthen locally degraded elements such as the flailed hedgerows and overgrown stone wall

The Parish Council believes that the proposed designation had regards to both national and local policy and national guidance, and therefore meets the basic conditions. The extents of the Draycot Parkland were also decided following extensive consultation with the local community to ensure that this plan as a whole reflects their wishes. As a consequence, the Parish Council feel that it is essential that the Draycot Parkland designation is retained as currently shown in the submission version of the (Plan).'

- 7.19 WC makes a series of comments on the wording used in the policy.
- 7.20 I have considered these comments very carefully in the round. As submitted, I have concluded that the policy includes an unnecessary level of detail about the character of the neighbourhood area, especially as important details are already captured in the supporting text (paragraph 6.1.6). As such, I recommend that the schedule of details about the character of the parish is deleted from the policy. I also recommend that the wording used in the retained first part of the policy is modified so that it uses the language in national policy as suggested by WC.
- 7.21 The representation comments about the spatial definition of the parkland associated with the former Draycot House. On the balance of the evidence, I am satisfied that SBPC has taken an appropriate approach to this matter, including the associated preparation of the Character Appraisal.
- 7.22 I recommend the deletion of paragraph 6.1.5 in the Plan which comments about a series of issues and concern in the part of the neighbourhood area around the former Draycot House. Whilst the issues have been highlighted in the Character Appraisal, they do not necessarily translate into neighbourhood plan land use policies. In any event, a neighbourhood plan should take a positive approach (identifying what a development proposal should achieve) rather than a negative approach (in this case, seeking to address concerns about future potential works as identified in the Character Appraisal).
- 7.23 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should demonstrate how they protect, conserve, and enhance the features which positively define the character of the neighbourhood area, and respond positively to the Wiltshire Landscape Character Assessment and Sutton Benger Parish Character Appraisal (Appendix 1).’

Delete paragraph 6.1.5

Policy SB2: Landscape - Maintaining the Separation of Settlements

- 7.24 The focus of this policy is to maintain the current separation of Sutton Benger and Draycot Cerne. It comments that new development should respect the rural landscape setting of the neighbourhood area and preserve the distinctive separation between the Sutton Benger and Draycot Cerne Neighbourhood Development Plan – Examiner’s Report

settlements of Sutton Benger and Draycot Cerne. It also advises that proposals on the land between the settlements, including additional non-allocated employment uses, should be supported by a landscape and visual impact assessment which demonstrates that the development will not erode the physical or visual separation of the settlements

7.25 WC comments that evidence should be presented identifying where and why a Landscape Visual Impact Assessment should be provided, given it may not be appropriate for all development to submit such an assessment.

7.26 Gladman Developments Limited comments that:

'(the policy) as currently written implies that proposals for any type of development should be supported by a landscape and visual impact assessment and that this assessment must demonstrate that the development will not erode the physical or visual separation of the settlements. The stipulation that the physical or visual separation of settlements will not be eroded, with no exceptions is highly restrictive and contrary to the National Planning Policy Framework, specifically paragraphs 180 (b) and 181. Compliance with this policy, as written with no flexibility, for the majority of proposals is likely to be unattainable and therefore Policy SB2 cannot be deemed as legally sound as it essentially acts a blanket restriction for any development outside of the defined settlement boundary.'

7.27 I sought SBPC's views on the matter-of-fact way in which the policy requires the preparation of a landscape visual impact assessment and whether a proportionate approach would be more appropriate. In its response to the clarification note, it advised that:

'Policy SB2 echoes the Parish Council's objective to protect and preserve the distinctive landscape character of the Neighbourhood Plan Area. It is acknowledged that a Landscape Visual Impact Assessment may not always be necessary to support a development proposal, as it could relate to smaller proposals. Therefore, the Parish Council is happy with accepting the Examiner's recommendation to reflect this.'

7.28 I recommend accordingly. I also recommend a modification to the final sentence of the second part of the policy so that WC can properly assess the harm which may or may not be caused by development proposals on a case-by-case basis. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with:

'As appropriate to their scale, nature, and location, development proposals on the land between the settlements, should be supported by a landscape and visual impact assessment which demonstrates that the development will not harmfully erode the physical or visual separation of the settlements.'

Policy SB3: Important Views

- 7.29 The context to the policy is that views that have been determined to be significant within the parish following consultation with residents.
- 7.30 The Plan identifies a series of important views (in Figure 13). The policy advises that proposals should respond positively to the identified views and demonstrate consideration of matters relating to design, height, and massing either individually or cumulatively.
- 7.31 WC comment that there are a significant number of views and advise that it would have been beneficial to reflect on the significance of the views and whether they all qualify for special protection.
- 7.32 Gladman Development Limited comments:

'According to the Character Appraisal 2024, the 'Important Views' within Policy SB3 and supporting evidence base were determined to be significant through consultation with the community and had been submitted by the local community. It is not clear whether these are all the views submitted for consideration by the community or just those considered 'significant'. There are 26 'Important Views' identified in the 'Character Appraisal' and 'Views on Views' evidence base documents, before being assessed within the latter.

This policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.

In this regard, Gladman specifically object to the identification of viewpoint 'PM18' as 'View North, South, East and West from SBEN18' The evidence base to support the policy does little to indicate why a view should be protected other than providing a view of the surrounding agricultural fields from users of the (public right of way) and there is insufficient evidence to support the protection of the view. Moreover, within the 'nature of the view' and 'detractors and risks' sections of the "Key View Assessment Record" there is no mention of the numerous pylons which can be seen on all 5 of the supporting images. In addition, the Character Appraisal provides no further information to justify the proposed policy and identified views.'

