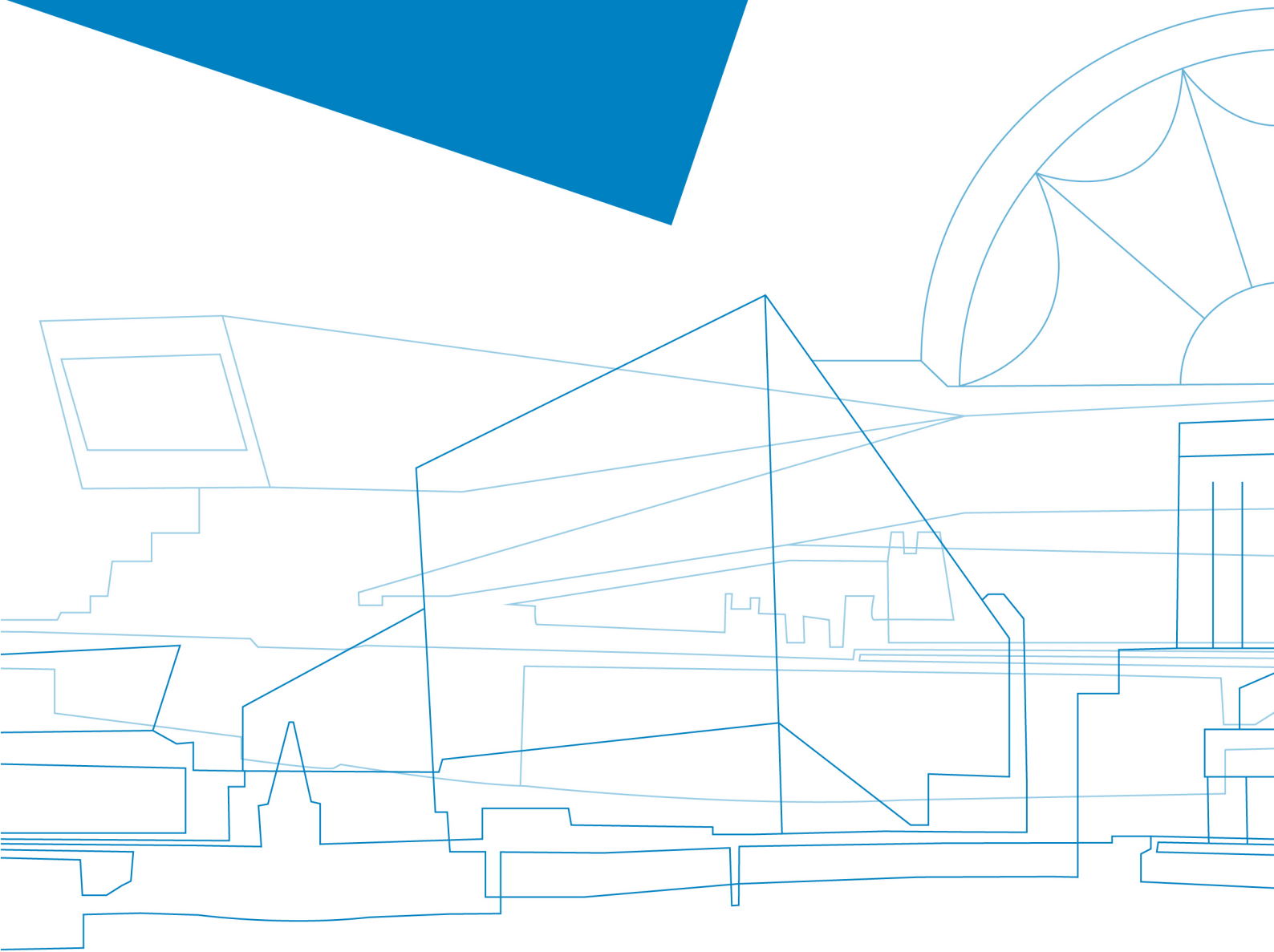


**Evidence and Policy Review
Warminster Neighbourhood Plan**

**Version 1.2
April 2022**



Contents

1. Introduction.....	3
1.1 Purpose of the Report	3
1.2 Methodology	3
2. Existing Neighbourhood Plan	5
2.1 Reasons for Reviewing the Plan	5
2.2 Plan Format and Content	6
2.3 Structure of Policies	7
2.4 Effectiveness of Policies	7
2.5 Issues not Dealt with by Policies	14
3. National and Local Policies.....	15
3.1 Changes at National Level	15
3.2 The Local Plan	16
3.3 Existing Local Plan Policies	18
3.4 Planning for Warminster 2021.....	22
4. Revision of the Neighbourhood Plan	23
4.1 Status of the Existing Neighbourhood Plan.....	23
4.2 Process for Revision	23
4.3 The Basic Conditions	25
5. Evidence	26
5.1 Existing Structure for Policies	26
5.2 Suggested Structure for Policies	27
5.3 Stakeholders	29
5.4 Evidence Requirements for Policies.....	29
6. Recommendations	48
6.1 Structure and Format	48
6.2 Policies.....	48
6.3 Evidence	49
6.4 Process	49
Appendix 1	50
Model Design Policy	50
Contact.....	52

1. Introduction

1.1 Purpose of the Report

The purpose of this report is to support the proposed review of the Warminster Neighbourhood Plan.

The Neighbourhood Area is the whole of Warminster Town Council's area.

Locality has commissioned the work, through the national neighbourhood planning support programme.

1.2 Methodology

Assessment of the 'made' Neighbourhood Plan

The policies of the existing Warminster Neighbourhood Plan are assessed in Chapter 2, based on discussions with the Town Council and a critical desktop review.

The structure and format of the plan is also assessed.

National and Local Policies

Recent changes to the planning system are highlighted in Chapter 3, including revision of the National Planning Policy Framework 2021, the new National Model Design Code, and legislative changes.

Local Plan policies are considered, as a basis for taking forward the Neighbourhood Plan review.

Process for Reviewing Neighbourhood Plans

The statutory process for revising neighbourhood plans is set out in Chapter 4 of this report.

Review of Evidence

Chapter 5 considers evidence requirements. This is based on a suggested structure for policies for a revised Neighbourhood Plan, which is based on existing policies and other plan content and discussion with the Town Council.

Warminster Neighbourhood Plan Review

The evidence underpinning the existing plan has been reviewed and recommendations are made on any need to update the evidence or for additional evidence, based on the suggested structure for policies.

Recommendations

General recommendations are made in Chapter 6 for the review and modification of the Warminster Neighbourhood Plan.

Appendix

A model design policy is included, as an example of drafting more detailed and specific requirements for development to meet.

2. Existing Neighbourhood Plan

2.1 Reasons for Reviewing the Plan

An initial fast review of the Neighbourhood Plan was undertaken and a meeting was held with Warminster Town Councillors to discuss the reasons for reviewing the plan and possible issues with the existing plan.

Reasons behind the intention to review and update the Neighbourhood Plan include:

- Responding to the review of the Wiltshire Local Plan;
- The existing Neighbourhood Plan does not meet aspirations;
- Concern over the lack of 5 Year land supply in Wiltshire.
- To take account of the impacts of COVID and climate change.

