



CCNP Review Options for Completion Update

The CCNP Steering Group considered a report in September on options to complete the CCNP Review considering two outside influences (See Appendix1):

- The Wiltshire Local Plan
- The CWPC reorganisation in May 2025

The Steering Group agreed that it was imperative to complete the CCNP review to referendum by May 2025 (and if possible, to have the referendum in February 2025) and agreed to investigate Option 3 further.

Discussions with Place Studio have identified the most time consuming aspects of delivering the plan, to stand a chance of meeting the referendum date we need to avoid them as far as possible:

- SEA (Strategic Environmental Assessment) and HRA (Habitats Regulation Appraisal) – Any greenfield allocations would almost certainly trigger a full SEA. Given the proximity of the river and the location within the Conservation Area or close to historic buildings even brownfield sites such as the Co-op and the Bethesda Nursing home may also trigger the survey requirements.
- Housing site appraisal for potential allocations – Aecom report still not received (Aecom awaiting information from Wiltshire Council). Consultation with landowners may take time.
- Wiltshire Local Plan
The Wiltshire Local Plan started its Regulation 19 consultation on 27th September 2023. Given the uncertainty of the final figures for housing development and the likelihood of challenges to the current figures it would not be unreasonable to defer considering housing allocations for this update of the Neighbourhood Plan.

Working backwards from the February referendum gives us a timeline for completion as follows:

	2023			2024												2025			
	Oct	Nov	Dec	Jan	Feb	March	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	Apr
CCNP SG																			
CTC & CWPC																			
Wiltshire C																			

Key	
	Final drafting of plan and supporting documents submission of policies for SEA screening
	Consultation events across Calne and CW
	Consideration of responses to consultation and revision of plan to submit to CTC and CWPC
	Draft Plan and consultation material to CTC and CWPC for approval
	Regulation 14 pre-submission consultation and publicity by CTC and CWPC
	Approval of draft Plan for submission
	Wiltshire Council screening of Plan for SEA and NRA
	Submission to Wiltshire Council by 31st May for Reg 15 6 week consultation period
	Appointment of examiner, examination, receipt of report, modifications if required, Wiltshire Council decision to go to referendum
	28 days notice of referendum
	Referendum
	Councils and CCNP Steering Group will need to monitor and engage with WC during this process

To meet the timetable above the scope of the plan will have to be reduced and members of the Steering Group and the Councils will have to be willing and able to commit time to the various aspects of completing the plan.

The reason for reducing the scope of the Plan review is to complete it before the governance review changes to Calne Without Parish Council.

The Steering Group Meeting of 21st September unanimously voted to adopt Option 3 of the Options paper (Appendix 1), “while more information is sought”. This was the Option to fast track a plan with brownfield sites or simple site allocations only. Following further investigation, it is recommended that the Steering Group revisits this decision and should instead proceed with Option 2 (Fast track a reduced plan with no allocations).

The reasons for this are:

1. The inclusion of some allocations will increase the risk of triggering a Strategic Environmental Assessment, which would take the timescale of the Plan Review beyond May 2025.
2. The inclusion of some allocations will need to be defensible. The Steering Group would need to be able to justify why some sites have been selected, but not enough to meet the housing requirement, and must be prepared for challenge from disappointed landowners, which will also increase the risk of the Review being delayed.

It is further recommended that a Policy should be included in the updated Neighbourhood Plan which states a clear, positive presumption in favour of brownfields sites. Reflecting the willingness of the Plan to meet housing needs.

If the option described is acceptable, the Plan review will be drafted “in conformity” with the Wiltshire Core Strategy (the adopted development plan) and “will have regard to” the emerging Wiltshire Local Plan. As both Councils will likely be challenging the housing numbers in the emerging Wiltshire Local Plan it is justifiable to leave any consideration of sites for allocation to meet the neighbourhood element of the WLP for a future review of the Neighbourhood plan.

The Regulation 14 consultation will need not only to comply with the regulations but will need to have considerable face to face and online opportunities for the community to see the Plan, engage with representatives from both Councils and the CCNP Steering Group and give feedback.

Evidence gathered as part of the consultation can be used as background evidence for the Submission Plan and the examination.

Appendices 2 to 5 give a breakdown of the work required and the costs that will need to be met by the Qualifying Bodies (CTC and CWPC).

Decision Required:

That the Steering Group decide whether or not to accept the work required and recommend Option 2 as described to Calne Town Council and Calne Without Parish Council.

Appendices:

1. Options Paper considered by CCNP Steering Group September 2023
2. Schedule of works for the CCNP Steering Group
3. Schedule of works for Regulation 14 consultation.
4. Schedule of approvals required by CTC and CWPC
5. Financial implications.