- 7.33 Persimmon Homes comments that:

'(the policy) seeks to protect three designated views across the Land at Sutton Lane: PM15, PM24 and PM25. The criteria used to identify important views is unsound and the evidence base is not sufficiently robust to justify such a policy. As explained in our previous representations these three viewpoints do not warrant a specific designation that would restrict development on such an arbitrary basis. These viewpoints should be deleted from the draft Policy. The Land at Sutton Lane could be sensitively developed to retain views and rights of way (which broadly follows PM15/24) through positive engagement with local stakeholders and good practice in urban design,

without the need for such a prescriptive policy. The view from PM25 is completely unjustified covering a vast swathe of land and must be deleted.'

7.34 I sought SBPC's comments on these representations. Its comprehensive response advised as follows:

'(it) would like to highlight that the list of important views, including views PM 15, 24 and 25, was compiled after being carefully assessed against a number of landscape and visual impact criteria.

The methodology that was followed was in accordance with the Guidelines on Landscape and Visual Impact Assessment (GLVIA3) and focused on assessing two key sets of criteria. These were:

- 1) The value and susceptibility of landscape elements; and*
- 2) The value and susceptibility of views*

Furthermore, the important views assessment was informed by the Sutton Benger Character Appraisal, which was prepared in accordance with The RTPi document entitled "How to prepare a character assessment to support design policy within a neighbourhood plan – Putting the pieces together" and the latest Wiltshire Landscape Character Assessment. Each important view was submitted for consideration by a member of the local community, and was assessed in regards to its relationship to the landscape and its environmental and community value.

The Parish Council considers that the study has been very thorough and has clearly identified the important features and characteristics that make the proposed views important to the local community. Therefore, the Parish Council feel that it is important they are retained. Notwithstanding this, the Parish Council note that the scoring for each criterion can be a subjective exercise, and understand why Persimmon Homes and could have reached different conclusions.

Lastly, the Parish Council would like to make clear that this policy does not aim to prevent any future development in the (neighbourhood area), but instead seeks to highlight the important features and characteristics that future development would need to preserve and enhance by applying appropriate urban design techniques. The Parish Council believe that this policy has been drafted on a positive light, and therefore meets the basic conditions.

PM 15 – Cornfield adjoining rec looking west from PROW SBEN37. The Parish Council considers that this view is important due to its location within the Neighbourhood Plan Area. The view is taken from a well walked footpath that connects the village with the southern part of the NP Area. In addition, this is the only publicly accessible footpath currently provides views to the south part of the village and towards the open countryside. The mature hedgerow, trees and open long views towards the countryside are also considered to provide a unique aesthetic that is highly valued by the local community. (Consequently), the Parish Council considers that PM15 is underpinned by robust evidence, and should therefore be retained.

PM 24 – View looking south from the recreation ground with village landmark (witchy tree) in distance. This view is also considered valuable by the local community, due to being on the edge of the settlement and providing the opportunity to local people and visitors to appreciate the rural character of the NP Area. It also looks across a valued community area, where it used as a drop-zone for the Bengier Blaze fireworks event for more than 20 years. The recreation ground is a well-used facility that is valued significantly by the local community due to the community and outdoor sport events that take place there.

The above in conjunction with the significant green features that can be viewed from this location, such as the native mature hedgerow, large trees and other characteristics that were identified to be of significant landscape value by the local community demonstrate that the views from this location are important to be protected. The Parish Council accordingly consider that this view should be retained, as it reflects the wishes of the local community.

PM 25 – View looking west from Sutton Lane across the field adjoining the recreation ground. The landscape elements that were identified in the important views assessment were found to be of moderate value and of high susceptibility. This is primarily due to the location of the field lying on the edge of the built-up area of the village. There are mature hedges and trees on the western side of Sutton Lane which screen part of the views across this field and into the open countryside; however, this is not always the case and especially during winter months when trees/hedges begin to lose foliage cover. The local community value highly these particular views across this field and consider them to have a high scenic value, which defines the unique characteristics and futures of the rural landscape of the NP Area, and therefore the Parish Council feel that this view should be retained.

Wiltshire Council proposes a series of detailed refinements to the policies and the supporting text. It would be also helpful if the Parish Council commented on those suggestions.

The Parish Council is happy with accepting the majority of the comments made by Wiltshire Council. Where there have been any outstanding errors of factual inaccuracies, which have been identified due to the passage of time, the Parish Council would be happy for these to be addressed. Regarding the comments made in relation to policy SB3 and the recommendation to take into account 'Table 1' within 'Landscape Institute Technical Guidance Note (LI TGN 02/21) – Assessing landscape value outside national designations), the Parish Council consider that the important views assessment has been very thorough and has clearly identified the landscape quality that are considered to be valuable by the local community.

Even though the important views assessment was completed by local community members who do not hold relevant qualifications, it was carried out in accordance with current best practice in GLVIA3. Similar technical studies that have supported other Neighbourhood Plans had previously been accepted by examiners, and therefore, the Parish Council does not consider necessary or appropriate to update the important views assessment.'

- 7.35 I have considered the approach taken in the policy very carefully. On the one hand, the Plan proposes an unusually large number of important views for a rural parish. On the other hand, the approach is underpinned by a robust appraisal by the local community based on a series of well-defined criteria. In general terms, I am satisfied that the approach taken reflects the landscape character of the parish, and is both positive and evidence-based. I am also satisfied that it has regard to Section 15 of the NPPF. I have considered WC's comments that it may be beneficial to consider 'Table 1' within 'Landscape Institute Technical Guidance Note (LI TGN 02/21 - Assessing landscape value outside national designations) to review the significance of the identified views. Whilst this would be helpful, I am satisfied that the evidence which underpins the policy is robust, and that the approach suggested by WC is not required to ensure that the policy meets the basic conditions.
- 7.36 Having considered the evidence and the representations very carefully, and looked at a selection of the views during the visit, I have concluded that they fall into two general categories. The first category consists of important views either of key features in the landscape or of settlements/key buildings in the settlements. Such views are both demonstrably important in the context of the policy and locally-distinctive to the parish. The second category consists of more general views of the countryside. In several cases, the Appraisal refers to them as 'typical' of the Wiltshire landscape. Based on this conclusion, I recommend that those views which are in the second category are deleted from the policy.
- 7.37 Finally, I recommend a modification to the wording used in the policy to bring the clarity required by the NPPF. Nevertheless, its overall approach is unaffected. I also recommend consequential modifications to Figures 12 and 13. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'The Plan identifies the following important views as shown on Figure 13. Development proposals should respond positively to the identified views and demonstrate consideration of matters relating to design, height, and massing, either individually or cumulatively.