On specific issues, the Town Council had the following concerns:

Issue	Possible Approach in a Revised NP
Addressing the 5 year land supply.	The NP could meet housing need for the Neighbourhood Area, based on a new housing needs assessment. This could address the 5 year land supply issue for two years. A housing needs survey could be commissioned or an evidence-based figure could be requested from the Local Planning Authority. The NP would need to fully meet housing need if it is to be effective in dealing with the 5 year land supply issue.
Affordable housing is not affordable.	Affordable housing is dealt with by national policy and would be strategic local policy. So, the NP could not amend proportions or thresholds without robust evidence, including consideration of viability. However, the NP could include policies on how affordable housing is provided.
Unadopted roads	This is a matter for highways legislation. However, the NP could include design guidance on layouts and the public realm.
Design Code	The revised NP could include much more specific policies on matters like sustainable development, character and biodiversity. External standards such as Building for Life could be converted into policy (referring to external standards is rarely effective).

Warminster Neighbourhood Plan Review

Conservation Areas	More specific policies could be drafted for conservation areas. These could identify redevelopment opportunities.
Community Facilities	The NP could seek to protect community facilities.
Flooding	The NP should not repeat national policies or Local Plan policies on flooding, but could provide a locally specific dimension, for example the impact of surface water run off on the Town Centre.
Natural Environment	Policies could be drafted to identify and protect the specific values and qualities of specific landscapes.

2.2 Plan Format and Content

The existing Neighbourhood Plan has a clear layout and consistent format. There is a clear hierarchy of headings. It looks like a professional document.

References to National and Local policy will need to be updated in the new plan.

There is a very complex set of visions and objectives in the existing Neighbourhood Plan. This includes two visions, one in bullet points on page 10, and one a fairly lengthy narrative on page 11. Page 12 includes a diagram of themes, but without explanation. Page 13 includes a combination of paragraphs and bullet point objectives, including matters outside of the scope of planning.

For the new plan, this could be simplified into a concise single vision, followed by a planning-focused set of aims. Aims would be better than objectives as a neighbourhood plan is a policy document and objectives tend to be action-based. There should be a direct correlation between the vision, aims and policies. All aims should have at least one policy to achieve them and all policies should relate to at least one of the aims.

In many parts of the document, there is a blurring of planning matters and actions or projects, which fall outside of the scope of Neighbourhood Plan policy. This means that many issues identified by the Plan are not translated into planning policies. For example, heritage is not really addressed in policy.

Chapter 9 on 'delivering the plan' appears largely unrelated to its status as part of the statutory development plan for the area. This chapter could highlight how the plan is used in the development management process, including the application of Section 38 of the Planning and Compulsory Purchase Act 2004. Section 38 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise, so is of fundamental importance.

The appendices would be better as separate background documents, rather than being part of the plan itself. Appendix A2 is out-of-date. External technical documents should not be included in the new, revised plan.

2.3 Structure of Policies

The general structure of policies is clear and concise, starting with background information and then setting principles. The grouping of policies in themed chapters provides a clear and logical structure.

The tables of principles suggest that they are based on community engagement, but with no mention of evidence. It would be better in the new plan to make clear that the principles are derived from both evidence and community engagement.

The principles listed for each policy do not relate well to the policies in each chapter. Some relate to policies in other chapters, some not. Many deal with non-planning matters. In the new plan, if a similar 'principles' format is used, all principles should be planning focused and then translate into one or more policies.

The policies include justification text, after the policy itself. It is unclear how this brief justification relates to the material that precedes each policy, which also appears to be justification. For the new plan, the justification after the policy could be omitted, for clarity. It may be beneficial to include 'interpretation' text after each policy, to clarify how it should be applied.

2.4 Effectiveness of Policies

The policies in the 'made' Neighbourhood Plan were tested at examination and found to meet the Basic Conditions. However, this does not necessarily mean that they will then be effective in the development management process.

The following pages consider the policies of the existing Neighbourhood Plan to assess whether they set clear requirements for development to meet.

An assessment of how the plan is being used in the development management process was commissioned by Warminster Town Council, based on analysis of eight planning applications (Place Studio Report, January 2022). This finds that policies are usually (but not always) being referred to in officer reports, but with little detailed analysis. The assessment highlights the lack of detail or specific requirements in the policies.

These findings accord closely with the following analysis of policies.

Warminster Neighbourhood Plan Review

Chapter	4. A Place to Live
General Comments	<p>Many of the principles (4.2, page 17) deal with non-housing matters, or matters that could affect housing proposals, but also have wider relevance. This means that most of the principles do not translate into housing policy.</p> <p>There are no policies on specific housing issues, such as housing standards.</p>
Policy L1 – Design	<p>This policy seeks to apply the Building for Life 12 standard. Whilst these are useful principles for housing, policies that seek to apply external standards tend to be ineffective, as they rely on the developer or decision-maker reading lengthy documents and picking out the relevant points.</p> <p>In addition, any revision of the external document renders the policy out-of-date. This is now the case with Policy L1.</p>
Suggestions for the New Plan	<p>The suggestion for the new plan would be to draft detailed design policy, based on Building for Life principles.</p> <p>There is a new version of Building for Life, 'Building for a Healthy Life'.</p> <p>Building for Life principles could also inform other policies relating to land use, mix of uses, community facilities and other relevant matters.</p> <p>It is worth considering whether to move the design policy to its own chapter, so that it also relates to non-housing development.</p> <p>Consideration should be given to adding policy on housing standards.</p>

Warminster Neighbourhood Plan Review

Chapter	5. A Place to Work
General Comments	As with housing, many of the employment principles (5.2, page 23) do not translate into employment policy.
Policy W1 – Existing Employment Sites	The policy is very vague and arguably inconsequential. It does not set any requirements for developers that want to change employment uses to other uses, for example demonstrating that the employment use is not viable.
Suggestions for the New Plan	<p>The new plan could set clearer requirements for developers, for example supporting specific kinds of employment. This should be done within the context of Local Plan policy, so as to avoid repetition.</p> <p>Home working could be supported by a fast broadband infrastructure policy for all new houses.</p>

Warminster Neighbourhood Plan Review

Chapter	6. A Place to Enjoy
General Comments	<p>The Policy includes community actions. These are boxed, so it is fairly clear that it is separate to the main part of the plan. However, it may be better to move actions to a separate document, as they are not part of the statutory neighbourhood plan.</p> <p>Much of the text on pages 28-33 relates to projects and actions, rather than providing the rationale and evidence to support the specific policies. Most of the text is therefore irrelevant. The text on page 36 appears to read in part as policy. This is confusing.</p>
Policy E1 – Existing Leisure Facilities	<p>The policy does set out the circumstances in which loss of a facility would be accepted. However, this does not include where there is no need for the facility.</p> <p>It is unnecessary to say ‘whether publicly or privately owned’. The policy applies regardless of ownership.</p>
Policy E2 – New Leisure Facilities	The policy is vague and does not include definitions or thresholds, so appears to be inconsequential and unenforceable.
Policy E3 - Youth-Related amenities	The policy appears to relate to specific developments. There is no consideration of impacts. The policy title is problematic, as age is not a factor in determining which Use Class development falls within.
Policy E4 – Athenaeum Centre	The policy is unclear. It is not clear what ‘integrate’ means in terms of development. The policy appears to be inconsequential.
Policy E5 – Surrounding Environment	The policy is vague and generic, with no locally-specific requirements. It appears to be inconsequential.
Policy E6 – Local Green Space	The policy successfully designates two Local Green Spaces. The reference to ‘very special circumstances’ is vague and undefined, so the requirements for development are unclear. Obviously, national policy refers to LGS having similar protection as Green Belts, though it should be noted that the purpose for LGS (protecting special community value) is different to the five purposes for Green Belts.
Suggestions for the New Plan	In the new plan, the supporting text that precedes the policies in each chapter should focus specifically on the

