

Calne Community Neighbourhood Plan

Review Initiation | June 2021

Introduction

In February 2018 the of hard work by the community of Calne and Calne Without paid off. The Calne Community Neighbourhood Plan successfully navigated all stages of Neighbourhood Plan preparation and following a successful referendum where the community of the Plan area voted in favour of the Plan, it was formally 'made' part of the statutory Local Development Plan for Wiltshire to be used by planning officers when determining planning applications in the Neighbourhood Area.

Since February 2018, the Calne community have benefitted from having this most local level plan in place as a proactive, and strong statutory tool for shaping development within the town and its rural hinterland. The Neighbourhood Plan sets out a clear vision and linked set of objectives which the community want to achieve in the future in the area.

Why a Review?

To remain a relevant document, it's important to ensure the Neighbourhood Plan remains up-to-date. Five key factors shape the reason a Neighbourhood Plan should be reviewed:

- Effectiveness of its policies in delivering the community's aspirations
- Changes in national legislation and policy at the foundation of local policy
- Changes in Local Plan policy, which the Neighbourhood Plan must be in broad conformity with
- Changes in local circumstances that need new approaches
- Local opinion that may reinforce or alter community aspirations.

In order to ensure its continued relevance, there is a need to monitor the Calne Community Neighbourhood Plan's performance and effectiveness. Since 2018 we have seen, and continue to see, changes in national and Wiltshire policy. A review of the Calne Community Plan will ensure this positive and effective community led document remains up-to-date and can be a strong tool in the legal framework within which planning decisions are made in the area of Calne and Calne Without.

In the past many communities have felt that they have little influence over what's decided in terms of planning policy, which in the past has been done solely by the Local Planning Authority. But that's changing, and the Calne Community Plan is clear evidence of that. There are, however, decisions that have been taken since the making of the Plan that have frustrated the community, who have felt that the decision has not reflected the Community Plan. Where this has happened, it is important to learn from the decision and make the plan stronger where it can be, or clearer where needed.

Review – Initial Stages

The Calne Town and Calne Without Parish Council are legally the responsible (or qualifying) bodies for the Neighbourhood Plan, but a Steering Group made up of a mixture of councillors and residents led the process of preparing the Community Plan. This Steering Group resolved to undertake monitoring and a review of the Calne Community Plan and its evidence base; to look closely at where the plan is working, and how it could be better, and to make sure it was realising local ambitions for the future of the area.

The Steering Group appointed Bristol based consultants, Place Studio, to work with them to begin the process of review. Place Studio specialise in the community-led planning and have worked with a number of communities in Wiltshire on Neighbourhood Plans. Place Studio suggested that free technical support that is available to Neighbourhood Plan groups was harnessed for this work and supported a successful application to Locality for technical support from consultants AECOM as part of its Supporting Communities in Neighbourhood Planning project.

This is a summary of the initial stage of the review of the existing Neighbourhood Plan. It is written by Place Studio. The single detailed technical review of the Neighbourhood Plan was undertaken in two elements, both using the same robust assessment method. These were addressed by consultants Place Studio (which reviewed 6 policies along with Planning Decisions taken since February 2018 – appendix 1) and AECOM (which reviewed a maximum of 16 policies as allowed by the technical support programme – appendix 2). These two review elements can be found in the accompanying appendices.

This technical process was complemented by a workshop for the Steering Group facilitated by Place Studio in order to add local knowledge and expertise into this initial stage of review. The workshop was held on June 16th 2021. A full written summary of the workshop is also available in appendix 1.

What are the summary headlines from this initial stage?

What is working?

- The policies are generally well-worded; clear and unambiguous, however they lack local detail and place-based criteria
- Objectives such as the protection of Local Green Spaces are clearly being achieved
- A wide range of issues are addressed
- The Neighbourhood Plan is being used by decision makers – from planning officers at Wiltshire to appeal inspectors
- The Town and Parish Council are actively referring to the NDP when commenting on planning applications
- The Plan is a community document (not the Parish or Town Council though they are the bodies responsible) – it realised community wishes and aspirations in planning policy and any future plans must do the same.

What could be improved? What new circumstances need to be addressed?

- There is a need for more locally specific evidence – it needs to add a layer of detail to Wiltshire policies and not repeat. Many of the policies would be more effective if supported locally specific evidence that could be collected
- As a result of a need for more local evidence there are instances where aspects of the intent of the policy may need further clarification to ensure the community aims are achieved
- Overall, there is a need to update National Planning Policy Framework references and check / update policies to have regard to recent Wiltshire Council documents and the Wiltshire Local Plan Review
- Need to check / update policies so that they have regard to current opportunities and priorities that may have changed since the Plan was made
- There are instances where aspects of the intent of the policy may have been lost in the final policy wording
- The Steering Group – made up of a mixture of existing and new members - have highlighted new issues which a review of the plan could address, notably a policy specifically drafted and evidenced to protect the Marden Valley, and more focus on climate change adaptation and

response, as well as a focus on rural issues. Other issues could be explored by working groups and engagement with the community of Calne.

- The Steering Group highlighted concern about development coming forward against the Neighbourhood Plan / local community intention (e.g. the recent appeal by Churchill Retirement Living approved in the town centre) – this needs to be addressed when thinking about the review and community engagement.
- The websites of both the Town and Parish need to include links to key pieces of evidence, such as the town centre masterplan, as it is currently not directly linked into the evidence base which is, as highlighted above, where the locally specific evidence that forms the foundations to the Plan be located.

What are the next steps?

There are three main aspects to consider: programming, resources and activities. These are summarised below.

Programming

- **Project Planning**

As the Steering Group and qualifying bodies are already aware, neighbourhood planning is no small undertaking and it requires effective management of time and resources. Project planning is essential to ensure efficient use of resources that results in a successful NDP review. Depending on in-house, Parish and Town Council, as well as Steering Group resources, consultants can assist with preparing a project plan and reviewing progress.

- **Timescale**

A realistic timescale for the NDP review must be established and kept under review as the project progresses. It should be noted that Wiltshire Council has advised that the reviewed NDP should come in after the new Local Plan is further crystalised. The new Local Plan is currently scheduled for submission to the Secretary of State in Quarter 3 of 2022, with pre-submission consultation scheduled for late 2021 (though it is likely that this timetable will shift as the outcomes from the consultation earlier in the year are yet to be shared by Wiltshire due to the high number of responses received).

The Steering Group may wish to take some time to consider the findings of this initial work over the summer of 2021, with a view to beginning the main part of the review process in the Autumn 2021.

Resources

- **Funding**

The qualifying body can apply for a basic grant of up to £10,000 from Locality to cover professional fees and local costs / expenses to support the review of the NDP. A further grant of up to £8,000 is available for groups that meet certain criteria, for example groups preparing Design Codes. More information about the grant available and application process can be found in the Locality Neighbourhood Planning Grant & Technical Support Guidance Notes¹.

- **Technical Support**

Consider what technical support is available and apply to Locality for the relevant packages. AECOM provide a range of NDP support packages through Locality (their work undertaken to

¹ <https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-planning-grant-technical-support-guidance-notes/>

support this stage is just one example). Harnessing this resource enables grant monies and other resources to be spent on other activities. More information is available in the Locality Neighbourhood Planning Grant & Technical Support Guidance Notes².

- **Professional Support**

Professional consultants can support the Steering Group in the NDP review process. Depending on the Steering Group and wider community skills and capacities, it can also provide assistance in overall project management and shaping and delivery of a community engagement strategy.

Place Studio can directly provide experienced and chartered neighbourhood planning support and town planning support, qualified expertise in urban design and green infrastructure and award-winning approaches to community and stakeholder engagement. We also network with other trusted experts to be able to offer chartered heritage and landscape support where required.

If the Steering Group agrees, Place Studio can provide a quotation to set out anticipated overall costs for the NDP review, including a detailed breakdown to support the qualifying bodies' application for grant funding (see above).

Support from your Parish and Town Council officers is also vital and should also be considered going forward taking into account workloads, project responsibilities etc.

- **Volunteers**

Consider the capacity of the Steering Group to play a role in the review work. Harnessing skills held and capacity to employ them can play a major role, harnessing local expertise and interests. Often, Steering Groups and local people organise into Working Groups to focus on particular topics (building on the detail of the initial review – see appendix) to spread the load and to ensure people work on the topics which truly interest them. Consider harnessing local knowledge by working with others in the community, for example a local history group may be well placed to undertake local heritage evidence collection, the local River Marden Action Group may be well placed to collate evidence on biodiversity etc. This has the added benefit of engaging local people in the Plan and building a sense of local ownership of the document.

- **Wiltshire Council**

Wiltshire Council has a duty to assist the Steering Group and your link officer, David Way, is already working with you on the scope of the review. The parallel review of the Local Plan presents an opportunity to collaborate in producing and sharing policy evidence and policy responsibility.

Activities

- **Scope**

The current sections of the Neighbourhood Plan could be retained and used to structure the scope of the review. The current Neighbourhood Plan is presented in a logical way. Current policies can be joined by new policy areas (as suggested by Steering Group members) under the 6 existing sections (Housing and Infrastructure / Getting Around / Working and Shopping / Community Facilities / Built Environment / Natural Environment). Working groups (see 'Evidence Collection' below) could be arranged to work on specific topic areas.

² <https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-planning-grant-technical-support-guidance-notes/>

- **Community engagement and communication**

As discussed in the workshop, this should be woven into the NDP review process and is integral to its success. Care needs to be taken to ensure that the reasons for NDP review are clearly expressed and to avoid consultation fatigue in the wider community. A community engagement strategy should be planned at the outset of the review process, to include engagement woven into evidence gathering activities as well as consultation on emerging draft content at appropriate points. This summary and associated appendices should be placed on the town and Parish Council’s website and shared with the community.

- **Evidence Collection**

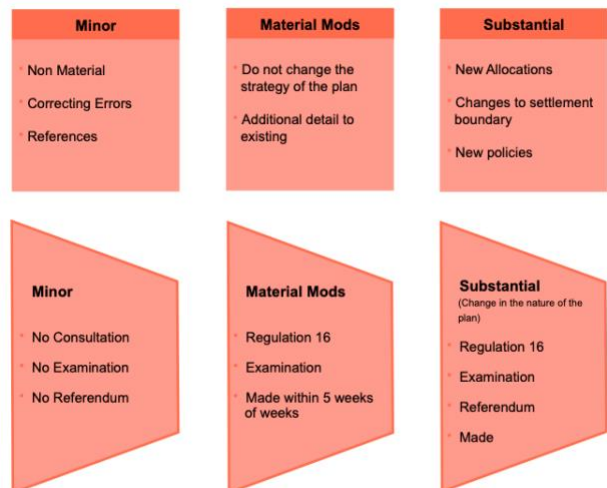
Initial work on the review has identified a lack of locally specific evidence to support the policies, so this will be a key aspect of work in the next stage. Professional consultants can support the Steering Group to collect robust evidence that will add local detail to the reviewed policies. Locality³, Place Studio and numerous other organisations have now produced guidance and toolkits to help NDP groups work effectively and efficiently through evidence collection. The made NDP is already supported by evidence, and so professional consultants may be particularly helpful at this stage to identify the additional evidence gathering activities that would be useful at this stage.

- **Policy Drafting**

Initial work on the review has identified the need to update a number of policies due to contextual changes and updates to the national and local policy framework. It has also identified areas for potential new planning policies. Evidence collection will inform drafting of updated and/or new planning policies. This technical aspect of plan drafting is where professional consultants can make a big difference; turning the local knowledge and evidence into robust and effective planning policies.

Review – regulations and process of bringing the reviewed Plan into force

There are three options for the level of review to a Neighbourhood Plan, which are summarised in the diagram overleaf. Findings from AECOM’s and Place Studio’s analysis, and discussions during the Workshop suggest that the Calne Neighbourhood Plan review could be material or substantial, and is likely to be substantial if the Steering Group wishes to progress to include new planning policies in the reviewed NDP. It should be noted that it is the reviewed NDP’s Examiner who decides whether a referendum should be held on the NDP. This is another reason that it is important that community consultation is integral to the review process.



The level of review to embark on is subject to overall resources available to the Steering Group and the ambitions of the group.

Above: Options for Reviewing NDPs - Herefordshire Council 2020⁴

³ <https://neighbourhoodplanning.org/toolkits-and-guidance/>

⁴ <https://www.herefordshire.gov.uk/downloads/file/20860/review-of-made-adopted-neighbourhood-development-plans>

APPENDIX 1 PLACE STUDIO TECHNICAL REVIEW AND STEERING GROUP WORKSHOP

1. Introduction

This is a part one of a two-part appendix to a summary note produced for the Calne Community Neighbourhood Plan (CCNP) Steering Group.

This document is part of a detailed technical review of the made Calne Community Neighbourhood Plan (2018) from Place Studio and should be read together with Appendix 2 – review of policies from consultants AECOM.

2. Approach

It was agreed with the CCNP Steering Group there would be a two-part approach to this initial stage of review:

Part A: Place Studio and AECOM Study of Policies and Planning Decisions

As part of the technical support package funded by the government, AECOM reviewed the maximum amount allowed in the support package of 16 policies. There are 22 policies in the Calne Community Neighbourhood Plan, so Place Studio reviewed the remaining 6 policies, along with reviewing a selection of planning applications decided since the Plan was formally 'made' as part of the Local Development Plan for Wiltshire, to look at how the Neighbourhood Plan was being used in the decision-making process by planning officers. The full detailed reports from both Place Studio and Aecom can be found in the appendix to this summary note.

Part B: Place Studio run workshop with Steering Group members

A Steering Group workshop was held on 16th June to review outputs from the detailed policy and planning application review and to identify and agree the scope of the Neighbourhood Plan Review work.

The aim of this initial stage of the review was to examine the existing evidence base, identify any gaps within it, and to explore how the Neighbourhood Plan can be updated and consolidated to continue to achieve local aims and aspirations for the future development of the town and rural parish.

3. Part A: Place Studio and AECOM Study of Policies and Planning Decisions

This report by Place Studio follows the AECOM methodology of policy review to ensure all policies are reviewed in the same way:

Policy understanding, which summarises what assessors understand the policy intent to be and follows on from an inception call with the group.

Evidence assembly, which covers basic checks including:

- Whether evidence has been gathered from verifiable and appropriate sources;
- Whether any third party comments have been considered (e.g. from developers, landowners, statutory bodies): and
- Whether there are any gaps and obvious sources not referred to (e.g. Local Plan background studies).

Evidence analysis, which considers whether the evidence referred to has been appropriately interpreted, analysed and reasonable conclusions reached in drawing up policy. A distinction is made between stakeholder-derived (e.g. from local household or business surveys) and technical evidence

in terms of how the evidence informed policy, although both are treated as equally important. This stage of the review also considers:

- Whether evidence is, on balance, proportionate; and
- Whether the evidence has already had a degree of external scrutiny (e.g. from the Local Planning Authority, LPA) in which case such comments are considered.

As outlined in the summary note, as part of the review work, and in addition to the AECOM review of policies, Place Studio will be reviewing policies not covered by the technical support delivered by AECOM (a maximum of 16 policies can be reviewed) and also review planning application decisions made during the time since the Neighbourhood Plan has been made. Place Studio have selected a range of planning applications to represent the different areas of both the town and the rural parish, and different types of development.

This report is set out in three parts:

- Policy and Evidence Base Analysis (linked to the Aecom document and examining the 6 not covered)
- Planning Application and Decision Analysis
- Steering Group Workshop Notes

Policies reviewed by AECOM and Place Studio are as follows

AECOM	Place Studio
<p>Housing and Infrastructure Policy H2 – Affordable Housing Policy H3 – Housing Mix Policy H5 – Phasing of Development</p> <p>Getting Around Policy GA1 – Sustainable Transport Policy GA2 – Highway Impact</p> <p>Working and Shopping Policy WS1 – Employment Policy WS2.1 – Calne Town Centre Policy WS3 – Local Neighbourhood Shopping</p> <p>Community Facilities Policy CF1 – Health, Leisure and Wellbeing Policy CF2 – Community Assets</p> <p>Built Environment Policy BE1 – Integration and Landscaping Policy BE2 – Design Principles for Local Distinctiveness Policy BE3 – Parking Provision Policy BE4 – Heritage Assets</p> <p>Natural Environment Policy NE3 – Biodiversity Policy NE4 – Energy Conservation</p>	<p>Housing and Infrastructure Policy H1 – Housing Allocation Policy H4 – Settlement Boundaries and Housing Sites</p> <p>Working and Shopping Policy WS2.2 – Calne Town Centre Masterplan</p> <p>Community Facilities Policy CF2 – Community Assets</p> <p>Natural Environment Policy NE1 – Local Green Space Policy NE2 – Setting of Calne and Calne Without</p>

Policy and Evidence Base Analysis

Policy name and number	Policy H1 – Housing Allocation
Place Studio understanding of policy intent	<p><i>The primary purpose of Policy H1 was to allocate housing land which had capacity for 295 dwellings, in this instance on land outside the settlement boundary for Calne (and it remains as such following the 2020 Wiltshire Housing Site Allocations Plan which amended settlement boundaries), which had community support due to the inclusion of community benefits which were identified as a link road (the key local benefit), a local convenience shop with parking, and two play spaces for children in the site.</i></p> <p><i>NOTE: The allocated sites already had planning permission at the time of allocation – therefore was the intent to secure delivery of the site regardless of whether a developer delivered on the planning permission or not? Intent unclear. The allocation does add in brief detail about the expected community benefit to be delivered along with dwellings on the site.</i></p>
Evidence source and type	<ul style="list-style-type: none"> ● Community Consultation Responses – evidence of support for housing along with delivery of community benefit. ● Granted planning permissions ● AECOM Site Assessments
Evidence analysis	<p>The Steering Group were informed by an appropriate evidence base that was comprised of both technical facts and community opinion about whether the benefits delivered would justify the additional housing. The consultation showed 28% responded ‘it depends’ and 41% of respondents were in favour and of the site that was allocated.</p> <p>The plan examiner noted that it is usually ‘vital’ for land allocation to be accompanied by criteria defining the bases on which acceptable proposals should be prepared. However, in this instance, development proposals have preceded the completion of the Plan Examination and, to avoid any confusion, the Policy was amended to cross-refer to the consents already granted.</p> <p>The allocation policy does not add too much more detail on expectations of what should be addressed in delivery.</p>
Proportionality and gaps	<p>The site allocation is supported by both technical evidence and community consultation, and is likely constrained in the detail it contained due to the site already being consented.</p>
Effectiveness of policy	<p>This site and the one adjacent, granted planning permission on appeal, were consulted on as one site, for the development of 250 dwellings.</p> <p>This site was considered by the public and was found to be acceptable due <u>only</u> to the community benefits it would bring in terms of a link road between Prince Charles Drive and Sandpit Road together with a local convenience shop with parking, and two play spaces for children in the site. Looking on google earth, and in letters from Persimmon the developers to Town Council, it seems that the benefit of the link road is in process of being delivered. Unsure as to whether the other community benefits have been delivered as yet (much of the site is yet to be delivered).</p>

	<p>Looking at Town & Parish Council and Community response to planning applications on the site¹, whilst the principle of development is accepted concerns have been raised about issues relating to parking, layout, street scene, lack of planting and other sustainability issues.</p> <p>The site allocations add little to the existing policy context (as a result of already having been granted permission) and though it offered the Plan Area a 3 year housing land supply protection* for two years (NPPF para. 14), Wiltshire Council had a 5 Year Housing Land Supply (5HLS) during that time. (*Neighbourhood Plans in local authority areas with less than a 5HLS but more than 3 years supply will not be regarded as out of date if housing is allocated and the Plan is no more than 2 years old, whereas the Local Plan will be. This has been a key tool for some Neighbourhood Plans in fending off development that is not 'plan led').</p>
<p>Conclusion and recommendations</p>	<p>Potential future allocations in the Neighbourhood Plan would benefit from detailed criteria (and design code) to provide detailed criteria and expectations of applications.</p> <p>The Housing Development Boundary of Calne is likely to change to encompass this site allocation (and any other allocations outside any of the housing development boundaries in the Plan Area) in the future.</p> <p>Wiltshire Council currently do not have a 5HLS and therefore an allocation may be beneficial for the reviewed plan to gain a 3 year housing land protection (though the NPPF para 14 states that protection lasts for only 2 years, in practice planning officers still afford weight to the 3 year housing land protection).</p>

<p>Policy name and number</p>	<p>Policy H4 – Settlement Boundaries and Housing Sites</p>
<p>Place Studio understanding of policy intent</p>	<p><i>Small windfall housing proposals will be supported provided they:</i></p> <ul style="list-style-type: none"> - <i>accord with the limits of development provisions of Wiltshire Core Strategy Core Policy 2; and</i> - <i>have a capacity appropriate, both individually and cumulatively, to the size, role and function of the settlement or part of the settlement within which they are located; and</i> - <i>consider and address their interaction with the surrounding area; and</i> - <i>have a safe highway access.</i>

¹ <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014emb9AAA/1612380rem>
<https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014emb9AAA/1612380rem>
<https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014en9UAAQ/1708942rem>
<https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014e15sAAA/1700679out>
<https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z000014evrbAAA/2000481rem>

	<i>In accordance with Wiltshire Core Strategy Core Policy 2, other than in circumstances as permitted by other policies within the development plan, development will not be permitted outside the limits of development.</i>
Evidence source and type	<p>The policy and supporting text does not make any direct reference to the evidence base for this policy.</p> <p>Wiltshire Core Strategy Core Policy 2 is referred to, along with its associated settlement boundaries.</p> <p>The supporting text refers to local concerns regarding ‘possible encroachment and coalescence’ and maintaining a green buffer between settlements in the Neighbourhood Area, providing justification for the policy. This is linked to Policy NE2.</p>
Evidence analysis	<p>The Wiltshire Housing Site Allocations Plan was adopted in 2020, after the NDP was made, updating the adopted Settlement Boundaries within the Neighbourhood Area. The settlement boundaries shown on the policies maps associated with this policy should therefore be updated as part of the NDP review.</p> <p>The Planning for Calne document published in January 2021 by Wiltshire Council as part of consultation on the Local Plan Review, should also be referred to inform the review of this policy.</p>
Proportionality and gaps	<p>The policy sets criteria for development to be supported within the settlement boundaries. The policy could be strengthened by referring to locally-produced evidence that draws out specific characteristics that development within the settlement boundaries should consider and address. For example, the third bullet point states that proposals will be supported provided that they consider and address their interaction with the surrounding area. Local evidence could be collected to identify existing Neighbourhood Area-specific positive characteristics that proposals should interact with or reflect e.g. positive design features, ambient density, green infrastructure features, footpaths, community facilities.</p> <p>Locally specific landscape character evidence could also be produced to strengthen and support the point currently made in the supporting text about concerns over coalescence and maintaining a green buffer.</p>
Effectiveness of policy	<p>The policy wording is clear, however as the Local Plan Review progresses, reference to Wiltshire Core Strategy Core Policy 2 may soon be outdated.</p> <p>In order for the planning policy to be more Neighbourhood Area specific, the policy wording could be refined to refer directly to any local evidence produced to support the policy (see ‘Proportionality and Gaps’ above).</p>
Conformity check	<p>By supporting development within the settlement boundaries, the policy has regard to national policy which was in place at the time that the NDP was made concerning efficient use of land. The 2019 iteration of the NPPF includes reference to this in para 122.</p> <p>The policy is in general conformity with Wiltshire Core Strategy Core Policy 2; supporting sustainable development within existing settlement boundaries.</p>

<p>Conclusion and recommendations</p>	<p>The reviewed policy should be informed by relevant emerging policy in the Local Plan Review; close working with Wiltshire Council will help to ensure that NDP policy wording aligns with the emerging Local Plan.</p> <p>The intent of the reviewed policy should remain but there is opportunity to add further, local detail to the criteria within the policy to further shape development within the settlement boundaries in the Neighbourhood Area.</p>
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<p>Policy name and number</p>	<p>Policy WS2.2 – Calne Town Centre Masterplan</p>
<p>Place Studio understanding of policy intent</p>	<p><i>Development proposals within or immediately adjacent to the defined Calne Town Centre must consider and address their relationship to the vision set out in the Calne Town Centre Masterplan (April 2014) and the evolving plans deriving from that. Proposals should demonstrate how they contribute to the Masterplan objectives and dovetail with ambitions for the Town Centre as a whole. In particular, proposals that have the potential to benefit vehicular, pedestrian and cycle movement within the Town Centre, helping to tackle issues identified within the Masterplan, should consider and address opportunities as part of their scheme.</i></p>
<p>Evidence source and type</p>	<p>National Policy; NPPF Planning for Town Centres</p> <p>Wiltshire Core Strategy (Including Saved Policies - WCS defines Calne town centre as a Market Town Centre to provide the range of retail and services of this settlement hierarchy.</p> <p>Calne Community Area Plan Calne Conservation Area Appraisal (note – this is noted in the Town Centre Masterplan as being available as a paper copy only. It is also noted in the Neighbourhood Plan but not referenced directly in the Evidence Base list or in the Heritage Assets Policy)</p> <p>Strategy: Calne Community Campus Proposal (concept)</p> <p>Engagement: Town Master Plan Workshop</p> <p>Professional Survey: Calne Town Centre Masterplan (TCMP) Calne TCMP provides the NDP with an evidenced strategy and identification of development opportunities that can both enhance the quality of the town centre and provide floorspace to meet diverse local town centre needs. This can include residential.</p> <p>As the TCMP is now eight years old, it should be reviewed to ensure that it is updated to reflect current issues (for example the now vacant COOP building), needs and be responsive to the current and future planning framework. This may include assessing the town centre against Class MA qualification and assessment criteria, including conservation area character.</p>
<p>Proportionality and gaps</p>	<p>The policy relates to a defined town centre and contains policy criteria that are directly related to seeking delivery of the town centre master plan vision</p>

	<p>and objectives. This is considered to continue to represent a proportionate approach.</p> <p>A review of the existing master plan against monitoring/research of its performance and changes to national and county level policy and regulation should inform where there are recognised gaps in the existing master plan. This should inform prioritisation of areas of its refreshment and updating. This may also inform the weight that should be afforded the master plan in relation to the NP, with particular reference to planning decision history following its adoption.</p>
<p>Effectiveness of policy</p>	<p>The TCMP contains a number of objectives and spatial recommendations for development and enhancement of the town centre. The effectiveness of policy WS2 may be judged by the progress made through planning management and development towards the delivery of the TCMP vision and objectives. The review of the TCMP may begin with such an assessment.</p> <p>There are likely to have been lasting changes to the use and vitality of town centres as a result of COVID 19. These may not necessarily have been all negative for market town centres that retain and enhance an attractive and particularly historic environment and a strong range of shops and services to meet local needs. The review of the TCMP should analyse potential impacts and opportunities to refine the existing strategy.</p> <p>Calne Transport Strategy (Atkins 2021) This study identified a comprehensive transportation evidence base and priority areas and projects that should inform future Town Centre studies. These would be funded through bids, Wilts Council budgets and CIL.</p>
<p>Conformity check</p>	<p>Policy WS2.2 relates to the delivery of a town centre vision and its objectives that proposes a positive future to meet local needs and identifies opportunity sites within the defined town centre that could contribute to growth to meet local needs within a diversified town centre. The policy and therefore is considered to remain in general conformity.</p> <p>Review of the policy, including potential amalgamation with Policy WS1, built upon an updated evidence base will be unlikely to undermine this conformity.</p>
<p>Conclusion and recommendations</p>	<p>Policy WS2.1 & WS2.2 could be amalgamated into an updated and comprehensive Town Centre policy and could be expanded to include protection for Calne town centre uses.</p> <p>Accessibility and public realm quality (including cross referenced with IDP CIL projects may be addressed through a bespoke public realm and access policy) which may be better related to the whole NP are linked to the CATS.</p> <p>The updated evidence base for the policy should be;</p> <p>Updated Town Centre Master Plan (To include assessment and strategy for town centre uses) NB Link to updated (town centre) conservation area appraisal.*</p> <p>Wiltshire Retail and Town Centre Study 2020</p>

	<p>*Use Class MA assessment criteria include impact of COU of ground floor town centre uses to residential on character and the sustainability of the town centre.</p> <p>The Updated TCMP should become an anchor evidence base / code for the conservation, protection and development of the TC within a new planning and post COVID retailing environment.</p>
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Policy name and number	Policy CF2 – Community Assets
Place Studio understanding of policy intent	<p><i>Development proposals that consider and address their potential to retain, improve and/or add community facilities will be supported subject to compliance with all relevant development plan policies. Any redevelopment proposals will only be supported if the facility affected is replaced by an equivalent or better provision in an equally suitable location.</i></p> <p><i>Development proposals that would result in the loss of community facilities will be resisted unless it can be demonstrated that the facility is no longer viable or that adequate alternative provision is available. In rural areas Wiltshire Core Strategy Core Policy 49 will apply, requiring a comprehensive marketing plan.</i></p>
Evidence source and type	<p>The made policy nor supporting text does not mention any supporting evidence. However, the supporting text lists a variety of types of community facility that exist within the Neighbourhood Area.</p> <p>The Evidence Base Links document lists the following evidence on Town and Village Services and Facilities:</p> <ul style="list-style-type: none"> ● Wiltshire Core Strategy Topic paper 3 - Settlement Strategy Appendices 2012 ● Calne Town Centre Masterplan 2016 ● Wiltshire Core Strategy Topic paper 14 - Building resilient communities 2012 <p>The Evidence Base Links document lists the following evidence on Play, Sport and Recreation:</p> <ul style="list-style-type: none"> ● Wiltshire Core Strategy Topic paper 14 - Building resilient communities 2012 ● Wiltshire Open Spaces Study, March 2015 <p>The Evidence Base Links document lists the following evidence on Education:</p> <ul style="list-style-type: none"> ● Wiltshire Core Strategy Topic paper 14 - Building resilient communities 2012 ● Wiltshire School Places Strategy 2015-20 <p>The Evidence Base Links document lists the following evidence on Health:</p> <ul style="list-style-type: none"> ● Wiltshire Core Strategy Topic paper 14 - Building resilient communities 2012 ● Air Quality Strategy for Wiltshire 2011-2015