Development proposals which would have an unacceptable impact on an identified Important View will not be supported.'

Within the schedule in the policy delete the following views:

- **PM8;**
- **PM9;**
- **PM10;**
- **PM11;**
- **PM12;**
- **PM15;**
- **PM16;**
- **PM18;**

- **PM24; and**
- **PM25.**

Remove the deleted views from Figures 12 and 13.

Policy SB4: Trees and Hedgerows

- 7.38 This is a comprehensive policy on trees and hedgerows. Some of the issues relating to the character of the landscape and rural landscape in the Parish Character Appraisal have been incorporated into the policy.
- 7.39 The policy has a focus on the retention of important trees and hedgerows. It also comments about how replacements should be secured if trees are lost because of new development.
- 7.40 In general, the policy takes a positive approach to these matters and has regard to Section 15 of the NPPF. However, to bring the clarity required by the NPPF and to allow WC to apply the policy in a practicable and proportionate way, I recommend the following package of modifications:
- changes to the wording in the first and second parts of the policy to acknowledge the role of neighbourhood plans in the development management system;
 - the replacement of the matter-of-fact (three for one) replacement tree approach in the second part of the policy to one which reflects the scale and nature of the development concerned and the number and importance of the trees which would be lost as part of the development; and
 - the deletion of the fourth part of the policy and the relocation of some of its elements into the first part of the policy and others into the supporting text. Whilst I recognise the importance of trees in reducing air pollution, the general support given to planting additional trees is sufficiently robust without the need to specify that trees reduce or absorb air pollution from traffic.
- 7.41 I also recommend modifications to the associated maps to bring the clarity required by the NPPF based on WC's comments on the Plan. In general, the Plan would benefit from greater clarity as to which trees and hedgerows were notable. Whilst this point is addressed through reference to Figures 12 and 15, I recommend that an additional map is produced which specifically illustrates the notable trees and hedgerows. This acknowledges that Figure 12 includes a significant amount of information which makes it difficult to interpret in some areas. In addition, I recommend that the 'Woodland and Hedgerows' layer on Figure 15 is made bolder to assist with the identification of notable trees/hedgerow, particularly around Sutton Benger.
- 7.42 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace 'must' with 'should'

At the end of this part of the policy add: 'Where appropriate, development proposals should be accompanied by a tree maintenance/care plan setting out

the maintenance of trees incorporated with the design and layout, including their replacement (when necessary) for a period of at least five years from substantive completion.'

In the second part of the policy replace 'must' with 'should' and delete 'Recommendation'

Replace the third part of the policy with:

'Where it is not practicable to retain existing trees within proposed developments, the loss should be mitigated by replacement trees within the site which are appropriate to the scale and nature of the development concerned, its location, and the type and number of trees which would be lost. Wherever practicable, the replacements should be native trees and fruit/nut trees of local provenance. Replacement trees with large canopy covers that provide increased shading opportunities will also be supported.'

Delete the fourth part of the policy.

Replace the final paragraph of supporting text with: 'Policy SB4 addresses the retention of trees and hedgerows. The retention of ancient or veteran trees on or near a proposed development site is covered by Natural England and Forestry Commission 'standing advice' (insert link) and is a material consideration when Wiltshire Council is making planning decisions. Insofar as planning permission is required, the responsible planting of additional trees that reduce or absorb air pollution from traffic will be supported.'

Produce an additional map which specifically illustrates the notable trees and hedgerows (in addition to Figure 12).

Make the 'Woodland and Hedgerows' layer on Figure 15 bolder to assist with the identification of notable trees/hedgerow, particularly around Sutton Benger.

Policy SB5: Biodiversity and Net Gain

7.43 This is a comprehensive policy on biodiversity. It advises that development proposals must achieve a biodiversity net gain of at least 20% (rather than the national requirement for 10% net gain). It also comments that new development will be supported where proposals meet a series of biodiversity related criteria.

7.44 It sought SBPC's views on its approach to the proposed 20% biodiversity net gain element of the policy. In its response to the clarification note, it advised that:

'Policy SB5 builds upon emerging Local Plan policy 89: Biodiversity net gain, which states that development must achieve a minimum of 20% biodiversity net gain. This policy is supported by the Parish Council, who also seeks to encourage developers to deliver a 20% biodiversity net gain in the Neighbourhood Plan Area.'

7.45 I have considered the policy very carefully. On the one hand, it is ambitious and I note WC's support for the approach taken. However on the other hand, it relies entirely on a policy in the emerging Local Plan (and its evidence base). That policy has not been

tested at its own examination, and it is not my role to do so out of context. On this basis, I recommend the deletion of this element of the policy. It is a matter which SBPC could address in any review of a made neighbourhood plan (once the emerging Local Plan has been examined and there is clarity on its approach towards biodiversity net gain).