Warminster Neighbourhood Plan Review

	<p>content of the policies. This applies to other policy chapters too.</p> <p>A detailed policy on new leisure facilities could support development, in suitable locations, subject to impacts. This could replace policies E2 , E3 and E4.</p> <p>A locally-specific policy could be prepared to protect the green and natural environment. This may be better in a specific environment chapter.</p> <p>A clearer and more detailed policy could be drafted with regard to development affecting Local Green Space.</p>
--	---

Warminster Neighbourhood Plan Review

Chapter	7. Town Centre
General Comments	The text and diagram on pages 40 to 43 relate poorly to the later policy.
Policy TC1 – Town Centre Regeneration	Other than the general reference to specific locations, it is unclear what kind of development is supported. No impacts are considered. There is a risk that the policy could be used to support unsustainable development, harmful to the vitality and viability of the centre.
Suggestions for the New Plan	The new plan could include more detailed policy or policies for the Town Centre, setting parameters for development to meet, with careful consideration of impacts.

Warminster Neighbourhood Plan Review

Chapter	8. Getting Around
General Comments	The table on page 49 focuses on a range of matters outside of the scope of planning.
Policy GA1 – Central Car Park	The policy sets requirements for a travel plan, but sets no requirements for development itself to meet. A Neighbourhood Plan should not set submission requirements. The policy appears to be inconsequential.
Policy GA2 – West Urban Extension Integration	The policy appears to relate to works by the highways authority, rather than setting requirements for development to meet. The application of the policy is unclear.
Policy GA3 – Pedestrian Links	The policy appears to relate to the highway or public realm in the Town Centre, rather than setting requirements for development to meet. It is unclear how the policy would be applied.
Policy GA4 – Rights of Way	The policy is vague, so it is unclear how it would be applied or in what circumstances planning applications should be refused.
Suggestions for the New Plan	<p>A policy could be drafted to set requirements for all development in terms of transport and movement. This could emphasise pedestrian and cycle requirements (active travel).</p> <p>Clearer policy could be drafted on rights of way, with an emphasis on avoiding harmful impacts.</p>

2.5 Issues not Dealt with by Policies

The existing Neighbourhood Plan does not contain policies on several issues, which could be address in the revised version.

Subject	Possible Policy in the New Plan
Heritage	<p>A Conservation Area policy could set out essential characteristics of the area, to guide new development.</p> <p>Other specifically local heritage issues could also be addressed in policy.</p> <p>Generic heritage policies add little value, so should not be included.</p>
Design	<p>Beyond the housing policy referring to 'Building for Life 12', there is no design policy.</p> <p>A detailed policy could be drafted to set design requirements for the whole area. This could address sustainable design, townscape and character, pedestrian movement, public realm, landscape and other matters.</p>
Environment	<p>A policy or policies could address landscape and environmental protection, including biodiversity.</p>
Traffic safety and congestion	<p>National policy makes clear that impacts must be 'severe' to warrant refusal of planning permission. Policy could address roads or junctions where existing safety or capacity problems are severe or approaching severe.</p>

3. National and Local Policies

3.1 Changes at National Level

There have been various changes to national legislation and policy, since the last Neighbourhood Plan was made.

National Planning Policy and Guidance

A revised National Planning Policy Framework 2021 was issued last year and made some changes, particularly relating to housing. This means that most of the paragraph numbers have changed throughout the document.

The new NPPF is here:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Further revisions are likely in the near future.

Planning Practice Guidance is continually being updated. This is available here:

<https://www.gov.uk/government/collections/planning-practice-guidance>

A National Model Design Code was also issued in 2021. This has useful content for supporting local design policies.

<https://www.gov.uk/government/publications/national-model-design-code>

Use Classes and Permitted Development

A new Use Class E has been introduced and includes many uses from the old A and B1 Use Classes. This should be considered when developing new policies for employment and the Town Centre.

Changes have been made to permitted development rights relating to changes from offices to residential uses.

The changes to Use Classes and permitted development rights have implications for the scope of policies to promote development of brownfield sites or to protect the vitality of Town Centres.

Planning Reform

The Planning White Paper 2020 proposed radical reform of the planning system, including a proposed zoning system for Local Plans. Following adverse reaction from a range of MPs, stakeholders and local communities, the White Paper has been reviewed. Proposals to digitise the planning system are being taken forward. Recent statements by ministers would suggest that many of the other reforms, including the zoning system, are not being taken forward. There will be no separate planning bill.

The recently issued Levelling Up White Paper appears to reinforce neighbourhood planning, simplify Local Plans and undertakes to engage with communities for specific developments.

3.2 The Local Plan

The adopted Local Plan is The Wiltshire Core Strategy, adopted on 20 January 2015. More detail on policies is given in 3.3.

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

There is also the Wiltshire Housing Site Allocations Plan, adopted February 2020. Relevant site allocations within the Warminster Neighbourhood Area are H2.7 Bore Hill Farm and H2.8 Boreham Road.

<https://www.wiltshire.gov.uk/planning-whsap>

The Local Plan is currently being reviewed. Close liaison with the Local Planning Authority is recommended, to ensure that the emerging Local Plan and Neighbourhood Plan work together. This is especially important in meeting housing need and growth.

As part of this process, Planning for Warminster was issued in January 2021. This is described in more detail in 3.4.

General conformity will be considered against the adopted Local Plan that is in place at the time of the independent examination for the revised Neighbourhood Plan. At present, this would involve strategic policies in the Wiltshire Core Strategy 2015 and the Wiltshire Housing Site Allocations Plan 2020. However, if a new Local Plan is adopted prior to the examination of the Neighbourhood Plan, then its strategic policies would be used as a basis for considering general conformity.

Even if the emerging plan is not adopted, it is necessary to consider its policies and evidence base for two reasons:

- The evidence base of the Local Plan can also be part of the evidence base for the neighbourhood plan.
- A Local Plan adopted after the Neighbourhood Plan is made may reverse some of the changes made by the Neighbourhood Plan.

Warminster Neighbourhood Plan Review

It is advisable to work closely with the Local Planning Authority, to ensure that the two emerging plans are broadly compatible.

3.3 Existing Local Plan Policies

The adopted Wiltshire Core Strategy has six strategic objectives:

Strategic objective 1: delivering a thriving economy

Strategic objective 2: addressing climate change

Strategic objective 3: providing everyone with access to a decent, affordable home

Strategic objective 4: helping to build resilient communities

Strategic objective 5: protecting and enhancing the natural, historic and built environment

Strategic objective 6: ensuring that adequate infrastructure is in place to support our communities

Core Policy 1 Settlement Strategy identifies Warminster as a Market Town (pages 40-43). These 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.

Core policy 2 Delivery Strategy includes land West of Warminster, for employment (6 hectares) and 900 dwellings.

Warminster Area Strategy begins on Page 194 and includes an Allocations and Strategic Sites map (Fig. 5.22) on Page 198. Core Policy 31 is shown on the following page.

Core Policy 31

Spatial Strategy: Warminster Community Area

Development in the Warminster Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.