Appendix 1

CCNP Review: Plan Completion Options September 2023

These options are presented in response to the two major outside influences on the CCNP.

1. Wiltshire Local Plan - uncertainty over the final housing numbers, allocations and timescale for its completion.
2. CWPC reorganisation to Derry Hill and Studley Parish Council. CCNP will cover new set of Parishes as May 2025.

Option 1: Continue current programme. CCNP to comply with the WLP.

Assess the Aecom development sites report. Meet with landowners /developers to discuss options for development on the preferred sites to meet the 100 houses in Calne and 30 houses in Derry Hill and Studley that are in the WLP. Run informal consultation with the public on sites before finalising a draft of the Plan for Regulation 14.

Benefits

- The Plan when completed will have NPPF para 14 protection, speculative development proposals will be easier to resist.
- All the policies of the plan will have proper weight attached and be as up to date as possible.

Problems

- The WLP could be delayed or be changed which could hold up the process.
- The Neighbourhood Plan could allocate unnecessary housing if the numbers in WLP decrease or if the numbers increase then more sites would need to be found and the timeline would be extended.
- The timeline for completion takes us past the reorganisation of the Parishes. The Plan will then need to be approved by all 7 Councils to progress to submission and examination. Costs to all Parishes will have to be budgeted for. Delays possible/likely.
- In the meantime, the greenspaces and heritage assets are not protected.
- The Design guide will hold less weight in the determination of planning applications.
- The Steering Group will have to be happy to continue for at least another 2 years to see the plan to completion.

Option 2: Fast track a reduced plan with no allocations. CCNP to comply with Core Strategy and indicate where it will also meet the emerging WLP requirements (apart from Housing) The Plan will use the Parish Council reorganisation as a reason for progressing without meeting the identified housing needs.

Benefits

Safeguards:

- Green spaces
- Heritage Assets

Design Guide will hold more weight and can be used to ensure development in all areas is of good design.

The plan should not need an SEA (Strategic Environmental Assessment) Makes it quicker to finish.

Problems

The Plan will not meet NPPF para 14 requirements so the neighbourhood plan will not stop speculative housing development.

The Plan will need to be reviewed again very quickly to run with the WLP and its housing requirements. This is an extra cost both financial and peoples time, but the Locality funding would be available again.

The Steering Group will need to be willing to put in the work to complete the Plan in a shorter timescale.

Option 3: Fast track a plan with brownfield or simple site allocations. CCNP to comply with the Core Strategy and indicate where it also meets the emerging WLP requirements.

Fast track the plan with the addition of small brownfield site allocations that arise from the Aecom report e.g. The Bethesda Care Home in Derry Hill and Studley, redundant farm buildings on the edge of Calne and Derry Hill and possibly the Co-op site. Also, a possible employment allocation at Forest Gate.

Benefits

Safeguards:

- Green spaces
- Heritage Assets

Design Guide will hold more weight and can be used to ensure development in all areas is of good design.

The allocations will go some way to meeting the housing need in Derry Hill and Studley

The plan should not need an SEA (Strategic Environmental Assessment) Makes it quicker to finish.

Problems

Depending on the size of brownfield allocation the Plan may still not have NPPF para 14 protection.

The Plan will need to be reviewed again very quickly to run with the WLP and its housing requirements. This is an extra cost both financial and peoples time, but the Locality Funding will be available again.

The Steering Group will need to be willing to put in the work to complete the Plan in a shorter timescale.

Notes:

If Option 2 or 3 are chosen, then Place Studio would need to requote to “finish the job” in the given timescales.

The referendum on the plan for options 2 and 3 will be voted on by all residents of the plan area (i.e., CTC and the current CWPC) but the plan when in use would be implemented by the Parishes that take on parts of the plan area in May 2025.

Appendix 2

Schedule of works for the CCNP Steering Group, CCNP Admin and Place Studio

The following tasks will need to be completed to achieve the completion of the Neighbourhood Plan update within the required timescale.

1 Finalising the topic papers, background documents and draft chapters for the Plan

As per the following schedule:

Document	Owner/ Editor	RAG status	Comments
Summaries			
Vision & Objectives	Tim & Celia	Complete	Shared with CTC & CWO June 23
Introduction	Andrew	Complete	Shared with CTC & CWO June 23
Natural Environment	Julie	Complete	Shared with CTC & CWO June 23
Climate Change and Sustainable Development	Celia	Complete	Shared with CTC & CWO June 23
Getting Around	Doug	Complete	Shared with CTC & CWO June 23
Built Environment	Doug	Complete	To be shared with the CTC & CWO in November
Housing and Communities	Sarah	In progress	Draft shared with SG at September meeting, minor amends to make, will be approved in November. And can then be shared with CTC & CWO.
Working and Shopping	Sarah	Complete	Shared with SG at the July meeting. Needs to be shared with CTC & CWO
Chapters			
Natural Environment	Julie & Celia	In progress	To be approved by SG and shared with the CTC & CWO in November
Climate Change and Sustainable Development	Celia	In progress	To be approved by SG and shared with the CTC & CWO in November
Getting Around	Doug/ Ioan/ Celia	In progress	To be approved by SG and shared with the CTC & CWO in November
Housing & Communities	Sarah	In progress	To be approved by SG and shared with the CTC & CWO in November
Working & Shopping	Sarah	In progress	To be approved by SG and shared with the CTC & CWO in November