- 7.46 The remainder of the policy takes a positive approach to biodiversity and has regard to Section 15 of the NPPF. Nevertheless, I recommend that its opening element is recast so that it sets out requirements for new development rather than specifying that it will be supported. This approach acknowledges that there will be other policy issues (and material planning considerations) which influence the outcome of planning applications. I also recommend that the wording of some of the criteria are recast to bring the clarity required by the NPPF and to allow WC to apply their contents with clarity and consistency.
- 7.47 I also recommend that the supporting text is expanded to provide clarity about the way in which biodiversity net gain is now controlled through the development management system and national legislation. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Wherever practicable, and as appropriate to their scale, nature and location, development proposals should:

- **incorporate public and private green amenity spaces using high quality landscaping to balance gardens and community spaces;**
- **create and conserve natural and green corridors as shown on figure 17, using landscape features and habitats. Opportunities taken to join up currently isolated green and blue infrastructure assets will be supported;**
- **introduce new or improve existing trees, wetlands, grassland, parks, woods, orchards, and allotments, based on the features as shown in figures 15 and 16;**
- **be designed to avoid having an unacceptable impact on priority habitats or result in the loss of woodlands, amenity trees or hedgerows including those as shown in figures 15 and 16. Development proposals which do not comply with this criterion will not be supported unless the need for, and the benefit of the development at that location clearly outweighs the loss, and suitable mitigation measures are put in place; and**
- **be designed to avoid having an unacceptable impact on protected species. Development proposals which do not comply with this criterion will not be supported unless the need for, and the benefit of the development at that location clearly outweighs the loss, and suitable mitigation measures are put in place.’**

At the end of the paragraph of supporting text beginning with ‘Biodiversity net gain’ add: ‘This matter is addressed nationally through the implementation of Environment Act 2021 as part of the determination of planning applications.’

Policy SB6: Flooding and Drainage

- 7.48 The context to the policy is that several areas within the parish are susceptible to fluvial flooding from the rivers and watercourses. The Plan advises that surface water flooding is also a potential concern that may not be readily apparent to those proposing new developments.
- 7.49 The policy comments that development will be supported where it is demonstrated that surface water drainage will not add to the existing site runoff or cause any adverse impact to neighbouring properties and surrounding environment. It also advises that where sites fall within Flood Zones 2 and 3, they shall follow the sequential approach as set out in the NPPF. Finally, it comments that to manage flood risk in a sustainable way on site and to ensure flood risk is not increased elsewhere, development proposals will be required to incorporate a sustainable urban drainage scheme (SuDS), unless it is demonstrated to be inappropriate.
- 7.50 In general terms, the policy takes a positive approach to flooding and drainage and has regard to Section 15 of the NPPF. Nevertheless, I recommend that its various elements are recast so that it sets out requirements for new development rather than specifying that it will be supported. This approach acknowledges that there will be other policy issues (and material planning considerations) which influence the outcome of planning applications. I also recommend that the wording of some of the elements are recast to bring the clarity required by the NPPF and to allow WC to apply their contents with clarity and consistency. This involves combining the first and second parts of the policy and the relocation of the list of vulnerable sites from the policy into the supporting text. This was agreed by SBPC in its response to the clarification note.
- 7.51 I also recommend consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with

‘Development proposals should demonstrate that surface water drainage will not add to the existing site runoff or cause any adverse impact to neighbouring properties and surrounding environment. Proposed development sites which fall within Flood Zones 2 and 3, should follow the sequential approach as set out in the NPPF.

To manage potential flood risk issues on site and to ensure flood risk is not increased elsewhere, development proposals should incorporate sustainable urban drainage schemes (SuDS), unless it would be inappropriate to incorporate such an approach on the site concerned. Wherever practicable, SuDS should be designed to contribute towards the landscaping and biodiversity of the development site concerned.

Where appropriate, development proposals should incorporate a site-specific flood risk assessment and be designed to respond positively to climate change, to manage rainfall run-off rates and volumes to existing pre-development rates, and the natural drainage regime of the site.’

At the end of the paragraph of the supporting text beginning with: 'Flooding from surface water' add the deleted third part of the policy (including the schedule of sites).

Policy SB6.1: Conversion of Rural Buildings to Employment Uses

- 7.52 This policy comments that proposals for the change of use of rural buildings to general industrial use (B2) or distribution and storage uses (B8) will be supported if it can be demonstrated that they will not have an adverse visual impact on the landscape or the local character of the parish.
- 7.53 In general terms, the policy takes a positive approach to this matter and has regard to Section 6 of the NPPF. However, I recommend that the second part of the policy is repositioned into the supporting text (with modifications to its wording). This acknowledges that it comments about a process matter (the provision of information) rather than being a land use policy.
- 7.53 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Delete the second part of the policy.

At the end of the paragraph of supporting text immediately preceding the policy add: 'Planning applications should be accompanied by proportionate information (based on the scale of development) to identify any harm in landscape and highway terms that the proposal may have on the parish and to identify any mitigation measures which may be needed.'

Policy SB6.2: Renewable Energy

- 7.54 This policy comments that proposals for the installation of new renewable energy facilities will be supported where it can be determined that it will not have an unacceptable adverse impact on the landscape, public rights of way, biodiversity, and/or the residential amenity of neighbouring properties. The second part comments about the eventual removal of approved solar farm structures. The third part sets out detailed matters in relation to landscape and visual impact.
- 7.55 The second part of the policy reads as a planning condition rather than as a planning policy. I sought SBPC thinking on this matter. In its response to the clarification note, it advised that:
- '(it) is concerned about the lasting effects such facilities could have to the rural character of the Neighbourhood Plan Area. There also concerns about budgeting and resourcing/workload limitations that Wiltshire Council faces, which prevents them from monitoring and enforcing these types of development.'*
- 7.56 In general terms, the policy takes a positive approach to this matter and has regard to Section 14 of the NPPF. In this context, I recommend that it is recast so that the first part properly incorporates SBPC's commentary on the Design Codes. I recommend the deletion of the second part of the policy. The matter will be controlled by planning conditions and is not a land use policy. Finally, I recommend that the third part of the

policy is recast so that it has a positive format and sets out requirements for any such proposals.

- 7.57 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals for the installation of new renewable energy facilities will be supported where it can be demonstrated that they will not have an unacceptable impact on the landscape, public rights of way, biodiversity, and the residential amenity of neighbouring properties. In addition, proposals should respond to relevant parts of the Design Code (Appendix 2).