	<ul style="list-style-type: none"> • Air quality supplementary planning document 2012 • Calne Air Quality Management Area Order • Health Infrastructure Note
Evidence analysis	<p>Other useful evidence which could be utilised in reviewing this policy could include:</p> <ul style="list-style-type: none"> - Planning for Calne published in January 2021 - Wiltshire Playing Pitch Strategy: Notes that there are no further requirements for more football or cricket facilities at Calne. - Emerging Wiltshire Council Green and Blue Infrastructure Study: identifies open spaces by type e.g. youth play space, children play space, recreation ground etc.
Proportionality and gaps	<p>The policy could benefit from being supported by more detailed evidence to identify and map specific community facilities to be protected by the policy. The policy refers to additional community facilities to be supported but does not set out what these should be in Calne. Further evidence could be collected to enable the policy to identify types of, or locations for, particular facilities that there is local need for. This could be bolstered by findings from more recent community engagement to establish what facilities the community feels are most important / needed in Calne.</p> <p>Since the making of the NDP, there have been a few significant changes to the provision of community facilities in the Neighbourhood Area:</p> <ul style="list-style-type: none"> - Calne Community Campus opened in 2020 - New, larger GP surgery was built to replace Patford House Surgery - Extension to Northlands Surgery built to increase capacity. <p>As part of the review, the policy and evidence base should be updated to reflect this.</p>
Effectiveness of policy	<p>The policy would benefit from including wording to directly relate to mapped information identifying the community assets that the policy refers to e.g. 'Community Assets, as shown on Figure X, will be...'</p>
Conformity check	<p>The policy links into current NPPF paras 91, 92, 97 and is in broad conformity with WCS policy CP49.</p> <p>Since the made policy was drafted, there have been changes to permitted development rights to allow a number of types of community facility to change use without planning permission. Permitted development rights will change again later in 2021 to allow for a number of types of community facility to change use to residential without planning permission, under new use class MA. The NDP policy should be updated to reflect these changes.</p>
Conclusion and recommendations	<p>Wiltshire Council will be considering the incoming changes to permitted development rights as part of the LPR. The NDP review would benefit from being informed by this.</p> <p>The evidence base can be updated to include more locally specific information, and the policy wording tied into this evidence base.</p>

Policy name and number	Policy NE1 – Local Green Space
Place Studio understanding of policy intent	<p><i>The following sites identified on the Policies Map are designated as Local Green Spaces:</i></p> <ul style="list-style-type: none"> ● <i>Petty Acre, Derry Hill</i> ● <i>Square of land off Petty Lane, Derry Hill</i> ● <i>Land Opposite Landsdowne Arms (Junction of Church Rd & Devizes Rd) Derry Hill</i> ● <i>Penn Wood Wildlife Area, High Penn</i> ● <i>Embry Close, Lower Compton</i> ● <i>Bowood Sports Ground, Studley</i> ● <i>Small field adjacent to Old Road, Studley</i> ● <i>Playing fields at Bentley Grove, Calne</i> ● <i>The Recreation Ground, Calne</i> ● <i>The green by Newbury Avenue, Calne</i> ● <i>Three green areas in Steeple Chase, Calne</i> ● <i>Allotment Gardens site to the South of Castle Walk, Calne</i> ● <i>Calne Beach, Calne</i> ● <i>Castlefields Canal & River Park, Calne</i>
Evidence source and type	Appendix 1 of the Neighbourhood Plan – Assessment of Local Green Spaces Proposed for Designation under the National Planning Policy Framework (NPPF) Criteria
Evidence analysis	Appendix 1 includes an assessment of each space against the national planning policy criteria, as well as a short description of each space identifying its special qualities. Relevant planning history is also included.
Proportionality and gaps	There is no evidence in appendix 1 that relevant landowners have been contacted for comment on the proposed designation of their land as LGS. This should have happened in order for the NDP to meet its basic conditions around EU human rights obligations, and must have done so for the Plan to pass examination. Further work on Local Green Space would require this stage to take place.
Effectiveness of policy	<p>The policy wording could be updated for clarity, to refer to the relevant NPPF criteria and to explain what the implications of LGS designation are i.e. protection in line with that of land in the green belt.</p> <p>The policy would also benefit from including wording directly linking to the policies map which shows the exact areas to be designated LGS e.g. ‘The following site, as shown on the policies map (Fig X), are designated...’ in order to improve clarity.</p>
Conformity check	The spaces designated as LGS are shown to clearly meet the national planning policy criteria required which were not changed in the 2019 iteration of the NPPF.
Conclusion and recommendations	<p>As part of the review, the Steering Group could review the list of designations to check that they are still relevant and if there are any further spaces that should be designated LGS.</p> <p>Open spaces that don’t meet the Local Green Space criteria could also be identified as Local Community Spaces; identifying them as valued open</p>

	<p>spaces and/or community spaces but attributing a lower level of protection against development to allow for managed development of the space which is in keeping with its existing use and community value. Local Community Spaces could include, for example, spaces such as school playing fields and church yards.</p> <p>This evidence base could be expanded upon to include an audit of all open green spaces in the Neighbourhood Area. Wiltshire Council is due to publish its Green and Blue Infrastructure Strategy² later in 2021, which is expected to include mapped and categorised information on open spaces across the Calne Neighbourhood Area. This Strategy could inform the NDP evidence base.</p>
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Policy name and number	Policy NE2 – Setting of Calne and Calne Without
Place Studio understanding of policy intent	<i>Proposals for new development must respect the pastoral setting of Calne & Calne Without . Enhancements are encouraged. The River Marden Valley is specifically identified as an area where the protection of the character, appearance, setting, recreational use and tranquillity is a priority.</i>
Evidence source and type	<p>The Evidence Base Links document lists the following evidence on Landscape Character:</p> <ul style="list-style-type: none"> - Historic Landscape Assessment for the Wiltshire Core Strategy 2012 - Wiltshire Council Strategic Site Options Landscape Assessment 2011 - Wiltshire Landscape Character Assessment Final Report 2005
Evidence analysis	<p>Other useful evidence which could be utilised in reviewing this policy could include:</p> <ul style="list-style-type: none"> - North Wessex Downs AONB Integrated Landscape Character Assessment (Land Use Consultants 2002) - Relevant extract from CPRE's Dark Skies mapping tool https://nightblight.cpre.org.uk/maps/ - North Wiltshire Landscape Character Assessment (2004) <p>The supporting text describes landscape character and features of the Neighbourhood Area in detail. As part of the review it would be useful to illustrate many of these points in a map to show Landscape Setting (e.g. AONB, Marden Valley, Wilts and Berks Canal route etc.). The reviewed policy could then refer to this map e.g. <i>'Planning applications... must demonstrate how the proposal responds sensitively to the Neighbourhood Area's landscape character including key features identified on Figure X...'</i></p>
Proportionality and gaps	The evidence documents listed above are Wiltshire-wide documents that provide a good basis for detailed, Neighbourhood Area-specific evidence to be collected as part of the NDP review. There is some good detail already included in the supporting text which could be drawn out and expanded upon. For example:

² <https://www.wiltshire.gov.uk/planning-bio-green-blue-infrastructure#:~:text=The%20Wiltshire%20Green%20Blue%20Infrastructure,contribute%20to%20the%20health%20and>

	<ul style="list-style-type: none"> - Para. 168 mentions that views into and out of settlements should be protected. Evidence could be collected to identify exactly what those views are; building a Valued Key Views evidence base to identify where the views can be seen from, the direction of the view (identified on a map), what can be seen, and what makes it special. - Neighbourhood-Area specific commentary can be added to relevant parts of the Wiltshire Landscape Character Assessment, AONB Landscape Character Assessment etc. <p>A large part of the landscape of the Parish (to the West, and including the River Marden Valley) is within a Special Landscape Area (SLA) – this is a saved policy from West Wiltshire Council Local Plan. There is little direct evidence supporting this designation available (and it may therefore be a policy which is not carried forward in the Wiltshire Local Plan Review), it can be the basis for the identification of a distinct area of landscape of special quality within the Neighbourhood Plan.</p>
Effectiveness of policy	The policy wording could be updated to refer to the relevant NPPF criteria. Mapped information – for example identifying key view locations and direction, together with mapped information and updated detail on key local landscape features / areas of special quality, as well identifying where the main approaches / gateways to the town are would improve the policy effectiveness.
Conformity check	Updates to the policy would need to link into the updated NPPF (as well as Wiltshire’s emerging Local Plan) – section 15 of the NPPF is the key reference for the policy area.
Conclusion and recommendations	There is potential for the policy to be refined through the identification and mapping of elements and key areas as highlighted in the policy. Updating work could be undertaken to review the Landscape Character Assessments as the Neighbourhood Plan level – identifying local examples of landscape characteristics and features that should be protected, or enhanced.

Planning Application and Decision Analysis

Once made, the neighbourhood plan becomes part of the statutory development plan for the area. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Local Planning Authority, Wiltshire Council, has a key responsibility in implementing the neighbourhood plan, by applying the policies through the development management process.

Development management refers to the role of Local Planning Authority in dealing with planning applications and other consents. Assessing the effectiveness of neighbourhood plan policies in development management will involve monitoring of various planning decisions:

- Officer reports
- Planning decision notices – Approval and Refusal notice together with any conditions applied.
- Appeal decisions

The clearer and more specific a policy is, the easier it should be to monitor decisions against it.

Summary of Planning Application and Decision Analysis

A total of 5 planning applications and their decisions were reviewed, including a range of type of applications from within Calne and Calne Without. The key points that emerged from the analysis are as follows:

- The NDP is being used by planning officers to inform planning application decisions in the Neighbourhood Area. The NDP is also being used to inform Appeal decisions. The Appeal decision below refers to the NDP Vision as well as the policies, which highlights the importance of looking holistically at the NDP's vision and objectives (this will be done at the Steering Group workshop) as well as the planning policies as part of the review.
- It is also encouraging to see that the Town Council is referring to the NDP in its comments on planning applications - there are instances where Neighbourhood Plans are not used by the local community once made!
- NDP policies are generally clearly written and enable the decision maker to use them in determining applications.
- There are examples where aspect/s of the intent of the policy may have been lost in the final policy wording and therefore where more clarity of wording is needed.
- There are instances where the NDP is effective in adding Neighbourhood Area-level detail to national and Wiltshire-level policy. There are other instances where further Neighbourhood Area-level evidence could be produced and tied into policy wording to have more of an impact on planning application decisions.
- The Town Centre Masterplan is a good evidence base document that sets out priorities and aspirations for the town centre. There is a need to thread it more strongly into the NDP policy framework to ensure that it is given more weight in planning decisions.

Methodology

In reviewing planning applications and decisions, we are looking at a number of areas:

Policy compliance: Are planning applications being determined in accordance with neighbourhood plan policies? If decisions depart from neighbourhood plan policies, are clear and valid reasons for doing so being given in officer reports?

Effectiveness: Are policies proving to be effective in shaping local authority decisions and appeal decisions? If policies are proving to be ineffective, then why?

Matters not addressed by policies: Are there any significant issues arising that are not covered by neighbourhood plan policies?

Planning application material can be found on the Wiltshire website:
<https://development.wiltshire.gov.uk/pr/s/>

Detailed Planning Application and Decision Analysis

Planning Application Reference	20/04070/FUL K4 Kitchens, New Road, Studley, Calne, SN11 9LX (Calne Without)
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Summary	Replacement of dis-used commercial premises with 3no. three bedroom new build dwellings. Approved with conditions 20.11.20
Policy compliance	The application was approved in line with the NDP policy WS1 as it is written. In considering the principle of development, the officer's report states: <i>'The Parish Council raised an objection to the proposal on the grounds that it is contrary to Policy WS1 of the CCNP relating to employment land. Policy WS1 of the CCNP is supportive of employment proposal and encourages the retention, regeneration and intensification of previously developed employment land. Crucially, however, it does not expressly prevent redevelopment of employment land.'</i>
Effectiveness	Whilst NDP policy WS1 supports proposals for employment development within the Neighbourhood Area, it does not include an explicit protection of existing employment land (or reference to the criteria in Wiltshire Core Strategy Core Policy 35 Existing Employment Sites). So, the redevelopment of the employment land into residential use was approved. In this case the existing employment use was not protected by NDP policy WS1, contrary to the Parish Council's comments on the application. This suggests the intent of the policy may have been lost through the wording used in the policy.
Matters not addressed by policies	The reviewed Plan should be informed by forthcoming changes to the use class order and permitted development rights, which will affect former use class B1 (business) – one of the identified 'employment' uses in NDP paragraph 119. From August 2021, former use class B1 will be permitted to change to residential (subject to prior approval), increasing the risk of loss of existing employment land. Policy WS1 should be drafted in liaison with Wiltshire Council who will also be considering this change of permitted development rights as part of the Local Plan Review.

Planning Application Reference	20/06684/OUT Land to the South of Chilvester Hill, Calne, Wiltshire
Summary	Outline application (all matters reserved except for main vehicular access from Chilvester Hill only) for up to 32 dwellings and associated infrastructure, landscape and biodiversity enhancements) Refused 16.2.21
Policy compliance	The application was refused in line with NDP policies H4 and BE1, both are referenced in the Officer Report and Decision Statement: H4 Settlement Boundaries and Housing Sites: <i>'The proposal would be contrary to the housing delivery... Policy H4 of the Calne Community Neighbourhood Plan'</i> (Officer report) BE1 Integration and Landscaping: <i>'It is not considered that the proposal would integrate effectively into the immediate setting and would have a harmful impact upon local landscape character'</i> (Decision Statement, reason for refusal 2).

<p>Effectiveness</p>	<p>The officer's report refers particularly to the supporting text of NDP policy H4 when considering the role of the settlement boundaries in the Neighbourhood Area:</p> <p><i>'Policy H4 of the CCNP relates to settlement boundaries and housing sites. Supporting text of this policy states that "the existing settlement boundary of Calne serves a specific purpose in that it is intended to contain the growth of the town and enable development to take place in a coherent manner, maintaining the structure and form of the existing settlement geography. In addition, the boundary will protect the landscape setting of the town and represent transitional edge between the urban and surrounding rural areas". The policy allows small windfall developments within the limits of development and in accordance with other criteria. In accordance with WCS Core Policy 2, other than in circumstances as permitted by other policies within the WCS, development will not be permitted outside the limits of development.'</i></p> <p>This suggests that NDP policy H4 is effective in adding local detail about the importance and specific role of the settlement boundaries in the Neighbourhood Area to Wiltshire Core Strategy Core Policy 2</p> <p>When considering the impact of the proposal on the character and appearance of the area, the Officer's Report refers to NDP policy BE1 and its requirement for appropriate landscaping to ensure that existing built form and community identity of areas are not adversely affected. The officer concludes that the proposal does not do this, but rather 'would result in localized landscape harm... (and) completely change the character and approach into Calne...'</p> <p>This suggests that NDP policy BE1 is being given due consideration in the decision making process.</p>
<p>Matters not addressed by policies</p>	<p>In commenting on this application, the landscape officer highlighted that this site currently provides a rural break in landscape terms for the setting of the Bershill Farmstead and the gateway into Calne. The reviewed NDP could draw and expand upon this in the landscape character evidence base. For example, identifying and describing key characteristics of the gateway points into the town may be a useful way to add a layer of protection to the valued landscape character of the Neighbourhood Area. The Officer report also cites the unacceptable impact on short distance views that the proposal would make. The NDP evidence base could be strengthened to identify specific key views to protect (see Policy NE2 above).</p>
<p>Planning Application Reference</p>	<p>20/00677/FUL Unit 20, Forest Gate, Pewsham</p>
<p>Summary</p>	<p>Change of use to B1 and B8 from D2. Approved with conditions 27.05.20</p>
<p>Policy compliance</p>	<p>In considering the principle of development, the officer's report states:</p>

	<i>'Policy WS1 of the Calne Neighbourhood Plan (Made February 2018) states that proposals for employment development within Calne & Calne Without will be supported subject to compliance with all relevant development plan policies. Proposals for the retention, regeneration and intensification of previously developed employment land are particularly encouraged. As a result, the principle of the proposal is considered to be acceptable and in line with local and national policy.'</i>
Effectiveness	The application was approved in line with the NDP policy. Policy WS1 adds Neighbourhood Area-specific detail to Wiltshire Core Strategy Core Policy 34 by particularly encouraging retention and regeneration of employment land.
Matters not addressed by policies	N/A

Planning Application Reference	16/04507/FUL Land south of Castle Walk, SN11 0EZ Calne
Summary	Erection of 36 Dwellings and Associated Works Refused (prior to the making of the NDP) Dismissed at appeal (prior to the making of the NDP, however the emerging NDP referred to in Appeal Decision APP/Y3940/W/3158241)
Policy compliance	The Appeal Decision refers to emerging NDP policies (at the time of the appeal, the NDP was expected to be subject to referendum later that year). The Inspector notes that the emerging NDP can only be attributed limited weight. However, the Inspector refers to the intent at the time to designate the site as a Local Green Space in the NDP (emerging NDP policy NE2 Local Green Space), as well as an emerging NDP policy that sought to protect views and linkages into and out of the town centre. It is not clear what policy the latter evolved into in the made version of the NDP.
Effectiveness	The Inspector referred to the intent to designate the site as a Local Green Space in the emerging NDP when considering that the proposal was not in line with the emerging NDP policy framework: <i>'The proposed allocation, within the draft CNP, of the site as Local Green Space provides some indication of the value which local people place on it as part of the Green Infrastructure network although I note that this allocation has been objected to by the appellant. The final version of the CNP is expected to be the subject of a referendum later this year. Although the emerging plan can, at present, be given only limited weight the proposal would also be contrary to draft Policy NE3, which states that development on the edge of Calne will only be permitted where it does not adversely affect views and linkages into and out of the town centre. To that extent, and by seeking development of a site proposed as Local Green Space, the proposal would not support the objectives of the Neighbourhood Plan.'</i>
Matters not addressed by policies	N/A

<p>Planning Application Reference</p>	<p>Appeal A</p> <ul style="list-style-type: none"> - Planning application ref. 18/09556/FUL, - Appeal ref. APP/Y3940/W/19/3224155 <p>Appeal B</p> <ul style="list-style-type: none"> - Planning application ref. 19/03435/FUL - Appeal ref. APP/Y3940/W/20/3246442 <p>Land to rear of 8-13 High Street, Calne, Wiltshire</p>
<p>Summary</p>	<p>Development of 39 apartments for older people (sixty years of age and/or partner over fifty five years of age), guest apartment, communal facilities, access, car parking, landscaping and 4 retail units.</p> <p>Both applications were refused by Wiltshire Council (in 2019 and 2020 respectively), and both decisions were appealed. Appeal A was dismissed and Appeal B was allowed.</p> <p>Three issues were considered at appeal:</p> <ul style="list-style-type: none"> - whether or not the proposed development would preserve or enhance the setting of the Zion Chapel and the character and appearance of the Calne Conservation Area (the site is within the Conservation Area and the setting of the Grade 2 Listed Zion Chapel) - Whether or not the proposed development would help strengthen or regenerate the town centre in line with the requirements of the local plan - The effect of the proposed development on the living conditions of the occupiers of neighbouring property with particular respect to privacy. This issue is not covered in detail here as it does not directly relate to existing NDP policy.
<p>Policy compliance</p>	<p>In considering the first issue above, the Inspector cites NDP policy BE2 and its requirement that development is designed to a high quality that reinforces local distinctiveness. The amended design of the proposal in Appeal B (a discernible reduction in the bulk and mass of the proposed building) is considered to preserve the character and appearance of the Conservation Area and so no conflict with NDP policy BE2 is found.</p> <p>In considering the second issue above, the Inspector looks to the Masterplan which is referred to directly by NDP policy WS2.2. The Masterplan includes parameters for the site, broadly for a mixture of retail units with residential above and a block of 3 storey residential development, potential for c. 28 units, 580sqm of retail and 210sqm of commercial use. The proposed development is more dense than the parameters set out in the Masterplan but considered by the Inspector to 'broadly conform to it' in terms of use.</p> <p>The Inspector also refers to the NDP's Vision, particularly its ambition for the town to deliver a range of housing types; the Inspector considers that the proposal is in line with this. The Inspector also notes the intent of NDP policy H3 to require proposals to consider including bungalows and other types of accommodation suitable for people who are elderly and/or disabled, and considers that the proposal does this.</p>

<p>Effectiveness</p>	<p>When considering the Masterplan, the Inspector describes its content as <i>‘akin to a sketch of what could be achieved and it is not a definitive requirement. Furthermore, the measured plan, and indeed Masterplan, whilst being important material considerations, are not in themselves documents adopted as part of the local plan’.</i></p> <p>The Inspector also states <i>‘whilst I acknowledge that the proposed development is not perhaps what the local community envisaged when developing the Calne Town Centre Masterplan, it is nonetheless in general compliance with it...’</i></p> <p>The list of key objectives for employment within the town centre that are given in paragraph 120 of the NDP is also referred to by the Inspector, who states that it is <i>‘of key aspirational criteria and not an inventory of criteria that every development should rigorously adhere to.’</i></p>
<p>Matters not addressed by policies</p>	<p>The Inspector was referred to NDP Policy WS1 in considering this proposal, but states that it is not strictly relevant to this application as it is concerned with proposals for employment development.</p>

Part B - Steering Group Workshop

The Steering Group workshop took place on Wednesday 16th June for 1.5hours from 7pm. Around 17 people attended representing a mixture of new and existing members.

The aims of the workshop were to:

- A. Examine how the vision and objectives of the NDP are being met – where is it working well and where could it be working better?
- B. To consolidate the feedback on the detailed policy review (from critical friends AECOM and Place Studio) and enable the Steering Group to ask questions and make comments about the detailed work
- C. To begin to explore what the guiding principles should be to inform the wider community engagement and consultation on the Plan review
- D. Refine the scope and focus of the forthcoming review

Comments recorded from the Steering Group

What is working?

- Protection of green space
- Town boundary identified and strengthened
- Wide range of issues addressed
- High quality/community influence
- The Plan is a community document (not the Parish or Town Council though they are the bodies responsible) – it realised community wishes and aspirations in planning policy and any future plans must do the same.

What could be improved? What new circumstances need to be addressed?

- Concern about development coming forward against NDP/local community intention
- Image weakened
- Retention of employment sites

- Local Plan Review -need to be careful about timing – it needs to come soon after this document to make sure it will remain up-to-date.
- Not just a land use plan but also a way to express community ambition-vision
- Unravel distinct identity – Market town/Rural
- Bring the Vision to the front – the NDP should inspire people but it’s currently buried!
- Measurement – how are we doing in achieving our goals?

Feedback on the detailed policy review from both Place Studio and Aecom was shared at the workshop – covering the sections as set out in the Neighbourhood Plan:

1. Housing and Infrastructure

- An up-to-date Neighbourhood Area Housing Needs Assessment would inform a more locally specific **H2 Affordable Housing** and **H3 Housing Mix**.
- **H5 Phasing of Development** could be improved by referring to a Neighbourhood Area-specific list of infrastructure projects that are needed.
- Wiltshire Local Plan Review suggests there will be an affordable housing requirement of 40% in developments of 10 or more homes in the Neighbourhood Area.
- Steering Group could consider an addition to policy to support alternative housing delivery models (e.g. Community Land Trust, housing co-ops) to implement a particular type of housing / on a particular site.

2. Getting Around

- Opportunity to update policy wording and evidence base to refer to up-to-date documents Calne Area Transport Strategy (Atkins, 2021), Wiltshire Local Transport Review and Chippenham Transport Review (emerging).
- Steering Group should consider support for ultra-low emission vehicles and associated infrastructure in policy.

3. Working and Shopping

- More local evidence would strengthen this section e.g. local urban and rural employment needs, updated Town Centre Masterplan and strategy for town centre uses
- New / updated local evidence should refer to recent changes to employment and town centre context e.g. COVID-19 impacts
- Town Centre Masterplan needs to be threaded more strongly into NDP policy framework to strengthen its impact
- The reviewed policies need to be informed by new use class E (and incoming MA) which allows more changes from employment uses to residential as permitted development

4. Community Facilities

- Neighbourhood Area-specific evidence can be collected to add more local detail to **CF2 Community Assets** e.g. list and map specific community facilities in the Neighbourhood Area
- Further evidence could be collected to identify any current gaps in provision of community facilities
- Emerging Local Plan Review documents should be monitored to inform this section
- Opportunity to draw links to other NDP policies e.g. sustainable transport, integration and landscaping

5. Built Environment

- A Calne and Calne Without Design Statement / Guide could be produced to support reviewed policies in this section, to identify positive characteristics of the Neighbourhood Area to be reflected in new development.

- Steering Group could consider producing a Local List of local heritage assets to make **BE4 - Heritage Assets** more locally-specific
- Would be beneficial to consider impact of **BE3 - Parking Provision** since the NDP was made.

6. Natural Environment

- Further local evidence would strengthen this section e.g. reviewing existing Landscape Character Assessment at NDP level, evidencing special quality of Special Landscape Area
- SG could consider any additional Local Green Spaces
- Policy should be updated to incorporate specific requirement for 'Biodiversity Net Gain'
- Opportunity for policy to contribute towards SSSI recovery

The steering group raised a few questions in relation to the above points:

- The Marden Valley is critically important and needs to be protected.
- Ownership and management of new green spaces should perhaps be taken into account – no longer adopted by Wiltshire Council now private and paid for by the local residents...
- Can more be added into the NP in terms of supporting low carbon development and sustainable construction?
- There is a very strong community spirit – thus could be harnessed in the way we look at uses in the town centre post covid?
- Would a town centre masterplan take account of retail offers in surrounding towns – Calne does exist as part of a wider network...
- A Design Code for the Town Centre should be explored.



Calne Community Neighbourhood Plan

Evidence Base and Policy Development
Final Report

AECOM Imagine it.
Delivered.

June 2021

Calne Community Neighbourhood Plan
Evidence Base and Policy Development

Quality information

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Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Authorized</u>	<u>Name</u>	<u>Position</u>
Version 1	19/05/21	Draft comment	for JH	Jesse Honey	Associate Director
Version 2	03/06/2021	Comments by ME		Mark Edwards	Calne Town Council
Version 3	15/06/21	Revised draft JH incorporating Town Council comments		Jesse Honey	Associate Director
Version 4	23/06/21	Final report	JH	Jesse Honey	Associate Director

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Disclaimer

This document is intended to aid the review of the made Calne Community Neighbourhood Plan (February 2018) and can be used to guide decision making and as evidence to support Plan policies if the Qualifying Body (QB) so chooses. It is not a Neighbourhood Plan policy document. It is a ‘snapshot’ in time and may become superseded by more recent information. Calne Town Council and Calne Without Parish Council are not bound to accept its conclusions. If any party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the Neighbourhood Plan at the consultation stage. Where evidence from elsewhere conflicts with this report, the QB should decide what policy position to take in the Neighbourhood Plan and that judgement should be documented so that it can be defended at the Examination stage.

Front Page Image:

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Abbreviations used in the report

Abbreviation

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
C&CW	Calne Town Council and Calne Without Parish Council
CIL	Community Infrastructure Levy
CSE	Centre for Sustainable Energy
Defra	Department of the Environment, Food and Rural Affairs
EBL	Evidence Base Links
EBPD	Evidence Base and Policy Development
FEMAA	Functional Economic Market Area Assessment
HMA	Housing Market Area
HNA	Housing Needs Assessment
HRA	Habitats Regulations Assessment
IMD	Indices of Multiple Deprivation
JSNA	Joint Strategic Needs Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
NA	Neighbourhood Area
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
WC	Wiltshire Council
WCS	Wiltshire Core Strategy

Executive Summary

Introduction and Context

Calne Town Council and Calne Without Parish Council (henceforth C&CW) are reviewing the Calne Community Neighbourhood Plan 2018 for their designated area, which lies in the Wiltshire Council local authority area.

As part of the development of the Neighbourhood Plan (NP) and its evidence base, C&CW applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood planning project. C&CW are represented by a joint Steering Group who prepare the Neighbourhood Plan by gathering relevant evidence.

This document comprises the final report of an Evidence Base and Policy Development (EBPD) study provided by AECOM to C&CW. There has been close communication between C&CW and AECOM throughout its development and, as such, feedback from C&CW has informed the final report, including C&CW's comments on the draft final version.

This EBPD covers 6 main topic/policy areas, as advised by C&CW, namely: housing and infrastructure; getting around; working and shopping; community facilities; built environment; and natural environment. The aim of the EBPD is to review the policy in the made Neighbourhood Plan and the existing evidence base, identify any gaps within it, and then present policy options and recommendations based not only on the existing evidence base but also on any additional relevant information that applies. Finally, at the request of the Steering Group, AECOM have also included some suggestions for indicators/'metrics' on each policy reviewed, which could be used for monitoring purposes.

No draft policy text currently exists for the Neighbourhood Plan review, and therefore the aim of the EBPD is to review and comment on those policies which are in the made Neighbourhood Plan and to recommend where the evidence base requires updating to inform a robust replacement policy, in addition to any amendments that may be required to ensure that the replacement policy meets the Basic Conditions of neighbourhood planning.¹

The review of existing policies is comprehensive, in that it assesses not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:

- Evidence has been assembled from robust sources;
- Stakeholder-derived evidence has been inclusively considered;

¹ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

- Relevant third-party comments/issues have been addressed;
- Reasonable conclusions have been drawn from that evidence;
- All useful evidence available has been referenced;
- There are no evidence gaps that need to be filled;
- The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan; and
- The policy meets the Basic Conditions.

If the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

General findings

In developing planning policies for the emerging new Neighbourhood Plan, C&CW should ensure that they do not repeat existing national and local planning policies. This is particularly important as the national and local policy environment have changed since the Calne Community NP was made in 2018. In a robust Neighbourhood Plan, neighbourhood policies always either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy void.

When C&CW supports the LPA's new policy approach this can simply be referenced in supporting text for the avoidance of doubt rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) to monitor effects of implementation is another way of ensuring the Neighbourhood Plan can add value over and above local and national policies.

All evidence that C&CW rely on in developing their new planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be more clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also refer to the LPA's evidence base documents and policies, as this will help support the policies and provide further justification.

Additional evidence work in some cases may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the existing and emerging local plan (e.g. in terms of standards), the more evidence is required. It is recommended that C&CW conducts further checks of their draft new policies as they are developed, to ensure they are adding value to the existing and emerging Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's neighbourhood planning officer.

Headline summary of policy specific findings (full details in Appendix 1)

WS1- Employment

The evidence quoted is appropriate and relevant but is not neighbourhood area-specific. This is reflected in the policy, which is reasonably general as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.

There is clear potential for the policy to be refined and made more area-specific through the production of evidence which relates directly to employment needs in the neighbourhood area, including an assessment of the differing requirements of the urban and rural areas, in line with section 6 of the NPPF and Core Policy 34.

The additional evidence gathering recommended would significantly enhance the effectiveness of the policy because it would provide greater clarity to developers on the type of employment development that will be supported and likely to be viable within the neighbourhood area.

One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. It is recommended that C&CW collectively reviews the emerging general and neighbourhood area-specific employment policy and evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs.