Market Towns: Warminster

Large Villages: Chapmanslade, Codford, Corsley, Heytesbury, and Sutton Veny

Small Villages: Chitterne, Crockerton, Horningsham, Longbridge Deverill, Maiden Bradley, Stockton and Upton Scudamore

The following Principal Employment Areas will be supported in accordance with Core Policy 35: Crusader Park, Warminster Business Park, Woodcock Road Industrial Estate and Northlands Industrial Estate.

Over the plan period (2006 to 2026), 6 ha of new employment land (in addition to that already delivered or committed at April 2011) and approximately 2,060 new homes will be provided. Of these about 1,920 dwellings should occur at Warminster, including land identified to the west of Warminster, between the existing built form and the A350 for strategic growth.

West Warminster Urban Extension 6 ha employment 900 dwellings

The strategic allocation will be brought forward through a masterplanning process agreed between the community, local planning authority and the developer and should be in accordance with the development templates shown by Appendix A.

Approximately 140 homes will be provided in the rest of the Community Area. Growth in the Warminster Community Area over the plan period may consist of a range of sites in accordance with Core Policies 1 and 2.

Development proposals in the Warminster Community Area will need to demonstrate how the relevant issues and considerations listed in paragraph 5.158 will be addressed.

Warminster Neighbourhood Plan Review

Table 5.18 Delivery of Housing 2006 to 2026 - Warminster Community Area

	Requirement 2006-26	Housing already provided for		Housing to be Identified	
		Completions 2006-14	Specific permitted sites	Strategic sites	Remainder to be identified
Warminster Town	1,920	504	199	900	317
Remainder	140	67	24	0	49
Community Area total	2,060	571	223	900	366

Wiltshire Core Strategy 2015

The Local Plan also includes detailed policies on a range of subjects. The most relevant to the proposed Neighbourhood Plan (based on the draft structure for policies in 5.2) are as follows.

Core Policy 34 supports employment development in Market Towns and **Core Policy 35** deals with loss of employment space. The Neighbourhood Plan could focus on more specific types of employment.

Core Policy 38 deals with retail and leisure uses outside of existing centres. Neighbourhood Plan policy could add locally-specific detail to this.

Core Policy 39 deals with tourism development. Neighbourhood Plan policy could guide development to suitable locations within Warminster.

Core Policy 43 relates to affordable housing and **Core Policies 45 and 46** deal with housing needs and specialist needs. Warminster Neighbourhood Plan policy could focus more on housing standards and how affordable provision is made.

Core Policy 48 includes conversion of rural buildings, but is fairly generalised. Neighbourhood Plan policy could add detail or include more locally-specific requirements.

Core Policy 49 deals with protection of rural services and facilities. Neighbourhood Plan policy could highlight key community facilities in the area.

Core Policy 50 deals with biodiversity and geodiversity. **Core Policy 52** deals with green infrastructure. **Core Policy 51** deals with landscape, but is fairly vague, so leaves good opportunity for the Neighbourhood Plan to provide locally-specific requirements for specific landscapes.

Core Policy 57 deals with design and place-shaping and covers a range of issues, but with little on pedestrian experience. Neighbourhood Plan policy

Warminster Neighbourhood Plan Review

could use Building for a Healthy Life to inform policy, with greater emphasis on pedestrians.

Core Policy 58 deals with the historic environment, but adds little to national policy. Neighbourhood Plan policy could be locally-specific.

Core Policies 60 and 61 deal with transport in development in very general terms. The Neighbourhood Plan could set more specific requirements, especially for walking and cycling.

Core Policy 67 deals with Flood Risk. The Neighbourhood Plan should not repeat this, but could add locally-specific requirements.

Neighbourhood Plan policies should not repeat Local Plan policies. The Neighbourhood Plan can add detail, a local dimension or can deal with planning matters not covered by the Local Plan.

3.4 Planning for Warminster 2021

The recently published 'Wiltshire Council Local Plan – Looking to the Future – Planning for Warminster 2021' is a useful consideration in revising the Neighbourhood Plan. Draft priorities in this document are:

- I. Deliver well designed homes to meet local needs alongside associated transport infrastructure.
- II. Promote sustainable transport modes through an integrated transport network.
- III. Strengthen the role of the town centre by encouraging spending; improving accessibility; better managing traffic and parking; and safeguarding heritage assets.
- IV. Redevelop Warminster central car park and explore the potential for an expansion of the GP surgery on to the site.
- V. Manage, and where possible, reduce flood risk.
- VI. Improve leisure facilities in line with the Wiltshire Council Leisure Services Review.

These are relevant to many of the policies suggested for the new Warminster Neighbourhood Plan, but there are notable absences, which could be added to the list:

- Finding local solutions to address climate change and promote biodiversity;
- Protecting, enhancing and realising the potential of Warminster's natural and historic environments;
- Promoting sustainable design and placemaking.

The document discusses a range of issues, including housing need, employment, infrastructure, Town Centre and key sites. Further references are made to this document in the following analysis of evidence.

The document is here:

https://wiltcc1-prd.gosshosted.com/media/5663/Planning-for-Warminster/pdf/WLP_Market_Town_Planning_for_Warminster_FINAL_19-01-2021_.pdf?m=637466662709430000

4. Revision of the Neighbourhood Plan

4.1 Status of the Existing Neighbourhood Plan

The existing Neighbourhood Plan would remain in force until a positive outcome at referendum for the new Plan.

4.2 Process for Revision

Fast Track

There is a fast track process for making minor changes to neighbourhood plans, but it would not be suitable for the level of change proposed for the Warminster Neighbourhood Plan. Therefore, revision of the Warminster Neighbourhood Plan would need to follow a similar process to the original Plan.

Early Actions

The intention to revise the Neighbourhood Plan has been publicised, together with the reasons for reviewing, on a recently published (Feb 2022) Neighbourhood Plan-specific website.

The Town Council is being supported by consultants Place Studio in early stage engagement on the Plan review. Early engagement focuses on checking and updating key local issues and priorities.

The suggested policy structure for the new plan (see 5.2) could form a basis for engagement in moving forward.

The evidence base from the previous plan will need to be updated and additional evidence is likely to be required. This is covered in more detail in Chapter 5 of this report.

Policies

A suggested structure for policies has been formulated (Chapter 5), to clarify the evidence requirements and also to inform community and stakeholder engagement.

Policy drafting should be based on the updated evidence base, also taking account of the outcomes of engagement. This also applies to any site allocations or changes to the settlement boundary, if being made. Engagement will be an essential part of the selection process for sites or settlement changes, including with landowners directly affected.

The draft plan will need to be submitted for screening to determine the need for detailed Strategic Environmental Assessment (SEA) or Habitat Regulations Assessment (HRA). These would need to be commissioned, if required.

Warminster Neighbourhood Plan Review

Consultation

The Town Council would need to agree the consultation draft of the new Neighbourhood Plan.

The plan would be subject to regulation 14 consultation, for a 6-week period. This would need to meet the requirements of The Neighbourhood Planning (General) Regulations 2012 (as amended) and also consultation case law.

Representations would need to be considered and the Plan could then be amended, where necessary.

Submission

The Town Council would need to approve the submission (Regulation 15) version of the Plan and the supporting statements, comprising the Consultation Statement and the Basic Conditions Statement.