Development proposals for the installation of new renewable energy facilities should be well-screened and:

- **respond positively to the setting of the landscape and the important views that have been identified in the Plan; and**
- **be designed and arranged to have acceptable levels of glint and glare.’**

Policy SB6.3: Polytunnels

- 7.58 The policy addresses a very specific matter in the parish. It advises that proposals for the construction of new polytunnels will be considered acceptable if it can be demonstrated that they will support the rural economy by employing local workers and ensure that a series of criteria are met

- 7.59 I am satisfied that the criteria in the policy are appropriate to polytunnels. Nevertheless, in the clarification note I sought SBPC’s comments on the extent to which the element of the policy about the employment of local workers is a land use planning policy, and if so, would it be practicable for Wiltshire Council to monitor and enforce the matter. In its response to the clarification note SBPC advised that:

‘it believes that (the) policy adds value to adopted Core Strategy policy 34 and Emerging Local Plan policy 64 by providing local context to a type of development that is common in the Neighbourhood Plan Area. This policy will help Wiltshire Council with monitoring and dealing more effectively with these matters and reduce pressure from their enforcement team. Many of the polytunnels that this policy refers to are significant structures which, having had similar experience elsewhere, have been recognised as such. This is especially true when they can be considered to attract a significant level of permanence due to the frames of the structure being in situ for a long period of time. The Parish Council therefore feels that it is important for this policy to be retained.’

- 7.60 I have considered this matter very carefully. I recommend that the commentary about local workers is deleted for two reasons. The first is that it is not a land use matter. The second is that ‘local’ is not defined, and would be impracticable for WC to monitor the issue.

- 7.61 I also recommend that the third criterion (on traffic capacity) is modified to bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will

contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘Proposals for the construction of new polytunnels will be supported where they meet the following criteria:’

Replace the third criterion with: ‘they will not result in an unacceptable increase in vehicular traffic’

Policy SB7: Design

- 7.62 The purpose of this policy is to support appropriate forms of development and to reinforce the locally-distinctive built form of the parish. Its overall objective is to retain the character of our Parish through sensitive, appropriate design.
- 7.63 The policy comments that development proposals should be of a high standard of design, in keeping with the character of the area as identified within the Sutton Benger Character Appraisal (Appendix 1) and Design Code (Appendix 2), and the setting of the Conservation Area. The policy also advised that it should be demonstrated that development proposals meet a series of identified criteria.
- 7.64 In the round, this is a very good policy which is underpinned by the submitted Character Appraisal and the Design Code. It is very distinctive to the parish and represents an excellent local interpretation of Section 12 of the NPPF.
- 7.65 WC considers that the policy represents an opportunity to provide support for sustainable construction. Whilst the provisions of the Design Code are noted by WC, it is considered that the inclusion of wording on this topic within the policy would be more effective at securing outcomes and provide the tools required for decision-makers to seek relevant changes to design. I agree with this suggestion. However, the broadening of the scope of the policy is not necessary to ensure that it meets the basic condition, and it would be beyond my remit to recommend such an approach.
- 7.66 I recommend that a proportionate element is introduced into the policy. Whilst good design should apply equally to all development types, the detailed criteria in the policy will not necessarily apply to smaller or domestic proposals. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace ‘It should be demonstrated that proposals:’ with ‘As appropriate to their scale, nature and location, it should be demonstrated that development proposals:’

Policy SB8: Heritage and Conservation

- 7.67 The policy comments that the neighbourhood area’s designated historic heritage assets and their settings, both above and below ground including archaeological sites, designated and non-designated heritage assets (as shown on plans 31 and 32 and described in Table 1) will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character, and sense of place.

- 7.68 In general terms, the policy takes a positive approach to this matter and has regard to Section 16 of the NPPF. However, I recommend modifications to the policy and to the supporting text so that the policy can apply both to existing heritage assets and to any additional assets which may be identified in the Plan period. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete ‘(as shown on plans 31 and 32 and described in Table 1)’

At the end of the first paragraph of supporting text under the Heritage heading add: ‘The most up-to-date list of heritage assets, both designated and non-designated, can be found on the Wiltshire Historic Environment Record (and add link)’

Policy SB9: Sustainable Development and Climate Change

- 7.69 The Plan advises that the context to the policy is that sustainability is a cornerstone of both national and local planning policy and that a climate emergency was declared by Wiltshire Council in February 2019. In recognition of the importance of climate change as an issue, sustainable development is a key focus of the submitted Plan.
- 7.70 The policy comments that measures to mitigate and adapt to climate change should, where appropriate, be incorporated into the design of new developments and through conversion or extension proposals, opportunities to retrofit such measures into existing housing should be taken as appropriate to the site. It also advises that a sensitive approach will need to be taken to safeguard the special character of the conservation area and to avoid harm to the setting of designated and non-designated heritage assets (as shown in table 1).
- 7.71 WC considers that the policy represents an opportunity for providing support for sustainable construction which is indivisible from design. Whilst the provisions of the Design Code are noted, it is considered that the inclusion of wording on this topic within the Policy would be more effective at securing outcomes and provide the tools required for decision makers to seek relevant changes to design. I agree with this suggestion. However, it is not necessary to ensure that the policy meets the basic condition, and it would be beyond my remit to recommend such an approach.
- 7.72 In general terms, the policy takes a positive approach to this important matter and has regard to Section 14 of the NPPF. Nevertheless, I recommend that the opening element of the policy is modified so that its component parts are clearer. I also recommend modifications to the wording used in the various detailed measures highlighted in the policy to bring the clarity required by the NPPF and to follow on from its opening element. Finally, I recommend a modification to the wording of the final part of the policy to bring the clarity required by the NPPF.
- 7.73 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with:

‘Measures to mitigate and adapt to climate change should, where appropriate, be incorporated into the design of new developments and conversion or extension proposals.