It is recommended that the supporting text is updated to reflect the current employment situation, considering any changes since the Neighbourhood Plan was made in 2018, including those resulting from the Covid-19 pandemic. At present, the detail within the supporting text is not translated into a neighbourhood area-specific policy. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. This includes ensuring that any reference to specific employment uses reflects the revocation of the B1 use class, the creation of new Classes E, F1 and F2 (where relevant), new 'Class MA' permitted development rights which can be used from 1st August 2021 to convert a use in the new Class E to Class C3 (dwelling houses), and any further relevant planning changes and reforms announced before the new NP is made.

Metrics which could be used to monitor this policy include employment development permissions in general, and on previously developed versus on greenfield land. However, monitoring and enforcing this policy may encounter difficulties due to the government's regularly-changing approach to permitted development rights.

WS2.1- Calne Town Centre

The evidence quoted is appropriate and relevant but is not sufficiently specific to the neighbourhood area. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.

There is potential for the policy to be refined, updated and made more area-specific through the production of evidence which relates directly to Calne Town Centre, including for the more general Policy WS2.1 to be combined with the Calne-focused Policy WS2.2 should an updated Town Centre Masterplan be produced.

The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would provide greater clarity on the type of development that will be supported.

One of the best ways to achieve such specificity and effectiveness is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. The policy could also consider what interventions have been tried in the past, their success or otherwise, and how future policy interventions could apply lessons learnt. As such, C&CW should review the emerging general and Calne-specific evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs. An updated Town Centre Masterplan may be required.

The key objectives for the town centre highlighted in the supporting text do not directly relate to the aims of the policy itself. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Metrics which could be used to monitor this policy include the delivery of projects / delivery against the aims of the existing Masterplan; alternative metrics could be set based on new evidence gathered such as particular community aspirations or new projects for the town centre, such as new seating installed, sales densities and other

indicators for retail performance, footfall, etc. (see the benchmarks mentioned in section 5 of the Masterplan).

WS3- Local Neighbourhood Shopping

The evidence quoted is appropriate and relevant although the Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on it to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and the neighbourhood evidence base should be consolidated and updated to reflect the most recent evidence supporting the Local Plan Review.

The first part of the policy, which seeks to preserve existing convenience retail provision away from the town centre, is proportionate and reasonable. In the second part of the policy there is an argument for making a distinction between provision in the rural and urban area, since different considerations apply to each, as suggested in the NPPF.

Further evidence-gathering is required to justify the urban part of the policy, given recent evidence of over-provision of convenience retail floorspace in Calne. An approach identifying areas of under-provision would allow for a more targeted policy to address existing shortfalls.

The supporting text provides detail not just on convenience retail, but on other uses. It should be rewritten to provide clear support for convenience retail development and avoids straying into other uses.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions, but it is considered this would not be problematic.

Metrics which could be used to monitor this policy include data on loss of retail / community space, applications for change of use / permitted development from retail / community uses, and/or spatial distribution of shops / distances between different parts of the neighbourhood area and their nearest shops.

CF1- Health, Leisure and Wellbeing

The evidence quoted is appropriate and relevant, although now quite dated. It is recommended that the emerging evidence base supporting the Local Plan review is monitored so that any updates can be appropriately referenced in the supporting text.

The policy is proportionate and reasonable, and it provides sufficient flexibility to allow proposals to be judged on their individual merit, with contributions to green infrastructure and public realm improvements assessed according to the scale of the scheme in question. Since the policy contains specific examples of contributions that

could be secured alongside new development, the supporting text and evidence base could justify this further.

The policy is likely to be effective in its current form, although it could be strengthened by drawing links to GA1 – Sustainable Transport and BE1 – Integration and Landscaping. As with all policies being updated, information on how the policy was implemented/applied should be reviewed and applied to maximise the effectiveness of its replacement.

References in the supporting text to community facilities should be moved into the supporting text supporting Policy CF2.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication that this would be difficult to achieve.

Metrics which could be used to monitor this policy include the indicators used in the JSNA and Health and Wellbeing JSNA or other Wiltshire public health data (see above) or Index of Multiple Deprivation data on health deprivation (IMD).

BE1- Integration and Landscaping

The evidence quoted is appropriate and relevant but with the exception of the environmental poll is not neighbourhood area-specific. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF should be retained but the 2019 version should now be cited.

There could be potential for the policy to be made more specific if there is more specific, detailed design evidence supporting it, such as, for example, an AECOM design code study or other characterization evidence with a specific focus on existing and potential landscaping, local views, and so on. The design code or guide should follow the new National Model Design Code.

With such evidence, the supporting text could also become more place-specific in terms of good practice and room for improvement. If enough detailed evidence is gathered, a neighbourhood area-specific Design Guide could be drafted and this policy (and other design policies) could state that proposals will be assessed in line with it.

The additional evidence-gathering recommended above, in particular photographs/visual images, would significantly enhance the effectiveness of the policy because it would make far clearer to developers what type of landscaping and integration is or is not supported.

Policy should be developed with a clear eye on what is already being said at the level above and then seeking to add to it and/or fill in any gaps. Here, therefore, it is

recommended that C&CW collectively reviews the emerging general and location-specific design and landscape policy at Wiltshire level , with the caveat that it may still change between now and adoption, and considers what neighbourhood area-specific topics, features or issues may be missing where a neighbourhood plan policy could add to or ensure clearer coverage.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Quantitative metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently long and varied, and qualitative more than quantitative. Identifying specific monitoring metrics as part of the process of gathering more locally specific evidence may in fact help the group to identify exactly what the policy is trying to achieve (e.g. number of developments permitted encroaching on specific identified views to protect, and so on).

Policy BE2 – Design Principles for Local Distinctiveness

The current policy is generic. A new Design Guide for the Calne Community neighbourhood area, clearly detailing the features and local character and townscape that make the neighbourhood area distinctive, could/should inform any replacement policy.

As an example, based on the current supporting text, a replacement policy could move the whole of the fifth bullet under paragraph 148 into the policy itself. Likewise, the last sentence of bullet point seven under the same paragraph could be added to policy, though perhaps here BE1 rather than BE2 would be the best place for it, given that it is more of an integration and landscaping point. Clearly, a new neighbourhood area-specific design guide could add dozens of further policy ideas. It could also go into further detail on specific features and characteristics which are particular to individual settlements across the neighbourhood area.

The policy and its supporting text differ, which is not ideal. The policy itself is about the design of buildings, whereas there is much in the supporting text about habitats, wildlife, biodiversity, and rural landscapes, not carried through to the policy itself. This suggests that either a new policy on the interaction of development with habitats, wildlife and its rural surroundings might be justified or that the supporting text on these topics should be moved to/merged into NE2 and NE3 (or their replacements) and inform those policies instead.

It should be noted that restrictions on storey height, like that in paragraph 47 may have the unintended effect of promoting further generic development.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Quantitative, broad metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently very long, detailed and varied, and also quite qualitative. Identification of specific monitoring metrics as part of the process of gathering more locally specific evidence may actually help the group to identify what exactly the policy is trying to achieve (e.g. number of developments permitted which encroach on specific identified views to protect etc).

Policy BE3 – Parking Provision

It would be helpful, if the Steering Group has not already gathered such evidence, to understand the extent to which the community is comfortable/happy with parking provision for new development consented under BE3. If the community feels the parking thus provided has been excessive or insufficient, then there could be a case for setting location-specific parking standards, based firmly on specific, illustrated examples of where the community is unhappy with policy effects, and using them as a basis for a replacement policy.

In the new NPPF, the relevant text is paragraph 105 which gives many more factors to consider than previously when setting parking standards. As the Wiltshire Parking Strategy has not itself been updated, it is recommended that for an effective replacement policy, the existing standards are taken as a starting point, checked against evidence of real-world effects and applications, and then redrafted in the light of both the effects monitored and new NPPF paragraph 105.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. In order for this to happen, it would need to go further than the current Wiltshire Parking Strategy, drafted long before NPPF paragraph 105, and the latter takes priority.

Metrics which could be used to monitor this policy include provision of parking spaces per unit of new development delivered in the neighbourhood area (potentially by size of development).

Policy BE4 – Heritage Assets

The evidence supporting the policy is appropriate, but the NPPF could also have been quoted. There is also scope, in line with recommendations on policies BE1 and BE2 above, for more neighbourhood area-specific evidence to be added, for example a neighbourhood design code/guide would contain much that is relevant on the conservation and enhancement of existing heritage assets across the neighbourhood area.

As with other built environment policies, there is scope to make the policy more neighbourhood area-specific.

While locally listed buildings are not protected by national policy, there is certainly scope for them to be considered as material considerations in planning applications and for a basic level of protection in neighbourhood plan policy. As such, it is recommended that for more location-specific policy, heritage/built environment evidence be gathered indicating if there are buildings C&CW considers are worthy of adding to a new Local Heritage List, to be compiled and evidenced in line with Historic England Advice Note 7.

Importantly, the recommendations above to make the policy as specific to the neighbourhood area, to its heritage assets and to its two conservation areas as possible- namely by using evidence from a new design code and/or townscape assessment and also to develop a local list of buildings/heritage assets and then protect those buildings/assets in policy- will significantly improve policy effectiveness.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. Refer in particular to NPPF paragraph 185 and its guidance on how heritage assets should be placed in their wider context and related clearly to local character and distinctiveness, which suggests that any replacement for BE4 would do well to cross-reference BE1 and BE2.

Metrics to monitor this policy may be difficult to obtain as compliance will be very individual to each development. The group could monitor whether recommendations of the council heritage officers on new applications in the conservation area were carried out in implementation of development, but this may be time consuming.

Policy NE3 – Biodiversity

It is not clear to Plan users how the evidence listed flowed into the most locally-specific elements of the policy most requiring evidence support, namely the three bullet points. In any replacement policy, the supporting/justifying text should flow much more clearly into the policy, particularly but not limited to the three bullet points. The supporting text could also link to other policies on the natural environment, community infrastructure, design and so on.

There could be potential for any policy seeking net gain in biodiversity to seek developments contributing towards recovery of SSSIs in the plan area. This point could be discussed with Natural England. The group should also discuss the emerging Wiltshire Green and Blue Infrastructure Strategy with the LPA.

For any neighbourhood plan policy in Wiltshire seeking net gain in biodiversity, the key evidence document is now the Council's 'Addressing Climate Change and Biodiversity

Net Gain Through the Local Plan- Raising the Ambition' report. This should be reviewed in detail and be quoted and referenced extensively in the supporting text.

The NPPF now requires policies to provide net gains for biodiversity. In this context, C&CW are to be congratulated for a draft policy that was ahead of the game, and the changed policy context means the draft policy can be resurrected without needing detailed evidence. In these specific circumstances, it would even be acceptable simply to restate NPPF requirements so that they become part of the statutory development plan for the neighbourhood area (the neighbourhood plan is part of the statutory development plan but the NPPF is not), although if there is local evidence to support policy wording adding to NPPF requirements, the policy could be even stronger.

As with all policies forming replacements for 'made' policies, monitoring and implementation evidence for the 'made' policy will be important- i.e. what are the effects of the made policy, if any, and are there lessons to be learnt in terms, for example, of unintended effects, that could inform new policy wording?

Metrics which could be used to monitor this policy include area of additional habitat space created as part of development / projects, number of wildlife corridors created or connected and endangerment status of local protected species.

Policy NE4 – Energy Conservation

The 2019 NPPF limits any replacement policy for NE4 to 'urging' developers to aim for energy conservation rather than setting requirements for them to do so that go further than national requirements. Likewise, Core Strategy 41 remains the adopted policy. As such, there seems no alternative but to roll the policy forward unchanged into the next neighbourhood plan.

Nevertheless, any monitoring data held by either C&CW or Wiltshire in terms of how often NE4 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective while maintaining its conformity with national and local policy.

As currently worded, the policy would still comply with the 2019 NPPF and with adopted and emerging Wiltshire policies. Any proposed changes to wording on the basis of implementation evidence (see above) should seek to maintain such conformity.

Metrics which could be used to monitor this policy include energy efficiency / performance of new development or number of energy performance certificates lodged on register (although this data does not appear to be available at a level below local authority, unless individual planning applications were scrutinised).

1. Introduction

1.1 About this document

1. The 2011 Localism Act introduced neighbourhood planning, allowing parishes or neighbourhood forums across England to develop and adopt legally binding development plans for their neighbourhood area.
2. Calne Town Council and Calne Without Parish Council (henceforth C&CW) are reviewing the Calne Community Neighbourhood Plan 2018 for their designated area, which lies in the Wiltshire Council local authority area.
3. As part of the development of the Neighbourhood Plan (NP) and its evidence base, C&CW applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood planning project. C&CW are represented by a joint Steering Group who prepare the Neighbourhood Plan by gathering relevant evidence.
4. This document comprises the final report of an Evidence Base and Policy Development (EBPD) study provided by AECOM to C&CW. There has been close communication between C&CW and AECOM throughout its development and, as such, feedback from C&CW has informed the final report, including C&CW's comments on the draft final version.
5. This EBPD covers 6 main topic/policy areas, as advised by C&CW, namely: housing and infrastructure; getting around; working and shopping; community facilities; built environment; and natural environment. The aim of the EBPD is to review the policy in the made Neighbourhood Plan and the existing evidence base, identify any gaps within it, and then present policy options and recommendations based not only on the existing evidence base but also on any additional relevant information that applies. Finally, at the request of the Steering Group, AECOM have also included some suggestions for indicators/'metrics' on each policy reviewed, which could be used for monitoring purposes.
6. No draft policy text currently exists for the Neighbourhood Plan review, and therefore the aim of the EBPD is to review and comment on those policies which are in the made Neighbourhood Plan and to recommend where the evidence base requires updating to inform a robust replacement policy, in addition to any amendments that may be required to ensure that the replacement policy meets the Basic Conditions of neighbourhood planning.²
7. The review of existing policies will be comprehensive, in that it will assess not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:

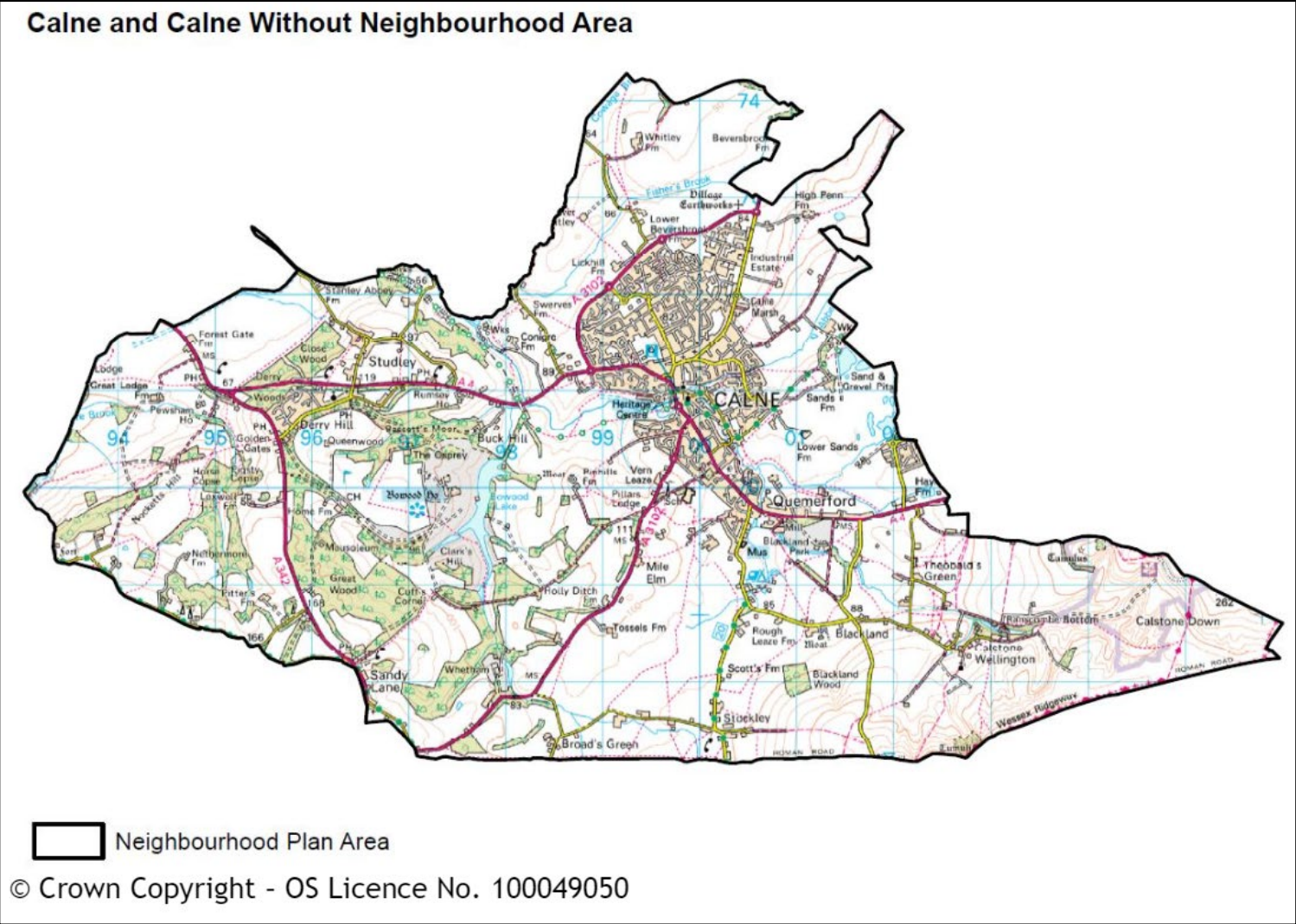
² Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

- Evidence has been assembled from robust sources;
 - Stakeholder-derived evidence has been inclusively considered;
 - Relevant third-party comments/issues have been addressed;
 - Reasonable conclusions have been drawn from that evidence;
 - All useful evidence available has been referenced;
 - There are no evidence gaps that need to be filled;
 - The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan; and
 - The policy meets the Basic Conditions.
8. If the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

1.2 Local context

9. The NP area covers the areas administered by Calne Town Council and Calne Without Parish Council. It is a large area encompassing the town of Calne, the adjacent settlement of Quemerford, and several villages and hamlets. The eastern part of the neighbourhood plan area falls within the North Wessex Downs AONB, there are three Sites of Special Scientific Interest (SSSIs) and a large number of listed buildings and scheduled monuments.
10. The NA is seeing substantial growth with allocation of 1,400 homes in Calne and 165 homes in the remainder of the Community Area in the 2015 Wiltshire Core Strategy (2006-2026) and a new housing requirement of 1,610 homes in the emerging Local Plan (2016-2036).
11. **Figure 1.1** below illustrates the neighbourhood plan area, designated on 17 February 2014.

Figure 1-1: Calne and Calne Without Neighbourhood Area (Source: Calne Town Council and Calne Without Parish Council)



1.3 Planning Policy and Evidence Base

12. This section summarises the local planning policy and evidence base available at the Wiltshire Council and Neighbourhood Plan levels.

1.3.1 National Planning Policy Framework (NPPF 2019)

13. The NPPF sets out national planning policies, including but not limited to those relevant to neighbourhood planning and to issues covered by the Calne Community Neighbourhood Plan.

14. The most recent version of the NPPF at the time of writing is the NPPF 2019³. One of the reasons for commissioning the Calne Community NP EBPD report is to ensure that the newest version of the NPPF is referred to in all policy, evidence and supporting wording.

15. In so doing, it is important to be aware that the government is consulting on new NPPF revisions at the time of writing (consultation concluded in March 2021)⁴. Currently, the NPPF references in the made Neighbourhood Plan and its previous evidence are out of date because they date from 2012, and thus from a previous version of the NPPF. Furthermore, even the references in this new EBPD may soon become out of date, depending on what final revisions the government decide to make to the NPPF once consultation is concluded.

1.3.2 Adopted Wiltshire Core Strategy (2015)⁵

16. The Wiltshire Core Strategy (WCS), incorporating some saved policies from the former district local plans, is the key policy document in the Development Plan applying to the neighbourhood area, which also includes the Wiltshire Housing Site Allocations Plan, Chippenham Site Allocations Plan, Minerals and Waste Plans and several made neighbourhood plans including the made Calne Community Neighbourhood Plan.

17. The Core Strategy, containing 69 Core Policies, provides the overarching policy framework, while the Neighbourhood Plan adds local detail. Chapter 3 sets out the spatial vision for Wiltshire.

18. Chapter 4 of the WCS contains the first three, more strategic, Core Policies to implement the plan's vision and spatial strategy, including a settlement and delivery strategy, as well as a policy on infrastructure requirements.

19. Calne itself is located in the north of Wiltshire (but defined as part of the North and West Housing Market Area in Core Policy 2), and is classified as a Market Town in Core Policy 1, which states that '*Outside the Principal Settlements,*

³ At:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

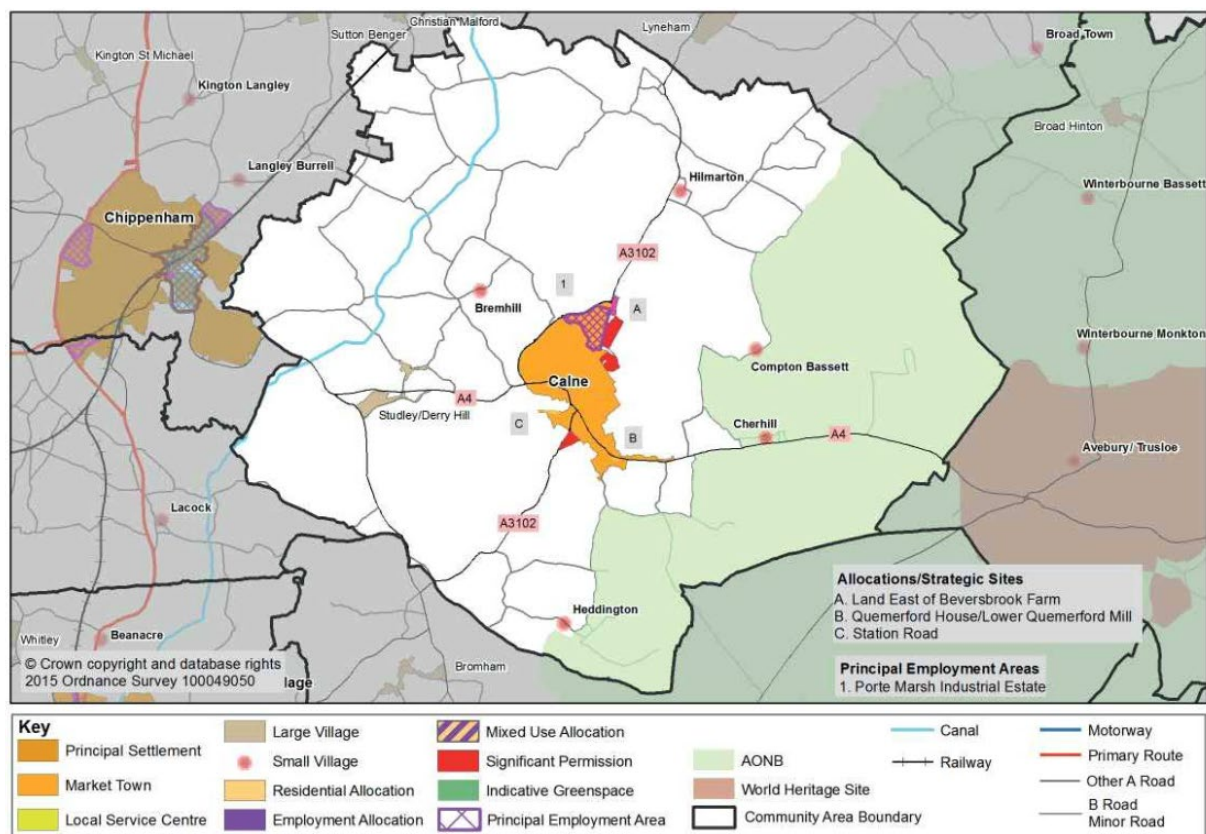
⁴ At: <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

⁵ At <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities’.

20. The Wiltshire Key Diagram (WCS Figure 4.1) shows part of the Calne NA as overlapping with the North Wessex Downs AONB and that the historic alignment of the Wilts and Berks Canal passes through the neighbourhood area. The latter is also discussed in Core Policies 16 and 53.
21. Figure 4.1A shows the Strategic Transport Network in Wiltshire and shows that Calne is connected by strategic bus routes to Royal Wootton Bassett, Chippenham, and Devizes, as well as connected by non-strategic A road to Chippenham and Marlborough. There is no railway connection to any part of the neighbourhood area, but the railway line passes through nearby Chippenham (the nearest station) to the west.
22. Core Policy 2, setting out the housing delivery strategy, states that the minimum housing requirement for the North and West Wiltshire Housing Market Area (HMA) combined is 24,740 dwellings, over half of the total requirement for Wiltshire as a whole (42,000).
23. Table 1 shows an indicative Housing Requirement for Calne town of 1,440 and of 165 units for the remainder of the neighbourhood area. This is also stated in Core Policy 8.
24. Chapter 5 concentrates on area strategies (Core Policies 4-33) with Section 5.37- 5.42 and Core Policy 8 dedicated to the spatial strategy for the Calne Community Area. Figure 5.3 shows the Calne Community Area, including nearby smaller and larger settlements, Principal Employment Areas, transport connections, designations, allocations, and regeneration areas. Calne contains one Principal Employment Area at the north end of the town and one saved employment allocation. Three significant permissions are shown in the north east and southwest of Calne.

Figure 1-2: Calne Community Area in the Wiltshire Core Strategy



Source: WCS Figure 5.3

25. The policy lists the single Principal Employment Area as Porte Marsh Industrial Estate, stating that this is supported in line with policy 35. Over the Core Strategy plan period 2006-2026, a further 6 hectares of new employment land are to be provided, including 3.2ha at Land East of Beversbrook Farm and Porte Marsh Industrial Estate.
26. Within the wider Calne community area, with Calne as the Market Town; Large Villages are Derry Hill / Studley and Small Villages include Bremhill, Cherhill, Compton Bassett, Heddington and Hilmarton.
27. As per Core Policy 8, development proposals in the Calne Community Area will need to demonstrate how issues and considerations listed in paragraph 5.41 will be addressed.
28. Paragraph 5.41 lists 13 specific issues to be addressed in planning for the Calne Community Area, relating to:
- the then emerging town plan, which provided the foundation for the made Calne Community NP;
 - congestion and public transport access;
 - the River Marden and associated opportunities;

- the requirement for a transport assessment for major applications which should include an investigation into identifying an appropriate solution to reducing the traffic/HGV impact of the waste facility on the edge of Calne;
- developer contributions, including to infrastructure and particularly culture and entertainment facilities, GP and cemetery capacity and emergency services;
- retail (see also the Wiltshire Town Centre and Retail Study)⁶;
- a proposed leisure campus;
- the need for growth to be phased and balanced (non-strategic growth to be in line with Core Policy 2);
- the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and its setting;
- safeguarding of the historical alignment of the Wilts and Berks Canal; and
- the Calne Air Quality Management Area (AQMA) and local air quality.

29. Core Strategy Table 5.3 sets out the details and distribution of the expected delivery of housing in the Calne Community Area to 2026.

30. WCS chapter 6 contains policies to deliver the plan's six strategic objectives. Policies to deliver Strategic Objective 1 on the economy (Core Policies 34-40) include policies on employment land, regeneration opportunities, military establishments, retail, and leisure uses, tourism and travel accommodation. The Calne Principal Employment Area to be developed in accordance with Core Policy 35 is Porte Marsh Industrial Estate.

31. Core Policies 41 and 42 on sustainable construction and renewable and low carbon energy aim to implement Objective 2 on climate change.

32. Housing policies implement Objective 3. These include Core Policies 43-47 on the subjects of affordable housing, rural exception sites and housing need, including for older people and gypsies and travellers.

33. Core Policies 48 and 49 are focused on rural communities, including on supporting rural life, services, and facilities.

34. On the subject of the natural, historic, and built environment (Objective 5), Core Policies 50-59 address the topics of biodiversity, landscape, green

⁶ Available at <http://pages.wiltshire.gov.uk/wiltshire-retail-study-march-2011-report.pdf>

infrastructure, canals, air quality, contamination, design and place shaping, and conservation.