The Neighbourhood Plan, a plan of the Neighbourhood Area and the supporting documents would need to be submitted to the Local Planning Authority (LPA). The LPA would check that proper process had been followed and then publicise the Plan (Regulation 16 publicity) for a 6-week period and also appoint an Independent Examiner. The Town Council would need to agree the choice of Independent Examiner.

Independent Examination and Referendum

The Independent Examination will consider whether the Neighbourhood Plan meets the Basic Conditions and also human rights and other legal requirements.

If the examiner finds that the amended plan meets the Basic Conditions and also the amendments would not change the nature of the Plan, then a referendum may not be necessary. However, this is unlikely to be the case for the revision of the Warminster Neighbourhood Plan.

Normally, examinations are conducted through written representations, though a hearing is also a possibility. The examiner will prepare a report setting out whether the plan meets the Basic Conditions, with modifications if necessary.

The LPA must consider the examiner's report and consider whether the Plan meets the Basic Conditions and make any modifications necessary. The modified plan will then be publicised.

A referendum will be organised. The Neighbourhood Plan must obtain a majority 'yes' vote. If a yes vote is obtained, the Neighbourhood Plan becomes part of the Statutory Development Plan, replacing the existing Neighbourhood Plan.

4.3 The Basic Conditions

To meet the Basic Conditions, the revised Neighbourhood Plan must:

- have regard to national policies and guidance.
- contribute to the achievement of sustainable development.
- be in general conformity with the strategic policies contained in the development plan for the area.
- not breaching EU obligations (equivalence in UK law).
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

In addition, the plan must be compatible with human rights legislation.

5. Evidence

5.1 Existing Structure for Policies

The existing plan is structured around chapters based on policy themes, and including one or more policies on those themes follows:

Chapter	Theme of Chapter	Policies
A Place to Live	Housing (design)	There is one policy in this chapter (L1), referring to Building for Life 12 (now superseded by Building for a Healthy Life). There are no policies on housing mix, standards or other housing matters.
A Place to Work	Employment	The one policy seeks to protect existing employment sites (W1).
A Place to Enjoy	Community facilities.	Policies seek to protect existing community facilities (E1). One policy seeks 'contributions' for play and amenity spaces, but without detail or definition (E2). Other policies deal with potential projects (E3, E4). One policy addresses green space and environment, but without specific requirements for development (E5). This sits uncomfortably in the chapter. Local Green Space is designated (E6).
Town Centre	The Town Centre	There is one policy (TC1), generally supporting regeneration, but without setting parameters or standards for the development to meet. There is no policy to protect the vitality of the Town Centre.
Getting Around	Transport and movement	One policy sets submission requirements (GA1), but sets no requirements for the actual development to meet, so is unenforceable. Other policies deal with highway and public realm matters, so are not really planning policies (GA2 and GA3). The remaining policy (GA4) states that public rights of way will be protected, but without clear measures to achieve that protection.

5.2 Suggested Structure for Policies

The following table suggests a structure for policies in the new Neighbourhood Plan.

The structure is based on:

- The existing policies;
- Discussion with the Town Council on aspirations for the new plan;
- Identification of issues raised in the existing Plan, but which are not translated into policy.

More detail on the possible content of policies is given in 5.4.

Warminster Neighbourhood Plan Review

Chapter	Theme	Policies in the new Plan
A Place to Live	Housing and community	<ol style="list-style-type: none"> 1. Housing growth. 2. Housing standards. 3. Housing mix and affordable housing. 4. Community facilities. 5. Local Green Space.
Economy and Town Centre	Employment, tourism and Warminster Town Centre	<ol style="list-style-type: none"> 1. Employment. 2. Tourism and visitor economy. 3. Town centre (viability and vitality).
Environment, Heritage and Design	Natural environment, heritage character, and sustainable design.	<ol style="list-style-type: none"> 1. Natural environment. 2. Sustainable Design. 3. Warminster Conservation Area. 4. Local Heritage. 5. Flood Risk.
Getting Around	Transport and walking	<ol style="list-style-type: none"> 1. Sustainable transport. 2. Paths.

5.3 Stakeholders

The List of stakeholders on Page 8 of the existing Neighbourhood Plan could be approached, requesting any recent or updated evidence that they may have. Stakeholder mapping could identify other key stakeholders.

Engagement with local business could also provide a useful insight into impacts from COVID, Brexit and other recent changes.

5.4 Evidence Requirements for Policies

The following pages consider existing evidence to support the policies envisaged for the new neighbourhood Plan, and identify any additional evidence needed.

The analysis is based on the suggested structure of policies in 5.2.

At this stage, the structure includes policy themes only, rather than any detail on content. The following analysis is therefore based on general evidence requirements. Once the detail of policy becomes apparent, need for further evidence may become apparent.

Warminster Neighbourhood Plan Review

Policy	Housing growth.
Scope	The Neighbourhood Plan will need to accommodate housing growth to meet local need, if it is to be effective in resisting 5 year land supply arguments. It is currently unclear whether this would involve changes to the settlement boundaries or site allocations.
Existing Evidence	<p>The LPA is updating the Local Plan, so is considering housing need at district-wide level.</p> <p>The Wiltshire Site Allocations Plan 2020 is supported by five topic papers setting out process and methodology, housing land supply and viability. The Plan is also supported by a Sustainability Appraisal, Habitat Regulations Assessment, Equality and Diversity Impact Assessment and other statements.</p> <p>These documents may also form part of the evidence base for the review of the Neighbourhood Plan.</p> <p>The local authority's Strategic Housing Market Assessment (SHMA) was issued in 2017.</p> <p>The local authorities Brownfield Land Register was updated in 2019.</p> <p>Wiltshire Council Local Plan – Looking to the Future – Planning for Warminster 2021 deals with housing need on pages 3 and 4. This includes at Paragraph 29:</p> <p><i>The Warminster Neighbourhood Plan can select sites for development for new homes, business and other uses to meet local needs and work would focus first on identifying opportunities using previously developed land. The pool of sites provided here is a starting point for any greenfield sites.</i></p>
Additional Evidence	<p>The 'Planning for Warminster' document deals with housing need in general terms.</p> <p>To ensure that the Neighbourhood Plan provides a robust response to speculative development based on 5 Year land supply considerations, it is necessary to obtain an evidence-based growth figure, by undertaking a housing need assessment.</p> <p>Any gap between housing need and capacity already in place would need to be addressed by site allocations, amendment of settlement boundary or other means. There would need to be an open and transparent process for making this decision, including criteria and options, and this could identify additional evidence requirements.</p> <p>Discussions should take place with the LPA to discuss the Local Plan review and evidence being compiled to support that. Ongoing</p>

Warminster Neighbourhood Plan Review

	<p>liaison with the LPA is essential, to ensure that the approaches to growth in the emerging Local and Neighbourhood Plans are compatible and complimentary.</p> <p>The results of the 2021 Census will start to be published in March 2022, and should be factored into consideration of housing need.</p>
--	--

Information on Local Housing Need in Wiltshire is here:

<https://www.wiltshire.gov.uk/housing-local-housing-needs>

Warminster Neighbourhood Plan Review

Policy	Housing Standards
Scope	The Neighbourhood Plan could set standards for housing to meet, for example relating to space standards, facilities and amenity.
Existing Evidence	Space standards are given in Technical housing standards – nationally described space standard 2015.
Additional Evidence	<p>The need for bin and cycle storage for new housing is fairly self-explanatory.</p> <p>The plan could include requirements for new dwellings to have access to external amenity space, for example in the form of gardens, balconies, shared space or nearby public space.</p>