Opportunities to retrofit building sustainability measures into existing housing should be taken as appropriate to the site including:’

Replace the first criteria with: ‘arranging the site layout and orientation to maximise solar gain and to take advantage of natural shelter whilst responding positively to the existing pattern of development, including building lines.’

In the second criterion replace the full stop after ‘measures’ with a comma

In the third criterion replace ‘Selecting’ with ‘the selection of’

In the fourth criterion replace ‘Use’ with ‘the use of’

In the fifth criterion replace ‘Incorporate’ with ‘the incorporation of’

In the final part of the policy replace ‘will need to’ with ‘should’

Policy SB10: Infill Development

- 7.74 The purpose of the policy is to provide a context for proposed infill development. It comments that within the built-up area of the villages as shown on the settlement boundary in figure 2, infill development and redevelopment of previously developed land or buildings will be supported, subject to compliance with other applicable policies including those in the Development Plan as a whole and the Sutton Benger Parish Character Appraisal (Appendix 1) and Design Code (Appendix 2).
- 7.75 WC question the added value of the policy beyond the strategic approach already taken in the Core Strategy. It also comments on the detailed wording used.
- 7.76 Gladman Developments Limited suggest that the policy will restrict the scope and scale of development and advises that:
- ‘(as) currently drafted, this (policy is the only mechanism within the (Plan) to bring forward additional development to meet local needs, focussing on infill and redevelopment opportunities. Only supporting residential development in these limited circumstances is a restrictive approach and does not accord with national policy which sets out a presumption in favour of sustainable development and the national policy imperative which seeks to markedly boost the supply of housing.’*
- 7.77 I have considered these two representations very carefully. I recommend modifications to the wording used to address some of the issues raised by WC. However, in general terms I am satisfied that the approach taken (as modified) meets the basic conditions and draws particular attention to the importance of proposals achieving good design (as captured in Policy SB7). In addition, I am satisfied that the policy proposes a positive context towards new development within the settlement boundaries. In this

context the Plan is silent on the type of development which could come forward outside the settlement boundary. Such an approach is entirely appropriate and any such proposals can be assessed against national and local planning policies.

- 7.78 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Within the built-up area of the villages as shown by the settlement boundary in figure 2, infill development and the redevelopment of previously-developed land or buildings will be supported, where it complies with other development plan policies and the specific design requirements as set out in Policy SB7 (Design).’

Policy SB11: Affordable and Rural Workers Housing

- 7.79 This policy comments that proposals for affordable housing, such as infill development, or as part of a larger rural exception sites or community-led schemes, would be supported if it can be shown to meet the recommendations of the Sutton Benger Parish Housing Needs Survey, reported in January 2022 (and any subsequent survey or assessment).
- 7.80 In general terms, the policy takes a positive approach to this important matter and has regard to Section 5 of the NPPF. It is underpinned with appropriate evidence. However, in this broader context, I recommend that the details about house types in the policy are deleted as they are already addressed in the supporting text. I also recommend that the policy wording provides flexibility if the Housing Needs Survey is updated in the Plan period.
- 7.81 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with: ‘Proposals for affordable housing, including infill development and as part of a larger rural exception sites or community-led schemes, will be supported if it can be shown that they meet the recommendations of the Sutton Benger Parish Housing Needs Survey (January 2022), or in any subsequent more up-to-date assessment.’

Policy SB12: Dwelling Extensions

- 7.82 The policy comments that proposals for extensions to existing dwellings will be supported where they are designed to follow the guidance in the Sutton Benger Parish Character Appraisal (Appendix 1) and Design Code (Appendix 2). It also advises that any such proposals should not lead to over-development of the site, the loss of important gaps between buildings, key views into or out of the settlement or vegetation of amenity value.
- 7.83 WC comments that the intentions of SB12 could be incorporated within Policy SB7 relating to design. I agree that this would be an appropriate alternative approach. However, Policy SB12 includes other matters which are specific to domestic

extensions. In addition, the approach suggested by WC is not needed to ensure that the policy meets the basic conditions.

- 7.84 Nevertheless, I recommend that the policy is modified so that it better achieves its ambitions and has the clarity required by the NPPF. This includes repositioning the comments about the specific element of the Design Code from the policy into the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals for extensions to existing dwellings will be supported where they respond positively to the guidance in the Sutton Benger Parish Character Appraisal (Appendix 1) and Design Code (Appendix 2).

Development proposals for residential extensions should not result in the over-development of the site, the loss of important gaps between buildings, the loss of key views into or out of the settlement, or the loss of vegetation of amenity value.’

At the end of the supporting text in section 6.2 add: ‘Policy SB12 addresses proposals for house extensions. It draws attention to the details in the Design Code. Code SB.15 will be particularly relevant to such proposals.’

Policy SB13: New Development and Highway Implications

- 7.85 The context to the policy is that the junction between the B4122 and B4069 is of particular concern as this is the route that links numerous villages to the M4 motorway and is extremely busy at main commuter times. The priority at this unusually configured crossroads follows the route between Chippenham and Lyneham allowing the motorway traffic to join at the same location as the Draycot Cerne village traffic. The Plan advises that priorities are not clear, and some vehicle approach speeds can be high. That same junction also serves Draycot Cerne and make access to, and egress from, the village difficult. The Plan also advised the overall situation has the potential to be exacerbated by the recent large developments by St Modwen Park, a 78.2-acre (30.1 ha) development site located on J17 of the M4.
- 7.86 The policy sets out detailed requirements for the highways implications of new development. In general terms, I am satisfied that it has regard to Section 13 of the NPPF.
- 7.87 WC suggest some minor rewording of the final paragraph. It comments that traffic calming measures often lead to increases in noise levels, due to the associated slowing and accelerating of vehicles which would contradict the aims of the paragraph as currently drafted. Furthermore, it advises that the paragraph advises that these measures should not have an adverse impact on users of the route, however, it is often the intention of traffic calming measures to impact traffic which some road users may feel is ‘adverse’ to force road users to reduce their speed, as such, this element of the paragraph may be somewhat counterproductive.