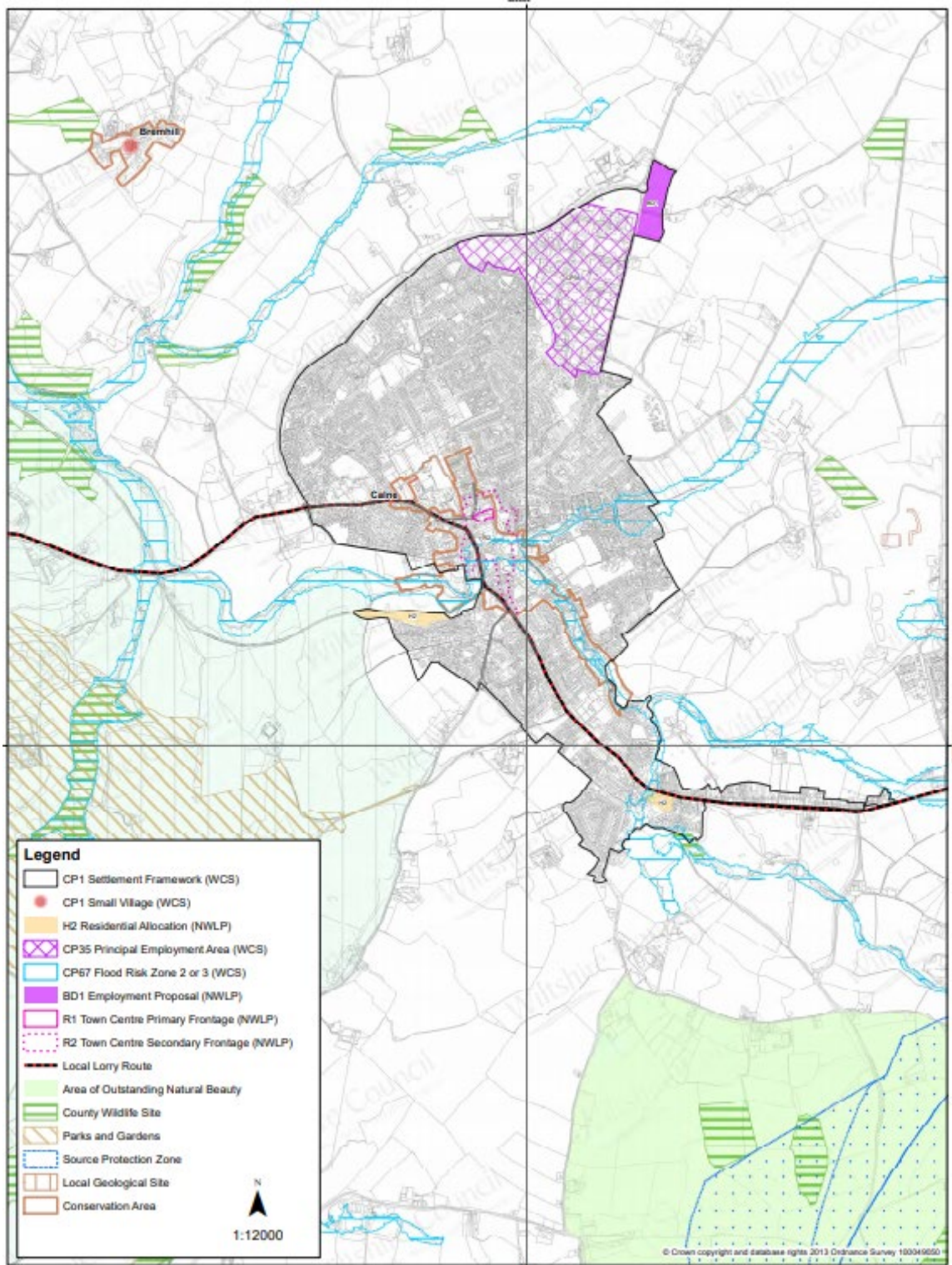
35. Core Policy 53 sets out the principals for development affecting the Wiltshire canals, including the Wilts and Berks. The policy safeguards the historical alignment, as there is an intention to re-establish this as a navigable waterway. The policy also supports proposals to enhance the canal's recreation and conservation potential and protects against negative impacts of the canal's reinstatement.
36. Core Policies 60-69 on infrastructure (Objective 6) discuss transport, freight, flood risk, water resources, and the protection of the River Avon SAC.
37. The Core Strategy is accompanied by an interactive policies map, including mapping for community areas, including one for Chippenham, Corsham and Calne Community Area. This sets out the local authority and community area boundary, housing and employment allocations, affordable housing zones (designating either 30 or 40% affordable housing requirements), settlement and employment classifications, the AQMA, heritage and environment designations, flood risk retail classifications, transport routes and hubs, services, retail classifications, agricultural land quality and conservation areas. A number of inset maps are also provided (inset 6 covers the Calne neighbourhood area).
38. The WCS is also supported by a variety of evidence documents, contained in its Document Library⁷. This includes Topic Papers⁸ on Climate Change Housing, Settlement Strategy, Rural Signposting, Natural Environment, Retail, Economy, Infrastructure and Developer Contributions, Built and Historic Environment, Transport, Green Infrastructure, Site Selection, Military Issues, Building Resilient Communities, Housing Requirements, and Gypsies and Travellers.

⁷ At

<http://pages.wiltshire.gov.uk/submissionofwiltshirecorestrategy/corestrategydocuments.htm>

⁸ At <http://pages.wiltshire.gov.uk/corestrategydocuments?directory=Topic%20Papers>

Figure 1-3: Core Strategy Inset Map 6 - Calne



Source: Wiltshire Council⁹

⁹ At <http://pages.wiltshire.gov.uk/wcsmods-calne-inset-updated.pdf>

39. The WCS's page on Studies, Surveys and Assessments¹⁰ lists a large number of evidence documents. However, as all documents were produced prior to the examination and adoption of the Core Strategy in 2015, and the vast majority were finalised prior to 2012, these evidence documents are now unlikely to offer up-to-date evidence to underpin the Calne Community Neighbourhood Plan review, and this has been reflected in our commentary on them in Appendix 1.

1.3.3 Emerging Swindon and Wiltshire Joint Spatial Framework¹¹

40. The Joint Spatial Framework is being prepared by Wiltshire Council and Swindon Borough Council. It will set out broad amounts and spatial distributions of new jobs, homes, and infrastructure from 2016 to 2036. It is intended to inform individual local plan reviews, enabling the preparation of separate but consistent local plans, taking their lead from the joint strategy.

41. Wiltshire Council and Swindon Borough Council published the Swindon and Wiltshire Joint Spatial Framework: Issues Paper and supporting evidence papers for each Housing Market Area for consultation in 2017. However, no further documents have been published since then. Specific framework documents were produced for Chippenham, Salisbury, Swindon, and Trowbridge HMAs. Other joint evidence included a Strategic Housing Market Assessment (SHMA) and a Functional Economic Market Area Assessment (FEMAA), both produced in 2017.

42. All the evidence described above is available on the Joint Spatial Framework page¹².

1.3.4 Emerging Wiltshire Local Plan¹³

43. The emerging Local Plan review is in its early stages. Wiltshire Council (WC) undertook a consultation on the emerging plan between January and March 2021. The results of the consultation will be reviewed by WC and will inform the emerging draft Local Plan. Further consultation is due to take place either in late 2021 or in 2022.

44. Relevant published consultation material included¹⁴:

- Emerging Spatial Strategy;
- Empowering Rural Communities;
- Addressing Climate Change and Biodiversity Net Gain;

¹⁰ At

<http://pages.wiltshire.gov.uk/corestrategydocuments?directory=Studies%2C%20Surveys%20and%20Assessments>

¹¹ At <https://www.wiltshire.gov.uk/planning-policy-sw-joint-spatial-framework>

¹² At <https://www.wiltshire.gov.uk/planning-policy-sw-joint-spatial-framework>

¹³ At <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

¹⁴ At <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

- Local Plan Review Interim Sustainability Appraisal;
 - Habitats Regulations Assessment Screening Opinion;
 - Local Transport Review;
 - Retail and Town Centre documents;
 - Local Housing Needs Assessment (2019);
 - Employment Land Review;
 - Functional Economic Market Assessment;
 - Level 1 Strategic Flood Risk Assessment;
 - Informal consultation reports (Autumn 2019);
 - Informal consultation reports (Autumn 2018);
 - Regulation 18 Issues and Options consultation statements (Autumn 2017);
 - Interactive Portal Map; and
 - Planning for Calne document and Site Selection Report.
45. The former contains information on the proposed scale of growth (additional new homes and employment land, 2016 to 2036); place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place); potential development sites - the justification for these is set out in an accompanying 'Site Selection Report'; and settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.
46. The emerging Spatial Strategy document sets out the new settlement hierarchy (in a table on page 3), in which Calne is still classified as a Market Town. Market Towns *'have the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities'*.
47. The document also discusses growth and climate change; the spatial strategy and how to formulate and deliver it; details of the four identified Housing Market Areas (HMAs) of Chippenham (the Calne Community neighbourhood area is part of the Chippenham HMA), Salisbury, Swindon and Trowbridge; the role and function of brownfield targets; and plans for next steps of the Local Plan.
48. The Chippenham HMA is forecast to have by far the largest additional housing need over the plan period. The levels of growth in the neighbourhood area will depend on the growth scenario / strategy chosen. For Calne, the Sustainability Appraisal also *'recognises a need to address concerns about job growth corresponding to the recent increase in new homes being built'*.
49. The emerging strategy (table on page 14 of the document) states the following proposed requirements:

Figure 1-4: Extract from table on page 14 of the Wiltshire Local Plan Emerging Spatial Strategy (January 2021)

			Overall Housing Requirement (Dwellings)		Overall Employment Requirement (Hectares)
	Wiltshire Core Strategy 2006-2026	Brownfield target 2021-2031	Emerging Strategy 2016-2036	Residual at 1 April 2019	
Calne	1440	60	1610	360	4

Source: Wiltshire Council

50. Paragraph 17 on page 25 further sets out individual calculations for Calne:

Figure 1-5: Extract from table on page 25 of the Wiltshire Local Plan Emerging Spatial Strategy (January 2021)

Settlement and Housing Market Area (HMA)	Average annual permissions 2009-2019(dwelling)	Brownfield Housing Target 2021-2031 (dwellings)	Existing developable permissions (2021-2031)
Chippenham HMA			
Calne		7.9	60
			3

Source: Wiltshire Council

51. The 'Empowering Rural Communities' document also includes a housing requirement for the settlement of Derry Hill/Studley which is located within the neighbourhood area:

Figure 1-6: Extract from table 2.4 'Chippenham HMA Large Village indicative housing requirements' of the Wiltshire Council Local Plan - Empowering Rural Communities document

Large Villages Chippenham HMA			
Settlement	Baseline indicative housing requirement 2016-2036	Annualised baseline housing requirement in dwellings per annum	Completions (2016-19) & Commitments (1 April 2019)
Derry Hill/Studley	80	4.0	2

1.3.5 Neighbourhood Plan activity

52. As noted previously, the first Calne Community Neighbourhood Plan was 'made' in February 2018 and covers Calne and Calne Without Neighbourhood Area. It was led by a partnership of local organisations including Calne Town Council, Calne Without Parish Council, and businesses, community groups, and schools. Since then, it has formed part of the statutory development plan for Wiltshire. The made Plan is based on the Wiltshire Core Strategy (2015).

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Subsequently, however, WC has started consulting on a new, emerging Local Plan (as explained above).

53. The four objectives of the made NP are to: a) promote high quality and sustainable growth; b) protect and enhance the historic built environment; c) protect and enhance the natural and built environment, countryside and landscape setting; and d) improve Calne town centre. It aims to deliver these four objectives through 21 following policies, grouped into six themes:

	Objective			
	A	B	C	D
Housing & Infrastructure				
Policy H1 - Housing Allocation	✓	✓	✓	
Policy H2 - Affordable Housing	✓			
Policy H3 - Housing Mix	✓	✓	✓	
Policy H4 - Settlement Boundaries and Housing Sites	✓	✓	✓	✓
Policy H5 - Phasing of Development	✓			
Getting Around				
Policy GA1 - Sustainable Transport	✓	✓	✓	✓
Policy GA2 - Highway Impact	✓	✓	✓	✓
Working & Shopping				
Policy WS1 - Employment	✓			✓
Policy WS2.1 - Calne Town Centre	✓	✓		✓
Policy WS2.2 - Calne Town Centre Masterplan	✓	✓		✓
Policy WS3 - Local Neighbourhood Shopping	✓	✓		
Community Facilities				
Policy CF1 - Health, Leisure and Wellbeing	✓		✓	
Policy CF2 - Community Assets	✓	✓	✓	✓
Built Environment				
Policy BE1 - Integration and Landscaping	✓	✓	✓	✓
Policy BE2 - Design Principles for Local Distinctiveness	✓	✓	✓	✓
Policy BE3 - Parking Provision	✓	✓		
Policy BE4 - Heritage Assets	✓	✓	✓	✓
Natural Environment				
Policy NE1 - Local Green Space		✓	✓	
Policy NE2 - Setting of Calne and Calne Without	✓	✓	✓	
Policy NE3 - Biodiversity	✓		✓	
Policy NE4 - Energy Conservation	✓	✓	✓	✓

Source: Made Calne Community Neighbourhood Plan, page 23

54. The made NP was supported by a range of evidence, some of which remains relevant but most of which needs to be updated, including:

- 2011 Census Local Neighbourhood Statistics
- Affordable Housing Core Policy 43 Paper - Implication of Viability Review (February 2014)
- Affordable Housing Viability Study 2011
- Air Quality Strategy for Wiltshire 2011-2015
- Air quality supplementary planning document 2012
- Appendix 1: Calne Community Area February 2016
- Calne Air Quality Management Area Order
- Calne Town Centre Masterplan 2016
- Calne Vision and Scoping Study 2012
- Creating Places: A guide to achieving high quality design in new development
- Draft Wiltshire Infrastructure Delivery Plan 3 2011 – 2026
- Emerging Wiltshire Housing Site Allocations Development Plan Documents (DPD)
- Environment Agency Flood Risk Maps
- Future Employment Needs in Wiltshire 2011
- Habitats Regulation Assessment
- Health Infrastructure Note
- Historic England Listing Schedules
- Historic Landscape Assessment for the Wiltshire Core Strategy 2012
- Housing Land Availability Assessment 2015
- Housing Site Appraisal for the Calne Community Neighbourhood Plan – January 2016 (AECOM)
- Local Transport Plan 3 2011-2026
- Methodology and disaggregation of additional housing requirements Jan 2014
- Natural England Designated Sites
- Neighbourhood Plan Scoping Report – October 2014 (URS)
- North Wiltshire Strategic Flood Risk Assessment (SFRA) Level One
- Note Matter 6 renewable energy note
- Planning for Town Centres - Practice guidance on need, impact, and the sequential approach
- Planning Obligations Supplementary Planning Document 2015
- Sustainability Appraisal for the Calne Community (various iterations)
- The Swindon and Wiltshire Local Enterprise Partnership (LEP) Business Plan - Jan 2012 to Mar 2015
- Wiltshire Biodiversity Action Plan
- Wiltshire CIL Charging Schedule May 2015
- Wiltshire Core Strategy Addendum to Topic Paper 15: Housing Requirements Technical Paper (February 2014)
- Wiltshire Core Strategy Development Plan Document Partial Review Scoping Consultation Document

- Wiltshire Core Strategy Examination Position Statement on Matter 9 (E) Community Areas – Calne
- Wiltshire Core Strategy Habitats Regulation Assessment Update (April 2014)
- Wiltshire Core Strategy Retail Review 2015
- Wiltshire Core Strategy Topic Papers 2021
- Wiltshire Council Housing Priorities Action Plan
- Wiltshire Council Strategic Site Options Landscape Assessment 2011
- Wiltshire Council Town Centre and Retail Study - Final Report, Plans and Appendices
- Wiltshire Green Infrastructure Strategy update 2012
- Wiltshire Infrastructure Delivery Plan 2013
- Wiltshire Intelligence Network Local Area Assessments and Maps
- Wiltshire landscape character assessment final report 2005
- Wiltshire Local Development Framework - Strategic Transport Assessment
- Wiltshire Local Transport Plan 2011- 2026 Car Parking Strategy
- Wiltshire Open Spaces Study, March 2015
- Wiltshire Revised CIL Regulation 123 List September 2016
- Wiltshire School places strategy 2015 – 2020
- Wiltshire Strategic Housing Market Assessment 2011
- Wiltshire surface water management plan 2011
- Wiltshire Surface Water Management Plan Phase 3 Final Report
- Wiltshire Sustainable Energy Planning Study
- Wiltshire Workspace & Employment Land Review 2011
- Wiltshire Workspace Strategy 2009

55. An NP Evidence Links document provides links to all the evidence listed above (though many are now in need of update). The evidence document links can also be viewed on the neighbourhood plan consultation webpage¹⁵.

56. Appendix 1 of the neighbourhood plan contains an Assessment of Local Green Spaces Proposal for Designation under the NPPF criteria, followed by overview and inset maps (maps 1-3, 4a and 4b) of the neighbourhood area.

57. Finally, Section 2 of the neighbourhood plan sets out non-planning issues and community aspirations.

58. At project inception, C&CW provided AECOM with a range of other relevant evidence documents relating to the Neighbourhood Plan. These comprise:

- Wiltshire Local Plan Review, Calne – Pool of Potential Development Sites, Site Selection Report (draft document);

¹⁵ At

https://consult.wiltshire.gov.uk/portal/spatial_planning/np/calne_neighbourhood_plan/calne_community_neighbourhood_plan_regulation_16_consultation?tab=files

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- Briefing Paper on the Local Plan Consultation – Planning for Calne;
- Calne Area Transport Strategy Report, February 2021;
- Calne Without Parish Council Response to the Wiltshire Local Plan consultation, March 2021; and
- Calne Without Parish Council Response to The Future Chippenham Consultation, March 2021.

59. These evidence base documents have been reviewed as appropriate throughout this report, together with the 15 policies identified for review by the Steering Group, as follows:

- Policy H2 – Affordable Housing
- Policy H3 – Housing Mix
- Policy H5 – Phasing of Development
- Policy GA1 – Sustainable Transport
- Policy GA2 – Highway Impact
- Policy WS1 – Employment
- Policy WS2.1 – Calne Town Centre
- Policy WS3 – Local Neighbourhood Shopping
- Policy CF1 – Health, Leisure and Wellbeing
- Policy BE1 – Integration and Landscaping
- Policy BE2 – Design Principles for Local Distinctiveness
- Policy BE3 – Parking Provision
- Policy BE4 – Heritage Assets
- Policy NE3 – Biodiversity
- Policy NE4 – Energy Conservation

60. The remaining six policies will be reviewed by the Steering Group and their consultants.

61. The purpose of this EBPD is to help the Steering Group identify:

- changes in the planning policy baseline;
- made Plan policies which now deviate from the emerging Local Plan and NPPF;
- gaps in the evidence base to support revised policies; and
- how the made policies could be adapted to reflect the new context.

2. Assessment methodology

2.1 Assessment of evidence base

62. As the Steering Group will be aware, the evidence base for neighbourhood planning needs to be 'proportionate', i.e. relating well in terms of breadth, depth and scope to the policy being proposed. In line with this approach, the Government's Planning Practice Guidance (PPG) expects evidence in Neighbourhood planning to be proportionate and robust to 'support the choices made and the approach taken'. This can often largely consist of 'secondary' evidence (i.e. already collected by another party, making evidence gathering more of an exercise in assembling, interpreting, and showing understanding of existing data).
63. However, proportional primary evidence can also be important to achieving NP policy objectives, particularly if the neighbourhood plan seeks requirements which are greater or more stringent than what is already set out in existing national and local policy.
64. Any evidence used to underpin the neighbourhood plan review should be clearly referenced and presented in an accessible way to justify policies, both for the purpose of examination and for the benefit of residents reading the plan as well as interested parties such as landowners, developers and service providers, all of whom may be impacted.
65. Evidence, as for the made NP, can come from several sources, including:
- The adopted or emerging Local Plan (from a policy conformity perspective¹⁶);
 - Local Plan evidence base studies that inform policy documents (e.g. the Strategic Housing Land Availability Assessment or equivalent and Employment Land Review);
 - Technical primary evidence generated or commissioned by the Steering Group itself;
 - Stakeholder-derived primary evidence generated or commissioned by the Steering Group (e.g. surveys of local households and businesses); and

¹⁶ In applying Basic Condition 'e,' 'general conformity' relates to the adopted, not emerging Local Plan (see PPG at <https://www.gov.uk/guidance/neighbourhood-planning--2>). However, the evidence behind any emerging Local Plan is part of the evidence base for the NDP and it is important the NDP takes account of policy development within it given that, once adopted, the new Local Plan policies will supersede those in the NDP.

- Relevant national reports, studies, and data, such as the 2011 Census¹⁷.

2.2 Assessment of evidence base (see also Appendix 1)

66. AECOM's evidence review focuses on three lines of inquiry:

- Policy understanding, which summarises what assessors understand the intent of the new policy to be;
- Evidence assembly, which covers basic checks including:
 - Whether evidence has been gathered from verifiable and reputable sources;
 - Whether any third party comments have been / can be considered, (e.g. from developers, landowners, statutory bodies); and
 - Whether there are any gaps and obvious sources not referred to (e.g. Local Plan background studies).
- Evidence analysis, which considers whether the evidence referred to / available has been appropriately understood, analysed and reasonable conclusions reached in drawing up policy. There are also recommendations on what reasonable conclusions can be drawn. Here, a distinction is made between stakeholder derived (e.g. from local household or business surveys) and technical evidence in terms of how the evidence is analysed, although both are treated as equally important. This stage of the review also considers:
 - Whether available evidence is, on balance, proportionate; and
 - Whether the evidence has already had a degree of external scrutiny (e.g. from the Local Planning Authority, LPA) in which case such comments are considered, although it is understood that this has not yet taken place for the replacement NP.

2.3 Policy review (see also Appendix 1)

67. After examining the evidence that is available to underpin the new policies, the review considers the following questions in terms of the revised NP meeting the Basic Conditions¹⁸ of a Neighbourhood Plan¹⁹:

- Is the policy / intended revised policy spatial in nature and therefore within the scope of a development plan or is it supporting a community project? If

¹⁷ While the evidence in the 2011 Census is increasingly out of date, there is no alternative but to continue to cite it until it is superseded by the full data from the 2021 Census, which will likely not be available in full until 2022.

¹⁸ For further information on the basic conditions, please see '*How to write a basic conditions statement available*' here: <https://mycommunity.org.uk/wp-content/uploads/2016/08/How-to-write-a-basic-conditions-statement.pdf>

¹⁹ While the made neighbourhood plan has of course already passed the Basic Conditions, it is important to examine whether the new / revised policies as they are intended still meet these Conditions

the latter, it could be retained in the Neighbourhood Plan but listed as a project rather than a statutory policy;

- Can the policy be reasonably interpreted and implemented by planning officers responsible for development management when determining planning applications?
- Does the policy have due regard to national policy and guidance?
- Does the policy comply with applicable human rights law?
- Is the policy in general conformity with adopted strategic Local Plan policy and is it in conformity (or have potential to be in conformity with) emerging policy? Does it add value to those policies, rather than restating their principles?
- Is the policy clearly written and easy to understand for plan users in general other than Council development management officers?

2.4 Policy wording

68. Planning practice guidance²⁰ states:

“A policy in a Neighbourhood Plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise, and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

69. Precise wording of revised policies is, broadly speaking, considered a matter more for the neighbourhood group itself than for AECOM, based not only on the conclusions and recommendations of this report, but also considering feedback from other relevant stakeholders, including the LPA.

70. Nevertheless, in cases where minor changes to policy wording may have the effect of increasing soundness and robustness, we have set out any changes we recommend (which, as with all our conclusions and recommendations, comprise non-binding advice).

71. Where significant re-drafting of policy wording is required, we have sign-posted useful toolkits and Examiners' comments. See Appendix 3.

72. We have undertaken a review of the evidence available to support the draft policies emerging in the documentation sent to AECOM by the Steering Group. From this, we have identified any gaps within the evidence base that has been gathered to date by the Steering Group and also provided comment on future work or actions needed to ensure a robust policy approach.

²⁰ Paragraph: 041 Reference ID: 41-041-20140306, available online at <https://www.gov.uk/guidance/neighbourhood-planning--2>

2.5 About Appendix 1

73. Appendix 1 is our detailed review of each policy using the methodology described above which considers the neighbourhood plan policies alongside the policies of the adopted and emerging Local Plans, relevant evidence base documents and the National Planning Policy Framework (NPPF)²¹. It aims to provide an answer to the questions raised above. Recommendations are provided in terms of actions C&CW should take in terms of further evidence gathering and/or policy development as part of the Neighbourhood Plan Review.

74. The column headings in the Appendix 1 table can be explained as follows:

- **Policy name, number, and theme:** The policy name and number as it appears in the made Plan, as there is not yet a draft new plan. Policies are grouped into themes;
- **Policy intent:** This column summarises the intent of the revised policy- normally, the most appropriate way to do this is to quote the policy text in full. Here, as no new policy text has yet been drafted, the made policy text is quoted;
- **Evidence source and type:** This column identifies and checks the source of evidence and whether it is technical evidence or based on local surveys and engagement;
- **Evidence analysis:** This column analyses whether the evidence has been appropriately analysed and reasonable conclusions drawn;
- **Proportionality and gaps:** This column indicates, in AECOM's view, whether the evidence is proportionate and where further potentially useful evidence in support of the policy, theme or objective could be found and referenced;
- **Effectiveness of the policy:** This column analyses whether the evidence is clearly written, easy to understand and implementable;
- **Conformity:** This column provides AECOM's assessment of the extent to which the policy conforms with the relevant policies or provisions of the adopted and/or emerging Local Plan, the NPPF and/or the local plan evidence base as well as with human rights law; and
- **Conclusion and recommendations:** This column summarises our thoughts on the policy and outlines our overall recommendations for any necessary changes to policy or evidence, including whether specific issues need to be discussed with third parties to develop the policy further (e.g. the LPA). If we consider that a policy should be deleted entirely in the

²¹ Available online at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

new NP, for example because it now duplicates Local Plan policy, we state this here.

2.6 About Appendix 2

75. Appendix 2 lists policies in 'made' (i.e. adopted) Neighbourhood Plans from across England that are relevant to some of the policies that have been assessed for the Calne Community neighbourhood plan. The value of assessing other 'made' plan policy is that it has passed Examination and thus must be in full conformity with the basic conditions of Neighbourhood planning. While the Calne Community Area already has a made NP, this is still relevant where other made NPs may have policies closer to those of the revised Calne Community NP objectives.
76. In most cases, the examples of policies from 'made' plans have been taken from those where AECOM advised the Steering Group, but in cases where a relevant policy can only be found in a 'made' plan that AECOM had no involvement in, the policy has been quoted nonetheless.
77. If any of the policy examples in Appendix 2 are considered of particular interest or relevance, then it may be helpful to search online for the relevant Neighbourhood Plan Examiner's Report, which should in every case be available online (if it is not, contact the relevant Local Authority). The Examiner's Report may show how and why the policy in question was amended to conform with the Basic Conditions, unless the draft policy was considered to meet the Basic Conditions without amendment.

2.7 About Appendix 3

78. Appendix 3 briefly sets out further information on Neighbourhood Plan policy drafting, including links to resources that may be helpful in this regard.

3. Conclusions and Recommendations

3.1 General findings

79. In developing planning policies for the emerging new Neighbourhood Plan, C&CW should ensure that they do not repeat existing national and local planning policies. This is particularly important as the national and local policy environment have changed since the Calne Community NP was made in 2018. In a robust Neighbourhood Plan, neighbourhood policies always either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy void.
80. When C&CW supports the LPA's new policy approach this can simply be referenced in supporting text for the avoidance of doubt rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) to monitor effects of implementation is another way of ensuring the Neighbourhood Plan can add value over and above local and national policies.
81. All evidence that C&CW rely on in developing their new planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be more clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also refer to the LPA's evidence base documents and policies, as this will help support the policies and provide further justification.
82. Additional evidence work in some cases may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the existing and emerging local plan (e.g. in terms of standards), the more evidence is required. It is recommended that C&CW conducts further checks of their draft new policies as they are developed, to ensure they are adding value to the existing and emerging Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's neighbourhood planning officer.

3.2 Headline summary of policy specific findings (full details in Appendix 1)

3.2.1 H2- Affordable Housing

83. There is much evidence being produced to support the emerging Wiltshire Local Plan that can and should be used to develop a replacement policy. Though this evidence is not yet complete, early indications are that the population is ageing and that smaller homes may be required.

84. Neighbourhood area-specific, up to date housing needs evidence could support a more detailed housing mix requirement, to help make the replacement policy less broad and more effective than the made policy. As such, a Housing Needs Assessment should be commissioned.
85. Any replacement policy should add value to the Local Plan policy by comparing needs evidence to past delivery in the supporting text, showing why and where intervention is required to correct any divergence between need and delivery / past shortfalls, based on Annual Monitoring Report data once available.
86. There is a wide range of housing delivery models which could be explored and, if considered locally feasible and appropriate, supported through a replacement housing policy, including community land trusts, co-housing, housing co-operatives, self and custom build (already referenced in the existing policy), self-help housing, and tenant management organisations. The Planning for Calne document suggests that replacement Neighbourhood Plan policies could identify specific sites on which new types of homes could be built that meet a particular housing need, e.g. for self-build housing or for other uses.
87. The effectiveness of the current policy is likely constrained because examples of the types of size and type needs are so broad that almost any scheme could argue compliance if it includes at least one of these categories. This should be remedied in the replacement policy.
88. Subject to it taking changing housing policy requirements at national level into sufficient account (such as, for example, Starter Homes), a task which will be significantly facilitated through a neighbourhood area housing needs assessment, the replacement policy has a good chance of achieving conformity with relevant adopted and/or emerging Local Plan policy and with national policy and guidance.
89. Metrics which could be used to monitor this policy include mix of dwelling sizes and types (including for older people, affordable, on self-build plots etc) of housing delivered (unit numbers and percentages), compared to the evidence of mix needed in the neighbourhood area housing needs assessment or similar, once this has been produced.

3.2.2 H3- Housing Mix

90. There is much evidence being produced to support the emerging Wiltshire Local Plan that can and should be used to develop a replacement policy. Though this evidence is not yet complete, early indications are that the population is ageing and that smaller homes may be required.
91. Neighbourhood area-specific, up to date housing needs evidence could support a more detailed housing mix requirement, to help make the replacement policy less broad and more effective than the made policy. As such, a Housing Needs Assessment should be commissioned.

92. Any replacement policy should add value to the Local Plan policy by comparing needs evidence to past delivery in the supporting text, showing why and where intervention is required to correct any divergence between need and delivery / past shortfalls, based on Annual Monitoring Report data once available.
93. There is a wide range of housing delivery models which could be explored and, if considered locally feasible and appropriate, supported through a replacement housing policy, including community land trusts, co-housing, housing co-operatives, self and custom build (already referenced in the existing policy), self-help housing, and tenant management organisations. The Planning for Calne document suggests that replacement Neighbourhood Plan policies could identify specific sites on which new types of homes could be built that meet a particular housing need, e.g. for self-build housing or for other uses.
94. The effectiveness of the current policy is likely constrained because examples of the types of size and type needs are so broad that almost any scheme could argue compliance if it includes at least one of these categories. This should be remedied in the replacement policy.
95. Subject to it taking changing housing policy requirements at national level into sufficient account (such as, for example, Starter Homes), a task which will be significantly facilitated through a neighbourhood area housing needs assessment, the replacement policy has a good chance of achieving conformity with relevant adopted and/or emerging Local Plan policy and with national policy and guidance.
96. Metrics which could be used to monitor this policy include mix of dwelling sizes and types (including for older people, affordable, on self-build plots etc) of housing delivered (unit numbers and percentages), compared to the evidence of mix needed in the neighbourhood area housing needs assessment or similar, once this has been produced.

3.2.3 H5- Phasing of Development

97. There is much recent and emerging evidence at Wiltshire level that could and should be used to underpin the new policy. Including WC's infrastructure needs assessment supporting the Local Plan review. There is evidence in recent years that Calne's population (and thus the neighbourhood area's population) has grown faster than the levels of employment and job opportunities available. This can be used to inform the specific infrastructure that may be needed. The Wiltshire Planning Obligations SPD, while not constituting policy, contains some useful wording on the phasing of infrastructure which could be used in the supporting text and/or policy.
98. The made policy is very broad, due to a lack of location-specific evidence on infrastructure and phasing, including triggers for infrastructure once a certain quantum of development is provided. This could be remedied for the new policy through the production of an updated IDP and/or a neighbourhood area-specific infrastructure projects list forming an NP appendix, with the policy

cross-referring to it, removing the projects already delivered and updating those still needed, in line with the projected growth trajectory of the emerging Local Plan. This would make for a more effective policy.