Document	Owner/ Editor	RAG status	Comments
Built Environment	Doug	In progress	To be approved by SG and shared with the CTC & CWO in November
Supporting Documents			
Local Green Spaces Report	Julie & Celia	In progress	To be approved by SG and shared with the CTC & CWO in November
Biodiversity Topic Paper	Andrew	Complete	Complete, to be shared with Natural Environment Chapter
Tress and Hedgerows Topic Paper	Andrew	Complete	Complete, to be shared with Natural Environment Chapter
Climate Change Topic Paper	Celia	In progress	In addition to the chapter. In progress with Katie.
Getting Around Supporting docs ?		TBC	Confirmation needed from Place
Transport Topic Paper	Ioan \ Celia \ Doug	TBC	Confirmation needed from Place
Technical Site Assessment Report	AECOM	Late	Site visits 7/6/23, report expected July 23 but not received to date. Katie and John B have chased
Community Assets Report	Julie	In progress	To be approved by SG and shared with the CTC & CWO in November
Working & Shopping Topic Paper	Sarah	In progress	To be approved by SG and shared with the CTC & CWO in November
Design Code Report	AECOM	Complete	Shared with CTC Planning Committee & CWO in June 23, shared with WC planners in September 23
Historic Non-Designated Assets Report	James (Place)	In progress	Report on the process of identifying assets and contacting landowners.
Calne and Calne Without Facts and Figures	Andrew	In progress	In progress, draft shared with SG, June 23 CS – Do we need to summarise the key facts and figures from this document??
Consultation Statement	Su Johnson	In progress	In progress until we complete the draft plan
Basic Conditions Statement/Modification Statement	Katie / Place Studio	In progress	Katie to complete. Will be for noting.

Chapter Summaries can be used as part of the Regulation 14 consultation documentation and will be finalised when the draft policies have been confirmed.

Consultation Statement – statement of all the consultation carried out prior to Regulation 14.

Basic Conditions Statement- technical document to be compiled by Place Studio.

2 Aims and Objectives of the Plan plus the draft policies submitted to Wiltshire Council for SEA and HRA screening.

Wiltshire Council carry out the screening process which includes consulting the Statutory consultees such as English Nature, Environment Agency and Historic England.

For more information see:

<https://neighbourhoodplanning.org/toolkits-and-guidance/understand-plan-requires-strategic-environmental-assessment-sea/>

3 Dates to be confirmed for all papers to go to the Town and Parish Council for approval including agenda deadlines.

4 Online and other material for Regulation 14 consultation events and publicity:

Questionnaire/ feedback form for the consultation. This is likely to be similar to the [questionnaire used by Chippenham](#) in their Regulation 14 consultation.

Displays and material for face to face events.

Copy for flyer or magazine insert to go to all households.

Pop up displays for Library, CTC offices, Derry Hill Lansdowne Hall.

Social media posts

5 Face to Face Events

Venues and dates for the face to face consultations and catering etc. (need to avoid half term 9th to 19th Feb 2023) Need to be booked and costed.

Face to Face events need to cover evening and weekend time.

Suggested venues

- Calne Town Hall
- Tesco Calne Springs Showroom
- Lansdowne Hall, Derry Hill
- Area Board 6th Feb 2024

Specific/hard to each groups:

Other Parishes

Youth/ elderly

Commercial /town centre business

6 Staffing of the consultation events

This will require Councillors from both Councils at all events, if not possible then the cost and time to find consultants will need to be factored in (NB. this would need to happen immediately to keep within the timescale.) CCNP Steering Group members from all topic groups will be needed at events.

Venues for static displays e.g., Library, CTC offices, Town Hall foyer, Lansdowne Hall Derry Hill

7 Recording, collation and reporting of the representations and any other survey information collected during the consultation period.

Responses will need to be read, analysed and any changes to the Plan being suggested responded to before a report is considered by both Councils and the Submission Plan is compiled. This may require professional input, see information on Community First in appendix 5

8 Report on the Consultation

The report and any suggested alterations to the draft Plan to be reported to the Qualifying Bodies for approval and Submission to Wiltshire Council for Regulation 15.