- 7.88 I recommend a modification to the final part of the policy to address this issue. As WC comment, traffic calming measures will slow down vehicle movements and some drivers may see this as an inconvenience. I also recommend that a proportionate element is weaved into the initial part of the policy. As submitted, the policy would apply equally across all development proposals and may have a disproportionate impact on minor and domestic proposals.
- 7.89 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should:’

In the second bullet point of the first part of the policy delete ‘as set out’

Replace the final part of the policy with:

‘Any traffic calming measures incorporated within development proposals should be designed so as not to have an unacceptable impact on visual amenity, not to increase noise, and to avoid having an unacceptable impact on residents in the immediate locality.’

Policy SB14: Local Green Spaces

- 7.90 This policy proposes the designation of eight local green spaces (LGSs). In general terms, it is a good policy which is underpinned by the Local Green Spaces Assessment.
- 7.91 I looked carefully at the proposed LGSs during the visit. I saw that they ranged from the Sutton Benger Recreation Ground (LG-2) and the Big Field (LG-5) to a range of more modest open spaces throughout Sutton Benger village.
- 7.92 WC comment about the way the local green space assessment has been conducted, including the allocation of points and the justification for the passing percentage which triggers a recommendation to designate land as a local green space. I have considered this matter carefully. Whilst the scoring of proposed LGS methodology used by SBPC is unusual, it does not detract from its wider assessment of the way in which the proposed LGSs meet the tests in paragraphs 105 and 106 of the NPPF. In addition, I have made my own assessment on this matter.
- 7.93 Persimmon Homes objects to the designation of LG-5 The Big Field as a LGS. In the circumstances, I address this proposed LGS as a separate matter from the other proposed LGS.

Proposed LG-5 The Big Field.

- 7.94 As the LGS Assessment comments, the proposed LGS lies immediately to the south of the Recreation Ground and Queen’s Close, Cowley Way and Lee Crescent. It is accessed by a right of way footpath leading from Queen’s Close and an informal footpath leading from the Recreation Ground. It is approximately 9 acres in size. In terms of SBPC’s view about the importance of the site, the LGS Assessment advises that:

'(the) field is important in that it is traversed by public right of way number 37 providing access to public rights of way 19A and 20. The field is also used as a safety fallout area for the annual fireworks display known as Bengel Blaze which is centred on the immediately adjacent recreation ground. A risk assessment is done as part of the fireworks display and this is noted as a safety drop zone by the appropriate experts.'

7.95 Persimmon Homes comment that:

'the identification of this land as a Local Green Space does not meet the Basic Conditions as it is demonstrably inconsistent with national planning guidance for the circumstances in when such a designation can be applied. The land does not meet the requirements for Local Green Space designation set out in bullet points (b) and (c) of paragraph 106 of the National Planning Policy Framework. The site is, as described by the Neighbourhood Plan's naming of the site, a "Big Field" – it is an extensive parcel of arable land that does not hold any particular local significance. Indeed, the Steering Group's own Green Space assessment confirms the site as being an extensive tract of land, which should preclude it being designated. It is frustrating that the proposed designation has been maintained as in addition to the detailed representations made to the Regulation 14 consultation in February 2023, the owners of the land previously responded to the Parish Council back in July 2021 to request that the land should not be identified as a green space. The reference to LG-5 should be deleted from the draft policy.'

7.96 In its response to a question on this matter in the clarification note, SBPC advised that:

'there appears to be a misunderstanding in regards to the status of the parcel of land known as "LG 5 – The Big Field". The Parish Council would like to make clear that there has been a mistake in the matrix included in the Local Green Space Assessment, which is evident from the detailed summary provided later in the assessment. Therefore, the Parish Council believe that it is evident that the assessment does not conclude that LG5 is an extensive tract of land.'

7.97 I looked at the proposed LGS carefully during the visit. In addition, I have considered the Persimmon representation and SBPC's response very carefully.

7.98 I am satisfied that the proposed LGS is in reasonably close proximity to the community it serves (NPPF paragraph 106a). It is to the immediate south of the Recreation Ground Queen's Close. The proposed LGS is approximately 9 acres in size. This is at the margins of what may be considered as local in character and not an extensive tract of land (NPPF paragraph 106c). On the balance of the evidence, I am satisfied that it is local in character.

7.99 On the balance of the evidence, I am not satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF paragraph 106b). Whilst it includes two footpaths, it is otherwise an arable field which surrounds the southern part of the village and has no specific features beyond those which might be found elsewhere within land in agricultural use on the edge of a village. I have noted that it operates as a safety fallout area for the annual fireworks display. Whilst this is an important safety issue, the firework display occurs on one day

only in the year and it would be inappropriate to give any weight to this matter in relation to the proposed designation of a LGS.

- 7.100 Given my conclusion about the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance in the previous paragraph, I recommend the deletion of LG-5 from the list of LGSs in the policy. I also recommend a consequential modification to Figure 34. I have reached this conclusion based on an assessment of the proposed LGS against the three criteria in the NPPF. It should not be considered for any other purpose, including Persimmon Homes ambitions for the site.

The other proposed LGSs

- 7.101 Based on all the available evidence, including the details in the Local Green Spaces Assessment, I am satisfied that the other proposed LGSs meet the criteria in paragraph 106 of the NPPF.
- 7.102 In addition, I am satisfied that their proposed designation would accord with the more general elements of paragraph 105 of the NPPF. Firstly, I am satisfied that their designation is consistent with the local planning of sustainable development. They do not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. They are an established element of the local environment and have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed LGSs would not endure beyond the end of the Plan period.
- 7.103 The policy itself seeks to take the matter-of-fact approach as set out in paragraph 107 of the NPPF. As such I am satisfied that it meets the basic conditions. It will contribute to the delivery of the social and economic dimensions of sustainable development.