99. Engagement with infrastructure providers, operators and statutory consultees will also have to be repeated and updated as part of the neighbourhood plan review.
100. The made policy suffers from a degree of internal overlap with GA1 and GA2 on transport, and CF1 and CF2 on community infrastructure. If this were avoided in the new NP, all policies on infrastructure delivery may be more effective. There are also issues of overlap with local plan policies, particularly Core Policy 3. While a level of interaction and interdependency between policies on related issues (such as housing, transport, community infrastructure and employment) is normal and to be commended, this should be reflected through cross-references within the supporting text. Policies themselves should avoid overlapping requirements as this is likely to be confusing and thus reduce their effectiveness.
101. Any replacement policy should retain the focus of the existing on three key issues: infrastructure delivery, phasing, and minimising disruption to the community. Based on the made policy and the expected future of travel in its replacement, there is no reason to suppose that conformity with either the adopted/emerging Local Plan and with national policy would be problematic.
102. Metrics which could be used to monitor this policy include transport settlement accessibility level, and/or number of years before a new primary/secondary school is required over time as development and infrastructure provision changes. Other metrics could include delivery dates of infrastructure projects against the dates when they were anticipated/needed, based on an updated IDP and/or a neighbourhood area-specific infrastructure projects list as mentioned above (which could also list requirements by location within the neighbourhood area), in line with the projected growth trajectory of the emerging Local Plan.

3.2.4 WS1- Employment

103. The evidence quoted is appropriate and relevant but is not neighbourhood area-specific. This is reflected in the policy, which is reasonably general as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.
104. There is clear potential for the policy to be refined and made more area-specific through the production of evidence which relates directly to employment needs in the neighbourhood area, including an assessment of the differing requirements of the urban and rural areas, in line with section 6 of the NPPF and Core Policy 34.
105. The additional evidence gathering recommended would significantly enhance the effectiveness of the policy because it would provide greater clarity to

developers on the type of employment development that will be supported and likely to be viable within the neighbourhood area.

106. One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. It is recommended that C&CW collectively reviews the emerging general and neighbourhood area-specific employment policy and evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs.
107. It is recommended that the supporting text is updated to reflect the current employment situation, considering any changes since the Neighbourhood Plan was made in 2018, including those resulting from the Covid-19 pandemic. At present, the detail within the supporting text is not translated into a neighbourhood area-specific policy. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.
108. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. This includes ensuring that any reference to specific employment uses reflects the revocation of the B1 use class, the creation of new Classes E, F1 and F2 (where relevant), new 'Class MA' permitted development rights which can be used from 1st August 2021 to convert a use in the new Class E to Class C3 (dwelling houses), and any further relevant planning changes and reforms announced before the new NP is made.
109. Metrics which could be used to monitor this policy include employment development permissions in general, and on previously developed versus on greenfield land. However, monitoring and enforcing this policy may encounter difficulties due to the government's regularly-changing approach to permitted development rights.

3.2.5 WS2.1- Calne Town Centre

110. The evidence quoted is appropriate and relevant but is not sufficiently specific to the neighbourhood area. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.
111. There is potential for the policy to be refined, updated and made more area-specific through the production of evidence which relates directly to Calne Town Centre, including for the more general Policy WS2.1 to be combined with the Calne-focused Policy WS2.2 should an updated Town Centre Masterplan be produced.

112. The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would provide greater clarity on the type of development that will be supported.
113. One of the best ways to achieve such specificity and effectiveness is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. The policy could also consider what interventions have been tried in the past, their success or otherwise, and how future policy interventions could apply lessons learnt. As such, C&CW should review the emerging general and Calne-specific evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs. An updated Town Centre Masterplan may be required.
114. The key objectives for the town centre highlighted in the supporting text do not directly relate to the aims of the policy itself. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.
115. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.
116. Metrics which could be used to monitor this policy include the delivery of projects / delivery against the aims of the existing Masterplan; alternative metrics could be set based on new evidence gathered such as particular community aspirations or new projects for the town centre, such as new seating installed, sales densities and other indicators for retail performance, footfall, etc. (see the benchmarks mentioned in section 5 of the Masterplan).

3.2.6 WS3- Local Neighbourhood Shopping

117. The evidence quoted is appropriate and relevant although the Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on it to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and the neighbourhood evidence base should be consolidated and updated to reflect the most recent evidence supporting the Local Plan Review.
118. The first part of the policy, which seeks to preserve existing convenience retail provision away from the town centre, is proportionate and reasonable. In the second part of the policy there is an argument for making a distinction between provision in the rural and urban area, since different considerations apply to each, as suggested in the NPPF.
119. Further evidence-gathering is required to justify the urban part of the policy, given recent evidence of over-provision of convenience retail floorspace in Calne. An approach identifying areas of under-provision would allow for a more targeted policy to address existing shortfalls.

120. The supporting text provides detail not just on convenience retail, but on other uses. It should be rewritten to provide clear support for convenience retail development and avoids straying into other uses.
121. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions, but it is considered this would not be problematic.
122. Metrics which could be used to monitor this policy include data on loss of retail / community space, applications for change of use / permitted development from retail / community uses, and/or spatial distribution of shops / distances between different parts of the neighbourhood area and their nearest shops.

3.2.7 CF1- Health, Leisure and Wellbeing

123. The evidence quoted is appropriate and relevant, although now quite dated. It is recommended that the emerging evidence base supporting the Local Plan review is monitored so that any updates can be appropriately referenced in the supporting text.
124. The policy is proportionate and reasonable, and it provides sufficient flexibility to allow proposals to be judged on their individual merit, with contributions to green infrastructure and public realm improvements assessed according to the scale of the scheme in question. Since the policy contains specific examples of contributions that could be secured alongside new development, the supporting text and evidence base could justify this further.
125. The policy is likely to be effective in its current form, although it could be strengthened by drawing links to GA1 – Sustainable Transport and BE1 – Integration and Landscaping. As with all policies being updated, information on how the policy was implemented/applied should be reviewed and applied to maximise the effectiveness of its replacement.
126. References in the supporting text to community facilities should be moved into the supporting text supporting Policy CF2.
127. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication that this would be difficult to achieve.
128. Metrics which could be used to monitor this policy include the indicators used in the JSNA and Health and Wellbeing JSNA or other Wiltshire public health data (see above) or Index of Multiple Deprivation data on health deprivation (IMD).

3.2.8 BE1- Integration and Landscaping

129. The evidence quoted is appropriate and relevant but with the exception of the environmental poll is not neighbourhood area-specific. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF should be retained but the 2019 version should now be cited.

130. There could be potential for the policy to be made more specific if there is more specific, detailed design evidence supporting it, such as, for example, an AECOM design code study or other characterization evidence with a specific focus on existing and potential landscaping, local views, and so on. The design code or guide should follow the new National Model Design Code.
131. With such evidence, the supporting text could also become more place-specific in terms of good practice and room for improvement. If enough detailed evidence is gathered, a neighbourhood area-specific Design Guide could be drafted and this policy (and other design policies) could state that proposals will be assessed in line with it.
132. The additional evidence-gathering recommended above, in particular photographs/visual images, would significantly enhance the effectiveness of the policy because it would make far clearer to developers what type of landscaping and integration is or is not supported.
133. Policy should be developed with a clear eye on what is already being said at the level above and then seeking to add to it and/or fill in any gaps. Here, therefore, it is recommended that C&CW collectively reviews the emerging general and location-specific design and landscape policy at Wiltshire level , with the caveat that it may still change between now and adoption, and considers what neighbourhood area-specific topics, features or issues may be missing where a neighbourhood plan policy could add to or ensure clearer coverage
134. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.
135. Quantitative metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently long and varied, and qualitative more than quantitative. Identifying specific monitoring metrics as part of the process of gathering more locally specific evidence may in fact help the group to identify exactly what the policy is trying to achieve (e.g. number of developments permitted encroaching on specific identified views to protect, and so on).

3.2.9 Policy BE2 – Design Principles for Local Distinctiveness

136. The current policy is generic. A new Design Guide for the Calne Community neighbourhood area, clearly detailing the features and local character and townscape that make the neighbourhood area distinctive, could/should inform any replacement policy.
137. As an example, based on the current supporting text, a replacement policy could move the whole of the fifth bullet under paragraph 148 into the policy itself. Likewise, the last sentence of bullet point seven under the same paragraph could be added to policy, though perhaps here BE1 rather than BE2 would be the best place for it, given that it is more of an integration and landscaping point. Clearly, a new neighbourhood area-specific design guide

could add dozens of further policy ideas. It could also go into further detail on specific features and characteristics which are particular to individual settlements across the neighbourhood area.

138. The policy and its supporting text differ, which is not ideal. The policy itself is about the design of buildings, whereas there is much in the supporting text about habitats, wildlife, biodiversity, and rural landscapes, not carried through to the policy itself. This suggests that either a new policy on the interaction of development with habitats, wildlife and its rural surroundings might be justified or that the supporting text on these topics should be moved to/merged into NE2 and NE3 (or their replacements) and inform those policies instead.
139. It should be noted that restrictions on storey height, like that in paragraph 47 may have the unintended effect of promoting further generic development.
140. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.
141. Quantitative, broad metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently very long, detailed and varied, and also quite qualitative. Identification of specific monitoring metrics as part of the process of gathering more locally specific evidence may actually help the group to identify what exactly the policy is trying to achieve (e.g. number of developments permitted which encroach on specific identified views to protect etc).

3.2.10 Policy BE3 – Parking Provision

142. It would be helpful, if the Steering Group has not already gathered such evidence, to understand the extent to which the community is comfortable/happy with parking provision for new development consented under BE3. If the community feels the parking thus provided has been excessive or insufficient, then there could be a case for setting location-specific parking standards, based firmly on specific, illustrated examples of where the community is unhappy with policy effects, and using them as a basis for a replacement policy.
143. In the new NPPF, the relevant text is paragraph 105 which gives many more factors to consider than previously when setting parking standards. As the Wiltshire Parking Strategy has not itself been updated, it is recommended that for an effective replacement policy, the existing standards are taken as a starting point, checked against evidence of real-world effects and applications, and then redrafted in the light of both the effects monitored and new NPPF paragraph 105.
144. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. In order for this to happen, it would need to go further than the current Wiltshire Parking Strategy, drafted long before NPPF paragraph 105, and the latter takes priority.

145. Metrics which could be used to monitor this policy include provision of parking spaces per unit of new development delivered in the neighbourhood area (potentially by size of development).

3.2.11 Policy BE4 – Heritage Assets

146. The evidence supporting the policy is appropriate, but the NPPF could also have been quoted. There is also scope, in line with recommendations on policies BE1 and BE2 above, for more neighbourhood area-specific evidence to be added, for example a neighbourhood design code/guide would contain much that is relevant on the conservation and enhancement of existing heritage assets across the neighbourhood area.
147. As with other built environment policies, there is scope to make the policy more neighbourhood area-specific.
148. While locally listed buildings are not protected by national policy, there is certainly scope for them to be considered as material considerations in planning applications and for a basic level of protection in neighbourhood plan policy. As such, it is recommended that for more location-specific policy, heritage/built environment evidence be gathered indicating if there are buildings C&CW considers are worthy of adding to a new Local Heritage List, to be compiled and evidenced in line with Historic England Advice Note 7.
149. Importantly, the recommendations above to make the policy as specific to the neighbourhood area, to its heritage assets and to its two conservation areas as possible- namely by using evidence from a new design code and/or townscape assessment and also to develop a local list of buildings/heritage assets and then protect those buildings/assets in policy- will significantly improve policy effectiveness.
150. Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. Refer in particular to NPPF paragraph 185 and its guidance on how heritage assets should be placed in their wider context and related clearly to local character and distinctiveness, which suggests that any replacement for BE4 would do well to cross-reference BE1 and BE2.
151. Metrics to monitor this policy may be difficult to obtain as compliance will be very individual to each development. The group could monitor whether recommendations of the council heritage officers on new applications in the conservation area were carried out in implementation of development, but this may be time consuming.

3.2.12 Policy NE3 – Biodiversity

152. It is not clear to Plan users how the evidence listed flowed into the most locally-specific elements of the policy most requiring evidence support, namely the three bullet points. In any replacement policy, the supporting/justifying text should flow much more clearly into the policy, particularly but not limited to the

three bullet points. The supporting text could also link to other policies on the natural environment, community infrastructure, design and so on.

153. There could be potential for any policy seeking net gain in biodiversity to seek developments contributing towards recovery of SSSIs in the plan area. This point could be discussed with Natural England. The group should also discuss the emerging Wiltshire Green and Blue Infrastructure Strategy with the LPA.
154. For any neighbourhood plan policy in Wiltshire seeking net gain in biodiversity, the key evidence document is now the Council's 'Addressing Climate Change and Biodiversity Net Gain Through the Local Plan- Raising the Ambition' report. This should be reviewed in detail and be quoted and referenced extensively in the supporting text.
155. The NPPF now requires policies to provide net gains for biodiversity. In this context, C&CW are to be congratulated for a draft policy that was ahead of the game, and the changed policy context means the draft policy can be resurrected without needing detailed evidence. In these specific circumstances, it would even be acceptable simply to restate NPPF requirements so that they become part of the statutory development plan for the neighbourhood area (the neighbourhood plan is part of the statutory development plan but the NPPF is not), although if there is local evidence to support policy wording adding to NPPF requirements, the policy could be even stronger.
156. As with all policies forming replacements for 'made' policies, monitoring and implementation evidence for the 'made' policy will be important- i.e. what are the effects of the made policy, if any, and are there lessons to be learnt in terms, for example, of unintended effects, that could inform new policy wording?
157. Metrics which could be used to monitor this policy include area of additional habitat space created as part of development / projects, number of wildlife corridors created or connected and endangerment status of local protected species.

3.2.13 Policy NE4 – Energy Conservation

158. The 2019 NPPF limits any replacement policy for NE4 to 'urging' developers to aim for energy conservation rather than setting requirements for them to do so that go further than national requirements. Likewise, Core Strategy 41 remains the adopted policy. As such, there seems no alternative but to roll the policy forward unchanged into the next neighbourhood plan.
159. Nevertheless, any monitoring data held by either C&CW or Wiltshire in terms of how often NE4 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective while maintaining its conformity with national and local policy.

160. As currently worded, the policy would still comply with the 2019 NPPF and with adopted and emerging Wiltshire policies. Any proposed changes to wording on the basis of implementation evidence (see above) should seek to maintain such conformity.
161. Metrics which could be used to monitor this policy include energy efficiency / performance of new development or number of energy performance certificates lodged on register (although this data does not appear to be available at a level below local authority, unless individual planning applications were scrutinised).

3.3 Next steps

162. This Neighbourhood Plan evidence base and policy review has aimed to provide the Forum with recommendations on policy and evidence for the Calne Community Neighbourhood Plan. We recommend that C&CW should, as a next step, implement the recommendations in drafting new or revised policies, at which point it can be submitted to the LPA for comment in advance of finalising a draft new NP.

Appendix 1: Detailed policy and evidence review

Policy name and number	Policy H2 - Affordable Housing
Policy intent as provided to AECOM	Proposals for residential development that result in a net gain of eleven or more dwellings, or more than a gross residential floorspace of 1,000m² will be required to include an affordable housing element subject, where appropriate, to the assessed viability of the development. The requirement is for at least 30% Affordable Housing but proposals must consider and address the current evidence of housing need; the mix of affordable housing may vary site-by-site on the basis of the evidence but will approximate to 60% affordable rented and 40% shared ownership.
Evidence source and type	Evidence currently mentioned in the made policy and supporting text: PPG on Affordable Housing (published 2016); Wiltshire Strategic Housing Market Assessment 2011; Wiltshire Core Strategy Topic Paper 2 – Housing 2012; Affordable Housing Viability Study 2011; Affordable Housing Core Policy 43 Paper - Implication of Viability Review (February 2014); Wiltshire Council Housing Priorities Action Plan; Housing waiting list data from Wiltshire Council dating from 2012/2013; and Results of the ‘What matters to you’ survey undertaken in 2013.
Evidence analysis	Newer evidence available that could and should inform a replacement policy is as follows: Wiltshire Regulation 18 Local Plan consultation and the C&CW Response; PPG on Affordable Housing within Housing and economic needs assessment guidance (at the time of writing, last updated in 2020); Government’s confirmation of First Homes product ²² ; Wiltshire Housing Site Allocations Development Plan Document (DPD) - Assessment of Viability 2017 ²³ ;

²² At <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-first-homes-proposals-in-changes-to-the-current-planning-system>

²³ At <https://cms.wiltshire.gov.uk/mqConvert2PDF.aspx?ID=132060>

Wiltshire Planning for Calne document 2021;
Wiltshire Chippenham Housing Market Area Profile of November 2017;
Income and house price data from the Land Registry, Nomis, and websites such as house.co.uk;
The Council's Housing Register (data can be requested);
Housing Needs Survey for Calne Community neighbourhood area once this is carried out (not yet available);
The Swindon and Wiltshire Strategic Housing Needs Assessment 2017 and 2019; and
Formulating alternative development strategies for Chippenham HMA²⁴.

The Wiltshire Planning for Calne document published January 2021 states that the annual average gross income in Calne is £37,400 and the net income after housing costs is £27,100. Affordability ratio (based on a two-bed property) is 4.4, with a median price of £165,900 and annual gross income of £37,400.

The Wiltshire Chippenham Housing Market Area (HMA) profile of November 2017 states that affordable housing was 27% of all homes built, below the Core Strategy target level of 30%. The ratio of house price to earnings rose from 8.0 to 9.6 between 2011 and 2016 and the ratio is below the average for settlements in Wiltshire.

This points towards affordability in the neighbourhood area worsening but being less of an issue than across the local authority area. Up to date data on house prices and rents in 2021 can be gathered from the Land Registry and from www.home.co.uk (for rents), data for up to date incomes from Nomis, and data on the housing waiting list from the LPA. An up-to-date neighbourhood household survey can also be used to examine affordability and need issues in more detail, as the housing characteristics and issues experienced across various locations and communities within the neighbourhood area may also differ. More detailed evidence could allow the policy to be more nuanced in its support for different housing solutions based on specific context, since the requirements in different parts of the neighbourhood area may be quite different.

The Swindon and Wiltshire SHMA 2017 capture information on the Chippenham Housing Market Area (HMA). Figure 70 suggests a 33% affordable housing need with a split of 73% affordable rent versus 27% intermediate product need for Wiltshire as a whole. However, this is without consideration of viability. The figure also provides

²⁴ At https://www.wiltshire.gov.uk/media/5668/Chippenham-HMA-Alternative-Development-Strategy/pdf/Chippenham_HMA_ADSs.pdf?m=637461346905970000

	<p>a split across different sizes. This updates the evidence in the made NP quoted from the 2011 SHMA which provided evidence of a 36.7 shared ownership / 63.3 % affordable rented split.</p> <p>The HMA in 2017 had the lower quartile house prices below the overall level for the County, as well as lower but increasing rents and better affordability. This indicates that it is unlikely that a higher affordable housing requirement than across Wiltshire will be necessary or justifiable for the Calne Community neighbourhood area.</p> <p>The Swindon and Wiltshire SHMA 2019 continues to include the Calne Community neighbourhood area within Chippenham HMA. While it does not set out a new percentage or numbers of affordable housing need, it does indicate that housing need has reduced slightly across the area compared with the previous SHMA.</p> <p>It would be advantageous for C&CW to commission an up to date Housing Needs Assessment to determine up to date levels of need and suitable size and tenure split for affordable housing, taking into account the change in PPG and the introduction of First Homes since the last NP was made, as well as any specific local characteristics and issues of the neighbourhood area's housing market or of particular locations within it.</p> <p>No new viability evidence appears to be available since 2017, which would be needed to compare average new property values with costs including build costs, land values etc across the neighbourhood area. However, a whole plan viability appraisal will be carried out for the new Local Plan, once this is more advanced.</p>
<p>Proportionality and gaps</p>	<p>Strictly speaking, a replacement policy is not really necessary, as the Core Strategy already makes a 30% affordable housing requirement and the Local Plan Review is considering a 40% requirement. The NPPF provides the 10+ unit threshold for the requirement.</p> <p>Any replacement policy on affordable housing would need to consider carefully if it can add to Wiltshire policy rather than restating it. As a broad principle, the neighbourhood planning system is not really an effective means of delivering affordable housing requirements additional to those at Local Plan level, unless a) supported by detailed viability evidence that a percentage higher than that in adopted and/or emerging Local Plan policy is justified and deliverable in the neighbourhood plan area or b) they are supply-side measures, i.e. neighbourhood plan allocates exception sites or locations for affordable housing not already allocated in the Local Plan, with the support of developers/landowners and the community.</p>

	<p>The fact that neighbourhood plans are relatively constrained in terms of how they can address affordable housing issues is, of course, largely due to the local authority's statutory function, which long pre-dates the introduction of neighbourhood planning, to deliver affordable housing on the basis of need (i.e. it continues to administer the housing waiting list and to manage the overall distribution of new affordable homes even after neighbourhood plans are made).</p>
<p>Effectiveness of policy</p>	<p>Any replacement policy would be more effective in delivering affordable housing if it made requirements of all schemes of 10 or more homes rather than 11 or more, in line with NPPF 2019 definition of major development and NPPF paragraph 63.</p> <p>The policy may also be more effective if it explicitly mentioned the minimum 30% affordable housing requirement is subject to viability and local need.</p> <p>Therefore, unless any replacement policy will exceed a level of 30% in advance of or instead of the Local Plan, subject to need and viability evidence being commissioned to support this, there is no need for the policy, as it supports a lower requirement than the emerging Core Strategy policy and thus would not be in conformity with it.</p> <p>The Steering Group should therefore investigate what evidence, if any, can be commissioned to support the 40% requirement, but only if there are indications that this will not be taken forward in the emerging Local Plan. If no such evidence can be gathered, and/or if the Local Plan continues to require 40% as it emerges (and there is some evidence to suggest it can and will do so)²⁵, the Steering Group may wish to reshape the policy to require an affordable tenure split only, subject to appropriate evidence.</p>

²⁵ For example, Wiltshire's 2017 viability assessment supporting its Housing Site Allocations document, which covered sites across Wiltshire (though not in Calne itself) indicated that 40% was viable and deliverable. See <https://cms.wiltshire.gov.uk/documents/s148764/WHSAP25AssessmentofViabilityBNPPParibasJune2017.pdf> . Wiltshire's Empowering Rural Communities paper suggests likewise: https://www.wiltshire.gov.uk/media/5624/Empowering-Rural-Communities/pdf/Wiltshire_Local_Plan_Empowering_Rural_Communities_FINAL.pdf?m=637459592290230000

Conformity check

This policy was originally written in general conformity with Wiltshire Core Strategy 2015 Core Policy 43, and with then-applicable national policy. The Examiner's report on the made Calne Community NP approved of the policy aiming for conformity with newer national guidance where it took precedence over the older Core Strategy policy.

Since examination, the NPPF has been amended, now stating that affordable housing requirements should only be placed on major developments (developments of 10+ homes or over 0.5 ha or non-residential development of 1000m² + as per NPPF glossary definition) except in designated rural areas, where a threshold of 5 or lower may be appropriate (paragraph 63). This indicates that any replacement policy would need to drop the wording 'eleven or more'.

NPPF Paragraph 64 also now requires a minimum 10% housing to be for affordable home ownership. However, this is unlikely to affect tenure splits for the Calne Community neighbourhood area as the current intermediate requirement already exceeds this.

If the Steering Group were to commission a housing needs assessment to establish up to date affordable housing need for sale and for rent, and the assessment were used to shape replacement policy, that would significant help the replacement policy achieve conformity with national policy and guidance, given that it has changed since the previous policy was adopted; as one example, an emerging homeownership scheme known by the Government as First Homes²⁶ will take the place of some shared ownership housing and/or social or affordable rented homes.

As such, there are further changes to national policy in the offing, and these should be monitored carefully as policy develops to maintain conformity.

²⁶ For more information on First Homes, see <https://www.gov.uk/government/consultations/first-homes>

**Conclusion and
recommendations**

There is no confirmation yet as to the affordable housing percentage that the emerging plan will require. There is a stated intention of 40%, based on SHMA and viability evidence from 2017.

There is no up-to-date neighbourhood-level need and viability evidence for the Calne Community neighbourhood area to support a requirement higher than 30%. Unless a higher requirement can be evidenced prior to or instead of the Local Plan Review's intended 40% affordable housing requirement, the 30% for 11+ unit development requirement in this policy is likely to be superseded by the emerging Local Plan and NPPF. Strictly speaking, therefore, a replacement policy may not be necessary, and if one is developed, it would need to consider carefully if it can add to emerging Wiltshire policy rather than restating it.

If the Steering Group wishes to retain and revise this policy, it is recommended that they commission a new housing needs assessment; this will enable consolidation and more detailed consideration of the significant changes to affordable housing policy requirements at national level (including but not limited to First Homes, which will affect tenure split percentages) since the original policy was adopted.

Additionally, if the Steering Group wishes to continue setting a percentage requirement that is higher than Wiltshire's adopted or emerging requirement, detailed, neighbourhood area-specific viability evidence will need to be commissioned from specialists.

Metrics which could be used to monitor this policy include: Delivery of affordable housing (unit numbers and as percentage of overall housing delivery); number of people with a local connection on the LPA's housing register / waiting list; size and tenure split of affordable housing delivered etc. This could then be compared with policy requirements and with the evidence of housing need in the neighbourhood area once a housing needs assessment or similar study has been carried out.

Policy name and number	Policy H3 - Housing Mix
Policy intent as provided to AECOM	Development proposals should include a suitable mix of dwelling sizes informed by and addressing the current and demonstrable needs for the community within which the site is located in accordance with Wiltshire Core Strategy Core Policy 45. The range is likely to include 1 and 2 bedroom small homes, larger 3 and 4 bedroom family homes, executive housing and affordable housing. Specific consideration should be given to the inclusion of bungalows and other types of accommodation suitable for people who are elderly and/or disabled. Specific consideration should also be given to the inclusion of plots for self-build houses.
Evidence source and type	<p>The evidence mentioned in the made policy and supporting text includes: Census 2011 on Council tax bands, size of houses, and population age profiles and projections.</p> <p>The evidence listed in the Evidence Base Links document includes: Wiltshire Strategic Housing Market Assessment 2011; Wiltshire Core Strategy Topic Paper 2 – Housing 2012; Wiltshire Core Strategy Topic Paper 15 – Housing 2012; Methodology and disaggregation of additional housing requirements Jan 2014; Wiltshire Core Strategy Addendum to Topic Paper 15 Housing; Requirements Technical Paper (February 2014); Wiltshire Council Housing Priorities Action Plan; Affordable Housing Viability Study 2011; Affordable Housing Core Policy 43 Paper - Implication of Viability Review (February 2014); and Wiltshire Council Housing Priorities Action Plan.</p>
Evidence analysis	<p>Other useful evidence which could be utilised in reviewing this policy could include: Results of any up to date community and/or housing survey; Results of a neighbourhood area Housing Needs Assessment (HNA);</p>

	<p>Any new local-plan level Strategic Housing Market Assessment (SHMA) or Local Housing Needs Assessment (LHNA) to support the emerging local plan; the results of the current parish level and rural Housing Needs Surveys being conducted by WC (neither completed as yet for the revised Calne Community NP); Most recent Annual Monitoring (AMR) Data from WC when it is published (currently unavailable); and Wiltshire’s self-build register data.</p> <p>The Planning for Calne document published January 2021 highlights that an ageing population is changing the housing need profile.</p> <p>The 2017 SHMA states that across Wiltshire as a whole (figure 70), primary need for market housing is for 3 bed, followed by 4 bed units; affordable housing need is mostly for 3 beds, but followed closely by 2 beds; and needs for 1-2 and 3 bed units are almost equally significant when split into affordable housing for rent and for sale needs.</p> <p>Annual Monitoring report data for WC will be useful to include once available, as this should show past completions which can be compared against need.</p> <p>Wiltshire’s self-build register data (not available online) could be used to support a stronger policy on self-build, if this is something the Steering Group wishes to pursue. For the previous NP, the Examiner mentioned that ‘no supporting evidence is provided to show why self-build housing might be exceptional in its potential to ‘impact adversely on the surrounding area’.</p>
<p>Proportionality and gaps</p>	<p>The policy is not currently underpinned by sufficiently specific and up to date housing needs evidence to support a more detailed housing mix requirement, which would help make the policy less broad and more effective. As such, a Housing Needs Assessment should be commissioned to fill the evidence gap to support any replacement policy.</p>

	<p>A key issue with the existing policy is that it largely overlaps with local policy, which means it does not add as much value as it could. Any replacement policy should look to add neighbourhood area-specific details of housing mix to adopted and/or emerging Local Plan policy. This could include comparing needs evidence to past delivery in the supporting text, showing why and where intervention is required to correct any divergence between need and delivery / past shortfalls.</p> <p>There is a wide range of housing delivery models which could be explored and, if considered locally feasible and appropriate, supported through a replacement housing policy, including community land trusts, co-housing, housing co-operatives, self and custom build (already referenced in the existing policy), self-help housing, and tenant management organisations.</p> <p>The Planning for Calne document suggests that replacement Neighbourhood Plan policies could identify specific sites on which new types of homes could be built that meet a particular housing need, e.g. for self-build housing or for other uses.</p>
<p>Effectiveness of policy</p>	<p>The effectiveness of the current policy is likely constrained because examples of the types of size and type needs are so broad that almost any scheme could argue compliance if it includes at least one of these categories. A housing needs assessment could underpin more neighbourhood area-specific mix requirements, this, in combination with a change of wording (e.g. requiring a specific percentage of housing to be the most needed type/size as demonstrated through evidence), could make the policy significantly more effective.</p>
<p>Conformity check</p>	<p>PPG Paragraph 017 covers the housing needs of different groups, including older and disabled people. This should be referenced and considered when producing any housing needs evidence.</p> <p>Recent government announcements about Starter Homes may again influence this policy on mix, as it interrelates with tenure (i.e. if more affordable homes for sale have to be built to follow government policy once it changes, and if size mix needs are different).</p>

	<p>The Wiltshire Empowering Rural Communities document signals that the emerging Local Plan will be seeking a shift towards smaller dwellings, particularly in rural areas. This has implications for the conformity of any replacement policy.</p>
Conclusion and recommendations	<p>There is much evidence being produced to support the emerging Wiltshire Local Plan that can and should be used to develop a replacement policy. Though this evidence is not yet complete, early indications are that the population is ageing and that smaller homes may be required.</p> <p>Neighbourhood area-specific, up to date housing needs evidence could support a more detailed housing mix requirement, to help make the replacement policy less broad and more effective than the made policy. As such, a Housing Needs Assessment should be commissioned.</p> <p>Any replacement policy should add value to the Local Plan policy by comparing needs evidence to past delivery in the supporting text, showing why and where intervention is required to correct any divergence between need and delivery / past shortfalls, based on Annual Monitoring Report data once available.</p> <p>There is a wide range of housing delivery models which could be explored and, if considered locally feasible and appropriate, supported through a replacement housing policy, including community land trusts, co-housing, housing co-operatives, self and custom build (already referenced in the existing policy), self-help housing, and tenant management organisations. The Planning for Calne document suggests that replacement Neighbourhood Plan policies could identify specific sites on which new types of homes could be built that meet a particular housing need, e.g. for self-build housing or for other uses.</p> <p>The effectiveness of the current policy is likely constrained because examples of the types of size and type needs are so broad that almost any scheme could argue compliance if it includes at least one of these categories. This should be remedied in the replacement policy.</p> <p>Subject to it taking changing housing policy requirements at national level into sufficient account (such as, for example, Starter Homes), a task which will be significantly facilitated through a neighbourhood area housing needs assessment, the replacement policy has a good chance of achieving conformity with relevant adopted and/or emerging Local Plan policy and with national policy and guidance.</p>

Metrics which could be used to monitor this policy include mix of dwelling sizes and types (including for older people, affordable, on self-build plots etc.) of housing delivered (unit numbers and percentages), compared to the evidence of mix needed in the neighbourhood area housing needs assessment or similar, once this has been produced.