Technical housing standards – nationally described space standard 2015 is available here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012976/160519_Nationally_Described_Space_Standard.pdf

The National Model Design Code is here:

<https://www.gov.uk/government/publications/national-model-design-code>

Building for a Healthy Life is here:

https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf

Warminster Neighbourhood Plan Review

Policy	Housing Mix and Affordable Housing
Scope	<p>The Local Plan policy review will involve updating data on housing need. This will include consideration of results of the 2021 Census, which will start to be published in March 2022. This will then feed into affordable housing and housing mix policies in the Local Plan.</p> <p>The burden of evidence on the Neighbourhood Plan would be considerable if the intention was to modify Local Plan housing mix or affordable housing policy. There could be issues in meeting the Basic Conditions (general conformity with strategic local policy).</p> <p>Any increase in affordable housing provision would also need to accord with national policy and guidance and include detailed assessment of viability implications.</p> <p>The best options for the Neighbourhood Plan may therefore be as follows:</p> <ol style="list-style-type: none"> 1. To avoid setting proportions or thresholds for affordable housing, but to focus on identification of housing to meet particular needs (such as encouraging smaller housing) or on how affordable provision is provided, for example through integration into the development (tenure blind) and support for First Homes. This would involve a lesser depth and breadth of evidence. 2. Request that the local planning authority make available evidence to support affordability and housing mix policies in the emerging Local Plan, and draft policy for the Neighbourhood Plan which reflects their intentions for a Wiltshire-wide policy. This would bridge the gap until the adoption of the new Local Plan.
Existing Evidence	<p>The evidence base for the Wiltshire Site Allocations Plan 2020 should be considered. This plan was supported by five topic papers setting out process and methodology, housing land supply and viability. The Plan is also supported by a Sustainability Appraisal, Habitat Regulations Assessment, Equality and Diversity Impact Assessment and other statements.</p>
Additional Evidence	<p>The housing needs assessment mentioned for the housing growth policy could also be used to inform policies on housing mix and affordable housing.</p> <p>The local planning authority is compiling evidence on housing need for Wiltshire.</p>

Warminster Neighbourhood Plan Review

	<p>Analysis of how affordable housing has been provided in the past few years would be useful. This could include consideration of whether it is of lesser specification than market housing.</p> <p>The LPA should have figures on completion for build, type and tenure of housing (due spring 2022).</p> <p>Also, identification of gaps in existing housing provision would be useful in informing policy.</p>
--	--

The Wiltshire Housing Site Allocations Plan and Supporting documentation is here:

<https://www.wiltshire.gov.uk/article/1081/Wiltshire-Housing-Site-Allocations-Plan>

Planning Practice Guidance on housing need is here:

<https://www.gov.uk/guidance/housing-needs-of-different-groups>

Warminster Neighbourhood Plan Review

Policy	Community Facilities
Scope	The Local Plan protects community facilities. The Neighbourhood Plan could identify and support facilities to address gaps, subject to impacts.
Existing Evidence	The idea of the 15 minute neighbourhood highlights the benefits of maintaining and expanding a mix of uses and community facilities in easy walking distance.
Additional Evidence	Evidence on local community facilities used to support the old plan could be updated. This could include identification of gaps in local provision, which currently results in the need to travel to facilities elsewhere.

More information on 15 minute neighbourhoods can be found here:

<https://www.rtpi.org.uk/find-your-rtpi/rtpi-english-regions/rtpi-london/london-calling-newsletter/15-minute-cities20-minute-neighbourhoods/>

Warminster Neighbourhood Plan Review

Policy	Local Green Space
Scope	Policy would take forward existing LGS.
Existing Evidence	<p>The designations were made in the previous plan. These were subject to examination and successfully designated. However, one of the spaces has since been contested (though not through legal challenge to the Plan).</p> <p>The criteria for LGS designation is now in Paragraphs 101-103 of the NPPF 2021.</p>
Additional Evidence	<p>Additional evidence and analysis would only be required if adding new LGS, or modifying existing LGS.</p> <p>Consistency of approach is essential. Only planning considerations should be taken into account, within the context of NPPF policies on LGS.</p>

Planning Practice Guidance on LGS is here:

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Warminster Neighbourhood Plan Review

Policy	Employment
Scope	To add to existing Local Plan policy, the NP could promote flexible working, including shared workspace close to where people live and ensuring that all dwellings have high speed broadband infrastructure within the site.
Existing Evidence	<p>The existing Neighbourhood Plan includes assessment of local employment and employment sites and their capacity (5.1 and 5.3).</p> <p>The Swindon and Wiltshire Functional Economic Market Area Assessment was published December 2016.</p> <p>Wiltshire Council Local Plan – Looking to the Future – Planning for Warminster 2021 states at Paragraph 20:</p> <p><i>On current evidence, further employment land is not needed at Warminster. 6ha of employment land is allocated in the existing Wiltshire Core Strategy. Core Policy 35 of the Wiltshire Core Strategy supports Crusader Park/Warminster Business Park, Woodcock Road Industrial Estate and Northlands Industrial Estate as Principal Employment Areas. Employment land supply has been reviewed and the existing supply is available and capable of meeting the needs over the plan period to 2036.</i></p> <p>Whilst additional site allocations are not required, the nature of employment has changed, so the Neighbourhood Plan could respond to the increasing flexibility in live/work patterns.</p>
Additional Evidence	<p>The assessment of employment sites should be updated.</p> <p>It would be useful to gain an understanding of recent changes to employment and live/work patterns resulting from COVID. This may have implications for demand for offices, need for flexible workspace near to where people live and home working.</p> <p>Gaining such insight could include data-based evidence and engagement with local businesses. Wiltshire Chamber of Commerce may have useful data.</p>

Information on economic development in Wiltshire is here:

<https://www.wiltshire.gov.uk/economic-regeneration>

The Swindon and Wiltshire Functional Economic Market Area Assessment is here:

https://www.swindon.gov.uk/downloads/download/888/swindon_and_wiltshire_functional_economic_market_area_assessment_fema

Warminster Neighbourhood Plan Review

Policy	Tourism and Visitor Economy
Scope	Policy in the Neighbourhood Plan could be more locally-specific than the policy in the Local Plan.
Existing Evidence	Various web sites set out Warminster's (and Wiltshire's) offer for tourists and visitors.
Additional Evidence	<p>The impact of COVID on tourism should be assessed. Obviously, there is a changing context, so certain assumptions on recovery may need to be made.</p> <p>For tourism involving open land or development in the rural area, it will be necessary to consider possible impacts on sensitive landscapes, biodiversity, habitats and historic environments.</p>

Wiltshire Council's web site includes a tourism page:

<https://www.wiltshire.gov.uk/article/1876/Travel-and-tourism>

Visit Wiltshire has a page with the Tourism Strategy and business plan:

<https://www.visitwiltshire.co.uk/partners/tourism-strategy>

Warminster Neighbourhood Plan Review

Policy	Warminster Town Centre
Scope	<p>Policy could support the diversification of uses and ensure that shop fronts are retained to ground floor frontages.</p> <p>Town centre policies will need to take account of the E Use Class and permitted development rights for commercial to residential changes of use (and the way these rights apply in designated conservation areas).</p>
Existing Evidence	<p>The Warminster Town Plan 2012 and its evidence base may still be relevant, but would need updating.</p> <p>Planning for Warminster 2021 includes material on the Town Centre.</p>
Additional Evidence	<p>The impact of COVID on the Town Centre should be assessed, for example any vacancies, closures, etc.</p> <p>The High Street Task Force web site contains a wealth of material on high streets, including identification of the 25 priorities for high streets, many of which could translate into planning policy.</p> <p>Assessment of the Town Centre could be made against these priorities, as part of the evidence base for the Neighbourhood Plan. Priorities relevant to planning could then be translated into policy.</p>

The High Street Task Force's web site is here:

<https://www.highstreetstaskforce.org.uk>

The 25 priorities for High Streets are here:

<https://www.highstreetstaskforce.org.uk/frameworks/25-vital-and-viable-priorities/>

Warminster Neighbourhood Plan Review

Policy	Natural Environment
Scope	A locally-specific policy could be drafted, with individual clauses to protect the specific characteristics of different kinds of designated landscape.
Existing Evidence	<p>Policy should be locally-specific, rather than setting vague requirements.</p> <p>The Local Planning Authority has records of designated landscapes, including map-based boundaries. For example, this includes AONBs, SSSIs, and LNRs.</p> <p>The mitigation hierarchy in BS42020:2013 could be used to inform policy drafting.</p> <p>The Environment Act 2020 has implications for certain kinds of development in terms of achieving biodiversity net-gain.</p>
Additional Evidence	<p>A key landscape map should be prepared, showing designated landscapes, waterways and other landscape features, to support policy development.</p> <p>For each landscape type, the key qualities could be identified, together with threats to those qualities.</p> <p>The Wiltshire Wildlife Trust is likely to have useful data.</p>

Information on Wiltshire's landscapes is here:

<https://www.wiltshire.gov.uk/planning-landscape-conservation>

Information on Landscape Character Areas is here:

<https://data.gov.uk/dataset/64f2fc19-ac0b-457c-969d-ca397dddc33c/wiltshire-council-local-landscape-character-areas>

RTPI guidance on biodiversity is here:

<https://www.biodiversityinplanning.org/news/rtpi-guidance-on-biodiversity-in-planning/>

Warminster Neighbourhood Plan Review

Policy	Sustainable Design
Scope	<p>Policy could build-in Building for Healthy Life issues, and place greater focus on pedestrian needs, permeability, connectivity, social use of space, etc.</p> <p>Design policy could address matters like townscape and character, pedestrian convenience, materials, green design and other matters.</p> <p>For design, character and heritage policies, care is required to avoid being over-prescriptive on stylistic matters, so as not to suppress creativity or prevent green design. The character of the area is based on architectural diversity, with vernacular elements, but also more formal architecture (reflecting wider national and international influences). Development should complement the area's architectural diversity, rather than promoting imitation of one period or type of building.</p>
Existing Evidence	<p>The National Model Design Code was issued in 2021. This contains useful guidance to support design policies.</p> <p>Building for Life 12 has been superseded by Building for a Healthy Life, and its principles could be translated into policies.</p> <p>There are numerous publications on the relationship between design, economy, health and well-being, sustainability, and other benefits.</p>
Additional Evidence	<p>Analysis of recent development could highlight good and poor design and its implications. For example, recent housing could be assessed for pedestrian permeability and connectivity.</p> <p>Vernacular materials for buildings and also traditional boundary treatments could be identified and encouraged in new development.</p> <p>Where external standards are used, the key planning principles should be drafted directly into policy or policies. For example, 'Building for Life 12' (now 'Building for a Healthy Life') would translate to policies on urban design, community facilities, transport/movement and other policies.</p> <p>A model design policy that includes 'Building for Life' principles is included at Appendix 1.</p>

Warminster Neighbourhood Plan Review

The National Model Design Code is here:

<https://www.gov.uk/government/publications/national-model-design-code>

Building for a Healthy Life is here:

https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%20020%20Brochure_3.pdf

Warminster Neighbourhood Plan Review

Policy	Conservation Areas
Scope	<p>Policy could set out the specific spatial and townscape characteristics and palette of materials for Warminster Town Centre Conservation Area.</p> <p>Similar policy could also be developed for other conservation areas.</p>
Existing Evidence	<p>The West Wiltshire 'Warminster Town Centre Conservation Area Assessment' (2006) is available on-line in draft form, but does not appear on Wiltshire Council's list of conservation area documents. The draft document is lengthy and quite descriptive.</p> <p>As with the design policy, Warminster Town Centre Conservation Area policies should avoid being prescriptive on stylistic matters, recognising that the character of the area is based on architectural diversity, with vernacular elements and more formal architecture.</p>
Additional Evidence	<p>Key elements of character would need to be identified, such as townscape and spatial character, predominant scale or height, materials, and other characteristics.</p>

The West Wiltshire draft Warminster Town Centre Conservation Area character assessment is here:

[https://cms.wiltshire.gov.uk/Data/Cabinet%20\(WWDC\)/20061213/Agenda/cabinet-13-12-06-item18-app1.pdf](https://cms.wiltshire.gov.uk/Data/Cabinet%20(WWDC)/20061213/Agenda/cabinet-13-12-06-item18-app1.pdf)

National Trust guidance on Heritage in Neighbourhood Plans is here:

<https://nt.global.ssl.fastly.net/documents/neighbourhood-planning-and-heritage-guidance.pdf>

Warminster Neighbourhood Plan Review

Policy	Local Heritage
Scope	Policy could be based on specific local heritage issues, avoiding repetition of Local Plan of national policy.
Existing Evidence	The Wiltshire Historic Environment Record gives details of heritage, including non-designated assets.
Additional Evidence	<p>Generic heritage policies should be avoided, as should repetition of national or local policy.</p> <p>Heritage policies that work best are those that relate to specific local heritage issues. Evidence requirements would depend on the type of heritage involved or on a specific heritage asset and the issues affecting them.</p>

Information on the Wiltshire Historic Environment Record is here:

<https://www.wiltshire.gov.uk/article/889/Archaeology-and-historic-environment-record>

National Trust guidance on Heritage in Neighbourhood Plans is here:

<https://nt.global.ssl.fastly.net/documents/neighbourhood-planning-and-heritage-guidance.pdf>

Warminster Neighbourhood Plan Review

Policy	Flood Risk
Scope	Policy could augment Local Plan policy, looking at impacts in the local area where flooding takes place.
Existing Evidence	Wiltshire's Local Flood Risk Management Strategy 2015.
Additional Evidence	Localised evidence of flooding in recent years should be compiled, to support any locally-specific policy.

Strategic Flood Risk Assessment is dealt with here:

<http://pages.wiltshire.gov.uk/planningpolicyevidencebase/strategicfloodriskassessment.htm>

Warminster Neighbourhood Plan Review

Policy	Sustainable Transport
Scope	Policy could set out requirements for development, with emphasis on sustainable modes, cycling and walking. Capacity or safety pressure points could be identified.
Existing Evidence	<p>Transport data for Wiltshire is available.</p> <p>Policy could include 'Building for a Healthy Life' principles, for example around pedestrian permeability and connectivity. This could cross-reference to the design policy.</p> <p>The Government's Decarbonising Transport Plan (2021) sets out a vision for future transport and aims to address the climate agenda, improve health and wellbeing, create better places to live whilst providing ways of travelling which are affordable and reliable.</p>
Additional Evidence	The policy could also address safety congestion by highlighting junctions or sections of road where there are severe or approaching severe problems. These would need to be evidenced, based on highways data, accident records, or other evidence relating to safety and/or congestion/capacity. The highways authority could be approached.