Delete LG-5

Delete LG-5 from Figure 34

Policy SB15: Protection of Existing Rights of Way and Cycle Network

- 7.104 This policy comments that development proposals which affect rights of way or the cycle network will be supported where they improve a series of factors. It also advises that proposals for development adjoining a public footpath or bridleway shall ensure that the rural character of the footpath or bridleway is maintained.
- 7.105 I recommend that the first part of the policy should acknowledge that the improvement of the listed criteria by development proposals will not always be practicable. I also recommend that the policy recognises that not all the criteria will be capable of being delivered by a development proposal. Finally, I recommend modifications to the wording of the final part of the policy to acknowledge the role of a neighbourhood plan in the development management process.

- 7.106 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘Development proposals which affect rights of way or the cycle network in the Plan area will be supported where, as appropriate to their scale, nature and location, and where it is practicable to do so, they improve:’

In the first part of the policy add ‘or’ after each criterion

In the third part of the policy replace ‘will be resisted’ with ‘will not be supported’

Policy SB16: Loss or Change to Community Facilities

- 7.107 The context to this policy is that there is strong community support for safeguarding important village assets. The Plan comments that Sutton Benger is blessed with high quality open spaces with opportunities for sport and recreation alongside well-used public spaces such as the village hall, all of which make an important contribution to the health and well-being of the community.
- 7.108 The policy has two parts. The first comments that development proposals that will result in either the loss of or significant harm to a community facility as defined in Table 2 will not be supported, unless it can clearly be demonstrated that the operation of the asset, or the ongoing delivery of the community value of the asset, is no longer financially viable. The second comments that proposals for the extension, adaptation or redevelopment of the community facilities identified in Table 2 for community purposes will be supported, provided the resulting improved facilities offer at least the same level of provision as previously existed and are appropriate in design terms and will not unacceptably impact the amenities of adjoining residential properties.
- 7.109 The policy has been carefully prepared and responds positively to the importance of community facilities in the parish. I am satisfied that the community facilities in Table 2 have been identified in an appropriate fashion. The policy recognises that the commercial viability and/or the use of the identified facilities may change in the Plan period. As such, the policy meets the basic conditions and will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Policy SB16A: Communications Infrastructure

- 7.110 The context to this policy is that for the community of the parish to continue to flourish, it is necessary to ensure that an appropriate level of infrastructure is maintained commensurate with the needs of the community. As such the Plan comments that active support will be given to development which is consistent with the other policies in the Plan where it secures the provision or funding of infrastructure that mitigates the effects of the development. It has specific regard to school capacity, sustainable transport measures, healthcare provision, sewage treatment capacity, water supply, public open space, and utility connections.
- 7.111 The policy comments major residential development proposals must contain a ‘Connectivity Statement’ highlighting the proposed connections to essential services,

such as water, electricity, gas, and telecommunications. It advises that this should also include details of suitable ducting to enable more than one service provider to provide a fibre connection to individual properties from connection chambers located on the public highway, or some alternative connection point available to different service providers.

7.112 WC comments about the nature of the policy and its potentially onerous impact on developers.

7.113 I have considered the policy very carefully. On the one hand, it comments about community concerns about connections to services. On the other hand, these matters are controlled under separate legislation, and the policy simply asks for a statement of connectivity. In addition, the issue of broadband access to new properties is now addressed nationally in the Building Regulations. In all the circumstances I recommend that the policy is deleted. In any event the matter is adequately address in the supporting text.

Delete the policy

Policy SB17: Economic Development and Rural Industries

7.114 The context to the policy is the ongoing need for business diversification in the parish and the limited ability of the existing road network to accommodate additional traffic.

7.115 The first part of the policy comments that notwithstanding any strategic employment allocations, new employment development should be focused on providing workspace for existing or new small-scale businesses where a series of criteria are met. The second and third parts of the policy set out detailed planning and operational requirements.

7.116 The opening part of the policy reads in a confusing way. I recommend a modification so that it more simply provides a context for new employment development. The second and third parts of the policy are detailed development management matters rather than planning policies, and WC will be able to make detailed judgements on a case-by-case basis. Nevertheless, I recommend that the matters are repositioned into the supporting text.

7.117 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

In the opening part of the policy delete ‘Notwithstanding any strategic employment allocations’

Delete the second and third parts of the policy.

At the end of the final paragraph of supporting text add:

‘Policy SB17 addresses these important matters. Given the constrained road network in the neighbourhood area, major development proposals should be accompanied by a Transport Statement and Travel Plan. Where necessary, developers should enter into lorry routing agreements. The 24-hour operation of new business premises (or

associated external lighting) will not be supported unless it can be demonstrated that such activities can be satisfactorily accommodated in the local environment and the local highway network.'

Other Matters - General

- 7.118 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for WC and SBPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.119 WC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.120 I also recommend a series of modifications to the text of the Plan based on WC's comments where they are necessary to ensure that the Plan meets the basic conditions. They relate to the more general parts of the Plan. For convenience I refer to them as set out in WC's representation:

Incorporate all the matters in Section 1: Introduction and Background – Section 5: Sutton Benger – the Neighbourhood Plan Area.

Incorporate the proposed changes (to paragraphs of text and to Figures) into the Plan as set out in the commentary on Section 6.

Other Matters - National Policy

- 7.121 There are several parts of the Plan where the reference to the NPPF needs to relate to its most recent version (December 2023). I recommend accordingly.

Update all references to the NPPF to December 2023 (including any associated revisions to the paragraphs numbers in that document).

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2035. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and to designate a package of local green spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the Sutton Benger and Draycot Cerne Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to Wiltshire Council that subject to the incorporation of the modifications set out in this report that the Sutton Benger and Draycot Cerne Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose 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 9 December 2015.
- 8.5 I am grateful to everyone who has contributed to the examination of the Plan.

Andrew Ashcroft
Independent Examiner
10 October 2024