Policy name and number	Policy H5 – Phasing of Development
Policy intent as provided to AECOM	Development proposals must consider, assess, and address their infrastructure requirements and plan the related programmes of work to ensure that these dovetail together and minimise any disruption to the community.
Evidence source and type	<p>The made policy and supporting text mentions no evidence.</p> <p>The Evidence Base Links document lists the following evidence on housing constraints: Wiltshire Strategic Housing Market Assessment 2011; Wiltshire Core Strategy Topic Paper 2 – Housing 2012; Housing Land Availability Assessment 2015; and Housing Site Appraisal for the Calne Community Neighbourhood Plan – January 2016 (AECOM).</p> <p>The Evidence Base Links document lists the following evidence on general infrastructure: Wiltshire Core Strategy Topic Paper 8 - Infrastructure and planning obligations 2012; Wiltshire Infrastructure Delivery Plan 2013; Wiltshire CIL Charging Schedule May 2015; Wiltshire Revised CIL Regulation 123 List September 2016; Draft Wiltshire Infrastructure Delivery Plan 3 2011 – 2026; Appendix 1: Calne Community Area February 2016; and Planning Obligations Supplementary Planning Document 2015.</p>
Evidence analysis	<p>Other evidence that could be considered includes: Formulating alternative development strategies for Chippenham HMA; Wiltshire Infrastructure Delivery Plan 2016 including IDP3 for the Calne Community Area; The Wiltshire Reg 18 Planning for Calne document; and Wiltshire Planning Obligations SPD 2016.</p>

The Wiltshire Regulation 18 Planning for Calne document sets out draft priorities, including the following mentions of infrastructure:

- ii. ... encourage delivery of infrastructure to support sustainable development;
- iii. Ensure infrastructure improvements to the local road network...;
- iv. Minimise the impact of development and associated infrastructure on the environment ...; and
- vi. ...new and improved bus routes and walking/cycling infrastructure.

Infrastructure needs therefore clearly play a large part in the future development of the Calne Community neighbourhood area, and sustainable transport infrastructure features particularly heavily. Much of the evidence in the document is clearly based on an assessment of infrastructure capacity at the local authority level but could still form a starting point for neighbourhood level infrastructure needs/ projects list supporting any replacement infrastructure.

WC are likely to be updating their infrastructure needs assessment to support the Local Plan review. As and when it emerges, this evidence could be also be used to update the neighbourhood level infrastructure projects list.

The Formulating Alternative Development Strategies document for Chippenham HMA (including Calne Community neighbourhood area) discusses infrastructure constraints and opportunities (paragraph 44). The table in paragraph 48 shows that the neighbourhood area has a medium transport settlement accessibility level (3) and that it has the highest number of years before a new secondary school is required (42.2) of all the parishes in the HMA.

The results of the public consultation 2017 (see page 17 for Calne) provide good evidence supporting the direction of any replacement policy and its supporting text, i.e. that in recent years Calne's population has grown faster than the levels of employment and job opportunities available, which has led to a decrease in air quality, excessive car travel/ownership and congestion, and that any future development should help develop the vitality of Calne town centre and invest in its regeneration. One opportunity suggested was an eastern relief road.

	<p>Again, this document could form the basis for a list of NA infrastructure requirements which could be produced in cooperation with WC and underpinned by an up to date community survey.</p> <p>The Wiltshire Planning Obligations SPD, while not constituting policy, contains some useful wording on the phasing of infrastructure which could be used in the supporting text and/or policy.</p>
<p>Proportionality and gaps</p>	<p>The made policy is very broad, due to a lack of location-specific evidence on infrastructure and phasing. This could be remedied for the new policy through the production of an updated IDP and/or a neighbourhood area-specific infrastructure projects list as noted above (which could also list requirements by location within the neighbourhood area), removing the projects already delivered and updating those still needed, in line with the projected growth trajectory of the emerging Local Plan.</p> <p>A new community survey could also inform the update, reflecting resident priorities and knowledge. A list of projects could form an appendix to the replacement NP, with details of phasing and locations of development to maximise the chances of necessary infrastructure being provided at the right time. The policy could then cross-refer to this list.</p> <p>The supporting text should cross-reference to the replacements for policies GA1 and GA2, acknowledging that transport forms a key part of the infrastructure required, but making it clear that it is dealt with separately, to avoid overlap.</p> <p>The current Implementation and Delivery chapter, which sets out delivery partners and implementation methods by policy, including for H5, is helpful. Engagement with infrastructure providers, operators and statutory consultees will also have to be repeated and updated as part of the neighbourhood plan review.</p>
<p>Effectiveness of policy</p>	<p>The made policy suffers from a degree of internal overlap with GA1 and GA2 on transport, and CF1 and CF2 on community infrastructure. If this were avoided in the new NP, all policies on infrastructure delivery may be more effective. There are also issues of overlap with local plan policies, particularly Core Policy 3.</p>

	<p>Effectiveness could be enhanced if the replacement policy were more locationally specific and less broad, referencing a specific list of projects with associated phasing information and with triggers for infrastructure once a certain quantum of development is provided.</p> <p>Any replacement policy should retain the focus of the existing on three key issues: Firstly, the delivery of sufficient infrastructure (covered by Core Policy 3 already, so the neighbourhood plan policy would add value if it referred to specific projects for the neighbourhood area, based on evidence of requirements and community preference); Secondly, phasing (again, touched on by Core Policy 3, so neighbourhood area-specific requirements and triggers should be referenced); and Thirdly, minimising disruption to the community (not covered by Core Policy 3) and thus could be elaborated on in the supporting text, stating what type of disruption may be envisaged based on the infrastructure assessed as needed, building in responses from community consultation, and options for minimising disruption, including consideration of cumulative impacts, perhaps based on past experience.</p>
<p>Conformity check</p>	<p>The replacement policy supporting text should reference the fact that major infrastructure is the responsibility of WC and explain that the policy focusses on locationally detailed matters for this reason.</p> <p>Based on the made policy and the expected future of travel in its replacement, there is no reason to suppose that conformity with either the adopted/emerging Local Plan and with national policy (though there is much on infrastructure in the NPPF, the requirements appear largely aimed at local authorities rather than neighbourhood planners) would be problematic.</p>
<p>Conclusion and recommendations</p>	<p>There is much recent and emerging evidence at Wiltshire level that could and should be used to underpin the new policy. Including WC's infrastructure needs assessment supporting the Local Plan review. There is evidence in recent years that Calne's population (and thus the neighbourhood area's population) has grown faster than the levels of employment and job opportunities available. This can be used to inform the specific infrastructure that may be needed. The Wiltshire Planning Obligations SPD, while not constituting policy, contains some useful wording on the phasing of infrastructure which could be used in the supporting text and/or policy.</p>

The made policy is very broad, due to a lack of location-specific evidence on infrastructure and phasing, including triggers for infrastructure once a certain quantum of development is provided. This could be remedied for the new policy through the production of an updated IDP and/or a neighbourhood area-specific infrastructure projects list forming an NP appendix, with the policy cross-referring to it, removing the projects already delivered and updating those still needed, in line with the projected growth trajectory of the emerging Local Plan. This would make for a more effective policy.

Engagement with infrastructure providers, operators and statutory consultees will also have to be repeated and updated as part of the neighbourhood plan review.

The made policy suffers from a degree of internal overlap with GA1 and GA2 on transport, and CF1 and CF2 on community infrastructure. If this were avoided in the new NP, all policies on infrastructure delivery may be more effective. There are also issues of overlap with local plan policies, particularly Core Policy 3. While a level of interaction and interdependency between policies on related issues (such as housing, transport, community infrastructure and employment) is normal and to be commended, this should be reflected through cross-references within the supporting text. Policies themselves should avoid overlapping requirements as this is likely to be confusing and thus reduce their effectiveness.

Any replacement policy should retain the focus of the existing on three key issues: infrastructure delivery, phasing, and minimising disruption to the community. Based on the made policy and the expected future of travel in its replacement, there is no reason to suppose that conformity with either the adopted/emerging Local Plan and with national policy would be problematic.

Metrics which could be used to monitor this policy include transport settlement accessibility level, and/or number of years before a new primary/secondary school is required over time as development and infrastructure provision changes. Other metrics could include delivery dates of infrastructure projects against the dates when they were anticipated/needed, based on an updated IDP and/or a neighbourhood area-specific infrastructure

projects list as mentioned above (which could also list requirements by location within the neighbourhood area), in line with the projected growth trajectory of the emerging Local Plan.

Policy name and number	Policy WS1 – Employment
Policy intent as provided to AECOM	Proposals for employment development within Calne and Calne Without will be supported subject to compliance with all relevant development plan policies. Proposals for the retention, regeneration and intensification of previously developed employment land are particularly encouraged.
Evidence source and type	<p>The Evidence Base Links document lists the following sources of evidence of employment needs:</p> <p>Wiltshire Core Strategy (2015); Wiltshire Workspace and Employment Land Review (2011); Wiltshire Core Strategy Topic Paper 7: Economy (2012) and Topic Paper 7 addendum (2012); Wiltshire Workspace Strategy (2009); Future Employment Needs in Wiltshire (2011); The Swindon and Wiltshire Local Enterprise Partnership Business Plan Jan 2012 – Mar 2015; NPPF (2012); and Planning Practice Guidance.</p> <p>The supporting text mentions a Neighbourhood Plan workshop and the Town and Country Planning (Use Classes) Order 1987.</p>
Evidence analysis	<p>The evidence quoted was appropriate and relevant at the time the policy was drafted, but it is not specific to the neighbourhood area. This is reflected in the policy, which is reasonably general as a result. This could be remedied with the gathering of neighbourhood area-specific evidence (see the ‘proportionality and gaps’ section).</p> <p>The Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on it to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and the evidence base should</p>

	<p>be updated to reflect the most recent evidence. This includes the Swindon and Wiltshire Functional Economic Market Areas Assessment (2016)²⁷ and the Wiltshire Employment Land Review (2018)²⁸.</p> <p>The supporting text refers to the employment allocations in the Wiltshire Core Strategy (Policies BD1, CP35 and CP2/HP2). This should be updated to reflect any progress on/change of status in these site allocations.</p> <p>The supporting text mentions a Neighbourhood Plan workshop, but this is not included in the Evidence Base Links document accompanying the submission plan and it is therefore not possible to ascertain when this was held or who was represented. However, it is likely that the evidence gathered at the workshop is now quite dated, and therefore new public engagement will be required to provide an up-to-date picture of community views on employment needs.</p>
Proportionality and gaps	<p>The examiner's commentary on the submission plan states that it does not add to Core Policies 34 and 36. The examiner suggested changes to the policy which would allow it to meet the Basic Conditions, but the text remains reasonably general due to the absence of neighbourhood area-specific evidence underpinning the policy. In its current form, it is proportionate, but there is clear potential for the policy to be refined and made more area-specific through the production of new evidence relating directly to employment needs in the neighbourhood area. A starting point for this evidence should be Wiltshire Council's Planning for Calne paper (2021)²⁹, which identifies the need for 4ha of employment land in Calne over the plan period, and the Employment Land Review (2018) which notes the stagnation of employment growth in Calne since 2009.</p> <p>Wiltshire Council's emerging employment evidence could be combined with local community and business surveys to produce a more targeted policy that expresses support for particular employment uses, taking into</p>

²⁷ This document is available at: <https://www.wiltshire.gov.uk/media/5689/Wiltshire-FEMA-2017-Report/pdf/spp-fema-report-2017-final.pdf?m=637459763966230000>

²⁸ This document is available at: https://www.wiltshire.gov.uk/media/5669/Wiltshire-Employment-Land-Review/pdf/20180202_Wiltshire_Employment_Land_Review.pdf?m=637459736210470000

²⁹ The document is available at https://www.wiltshire.gov.uk/media/5631/Planning-for-Calne/pdf/WLP_Market_Town_Planning_for_Calne_FINAL.pdf?m=637459644494200000

account the recent changes to the Town and County Planning (Use Classes) Order, which has revoked the B1 (Business) use class and created a new Class E use. This would allow some of the content of the current supporting text (paragraph 117) to be incorporated into the policy itself, subject to the availability of appropriate evidence. An employment survey which assesses separately the employment needs of the neighbourhood area could allow the policy to be more nuanced in its support for different forms of employment based on specific context, since the requirements are likely to be quite different by location.

It is recommended that the supporting text is updated to reflect the current employment situation, considering any changes since the Neighbourhood Plan was made in 2018, including those which may have resulted from the Covid-19 pandemic, whose long-term effects on ways of working (such as the prevalence of home working, changing demand for office space etc.) in the neighbourhood area, across Wiltshire and across the country are as yet largely unknown. However, up to date neighbourhood area-specific survey results and discussions with the local authority may identify some emerging trends.

At present, the detail within the supporting text does not translate into a neighbourhood area-specific policy, perhaps not helped by the changes made at Examination. This could be remedied through new evidence gathering that would restore the link between any replacement policy and the supporting text.

The Evidence Base Links document refers to the NPPF (2012), but this is not mentioned in the supporting text. Reference to section 6 of the updated NPPF (2019) could be included, with a clearer distinction made in the policy between the different requirements for urban and rural employment, reflecting the diversity of the neighbourhood area.

Effectiveness of policy

The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would provide greater clarity to plan users on the type of employment development that will be supported and likely to be viable within the neighbourhood area.

The key issue with the existing policy is that it is relatively general and not specific to the neighbourhood area and to particular locations within it. The more local detail that can be included within the policy, supporting text

	<p>and evidence base, the more effective the policy will be in shaping development in accordance with community opinion. One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. Here, therefore, it is recommended that C&CW collectively reviews the emerging general and neighbourhood area-specific employment policy and evidence at Wiltshire level³⁰, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs.</p>
Conformity check	<p>Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve. Indeed, generating additional neighbourhood area-specific employment evidence as recommended above would be a highly effective way of informing neighbourhood area-specific policies that add to national and local policy without conflicting with them.</p> <p>This will include ensuring that any reference to specific employment uses reflects the revocation of the B1 use class, the creation of a new Class E, F1 and F2 (where relevant), new 'Class MA' permitted development rights which can be used from 1st August 2021 to convert a use in the new Class E to Class C3 (dwelling houses)³¹, and any further relevant planning changes and reforms announced before the new NP is made.</p>
Conclusion and recommendations	<p>The evidence quoted is appropriate and relevant but is not neighbourhood area-specific. This is reflected in the policy, which is reasonably general as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.</p> <p>There is clear potential for the policy to be refined and made more area-specific through the production of evidence which relates directly to employment needs in the neighbourhood area, including an assessment of the differing requirements of the urban and rural areas, in line with section 6 of the NPPF and Core Policy 34.</p>

³⁰ Specifically, at the time of writing, this comprises the Wiltshire Local Plan document 'Planning for Calne', which identifies the need for additional employment land in Calne.

³¹ At <https://www.legislation.gov.uk/uksi/2021/428/made/data.xht?view=snippet&wrap=true>

The additional evidence gathering recommended would significantly enhance the effectiveness of the policy because it would provide greater clarity to developers on the type of employment development that will be supported and likely to be viable within the neighbourhood area.

One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. It is recommended that C&CW collectively reviews the emerging general and neighbourhood area-specific employment policy and evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs.

It is recommended that the supporting text is updated to reflect the current employment situation, considering any changes since the Neighbourhood Plan was made in 2018, including those resulting from the Covid-19 pandemic. At present, the detail within the supporting text is not translated into a neighbourhood area-specific policy. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. This includes ensuring that any reference to specific employment uses reflects the revocation of the B1 use class, the creation of new Classes E, F1 and F2 (where relevant), new 'Class MA' permitted development rights which can be used from 1st August 2021 to convert a use in the new Class E to Class C3 (dwelling houses)³², and any further relevant planning changes and reforms announced before the new NP is made.

³² At <https://www.legislation.gov.uk/uksi/2021/428/made/data.xht?view=snippet&wrap=true>

Metrics which could be used to monitor this policy include employment development permissions in general, and on previously developed versus on greenfield land. However, monitoring and enforcing this policy may encounter difficulties due to the government's regularly-changing approach to permitted development rights.

Policy name and number	Policy WS2.1 – Calne Town Centre
Policy intent as provided to AECOM	Development proposals within Calne Town Centre must consider, assess, and address their impact on the streets, pavements, parking areas and other public spaces and the opportunities provided to improve the quality, accessibility and safety of the public realm and benefit businesses and customers alike.
Evidence source and type	<p>The Evidence Base Links document lists the following sources of evidence:</p> <p>Wiltshire Core Strategy (2015); North Wiltshire Local Plan (2011); NPPF (2012); and Planning Practice Guidance.</p> <p>The supporting text refers to a Neighbourhood Plan workshop.</p>
Evidence analysis	<p>The evidence quoted is appropriate and relevant, but it is not specific to the neighbourhood area or to Calne town centre, with the exception of the Neighbourhood Plan workshop referred to in the supporting text. This is reflected in the policy, which is reasonably general as a result. This could be remedied by gathering new evidence specific to the neighbourhood area and particularly to the town centre (see the ‘proportionality and gaps’ section).</p> <p>The supporting text mentions a Neighbourhood Plan workshop, but this is not included in the evidence base document provided and it is therefore not possible to ascertain when this was held or who was represented. However, it is likely that the evidence gathered is now quite dated, and therefore new public engagement will be required to provide an up-to-date picture of community views on development within the town centre.</p> <p>The supporting text refers to the primary and secondary frontages identified in the North Wiltshire Local Plan saved policies R1 and R2. Whilst this is still current adopted policy, it is now 10 years old, and it is recommended that the emerging Local Plan Review be monitored for any changes to the defined town centre boundaries.</p>

**Proportionality
and gaps**

In its present form, the policy is reasonably generic due to the absence of more up to date and locationally specific supporting evidence. While proportionate, it adds little to the corresponding Core Policy 57 and there is potential for the policy to be refined through the production of evidence identifying specific issues within the town centre that could be addressed through a more targeted policy and potentially also through projects the neighbourhood plan could support.

The supporting text provides some themes which could be developed and strengthened through such evidence, for example the expansion of market facilities and support for start-ups and pop-up spaces. Community and business surveys could be used to provide justification for objectives so that the policy can better reflect local community aspirations for the future development of the town centre. The steering group has made AECOM aware that plans for regenerating the town centre have been ongoing for a considerable time. C&CW may wish, therefore, to consider what realistic policy interventions and projects may make a greater difference in future and reflect on why past interventions have not always succeeded in fulfilling community aspirations. This could also be a subject for community and stakeholder engagement discussions and could feed into any future reviews of the Town Centre Masterplan.

The policy evolved through the examination due to the status of the Town Centre Masterplan review, which had not been completed at the time of submission. This resulted in the separation of Policy WS2 into two parts (WS2.1: Calne Town Centre and WS2.2: Town Centre Masterplan). The Evidence Base Links document refers to a 2016 masterplan, but this link needs updating and the latest version of the masterplan on the Calne Town Council website is the 2014 document referred to in Policy WS2.2. If an updated masterplan has subsequently been produced, this could allow the two parts of this policy to be merged into one, leading to a more locally-specific policy, since there is considerable crossover between the general aims of WS2.1 and the Calne-specific WS2.2.

	<p>Further detail could be added to the policy through the use of the updated evidence base supporting the Wiltshire Local Plan review, including the Wiltshire Retail and Town Centres Study 2020 Volume 1³³ which provides an assessment of current and projected retail trends in Calne Town Centre. This includes evidence on vacancy rates, retailer representation and customer behaviour.</p> <p>The key objectives for the town centre highlighted in paragraph 120 of the made Neighbourhood Plan do not relate to the aims of the policy itself, presumably as a result of the changes made during the examination which have led to the policy becoming more general. This could be remedied through additional up-to-date evidence gathering that would restore the link between the policy and the supporting text.</p>
Effectiveness of policy	<p>The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would allow issues specific to Calne Town Centre to be addressed.</p> <p>The key issue with the existing policy is that it is relatively general and not specific to the neighbourhood area. The more local detail that can be included within the policy, supporting text and evidence base, the more effective the policy will be in shaping development in accordance with community opinion. One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. The policy could also consider what interventions have been applied in the past, their success or otherwise, and how future policy interventions and projects could learn lessons from what was tried in the past.</p> <p>Here, therefore, it is recommended that C&CW collectively reviews the emerging general and Calne-specific evidence at Wiltshire level³⁴, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet</p>

³³ This document is available at: https://www.wiltshire.gov.uk/media/5686/Retail-and-Town-Centre-Study-2020/pdf/Retail_and_Town_Centre_Study_2020_Final_20201118.pdf?m=637459762232530000

³⁴ Specifically, at the time of writing, this comprises the Wiltshire Local Plan document 'Planning for Calne', which identifies place-shaping priorities for Calne and features a settlement profile which includes some detail on the town centre.

	<p>identified future needs. In addition, subject to the production of an updated Town Centre Masterplan, C&CW should consider the options for policy requirements that would support the aims of the masterplan.</p>
<p>Conformity check</p>	<p>Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve given the crossover between Policy WS2.1 and Core Policy 57. Generating additional neighbourhood area-specific evidence as recommended above would be a highly effective way of informing neighbourhood area-specific policies that add to national and local policy without conflicting with them.</p>
<p>Conclusion and recommendations</p>	<p>The evidence quoted is appropriate and relevant but is not sufficiently specific to the neighbourhood area. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF in the Evidence Base Links document should be retained (and ideally also cited in the supporting text) but the 2019 version should now be cited.</p> <p>There is potential for the policy to be refined, updated and made more area-specific through the production of evidence which relates directly to Calne Town Centre, including for the more general Policy WS2.1 to be combined with the Calne-focused Policy WS2.2 should an updated Town Centre Masterplan be produced.</p> <p>The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would provide greater clarity on the type of development that will be supported.</p> <p>One of the best ways to achieve such specificity and effectiveness is to develop policy with a clear eye on what is already being stated at the level above and then seeking to add to it and/or fill in any gaps. The policy could also consider what interventions have been tried in the past, their success or otherwise, and how future policy interventions could apply lessons learnt. As such, C&CW should review the emerging general and Calne-specific evidence at Wiltshire level, with the caveat that it may still change between now and adoption and considers how the Neighbourhood Plan policy could encourage particular forms of employment development to meet identified future needs. An updated Town Centre Masterplan may be required.</p>

The key objectives for the town centre highlighted in the supporting text do not directly relate to the aims of the policy itself. This could be remedied through additional evidence gathering that would restore the link between the policy and the supporting text.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Metrics which could be used to monitor this policy include the delivery of projects / delivery against the aims of the existing Masterplan; alternative metrics could be set based on new evidence gathered such as particular community aspirations or new projects for the town centre such as new seating installed, sales densities and other indicators for retail performance, footfall, etc. (see the benchmarks mentioned in section 5 of the Masterplan).

Policy name and number	Policy WS3 – Local Neighbourhood Shopping
Policy intent as provided to AECOM	<p>Proposals which result in the loss of existing local neighbourhood convenience shops will be resisted; they will only be supported where the applicant has demonstrated that there is no reasonable prospect of the site or premises being used for ongoing retail or community uses. Applicants will be expected to demonstrate that the existing use is no longer viable and that the site has been marketed for a reasonable period of time for alternative retail or community uses.</p> <p>Development proposals that add to and/or sustain the distribution of local neighbourhood convenience shops, designed to be accessible primarily on foot or by cycle, will be supported subject to compliance with all relevant development plan policies.</p>
Evidence source and type	<p>The Evidence Base Links document lists the following sources of evidence:</p> <p>Wiltshire Core Strategy (2015); North Wiltshire Local Plan (2011); NPPF (2012); Planning Practice Guidance; Wiltshire Core Strategy Topic Paper 6 – Retail 2012; Wiltshire Core Strategy Topic Paper 6 – Retail Addendum 2012; Wiltshire Council Town Centre and Retail Study - Final Report; Wiltshire Council Town Centre and Retail Study - Final Plans and Appendices; Wiltshire Core Strategy Retail Review 2015.</p> <p>The supporting text refers to a Neighbourhood Plan workshop.</p>
Evidence analysis	<p>The evidence quoted is appropriate and relevant, although the Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on this evidence to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and the evidence base should be consolidated and updated to</p>

	<p>reflect the most recent evidence supporting the Local Plan Review. This includes the following documents which include data and analysis specific to the neighbourhood area:</p> <ul style="list-style-type: none">• Wiltshire Retail and Town Centres Study 2020 Volume 1: Main Text³⁵• Wiltshire Retail and Town Centres Study 2020 Volume 2: Appendices³⁶ <p>The supporting text mentions a Neighbourhood Plan workshop, but this is not included in the evidence base document provided and it is therefore not possible to ascertain when this was held or who was represented. However, it is likely that the evidence thus gathered is now quite dated, and therefore new public engagement will be required to provide an up-to-date picture of community views on development within the town centre.</p> <p>References to the NPPF should be updated to reflect the most recent version (2019), and the PPG reference should be similarly updated to reflect the current iteration (Town centres and Retail).</p>
<p>Proportionality and gaps</p>	<p>The first part of the policy, which seeks to preserve existing convenience retail provision away from the town centre, is proportionate and reasonable.</p> <p>In the second part of the policy, which seeks to secure additional provision, there is an argument for making a distinction between provision in the rural and urban area, since different considerations apply to each.</p> <p>NPPF (2019) paragraph 83(d) is designed to ensure that rural settlements remain sustainable by encouraging the retention and development of accessible local services. This provides a clear justification for the second part of the policy with respect to rural areas. However, there is evidence in the Retail and Town Centres Study 2020 suggesting there is a marginal over-supply of convenience goods floorspace in the town that will remain throughout the plan period. Therefore, in order to justify the continued inclusion of this part of the policy in relation</p>

³⁵ This document is available at: https://www.wiltshire.gov.uk/media/5686/Retail-and-Town-Centre-Study-2020/pdf/Retail_and_Town_Centre_Study_2020_Final_20201118.pdf?m=637459762232530000

³⁶ This document is available at: https://www.wiltshire.gov.uk/media/5687/Retail-and-Town-Centre-Study-2020-Appendices/pdf/Retail_and_Town_Centre_Study_2020_Appendices_Final_20201118.pdf?m=637459763031130000

	<p>to the urban area, it is recommended that additional evidence gathering takes place to identify areas of localised shortfalls in provision (as suggested in the supporting text, para. 129). This could involve a combination of spatial analysis/mapping and community surveys. The policy or supporting text could then provide targeted support for proposals of this nature in those areas with existing deficiencies in provision and this would align with the objective of convenience retail being primarily accessible on foot or by bicycle.</p>
<p>Effectiveness of policy</p>	<p>The additional evidence-gathering recommended above would significantly enhance the effectiveness of the policy because it would allow specific areas of under-provision of convenience retail floorspace within Calne Town to be better addressed.</p> <p>It is recommended that the policy contains separate provisions for convenience retail in rural and urban areas. This will allow a more permissive policy for retail proposals in rural areas where they are appropriate and needed, and a targeted approach to increasing supply in specific parts of the neighbourhood area whilst avoiding over-supply elsewhere (and consequential adverse impacts on the viability of existing businesses).</p> <p>The supporting text provides detail not just on convenience retail, but on other uses including other forms of retail, social, leisure, and community facilities. At the examiner’s suggestion, the policy was amended so that it focused purely on convenience retail uses, but the supporting text has not been updated to reflect this change. It is recommended that for effectiveness and clarity the supporting text is rewritten so that it provides clear justification for the policy’s support for convenience retail development and avoids straying into other uses.</p>
<p>Conformity check</p>	<p>Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve. Indeed, generating additional evidence as recommended above would be a highly effective way of informing location-specific policies that add to national and local policy without conflicting with them.</p>

**Conclusion and
recommendations**

The evidence quoted is appropriate and relevant although the Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on it to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and the neighbourhood evidence base should be consolidated and updated to reflect the most recent evidence supporting the Local Plan Review.

The first part of the policy, which seeks to preserve existing convenience retail provision away from the town centre, is proportionate and reasonable. In the second part of the policy there is an argument for making a distinction between provision in the rural and urban area, since different considerations apply to each, as suggested in the NPPF.

Further evidence-gathering is required to justify the urban part of the policy, given recent evidence of over-provision of convenience retail floorspace in Calne. An approach identifying areas of under-provision would allow for a more targeted policy to address existing shortfalls.

The supporting text provides detail not just on convenience retail, but on other uses. It should be rewritten to provide clear support for convenience retail development and avoids straying into other uses.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions, but it is considered this would not be problematic.

Metrics which could be used to monitor this policy include data on loss of retail / community space, applications for change of use / permitted development from retail / community uses, and/or spatial distribution of shops / distances between different parts of the neighbourhood area and their nearest shops.