Transport data is here:

<https://www.wiltshireintelligence.org.uk/key-issues/transport/>

Building for a Healthy Life is here:

https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf

The Decarbonising Transport Plan 2021 is here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

Warminster Neighbourhood Plan Review

Policy	Paths
Scope	Policy could ensure that development affecting footpaths considers impacts.
Existing Evidence	Public rights of way are identified across Wiltshire.
Additional Evidence	Evidence of harm to public rights of way or assessment of threats from development could inform policy drafting.

Information on public rights of way in Wiltshire is here:

<https://www.wiltshire.gov.uk/recreation-rights-of-way>

6. Recommendations

6.1 Structure and Format

The existing Neighbourhood Plan has a clear overall structure and consistent formatting and this could also be reflected in the revised Plan. A different cover would be useful to allow easy differentiation between the old and new versions.

A single concise vision could replace the two visions in the existing Plan. Any aims should be planning focussed. There should be a close correlation between the vision/aims and the policies. Each aim should be delivered by at least one policy and each policy should relate to at least one of the aims.

To keep the Plan as concise as possible, detailed technical evidence documents should not be included in the plan itself. Rather the Plan could make reference to external evidence documents, relevant to the policies.

The text preceding policies should be specifically focused on justifying the policies, and omit non-planning issues. Essentially, the text should provide a clear planning rationale and refer to relevant evidence to support each of the policies.

Projects and actions could be put in a separate document, as they are not part of the statutory neighbourhood plan.

6.2 Policies

Redrafting of all policies is recommended, to make the Plan more effective. Policies should set clear requirements for development to meet, but avoid being over-prescriptive.

A suggested structure for policies is given in Chapter 5 (5.2).

Effective policies include:

- Having a clear and consistent structure.
- Clear and concise planning rationale and references to relevant evidence to support each policy.
- Setting clear requirements for development to meet, using precise and unambiguous language.
- Avoiding being over-prescriptive or setting unreasonable requirements.

An interpretation or guidance note could be added after policies, giving examples of how the policy should be applied.

Common policy drafting mistakes include:

- Drafting policies as statements, aspirations or narrative.
- Dealing with non-planning matters, projects and actions.
- Setting out submission requirements for planning applications, rather than setting clear tests for development itself.
- Repetition of national or local policies.
- Setting vague or generic requirements.
- Multiple policies on the same issue, with differing and inconsistent requirements.

Once policies are drafted, a health check is recommended. This could check whether there are any issues in terms of meeting the Basic Conditions, but also assess the likely effectiveness of policies in the development management process. The health check should take place prior to the Regulation 14 consultation.

6.3 Evidence

The submission plan should include rationale and evidence to justify and support all policies. It is not necessary to include technical reports or detailed evidence in the plan itself, either in the main body or as appendices, but to refer to relevant external evidence documents explaining how they underpin the policies and inform their content.

Evidence required to support policies is discussed in Chapter 5 (5.3).

6.4 Process

The process for revising the Plan is set out in Chapter 4 (4.2). This is essentially similar to the process for the original Plan and includes:

- Informal engagement and publicity
- Screening for SEA/HRA
- Regulation 14 Consultation
- Submission and regulation 16 Publicity
- Independent Examination
- Referendum

The new Plan will supersede the existing Plan if a 'yes' vote is obtained at referendum.

Appendix 1

Model Design Policy

1. Development must be well-designed and sustainable and add to Warminster's locally distinctive sense of place, meeting the following requirements of this policy, proportionate to the scale and nature of the development.
2. Development must complement the surrounding context and local character in terms of:
 - a. Scale, height and massing;
 - b. Degree of set-back from the road and footway;
 - c. Any established pattern of front and/or rear gardens;
 - d. Extent of site coverage and spacing around and between properties.
3. Development must create a safe and convenient environment for pedestrians and cyclists, including:
 - a. Designing the public realm to support ease of movement, recreation, social interaction, play and exercise, to support good physical and mental health.
 - b. Providing links to surrounding footpaths to create ease of movement to surrounding facilities;
 - c. Ensuring that street and spaces are overlooked by active building frontages, to create natural surveillance;
4. Development should include positive features to reduce carbon impacts in its design, specification and landscaping.
5. Development should use durable materials with a high standard of finish, and support will be given to the use of local vernacular materials, reclaimed or recycled materials, or green materials from sustainable sources or with low embodied energy.
6. Boundary treatments should reinforce local character, including use of low walls or hedges.
7. Parking should be integrated in the design and layout of development, so that streets and spaces are not dominated by parked cars.
8. Creative or innovative design solutions for the specific site and context will be supported, especially where they incorporate green design and landscape features for superior environmental performance and biodiversity net-gain.

Interpretation

To meet the requirements of the policy, an integrated approach should be taken to the design of buildings, spaces and landscape. The design process should be based on analysis of the site and local context, including surrounding landscape and townscape characteristics.

Active frontages would include elevations with windows, doors and balconies and low boundary treatments.

The National Model Design Code and Building for a Health Life standard may both be useful in securing compliance with the policy.

Local traditional materials include local bricks, stone, render, plain clay tiles.

Positive green design features to reduce carbon use could include:

- use of efficient heating and cooling systems, or design to reduce dependency on heating and cooling systems;
- superior insulation properties and airtightness;
- natural ventilation and air flow (for warmer months) to help avoid over-heating;
- living (green or brown) walls or roofs as part of the design;
- orientation to take account of climate factors;
- rainwater capture, storage and reuse (grey water);
- flexible spaces and layouts to accommodate changing demands;
- sustainable urban drainage systems (SUDS) incorporated into the landscape design;
- use of traditional hedges for boundary treatments, to create a greener environment;
- Use of local native species in planting;
- local green energy schemes such as ground heat pumps, photovoltaics, biomass and other technologies;
- reusing and retrofitting existing buildings to maintain the embodied energy used in their construction, also avoiding landfill.

Even very minor development can include design features to reduce carbon use, for example in the specification of materials from sustainable sources.

Integration of parking could be achieved by using a range of parking provision including garages and curtilage spaces, bearing in mind that some people use garages for other purposes.

Design and Access statements, where required, provide an opportunity to demonstrate how the requirements of this and other policies have been met.

Use of independent design review is encouraged for larger or complex schemes, or in locations with particular design sensitivity. Compliance with the policy will be easier to achieve care is taken over the selection of skilled and experienced design professionals.

Strong encouragement is given to engagement with the Town Council and the local community at an early stage of the design process.

Contact



Urban Vision Enterprise CIC

uvecic.co.uk
info@uvecic.co.uk
01538 386221


Midlands Office:

Foxlowe Arts Centre (1st Floor)
Stockwell Street
Leek
Staffordshire
ST13 6AD

Northwest Office:

Suite 15
Oriel Chambers
14 Water Street
Liverpool
L2 8TD





Company No. 7690116.

Registered address: Foxlowe Arts Centre (1st Floor), Stockwell Street, Leek, Staffordshire, ST13 6AD