To keep to the timetable this submission must be done by 31st May 2024.

9 Regulation 15

This stage is carried out by Wiltshire Council but the CCNP Steering Group, CTC and CWPC must be available to respond to Wiltshire quickly to keep the process moving.

10 Examination and Referendum

Wiltshire Council will appoint an examiner and hopefully the examiner will recommend the Plan to go to Referendum. The legislation for the referendum allows the examiner to recommend that the area covered by the vote is extended. ([Para292 Localism Act 2011](#))

Appendix 3

Schedule of works for the Regulation 14 consultation.

Regulation 14 is the first statutory phase of the plan review process.

<https://www.legislation.gov.uk/ukxi/2012/637/regulation/14/made>

It must be carried out by the Qualifying Bodies; Calne Town Council and Calne Without Parish Council. (The CCNP Steering Group can assist)

The consultation allows everyone who lives works or carries on business in the Plan area a formal chance to comment on the draft plan.

All parts of the regulations must be carried out on time and as set out in the Regulations, or the process is null and void and must be repeated.

Before Regulation can be commenced both Qualifying bodies must have agreed:

- The Draft Plan.
- All Supporting evidence documents.
- The Consultation Statement.
- The Statement of Basic Conditions. (This sets out how the draft plan conforms to National Policy, Wiltshire Council's approved Strategic Plan and any retain EU regulations).

The consultation must last for at least 6 weeks (it can be longer).

Any adverts must set out:

1. the dates by which representations must be received.
2. how to make representations. (This would include the questionnaire but will also allow for written representations).
3. where copies of the Plan can be inspected.

In addition to the public a set of Statutory consultees must be consulted (a list will be provided by David Way) and anyone that the qualifying bodies consider will be affected by the policies and proposals in the Plan (i.e., owners occupiers of heritage assets, green spaces etc)

A copy of the plan must be sent to Wiltshire Council.

All representations must be carefully recorded and reported back to the Qualifying bodies.

Appendix 4

Schedule of approvals required by Calne Town council and Calne Without Parish Council.

Council	Date	Item to be approved
CTC and CWPC		Option to proceed with limited scope plan to achieve referendum before May 2025. Resources required to do so.
Regulation 14 documents		
CTC and CWPC		Draft Plan
		Consultation Statement
		Statement of Basic Conditions
		Housing Needs Assessment
		Local Green Spaces Report
		Biodiversity Topic Paper
		Trees and Hedgerows Topic Paper
		Climate Change Topic Paper
		Transport Topic Paper
		Technical Site Assessment Report
		Community Assets Report
		Working & Shopping Topic Paper
		Design Code Report
		Historic Non-Designated Assets Report
		Calne and Calne Without Facts and Figures
		Chapter Summaries
Consultation Material and costs for Regulation 14		
		Newsletter
		Adverts/Social Media Posts
		Exhibition material
		Website material
		Feedback questionnaire/form
		Letter to Statutory consultees and other affected by the Plan

Appendix 5 Financial and Resource Implications.

The drafting and setting up of the questionnaire and analysis of the feedback will be a technical and significant job and is likely to require professional input. Place Studio do not have the capacity to do that for the Steering Group. [Community First](#) carry out this work and a quote of £2000 - £2500 should be planned for.

Revised quote from Place Studio

Place Studio are making a revised quote to reflect the new scope of the Plan and the ambitious timetable.

CTC and CWPC

Costs for consultation material, adverts, venue hire and staff time.

Quote requested from Community First for running consultation events.

Leaflet drop and consultation events costs estimated in the region of £1500.

If advert is required in Gazette and Herald include cost.

Cost for Calne

Royal Mail to SN11 0 , 8 & postcodes - £737.90

10,000 copies A4 8 pages - £1,308.00

Banners from Hello Print cost around £50 each

Pull up display stands £70 each

All costs dependent on the number and type of events and who will staff them.

Examples:

Melksham Neighbourhood Plan

- Melksham news advert, cost £2000.

<https://melkshamnews.com/2023/10/10/communitys-chance-to-help-shape-the-towns-future/>

- Leaflet drop and launch events, cost £1600.

(Melksham NHP Consultation drop in events on

Thursday 26th October at the Campus 4-7pm

Friday 10th November at Shaw Village Hall 4-7pm

Saturday 11th November at the Campus 10am to 2pm)

Chippenham Neighbourhood Plan

<https://chippenhamneighbourhoodplan.org.uk>

Regulation 14 Consultation (done during covid restrictions)

- Video
- Social media

- A4 posters
- Talk Chippenham article.
- Gazette and herald article
- NP and Town Council websites
- Article on Wiltshire Council Our community matters blog.