<p>Policy name and number</p>	<p>Policy CF1 – Health, Leisure and Wellbeing</p>
<p>Policy intent as provided to AECOM</p>	<p>Development proposals should consider, assess and address their opportunities to contribute to the health and wellbeing of the community at a scale relevant to the proposal.</p> <p>Elements that can positively contribute to health and wellbeing include:</p> <ul style="list-style-type: none"> • Informal open areas • Outdoor seating • Landscape planting • High quality public realm • Footpaths and cycleways • Allotments
<p>Evidence source and type</p>	<p>The Evidence Base Links document lists the following sources of evidence:</p> <p>Wiltshire Core Strategy (2015); Wiltshire Core Strategy Topic Paper 14 – Building Resilient Communities (2012); NPPF (2012); and Planning Practice Guidance.</p> <p>No additional evidence is cited in the supporting text.</p>
<p>Evidence analysis</p>	<p>The evidence quoted is appropriate and relevant, although the Wiltshire Core Strategy supporting evidence is now quite dated, and it will be increasingly difficult to rely on it to support the Neighbourhood Plan. Wiltshire Council is reviewing the Local Plan, and while there does not appear to be any more recent evidence directly related to this policy, it is recommended that the emerging evidence base is monitored so that any updates can be appropriately referenced in the supporting text as and when they become available.</p>

	<p>Any references to the NPPF 2012 should be replaced with appropriate references to the revised NPPF (2019), particularly Section 8 – Promoting Healthy and Safe Communities (paragraphs 91 - 101). Similarly, the Healthy and Safe Communities PPG³⁷ should be referenced.</p> <p>Public health data is available from the Wiltshire Joint Strategic Needs Assessment (JSNA) and the Wiltshire Health and Wellbeing JSNA³⁸. Index of Multiple Deprivation data (IMD) could also serve as evidence (particularly on health deprivation)³⁹.</p> <p>Another matter which should be considered is the arrangements for public access to, and the management and ownership of new open spaces and other similar provisions, as well the funds required for their maintenance (including in some cases from management fees collected from residents). Section 106 planning obligations and/or planning conditions can be used to set out suitable arrangements and this could be discussed with the local authority, to ensure any new provisions are truly accessible to and suitable for those who need them, as well as ensuring that any management fees levied on residents are reasonable and affordable. Arrangements for this could also be set out as part of this policy, subject to evidence and to discussions with the LPA.</p>
Proportionality and gaps	<p>The policy is proportionate and reasonable, and it provides sufficient flexibility to allow proposals to be judged on their individual merit, with contributions to green infrastructure and public realm improvements assessed according to the scale of the scheme in question.</p> <p>Since the policy contains specific examples of contributions and/or provisions that could be secured alongside new development, the supporting text and evidence base could justify this further. For example, a survey demonstrating demand and/or deficiency in allotment provision could be undertaken, and references to wider</p>

³⁷ Available at <https://www.gov.uk/guidance/health-and-wellbeing>

³⁸ At <https://www.wiltshire.gov.uk/public-health-intelligence>

³⁹ At <https://www.wiltshireintelligence.org.uk/wp-content/uploads/2019/12/IMD-2019-report.pdf>

	evidence could be included, such as Public Health England’s ‘Spatial Planning for Health’ (2017) ⁴⁰ or the Royal Institute of Chartered Surveyors’ ‘Cities, Health and Well-Being’ report (2018) ⁴¹ .
Effectiveness of policy	<p>The policy is likely to be effective in its current form, although it could be strengthened by drawing links to other policies in the Neighbourhood Plan, including Policy GA1 – Sustainable Transport and Policy BE1 – Integration and Landscaping.</p> <p>As with other policies, the effectiveness of any replacement policy can be maximised by reviewing the way in which the adopted policy did (or did not) shape development appropriately. If there were unintended effects, or if the policy was not cited as frequently in development decisions as it could have been, are there indications as to why this was and if there is room for improvement?</p> <p>The supporting text contains some detail in paragraphs 132 - 133 and 136 - 137 which is more relevant to Policy CF2 (Community Assets), and it is recommended that this is moved or restated alongside Policy CF2 so that it supports the appropriate policy.</p>
Conformity check	Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve.
Conclusion and recommendations	The evidence quoted is appropriate and relevant, although now quite dated. It is recommended that the emerging evidence base supporting the Local Plan review is monitored so that any updates can be appropriately referenced in the supporting text.

⁴⁰ This document is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

⁴¹ This document is available at: <https://www.rics.org/globalassets/rics-website/media/knowledge/research/insights/cities-health-and-well-being-rics.pdf>

The policy is proportionate and reasonable, and it provides sufficient flexibility to allow proposals to be judged on their individual merit, with contributions to green infrastructure and public realm improvements assessed according to the scale of the scheme in question. Since the policy contains specific examples of contributions that could be secured alongside new development, the supporting text and evidence base could justify this further.

The policy is likely to be effective in its current form, although it could be strengthened by drawing links to GA1 – Sustainable Transport and BE1 – Integration and Landscaping. As with all policies being updated, information on how the policy was implemented/applied should be reviewed and applied to maximise the effectiveness of its replacement.

References in the supporting text to community facilities should be moved into the supporting text supporting Policy CF2.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication that this would be difficult to achieve.

Metrics which could be used to monitor this policy include the indicators used in the JSNA and Health and Wellbeing JSNA or other Wiltshire public health data (see above) or Index of Multiple Deprivation data on health deprivation (IMD).

<p>Policy name and number</p>	<p>BE1- Integration and Landscaping</p>
<p>Policy intent as provided to AECOM</p>	<p>All development proposals must provide appropriate landscaping to integrate the existing and new built form and landscape; the landscaping treatment should:</p> <ul style="list-style-type: none"> • minimise but not obliterate views of the development (except where other treatments are advised from the visual impact assessment); and • use stands of trees to either restrict or focus views of the development and to break up the outline of buildings; and • extend existing landscaping ensuring that existing built form and community identity of streets and areas are not adversely affected; and • ensure that access routes are attractive and safe; and • contribute to supporting native fauna where possible, using the latest research to support choices, which may include non-native species where these may be more tolerant to future climate change; and • for developments with a countryside edge, build density should reduce toward the countryside with larger areas dedicated to gardens; and • for developments within Calne on the main approaches into town, allow for a wide boulevard on the main frontage to create a high quality environment. <p>Proposals must be accompanied by a plan showing the extent and form of the landscaping as well as details of how these will be managed and maintained upon completion.</p>
<p>Evidence source and type</p>	<p>Wiltshire Core Strategy Facebook Environmental Poll NPPF (2012) Planning Practice Guidance</p>
<p>Evidence analysis</p>	<p>The evidence quoted is appropriate and relevant but with the exception of the environmental poll is not neighbourhood area-specific. This is reflected in the policy, which is reasonably generic as a result. However, this can be remedied through the gathering of more neighbourhood area-specific evidence (see row below). In terms of the environmental poll, it is not clear to a third party exactly how it informed the policy, but it could be</p>

	<p>replaced by a design guide with appropriate public realm and environmental content, which could itself be informed by community consultation, (again, see recommendation below).</p> <p>The reference to the NPPF should be retained but the 2019 version should now be cited, the relevant chapter now being 12.</p> <p>In the Evidence Base Links (EBL) document accompanying the Submission Plan, there is reference to Wiltshire’s Creating Places design guide but a) it is not clear how, if at all, the guide informed BE1, b) the link in the EBL document is broken⁴², c) the guide is Wiltshire but not neighbourhood area-specific and d) is now old, dating from 2006. For reasons c) and d) specifically it is therefore recommended that the design guide not be used to shape BE1’s replacement policy but neighbourhood area-specific evidence should be gathered instead (again, see below). It may also be helpful in any replacement EBL document to include a new ‘Design’ section under the Built Heritage heading alongside the existing ‘Heritage’ section, as the two topics, though strongly interlinked, are separate.</p>
Proportionality and gaps	<p>The policy evolved through the Examiner’s recommendation that it be recast to a) distinguish more clearly between general and specific recommendations and b) to include only specific recommendations where clearly supported by evidence. The net result is a reasonably general policy with reasonably limited evidence supporting it. There could therefore be potential for the policy to be made more specific if there is more specific, detailed design evidence supporting it, such as, for example, an AECOM design code study or other characterization evidence with a specific focus on existing and potential landscaping, key views in the neighbourhood area that may need protecting, and so on. The design code or guide should follow the new National Model Design Code.⁴³ With such evidence, the policy supporting text could also become more place-specific, for example including photos of existing landscaping, access routes, edges between town and country, environment on the main</p>

⁴² The correct link is <https://pages.wiltshire.gov.uk/creating-places-design-guide-spg-adopted-april-2006.pdf>

⁴³ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

	<p>approaches into town, key local views and so on- with those photos illustrating both good practice and room for improvement. If enough detailed evidence is gathered, a neighbourhood area-specific Design Guide could even be drafted and this policy (and other design policies) could state that proposals will be assessed in line with it. The Design Guide would add clarity on some of the terms in the policy supporting text which are currently less clear, e.g. what 'urban or mass produced design' in a rural context entails (examples of what to avoid or what is to be encouraged could be illustrated)</p> <p>It may be that the Examiner has made a minor error in the existing policy because it would be more logical and rational for the bullet point on 'native fauna' to state 'native flora' given that animals are not normally provided alongside or within a development, but plants can be. Even better could be 'native habitats and flora' because then there is some acknowledgement that fauna is also important but, unlike planting and habitat creation, cannot be explicitly required of developers.</p>
Effectiveness of policy	<p>The additional evidence-gathering recommended above, in particular photographs/visual images, would significantly enhance the effectiveness of the policy because it would make far clearer to developers what type of landscaping and integration is or is not supported.</p> <p>Additionally, the key issue with the existing policy is that it is reasonably general and not particularly specific to the neighbourhood area. The more location-specific its replacement can be, the more effective it will be in shaping development in the way the community wants. One of the best ways to achieve such specificity and effectiveness in neighbourhood planning policy is to develop policy with a clear eye on what is already being said at the level above and then seeking to add to it and/or fill in any gaps. Here, therefore, it is recommended that C&CW collectively reviews the emerging general and neighbourhood area-specific design and landscaping policy at Wiltshire level⁴⁴, with the caveat that it may still change between now and adoption, and considers what</p>

⁴⁴ Specifically, at the time of writing, this comprises the Wiltshire Local Plan document 'Planning for Calne', which though not primarily concerned with design, contains much place-specific content that could be used to inform place-specific neighbourhood design policies unlikely to appear at Wiltshire level. The document is available at https://www.wiltshire.gov.uk/media/5631/Planning-for-Calne/pdf/WLP_Market_Town_Planning_for_Calne_FINAL.pdf?m=637459644494200000

	location-specific topics, features or issues may be missing where a neighbourhood plan policy could add to or ensure clearer coverage?
Conformity check	Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve. Indeed, generating additional neighbourhood area-specific design evidence as recommended above would be a highly effective way of informing neighbourhood area-specific policies that add to national and local policy without conflicting with them.
Conclusion and recommendations	<p>The evidence quoted is appropriate and relevant but with the exception of the environmental poll is not neighbourhood area-specific. This is reflected in the policy, which is reasonably generic as a result. The reference to the NPPF should be retained but the 2019 version should now be cited.</p> <p>There could be potential for the policy to be made more specific if there is more specific, detailed design evidence supporting it, such as, for example, an AECOM design code study or other characterization evidence with a specific focus on existing and potential landscaping, local views, and so on. The design code or guide should follow the new National Model Design Code.</p> <p>With such evidence, the supporting text could also become more place-specific in terms of good practice and room for improvement. If enough detailed evidence is gathered, a neighbourhood area-specific Design Guide could be drafted and this policy (and other design policies) could state that proposals will be assessed in line with it.</p> <p>The additional evidence-gathering recommended above, in particular photographs/visual images, would significantly enhance the effectiveness of the policy because it would make far clearer to developers what type of landscaping and integration is or is not supported.</p> <p>Policy should be developed with a clear eye on what is already being said at the level above and then seeking to add to it and/or fill in any gaps. Here, therefore, it is recommended that C&CW collectively reviews the emerging general and location-specific design and landscape policy at Wiltshire level , with the caveat that it</p>

may still change between now and adoption, and considers what neighbourhood area-specific topics, features or issues may be missing where a neighbourhood plan policy could add to or ensure clearer coverage

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Quantitative metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently long and varied, and qualitative more than quantitative. Identifying specific monitoring metrics as part of the process of gathering more locally specific evidence may in fact help the group to identify exactly what the policy is trying to achieve (e.g. number of developments permitted encroaching on specific identified views to protect, and so on).

Policy name and number	BE2- Design Principles for Local Distinctiveness
Policy intent as provided to AECOM	<p>All development must be designed to a high quality that reinforces local distinctiveness, including in relation to materials, built form and settlement patterns.</p> <p>Design should be guided by the overall scale, density, massing, height, landscape, layout, materials, detailing, roof orientation, relationship to back of pavement, wall to window ratios, proportion of windows, plan depth, plot width and access, the site and its surroundings including considerations of flood risk management.</p> <p>Buildings on the fringes of major developments should have variations in height, style and position. All new buildings should reflect the local heritage design and characteristics with a variety of traditional and modern building materials. As a matter of good design, defensible space should be provided.</p> <p>Careful consideration should be given to the servicing requirements of buildings to ensure that essential items such as car parking and space for the storage of waste and recycling bins are successfully integrated into the design, including access for service and emergency vehicles.</p>
Evidence source and type	<p>Community consultation (in Studley)</p> <p>Building for Life⁴⁵</p> <p>Wiltshire and Swindon Biological Records Centre, Living Records</p>
Evidence analysis	<p>The supporting text referencing the evidence and justifying the policy is long and detailed, but, reflecting the comments on BE1 above, still does not culminate in a particularly neighbourhood area-specific policy. The supporting text and the policy itself could both be improved by neighbourhood area-specific design evidence because at present, with the sole exception of the fifth bullet point and the last sentence of the seventh bullet point below paragraph 148, the supporting text and policy could be lifted and applied to almost any neighbourhood plan in England outside major urban areas. As such, the recommendation for commissioning a C&CW Design Guide, clearly detailing the features and local character and townscape that make the neighbourhood area distinctive, should inform any replacement policy.</p>

⁴⁵ Available at https://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%2012_0.pdf

	<p>The aim of the photos within the supporting text is unclear to someone not familiar with the area, and this is not helped by the lack of captions. Are they aimed at providing examples of good practice, or lessons to be learnt? While the landscaping in the first picture is attractive, the new buildings do not appear distinctive to the neighbourhood area; they could be in any local town in the Cotswold limestone belt. The second picture is an attractive rural scene but contains no foreground built development so its relevance to this policy is unclear. It may be better used to illustrate a landscape policy, with a caption explaining why it has been included. Finally, the third picture is simply a close-up of the new library, already illustrated in the first picture, and again the lack of caption makes it unclear what is being illustrated.</p>
<p>Proportionality and gaps</p>	<p>It is noted above that parts of paragraph 148 in the supporting text are the only ones that point to location-specific features, so it is disappointing to see that they are not specifically mentioned in the policy, which is overly generic as a result. Any replacement policy, as already recommended, should be informed by a design guide specific to the neighbourhood area but, crucially, should carry through location-specific text into the policy itself. As an example, based on the current supporting text, a replacement policy could move the whole of the fifth bullet under paragraph 148 (which is already phrased as if a policy requirement anyway) into the policy itself, perhaps under a sub-section called 'new housing in rural areas'. Likewise, the last sentence of bullet point seven under the same paragraph could be added to policy, though perhaps here BE1 rather than BE2 would be the best place for it, given that it is more of an integration and landscaping point. Clearly, a new town-specific design guide could add dozens more ideas for place-specific text to incorporate into replacement policies.</p> <p>The policy and its supporting text differ, which is not ideal. The policy itself is squarely about the design of buildings, whereas there is much in the supporting text about habitats, wildlife, biodiversity and rural landscapes, not carried through to the policy itself. This suggests that either a new policy on the interaction of development with habitats, wildlife and its rural surroundings might be justified or that the supporting text on these topics should be moved to NE2 and NE3 (or their replacements) and inform those policies instead.</p>
<p>Effectiveness of policy</p>	<p>The pictures accompanying the supporting text are a missed opportunity for driving up the quality of new development to make it truly specific to the neighbourhood area and to the individual settlements within it. Images are very important in design policies and guides due to the visual and aesthetic nature of the topic and if the</p>

pictures can be captioned as clear examples of what to draw inspiration from and/or what to avoid, this increases effectiveness further. In terms of what images to use, a new design guide should provide the answer but in the meantime, and with the qualification that this advice is provided by policy generalists rather than design specialists, images of the following buildings and features could be appropriate: domestic buildings and townscape in and around Kingsbury Street/The Green, detailing and materials of the Town Hall, older houses along Curzon Street, London Road and Quemerford Road, former cloth mills both in Calne and Quemerford, and other relevant buildings including materials and detailing specific to the neighbourhood area. Given that the cloth mills in particular are some of the most beautiful and distinctive buildings in the town, and that many are of three or even four storeys, it is surprising that paragraph 147 recommends a two-storey maximum, although it is accepted that the policy text itself is more flexible. There is much recent two-storey housing around the edge of the town (e.g. Lansdowne Park) that, while pleasant and good-quality, is not really distinctive to the neighbourhood area- it could be anywhere in England (it is possible that this or similar local development was a driver for the petition in nearby Studley referenced in paragraph 146). It should therefore be noted that restrictions like that in paragraph 47 may have the effect of promoting further generic development rather than responding to the beautiful, distinctive character and buildings of the town centre and across the neighbourhood area.

With sufficient detail on neighbourhood area-specific and local materials, a new Design Guide would reinforce and complement the existing requirement (paragraph 147) for materials to score highly against Building for Life criteria and would thus enable this point to be moved from the supporting text into the policy proper for added effectiveness. Depending on the evidence available, it may also be possible for the policy to set requirements by location within the neighbourhood area, to promote the application of distinctive features, materials and so on which may be specific to individual settlements.

Conformity check

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication based on the existing policy and on emerging Wiltshire policy that this would be difficult to achieve. Indeed, generating additional neighbourhood area-specific design evidence as recommended above would be a highly effective way of informing location-specific policies that add to national and local policy without conflicting with them.

**Conclusion and
recommendations**

The current policy is generic. A new Design Guide for the Calne Community neighbourhood area, clearly detailing the features and local character and townscape that make the neighbourhood area distinctive, could/should inform any replacement policy.

As an example, based on the current supporting text, a replacement policy could move the whole of the fifth bullet under paragraph 148 into the policy itself. Likewise, the last sentence of bullet point seven under the same paragraph could be added to policy, though perhaps here BE1 rather than BE2 would be the best place for it, given that it is more of an integration and landscaping point. Clearly, a new neighbourhood area-specific design guide could add dozens of further policy ideas. It could also go into further detail on specific features and characteristics which are particular to individual settlements across the neighbourhood area.

The policy and its supporting text differ, which is not ideal. The policy itself is about the design of buildings, whereas there is much in the supporting text about habitats, wildlife, biodiversity and rural landscapes, not carried through to the policy itself. This suggests that either a new policy on the interaction of development with habitats, wildlife and its rural surroundings might be justified or that the supporting text on these topics should be moved to/merged into NE2 and NE3 (or their replacements) and inform those policies instead.

It should be noted that restrictions on storey height, like that in paragraph 47 may have the unintended effect of promoting further generic development.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions.

Quantitative, broad metrics which could be used to monitor this policy may be quite difficult to identify, as the policy is currently very long, detailed and varied, and also quite qualitative. Identification of specific monitoring metrics as part of the process of gathering more locally specific evidence may actually help the group to identify what exactly the policy is trying to achieve (e.g. number of developments permitted which encroach on specific identified views to protect etc).

Policy name and number	BE3- Parking Provision
Policy intent as provided to AECOM	All residential development proposals, including change of use to residential, must provide adequately for off-street parking in accordance with the standards set out in the Wiltshire Car Parking Strategy 2011 - 2026. A design-led approach should be taken to ensure parking is properly integrated into the layout of the scheme, minimises adverse impacts on surrounding uses, and facilitates traffic flow and accessibility for service and emergency vehicles.
Evidence source and type	Wiltshire Car Parking Strategy 2011-2026
Evidence analysis	It is appropriate and logical to base neighbourhood plan parking policies on local authority level parking standards, particularly where (as in most cases) the local authority standards are recommendations only- the neighbourhood policy can thus give them more ‘teeth’. However, monitoring and implementation evidence now needs to be gathered to determine the effects of the existing policy (see below).
Proportionality and gaps	In his report on the first neighbourhood plan, the Examiner required the policy to follow the Wiltshire Car Parking Strategy standards. It would be helpful, if the Steering Group has not already gathered such evidence, to understand the extent to which the community is comfortable/happy with parking provision for new development consented under BE3. If the community feels the parking thus provided has been excessive or insufficient, then there could be a case for setting location-specific parking standards, based firmly on specific, illustrated examples of where the community is unhappy with policy effects, and using them as a basis for a replacement policy.
Effectiveness of policy	As noted in the Examiner’s report, to be effective, parking policies need to comprise ‘a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency’. This was a quote from the 2012 NPPF, but the point still holds even though it has been replaced with the 2019 NPPF. In the new NPPF, the relevant text is paragraph 105 which goes further, as follows: ‘If setting local parking standards for residential and non-residential development,

	<p>policies should take into account:</p> <ul style="list-style-type: none"> a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. <p>It is clear that there is more to consider, therefore, when setting parking standards in the context of the 2019 NPPF than there was for the 2012 NPPF. As the Wiltshire Parking Strategy has not itself been updated, it is recommended that for an effective replacement policy, the existing standards are taken as a starting point, checked against evidence of real-world effects and applications, and then redrafted in the light of both the effects monitored and new NPPF paragraph 105.</p>
<p>Conformity check</p>	<p>Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. In order for this to happen, it would need to go further than the current Wiltshire Parking Strategy, drafted long before NPPF paragraph 105, and the latter takes priority. As such, the current policy will need redrafting on the basis of monitoring of its effects and taking into account all of a) to e) in NPPF paragraph 105. A recent example of how paragraph 105 was taken into account in a just-adopted neighbourhood plan is Queen Camel in South Somerset, where the examiner’s report⁴⁶ highlighted the importance of this paragraph.</p>
<p>Conclusion and recommendations</p>	<p>It would be helpful, if the Steering Group has not already gathered such evidence, to understand the extent to which the community is comfortable/happy with parking provision for new development consented under BE3. If the community feels the parking thus provided has been excessive or insufficient, then there could be a case for setting location-specific parking standards, based firmly on specific, illustrated examples of where the community is unhappy with policy effects, and using them as a basis for a replacement policy.</p> <p>In the new NPPF, the relevant text is paragraph 105 which gives many more factors to consider than previously when setting parking standards. As the Wiltshire Parking Strategy has not itself been updated, it is recommended</p>

⁴⁶ Available at <https://www.southsomerset.gov.uk/media/3359/queen-camel-ndp-final-examiner-report-010620.pdf>

that for an effective replacement policy, the existing standards are taken as a starting point, checked against evidence of real-world effects and applications, and then redrafted in the light of both the effects monitored and new NPPF paragraph 105.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. In order for this to happen, it would need to go further than the current Wiltshire Parking Strategy, drafted long before NPPF paragraph 105, and the latter takes priority.

Metrics which could be used to monitor this policy include provision of parking spaces per unit of new development delivered in the neighbourhood area (potentially by size of development).

Policy name and number	BE4- Heritage Assets
Policy intent as provided to AECOM	Development proposals within or affecting the Calne or Derry Hill Conservation Areas must take account of their distinctive characters, including their open spaces and natural features, and reflect these in the proposed layout, design, form, scale, mass, use of materials and detailing.
Evidence source and type	Community consultation Grade I, II* and II building listings Registered Park and Garden designation Scheduled Monument designation Planning (Listed Buildings and Conservation Areas) Act 1990 Calne Conservation Area Derry Hill Conservation Area
Evidence analysis	The evidence supporting the policy is appropriate, but the NPPF could also have been quoted. The relevant section in the 2019 NPPF is Chapter 16. There is also scope, in line with recommendations on policies BE1 and BE2 above, for more neighbourhood area-specific evidence to be added, for example a neighbourhood design code/guide would contain much that is relevant on the conservation and enhancement of existing heritage assets.
Proportionality and gaps	As with other built environment policies, there is scope to make the policy more neighbourhood area-specific- it is noted that in his report on the draft neighbourhood plan, the Examiner amended the policy to make it more locality-specific as the previous text was too generic. Any replacement policy could continue this direction of travel. For example, at present there appear to be no locally listed buildings in either Wiltshire or the neighbourhood area. While locally listed buildings are not protected by national policy, there is certainly scope for them to be considered as material considerations in planning applications and for a basic level of protection in neighbourhood plan policy. As such, it is recommended that for more neighbourhood area-specific policy, heritage/built environment evidence be gathered indicating if there are buildings C&CW considers are worthy of

	<p>adding to a new Local Heritage List, to be compiled and evidenced in line with Historic England Advice Note 7.⁴⁷ Buildings to be locally listed should be genuinely worthy of listing on objective criteria of local character and distinctiveness, not already be (nationally) listed, and may or may not be located within the Calne or Derry Hill conservation areas, although those that are will already have a greater degree of protection in national and local policy. Equally, though the boundary amendment of any existing (or the creation of any new) conservation area is not itself a neighbourhood plan matter, it may be that heritage evidence gathered to inform neighbourhood plan policy could have the secondary effect in the longer term of supporting such action on the part of Wiltshire.</p>
<p>Effectiveness of policy</p>	<p>Importantly, the recommendations above to make the policy as specific to the neighbourhood area and its two conservation areas as possible- namely by using evidence from a new design code and/or townscape assessment and also to develop a local list of buildings/heritage assets and then protect those buildings/assets in policy- will significantly improve policy effectiveness. More specific, locally-sensitive policies will always be more effective. This could mean policies specifically tailored to the neighbourhood area and/or policies specific to particular locations within it, if the evidence supports a need.</p>
<p>Conformity check</p>	<p>Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. There is no indication or evidence that this would not be possible, and the 2019 NPPF's basic requirements for the protection of heritage assets are little changed, if at all, from the 2012 NPPF. However, there are some new paragraphs with significant detail with the potential to inspire replacement policy- see, for example, paragraph 185 and its guidance on how heritage assets should be placed in their wider context and related clearly to local character and distinctiveness, which suggests that any replacement for BE4 would do well to cross-reference BE1 and BE2 to enhance the strength and effectiveness of all three policies and to demonstrate additional NPPF conformity.</p>
<p>Conclusion and recommendations</p>	<p>The evidence supporting the policy is appropriate, but the NPPF could also have been quoted. There is also scope, in line with recommendations on policies BE1 and BE2 above, for more neighbourhood area-specific evidence to be added, for example a neighbourhood design code/guide would contain much that is relevant on the conservation and enhancement of existing heritage assets across the neighbourhood area. As with other built environment policies, there is scope to make the policy more neighbourhood area-specific.</p>

⁴⁷ Available at <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

While locally listed buildings are not protected by national policy, there is certainly scope for them to be considered as material considerations in planning applications and for a basic level of protection in neighbourhood plan policy. As such, it is recommended that for more location-specific policy, heritage/built environment evidence be gathered indicating if there are buildings C&CW considers are worthy of adding to a new Local Heritage List, to be compiled and evidenced in line with Historic England Advice Note 7.

Importantly, the recommendations above to make the policy as specific to the neighbourhood area, to its heritage assets and to its two conservation areas as possible- namely by using evidence from a new design code and/or townscape assessment and also to develop a local list of buildings/heritage assets and then protect those buildings/assets in policy- will significantly improve policy effectiveness.

Any replacement policy would need to maintain conformity with national and local policy in order to meet the Basic Conditions. Refer in particular to NPPF paragraph 185 and its guidance on how heritage assets should be placed in their wider context and related clearly to local character and distinctiveness, which suggests that any replacement for BE4 would do well to cross-reference BE1 and BE2.

Metrics to monitor this policy may be difficult to obtain as compliance will be very individual to each development. The group could monitor whether recommendations of the council heritage officers on new applications in the conservation area were carried out in implementation of development, but this may be time consuming.

Policy name and number	NE3- Biodiversity
Policy intent as provided to AECOM	<p>In addressing Wiltshire Core Strategy Core Policy 50, development proposals for Calne and Calne Without should consider, assess and address their potential to:</p> <ul style="list-style-type: none"> • create additional habitat space, including roosting, nesting or shelter opportunities for wildlife; and • facilitate or include wildlife corridors; and • protect and enhance riparian corridors for protected species, such as otter, kingfisher and water vole, especially along the River Marden and the Wiltshire & Berkshire Canal to the west of Calne.
Evidence source and type	<p>(listed in supporting text:)</p> <p>Avon Vale Biodiversity Assessment 2013 Wiltshire Landscape Character Assessment Map/list of County Wildlife Sites, Wiltshire and Swindon Biological Records Centre Wiltshire Wildlife Reserve at Penn Wood</p> <p>(listed in EBL document:)</p> <p>Wiltshire Core Strategy Topic Paper 5- Natural Environment 2012 Habitats Regulations Assessment Wiltshire Core Strategy Habitats Regulation Assessment Update Wiltshire Biodiversity Action Plan Natural England Designated Sites</p>
Evidence analysis	<p>The supporting text and EBL document are rich in evidence sources, which is helpful in principle, but it is not at all clear to Plan users how the evidence listed above flowed into the most locally-specific elements of the policy most requiring evidence support, namely the three bullet points. In any replacement policy, the supporting/justifying text should flow much more clearly into the policy, particularly but not limited to the three bullet points. Taking each evidence document listed in the supporting text in turn: It is assumed that the reference</p>

to Avon Biodiversity Assessment 2013 is to the Avon Vales National Character Area Profile 2014⁴⁸. This is still up to date, but could be referenced more strongly- the current text simply states that C&CW accepts its findings, but for it to inform a stronger policy, it would be better to go into more detail, i.e. reference the Statements of Environmental Opportunity (SEOs), which is the key text that should inform local policies on biodiversity net gain, and state that C&CW will be expecting developers to have appropriate regard to the SEOs most relevant to their development in terms of delivering net biodiversity gains.

The Wiltshire Landscape Character Assessment is cited but it is not at all clear how it has informed the policy and given that it is more appropriate for this document to be referenced in a landscape policy rather than a biodiversity policy, it is likely that evidence and supporting text for any replacement policy need not reference it, particularly as there is no shortage of other evidence.

The mapping and list of County Wildlife Sites is, of course, relevant to biodiversity in general but it is not clear how it is relevant to this policy, given that neither of the places specifically mentioned in the policy (River Marden and Wiltshire and Berkshire Canal) appear to be county wildlife sites. At the same time, the places mentioned in the supporting text (the County Wildlife Sites and the Wiltshire Wildlife Reserve at Penn Wood) do not appear relevant to the policy. This is all quite confusing to plan users.

Turning to the Wiltshire Core Strategy Topic Paper 5, the Biodiversity Action Plan (now dated, as it was published in 2008, but still being used) and to the Defra Magic Map⁴⁹, which shows all Natural England designated sites, plan users will be none the wiser, as none of these sources specifically list either the River Marden or the Wiltshire and Berkshire Canal as habitats for protected species. While not doubting that these are indeed important habitats for otters, kingfishers and water vole, there is still a lack of clarity on the evidence supporting these important statements in the policy, and this should be remedied.

⁴⁸ Available at <http://publications.naturalengland.org.uk/file/5057323605164032>

⁴⁹ Available at <https://magic.defra.gov.uk/MagicMap.aspx>

What the Magic Map does show is that the only statutory nature designations in the neighbourhood plan area (County Wildlife sites and reserves being non-statutory) are the Calstone and Cherhill Downs and Morgan's Hill SSSIs. Both of these are assessed as having an 'unfavourable recovering' status. There could be potential, therefore, for any policy seeking net gain in biodiversity to seek developments contributing towards recovery of these SSSIs. This point could be discussed with Natural England.

For any neighbourhood plan policy in Wiltshire seeking net gain in biodiversity, the key evidence document is now the Council's 'Addressing Climate Change and Biodiversity Net Gain Through the Local Plan- Raising The Ambition' report.⁵⁰ This should be reviewed in detail and be quoted and referenced extensively in the supporting text. Chapters 3, 4 and 5 are the most relevant, and Policy Theme 2's approach to net gain forms an emerging structure for what a new policy might look like (though if a new Wiltshire Local Plan policy is adopted on the basis of this text first, the neighbourhood plan policy should ensure it does not restate it).

The EBL document lists the Habitats Regulations Assessment (HRA) as supporting evidence for the made policy. Likewise, the replacement Wiltshire HRA, for which the scoping report has already been produced⁵¹, could inform and be referenced in the new policy and its supporting text. At the time of writing, however, the scoping report for the new HRA contains no information specific to the neighbourhood plan area.

Finally, Council is currently preparing a new Green and Blue Infrastructure Strategy for Wiltshire⁵² which will replace the current strategy from 2013⁵³ and which particularly aims to improve local green and blue

⁵⁰ Available at https://www.wiltshire.gov.uk/media/5622/Addressing-Climate-Change-and-Biodiversity/pdf/Wiltshire_Local_Plan_Addressing_Climate_Change_and_Biodiversity_FINAL.pdf?m=637469175263630000

⁵¹ Available at https://www.wiltshire.gov.uk/media/5720/Wiltshire-Local-Plan-Review-Habitats-Regulations-Assessment-Scoping-Report/pdf/LPR_HRA_Wiltshire_HRA_Scoping.pdf?m=637460563180270000

⁵² At <https://www.wiltshire.gov.uk/planning-bio-green-blue-infrastructure#:~:text=The%20Wiltshire%20Green%20Blue%20Infrastructure%20%28GBI%29%20Strategy%20will,to%20the%20health%20and%20wellbeing%20of%20our%20communities.>

⁵³ At <https://cms.wiltshire.gov.uk/documents/s65707/GI%20report%20ESC%20291013.pdf>

	<p>infrastructure networks in and around towns (including Calne) to support sustainable growth. The Council website already contains an overview of the new emerging strategy, with more information due to be published in the summer of 2021. This should be taken into account when available and could be discussed with the LPA to coordinate efforts and join up existing and emerging networks.</p>
<p>Proportionality and gaps</p>	<p>In his report on the draft Calne Community Neighbourhood Plan, the Examiner noted that the draft policy required a net gain in biodiversity as part of development applications but that this would conflict with then-applicable Wiltshire and national policy by going further than it. As there was no evidence supporting this additional requirement, he struck it out and required the policy to reference and align with Wiltshire Core Strategy Policy 50.</p> <p>However, national policy has subsequently changed, and although Core Strategy Policy 50 still applies, it is now out of date for the purposes of national policy, which takes precedent. NPPF paragraphs 32 and 170 are most relevant, with 170 d) requiring policies to provide net gains for biodiversity. Paragraphs 174 b) and 175 d) are also supportive. In this context, C&CW are to be congratulated for a draft policy that was ahead of the game when it came to biodiversity net gains, and the changed policy context means the draft policy can be resurrected without needing detailed evidence, which is good news. In these specific circumstances, it would even be acceptable simply to restate NPPF requirements so that they become part of the statutory development plan for the neighbourhood area (the neighbourhood plan is part of the statutory development plan but the NPPF is not), although if there is local evidence to support policy wording adding to NPPF requirements, the policy could be even stronger. Assuming that the three bullets retained in the policy by the Examiner as points to ‘consider, assess and address [the] potential of’ are still supported by appropriate evidence (see evidence comments above) then these three bullets could stay and become neighbourhood-specific requirements.</p>
<p>Effectiveness of policy</p>	<p>Clearly, the more the policy can require net gains in biodiversity, the more effective it will be. The stronger the requirements, the more local evidence will be needed, and therefore evidence (see comments above) will be key to maximising effectiveness. Again, as with all policies forming replacements for ‘made’ policies, monitoring and implementation evidence for the ‘made’ policy will be important- i.e. what are the effects of the made policy, if any, and are there lessons to be learnt in terms, for example, of unintended effects, that could inform new policy wording?</p>

	<p>As noted above, the supporting text for policy BE2 contains information on habitats, wildlife, biodiversity and rural landscapes, which is not carried through to the policy itself; potentially it could be integrated with the supporting text for NE2 and NE3 (or their replacements) to inform those policies.</p> <p>Finally, there are also opportunities for the supporting text to link policy NE3 with others on the natural environment, design, and community infrastructure, as these matters clearly interrelate. However, as noted previously, overlap of policy text itself should be avoided.</p>
<p>Conformity check</p>	<p>As noted above, any replacement policy requiring net gains in biodiversity would now be in conformity with national policy in the NPPF, which takes precedence over Wiltshire Core Policy 50, which, though still adopted, is therefore now out of date for planning purposes and conformity with it is no longer necessary in terms of the Basic Conditions. Wiltshire themselves have recognised this through their ‘Addressing Climate Change and Biodiversity Net Gain Through the Local Plan’ evidence base document referenced above.</p>
<p>Conclusion and recommendations</p>	<p>It is not clear to Plan users how the evidence listed flowed into the most locally-specific elements of the policy most requiring evidence support, namely the three bullet points. In any replacement policy, the supporting/justifying text should flow much more clearly into the policy, particularly but not limited to the three bullet points. The supporting text could also link to other policies on the natural environment, community infrastructure, design and so on.</p> <p>There could be potential for any policy seeking net gain in biodiversity to seek developments contributing towards recovery of SSSIs in the plan area. This point could be discussed with Natural England. The group should also discuss the emerging Wiltshire Green and Blue Infrastructure Strategy with the LPA.</p> <p>For any neighbourhood plan policy in Wiltshire seeking net gain in biodiversity, the key evidence document is now the Council’s ‘Addressing Climate Change and Biodiversity Net Gain Through the Local Plan- Raising The Ambition’ report. This should be reviewed in detail and be quoted and referenced extensively in the supporting text.</p> <p>The NPPF now requires policies to provide net gains for biodiversity. In this context, C&CW are to be congratulated for a draft policy that was ahead of the game, and the changed policy context means the draft</p>

policy can be resurrected without needing detailed evidence. In these specific circumstances, it would even be acceptable simply to restate NPPF requirements so that they become part of the statutory development plan for the neighbourhood area (the neighbourhood plan is part of the statutory development plan but the NPPF is not), although if there is local evidence to support policy wording adding to NPPF requirements, the policy could be even stronger.

As with all policies forming replacements for 'made' policies, monitoring and implementation evidence for the 'made' policy will be important- i.e. what are the effects of the made policy, if any, and are there lessons to be learnt in terms, for example, of unintended effects, that could inform new policy wording?

Metrics which could be used to monitor this policy include area of additional habitat space created as part of development / projects, number of wildlife corridors created or connected and endangerment status of local protected species.

Policy name and number	NE4- Energy Conservation
Policy intent as provided to AECOM	Prospective developers should aim to be both aspirational and distinctive in terms of their developments within Calne and Calne Without making a substantial contribution to energy conservation.
Evidence source and type	Wiltshire Core Strategy (Core Policy 41)
Evidence analysis	<p>Core Policy 41 remains valid. As noted below, monitoring evidence on how the existing policy was implemented could and should inform any replacement policy.</p> <p>The group could also review the Centre for Sustainable Energy Locality Toolkit on Design ‘Neighbourhood Planning in a Climate Emergency’ Feb 2020⁵⁴, and the UK Green Building Council: Net Zero Carbon Buildings – A Framework Definition 2018⁵⁵. The government also keeps data tables on the number of energy performance certificates lodged on the Energy Performance Registers by local authority (however, not by parish)⁵⁶.</p>
Proportionality and gaps	<p>In his report on the draft Calne Community Neighbourhood Plan, the Examiner watered down the draft policy, because he felt that it conflicted with the Ministerial Planning Update Statement of March 2015, which was clear that ‘local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings’. Unfortunately, in 2021, this national policy still holds (it has now been incorporated into the 2019 NPPF at paragraph 150 b)), meaning that any replacement for NE4 would similarly have to be limited to ‘urging’ developers to aim for energy conservation rather than setting requirements for them to do so that go further than national requirements. Likewise, Core Strategy 41 remains the adopted policy. As such, even if there were new</p>

⁵⁴ At <https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf>

⁵⁵ At <https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/>

⁵⁶ At <https://www.gov.uk/government/statistical-data-sets/live-tables-on-energy-performance-of-buildings-certificates>

	<p>evidence locally that could support requirements of developers in this regard, the policy would have to continue to 'urge', 'encourage' or 'support' such measures rather than 'require' them. As such, there seems no alternative but to roll the policy forward unchanged into the next neighbourhood plan.</p>
<p>Effectiveness of policy</p>	<p>Despite the conclusion above that there appears no realistic alternative but to roll the policy forward unchanged into the next neighbourhood plan, any monitoring data held by either C&CW or Wiltshire in terms of how often NE4 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective while maintaining its conformity with national and local policy.</p>
<p>Conformity check</p>	<p>As currently worded, i.e. if rolled forward unchanged, the policy would still comply with the 2019 NPPF and with adopted and emerging Wiltshire policies. Any proposed changes to wording on the basis of implementation evidence (see above) should seek to maintain such conformity.</p>
<p>Conclusion and recommendations</p>	<p>The 2019 NPPF limits any replacement policy for NE4 to 'urging' developers to aim for energy conservation rather than setting requirements for them to do so that go further than national requirements. Likewise, Core Strategy 41 remains the adopted policy. As such, there seems no alternative but to roll the policy forward unchanged into the next neighbourhood plan.</p> <p>Nevertheless, any monitoring data held by either C&CW or Wiltshire in terms of how often NE4 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective while maintaining its conformity with national and local policy.</p> <p>As currently worded, the policy would still comply with the 2019 NPPF and with adopted and emerging Wiltshire policies. Any proposed changes to wording on the basis of implementation evidence (see above) should seek to maintain such conformity.</p>

Metrics which could be used to monitor this policy include energy efficiency / performance of new development or number of energy performance certificates lodged on register (although this data does not appear to be available at a level below local authority, unless individual planning applications were scrutinised).

Policy name and number	GA1- Sustainable Transport
Policy intent as provided to AECOM	<p>Development proposals must demonstrate how opportunities for the use of sustainable modes of transport are maximised. This should be achieved through maximising:</p> <ul style="list-style-type: none"> • the potential for cycling and walking throughout the site; and • linkages, including bus connections through to the relevant town or village centre, employment provision and services and facilities located elsewhere in Calne or Calne Without.
Evidence source and type	<p>(listed in supporting text:) Wiltshire Core Strategy 2011 Census data on car ownership</p> <p>(listed in EBL document:) Wiltshire Core Strategy Topic Paper 10 - Transport 2012 Wiltshire Core Strategy Topic Paper 10 – Transport Addendum 2012 Local Transport Plan 3 2011-2026 Wiltshire Local Development Framework - Strategic Transport Assessment</p>
Evidence analysis	<p>The supporting text sets out the evidence underpinning the policy in a clear and compelling way. In any replacement policy, evidence from the 2011 Census will still have to be used unless the policy is being drafted after results of the 2021 Census have been made available online, which will likely not be until a yet-to-be-announced point in 2022.</p> <p>In the EBL document, all links need to be updated.</p> <p>The Core Strategy has not yet been updated, and neither has Local Transport Plan 3, so these references remain valid at the time of writing.</p> <p>The Calne Area Transport Strategy (Atkins, February 2021)⁵⁷, already adopted by C&CW, is the key document providing more up-to-date and locally-specific information in the absence of new Census data. It should be used as a key element of the evidence underpinning any replacement policy for GA1. It comprises an early-stage</p>

⁵⁷ Available at <https://moderngov.microshadeapplications.co.uk/calnetc/documents/s4434/Calne%20Transport%20Strategy.pdf>

assessment (i.e. a longlist) of key transport interventions that may be required to accompany new growth envisaged for the neighbourhood area. It is recommended that, as a first step, the neighbourhood plan steering group review the longlist to determine the extent to which the new neighbourhood plan should or could support any or all of these interventions, and discusses emerging thinking with Wiltshire Council and the Calne Area Transport Group⁵⁸, seeking to ensure as ever, that the neighbourhood plan does not restate the requirements of the Local Plan. Additionally, as with all replacement policies, new text should be informed by monitoring and implementation data gathered on how made policy GA1 has been used in development decisions.

The most significant element of the overall evidence base that has changed between the original neighbourhood plan and its replacement is the significant growth in demand and infrastructure provision for electric vehicles (including e-bikes and scooters as well as cars), which clearly have a positive impact in terms of air quality and the Air Quality Management Area. As such, the greatest potential for updating the policy is in this regard. In terms of new policy and evidence that could be cited, the NPPF is strong- see in particular paragraphs 108 a) and 110 e). Supporting the NPPF is the Government's Road to Zero Industrial Strategy⁵⁹- see in particular Parts 2 and 3. The previously-mentioned Calne Area Transport Strategy also covers the potential for electric and zero-emissions vehicles in some depth.

Wiltshire has started building the strategic transport evidence base for its Local Plan Review, with the first relevant document being the Wiltshire Local Plan Transport Review (January 2021).⁶⁰ However, this is at a very early stage and, compared with the Calne Area Transport Strategy, there is very little neighbourhood-specific data within it. Nevertheless, it provides further evidence that County transport policy needs to be shifted towards electric and zero-emissions vehicles and could be signposted/referenced as appropriate in the policy supporting text. The LPA will also release further evidence soon to support progress on its Draft Local Plan.

⁵⁸ The document does not clarify the membership of Calne Area Transport Group, so it is possible the Town Council is already a member and/or has already input into some of the proposed interventions longlisted.

⁵⁹ Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

⁶⁰ Available at <https://www.wiltshire.gov.uk/media/5725/Wiltshire-Local-Plan-Transport-Review/pdf/Wiltshire-Local-Plan-Transport-Review.pdf?m=637460675515330000>

<p>Proportionality and gaps</p>	<p>The current policy is clear and easy to apply, and this clarity should be retained in any replacement. As noted above, since the original policy was drafted, the electric and zero-emissions evidence and policy has advanced significantly at national level, and there is potential for NPPF requirements to be embedded into the replacement policy given that the NPPF is not part of the development plan, but the replacement policy will be. For example, a third bullet point could be added to the existing policy text stating ‘infrastructure for charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations’. This would significantly strengthen the requirements for developers given that the adopted Wiltshire Core Strategy does not reference electric, low emission or plug-in vehicles, or the infrastructure needed to support them, at all. While such vehicles and the infrastructure they need are at least mentioned in Local Transport Plan 3 (2011) no requirements are set for them.</p>
<p>Effectiveness of policy</p>	<p>As with all other adopted policies, any monitoring data held by either C&CW or Wiltshire in terms of how GA1 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective. The additions recommended above in terms of electric and low emissions vehicles and supporting infrastructure have very significant potential to make the policy far more effective, not just in terms of the development applications it can shape, but also in terms of positive impacts on the Air Quality Management Area; Wiltshire’s 2021 Local Plan transport review indicates that similar policy in this regard is being shaped at Local Plan level, which will aid effectiveness.</p>
<p>Conformity check</p>	<p>Any replacement policy for GA1 that sought similar goals/outcomes as the made policy is very likely to be in conformity with relevant national and local policies, both adopted and emerging. The relevant paragraphs of the 2019 NPPF, as well as those already mentioned on electric and low-emission vehicles, are as follows: 102-104, 108 b) and c), 110 a)-d), and 111.</p>
<p>Conclusion and recommendations</p>	<p>The supporting text sets out the evidence underpinning the policy in a clear and compelling way. However, in the EBL document, all links relating to the topic area need to be updated. The Calne Area Transport Strategy (Atkins, February 2021) , already adopted by C&CW, is the key document providing more up-to-date and locally-specific information in the absence of new Census data. It should be used as a key element of the evidence underpinning any replacement policy for GA1. It is recommended that, as a</p>

first step, the neighbourhood plan steering group review the longlist to determine the extent to which the new neighbourhood plan should or could support any or all of these interventions, and discusses emerging thinking with Wiltshire Council and the Calne Area Transport Group , seeking to ensure as ever, that the neighbourhood plan does not restate the requirements of the Local Plan.

Additionally, as with all replacement policies, new text should be informed by monitoring and implementation data gathered on how made policy GA1 has been used in development decisions.

In topic terms, the greatest potential for updating the policy is to ensure it covers electric and low-emission vehicles and the infrastructure they need. The NPPF, the Government's Road to Zero Industrial Strategy, Wiltshire Local Plan Transport Review, and Calne Area Transport Strategy are all relevant here.

The current policy is clear and easy to apply, and this clarity should be retained in any replacement. A third bullet point could be added to the existing policy text stating 'infrastructure for charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations'.

As with all other adopted policies, any monitoring data held by either C&CW or Wiltshire in terms of how GA1 was applied in development decisions and what, if any, effects (including unintended effects) it had in shaping those decisions would be helpful in terms of possible changes to wording to make the policy more effective.

Any replacement policy for GA1 that sought similar goals/outcomes as the made policy is very likely to be in conformity with relevant national and local policies, both adopted and emerging.

Metrics which could be used to monitor this policy include transport intervention schemes delivered which are mentioned in the Calne Transport Strategy, transport mode share (although this cannot be regularly determined), or number/length of walking and cycling routes delivered / improved.

<p>Policy name and number</p>	<p>GA2- Highway Impact</p>
<p>Policy intent as provided to AECOM</p>	<p>Development proposals that detrimentally impact the highway network in terms of congestion and/or safety must include for the appropriate mitigation of these impacts by highway improvements and/or financial contributions for the measures required.</p> <p>New developments which involve alterations to existing highways and the provision of new highways must meet the following design criteria:</p> <ul style="list-style-type: none"> • Provide suitable measures to accommodate traffic (including at peak times); • Improve the safety and attractiveness of the street scene; and • Integrate appropriate traffic-calming measures within the development. <p>Development proposals, which by virtue of their scale, nature or location are likely to adversely affect air quality through Calne town centre and the Air Quality Management Area, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.</p> <p>Major development that will result in HGV movements through Calne town centre and the Air Quality Management Area will need to set mitigation measures in their Transport Assessments. Mitigation measures may include defined routing, restrictions on times of movements or the use of low emission vehicles. Proposals that demonstrate alternative routing proposals using the main road network to avoid Calne town centre and the Air Quality Management Area will be sought where feasible.</p>
<p>Evidence source and type</p>	<p>(listed in supporting text:) Wiltshire Highway Standards April 2016 Consultation Survey Town Masterplan www.crashmap.co.uk Calne Air Quality Management Area (listed in EBL document:)</p>

	<p>Wiltshire Core Strategy Topic Paper 10 - Transport 2012 Wiltshire Core Strategy Topic Paper 10 – Transport Addendum 2012 Local Transport Plan 3 2011-2026 Wiltshire Local Development Framework - Strategic Transport Assessment</p>
<p>Evidence analysis</p>	<p>The evidence listed is wide-ranging, detailed and relevant, but some of it is now quite old (for example, the Topic Papers) and should be replaced by more up-to-date/emerging data such as the previously-mentioned Calne Area Transport Strategy and Wiltshire Local Plan Transport Review, with the aforementioned caveats that both documents comprise early-stage assessments and that more detailed evidence may be gathered by Wiltshire Council as the Local Plan develops further. The former document is already adopted by C&CW and is now a key document in terms of up-to-date and locally-specific transport information. It should be used for the time being as a key element of the evidence underpinning any replacement policy for GA2, and the extent to which it could and should inform neighbourhood plan policy alongside Local Plan policy (seeking, as ever, to avoid the former restating the latter) should be discussed with Wiltshire Council.</p> <p>Another useful source of evidence would be any air quality monitoring data available for the neighbourhood area. The monitoring site at Calne New Road 2 appears no longer functional,⁶¹ with the latest reporting period available being 2015⁶². However, other air quality monitoring sites appear to still be functional⁶³. If any of the measures are in excess of government guidelines, this should be sought to be addressed/alleviated through this policy.</p>
<p>Proportionality and gaps</p>	<p>As noted previously in this EBPD, the Examiner on the now made Neighbourhood Plan appears to have concentrated his energies only on policy wording and not suggested amendments or improvements to the supporting text. However, this does not change the fact that the supporting text for all neighbourhood plan policies is extremely important, because it justifies and explains the policy for plan users, including, crucially, for those applying the policy.</p>

⁶¹ See https://www.airqualityengland.co.uk/local-authority/?la_id=394

⁶² At <https://www.airqualityengland.co.uk/assets/downloads/airqualityengland-statistics-report-WIL2-2015link.pdf>

⁶³ At <https://www.sustainablecalne.org.uk/scpc.html>

	<p>The supporting text for this policy is very long and detailed but the level of local detail included is not reflected in the policy itself (though it is accepted that this could be partly as a result of the Examiner’s changes to it). Nevertheless, in any replacement policy, it would be advisable for there to be a much clearer link between the supporting text and the policy itself in terms of length and detail (i.e. if the policy is not long, the supporting text need not be, and vice versa).</p> <p>The topic areas covered in the current supporting text, however, do relate well to policy content, namely traffic congestion, road safety, the Air Quality Management Area in Calne and, finally, HGV movements.</p> <p>It is clear from the supporting text that any replacement policy for GA2 should have much local evidence to draw on. The challenge is to determine if there is anything actually missing from the current policy as worded, which is comprehensive, clear and proportionate. It may be that GA2 could and should be rolled forward unchanged- the critical factor in whether it should or should not be is in the data monitoring its current effectiveness (see below). Ahead of this exercise, and in line with previous comments on GA1, there is potential for a fourth bullet point to be added on integration of zero and low-emission vehicle infrastructure into new developments.</p>
<p>Effectiveness of policy</p>	<p>Though important for all policies, any data on how GA2 was implemented, the effects it had, and if any of those effects were unintended, is particularly crucial here, because it will determine the extent to which the policy should survive into the next neighbourhood plan. The Town Council should work with Wiltshire to determine which development applications were shaped by GA2 and in what way- this data should then be used to determine if the policy needs to be made more locally-specific or (as is often the case with traffic and transport policies) its current ‘blanket’ approach across the whole plan area is in fact preferable as this covers transport issues across all locations.</p>
<p>Conformity check</p>	<p>Any replacement policy for GA2 that seeks similar goals/outcomes as the made policy is very likely to be in conformity with relevant national and local policies, both adopted and emerging. The relevant paragraphs of the 2019 NPPF are as follows: 102 a), d), 104 a), 109, 110 c) and d), and 111.</p>
<p>Conclusion and recommendations</p>	<p>The evidence should be updated with the Calne Area Transport Strategy and Wiltshire Local Plan Transport Review (and any other relevant local plan evidence as it emerges), with the aforementioned caveats that these documents currently comprise early-stage assessments. The former document is already adopted by C&CW.</p>

The group should also seek to ascertain air quality monitoring data if available. If any measurements exceed government guidelines, this should be addressed through this policy.

The supporting text for this policy is very long and detailed but the level of local detail included is not reflected in the policy itself. In any replacement policy, it would be advisable for there to be a much clearer link between the supporting text and the policy itself in terms of length and detail (i.e. if the policy is not long, the supporting text need not be, and vice versa).

The current policy as worded is comprehensive, clear and proportionate. It may be that GA2 could and should be rolled forward unchanged- the critical factor in whether it should or should not be is in the data monitoring its current effectiveness. Ahead of this exercise, and in line with previous comments on GA1, there is potential for a fourth bullet point to be added on integration of zero and low-emission vehicle infrastructure into new developments.

Any replacement policy for GA2 that seeks similar goals/outcomes as the made policy is very likely to be in conformity with relevant national and local policies, both adopted and emerging.

Metrics which could be used to monitor this policy include number of accidents in the neighbourhood area (from www.crashmap.co.uk), air quality monitoring data, and/or public health indicators (e.g. IMD health deprivation & JSNA data mentioned above).

Appendix 2: Relevant ‘made’ Neighbourhood Plan policies

Alongside the advice presented in this report, C&CW may find it helpful to refer to the following Neighbourhood Plans that have been ‘made’ or adopted, and many of which AECOM advised as the Neighbourhood Planners developed their plans. All of the Neighbourhood Plans listed are available online and were made in 2021.

<i>‘Made’ Neighbourhood Plan</i>	<i>Date ‘made’</i>	<i>Relevant policy/policies</i>	<i>Corresponding Calne Community NP policy</i>
Newton Poppleford and Harpford (East Devon)	2021	H3: Outside the Built-up area boundary	H2 – Affordable Housing
Camley Street (London Borough of Camden)	2021	HS HO1 – Affordable Housing Provision	H2 – Affordable Housing
Durham City (Durham)	2021	D3: Affordable Housing	H2 – Affordable Housing
Edenthorpe (Doncaster)	2021	3 – Housing Type and Mix	H3 – Housing Mix
Everton (Bassetlaw)	2021	E9 – Providing Appropriate House Types and Sizes to meet Local Needs	H3 – Housing Mix
Seeton with Eastburn and Silsden (Bradford)	2021	SWES7 – Infrastructure for new Development	H5 – Phasing of Development
Shenley (Hertsmere)	2021	SH6 – Local knowledge for good design (see 6.2 Design and Development Briefs)	H5 – Phasing of Development

<i>'Made' Neighbourhood Plan</i>	<i>Date 'made'</i>	<i>Relevant policy/policies</i>	<i>Corresponding Calne Community NP policy</i>
West Grinstead (Horsham)	2021	8 - Employment	WS1 – Employment
Alderley Edge (Cheshire East)	2021	AI1 Alderley Edge Development Strategy	WS1 – Employment
Durham City (Durham)	2021	E3: Retail Development	WS2.1 – Calne Town Centre
Radlett (Hertsmere)	2021	RV1 – A Vibrant Village Centre	WS2.1 – Calne Town Centre
Colwall (Herefordshire)	2021	CF1 Supporting a range of goods and services in the village centre	WS3 – Local Neighbourhood Shopping
Burntwood (Lichfield)	2021	B4 – Local Shops	WS3 – Local Neighbourhood Shopping
North Loose (Maidstone)	2016	HTWA Policy 1: Promotion of Healthy Communities	CF1 – Health, Leisure and Wellbeing
Willenhall (Coventry)	2018	7- Health and Well-being	CF1 – Health, Leisure and Wellbeing
Stretton Grandison (Herefordshire)	2021	SG5 - Protecting Local Landscape Character and Wildlife	BE1 – Integration and Landscaping
Hailsham (Wealden)	2021	HAIL HS1 - Natural and amenity green space	BE1 – Integration and Landscaping

<i>'Made' Neighbourhood Plan</i>	<i>Date 'made'</i>	<i>Relevant policy/policies</i>	<i>Corresponding Calne Community NP policy</i>
Gainsborough (West Lindsey)	2021	NPP 6 – Ensuring High Quality Design	BE2 – Design Principles for Local Distinctiveness
Alderley Edge (Cheshire East)	2021	AE12: Local and Historic Character (see 1. Local Character)	BE2 – Design Principles for Local Distinctiveness
Darnhall (Cheshire West)	2021	RCLE 5 - Design	BE2 – Design Principles for Local Distinctiveness
Durham City Council (Durham)	2021	T2: Residential Car Parking	BE3 – Parking Provision
Thundridge (east Herts)	2021	THFS7 – Sustainable Transport & THH5 Vehicle Parking in Residential Developments	BE3 – Parking Provision
Belper (Amber Valley)	2021	NPP11 – Protecting Heritage Assets	BE4 – Heritage Assets
Kirk Langley (Amber Valley)	2021	HER2 – Protecting the Conservation Area, listed buildings and other heritage assets	BE4 – Heritage Assets
Fleckney (Harborough)	2021	F3: Ecology and Biodiversity	NE3 – Biodiversity
Stretton Grandison (Herefordshire)	2021	SG5 Protecting Local Landscape Character and Wildlife	NE3 – Biodiversity

<i>'Made' Neighbourhood Plan</i>	<i>Date 'made'</i>	<i>Relevant policy/policies</i>	<i>Corresponding Calne Community NP policy</i>
Billingshurst (Horsham)	2021	3 - Energy Efficiency and Design	<i>NE4 – Energy Conservation</i>
Bramber (Horsham)	2021	B4 – Energy Efficiency and Design	<i>NE4 – Energy Conservation</i>
Bury Village (Huntingdonshire)	2021	ISF1 – Sustainable Transport	<i>GA1 – Sustainable Transport</i>
Alderley Edge (Cheshire East)	2021	AE14 – Sustainable Transport Routes	<i>GA1 – Sustainable Transport</i>
Southwater (Horsham)	2021	SNP4 – Keeping our roads moving	GA2 – Highway Impact
Bury Village (Huntingdonshire)	2021	ISF3 – Highway Impact	GA2 – Highway Impact

Appendix 3: Further guidance on Neighbourhood planning policy

Further advice can be found in the following places:

The full range of technical support packages available through Locality can be found at: <https://neighbourhoodplanning.org/about/technical-support/>

Advice on writing planning policies is can be found by following the link below:

<https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>

Advice on drafting Neighbourhood Development Orders and bringing forward community-led housing is available on the Locality website:

<https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-development-orders-community-right-build-orders/>

National Planning Practice Guidance on Neighbourhood Planning can be found here: <https://www.airqualityengland.co.uk/assets/downloads/airqualityengland-statistics-report-WIL2-2015link.pdf>

These best practice toolkits and guidance, together with a final health check, which is available free of charge, will aid the Forum in ensuring the Plan meets the Basic Conditions that enable the revised draft neighbourhood plan to proceed to referendum.

