

Ashchurch Rural

Neighbourhood Development Plan

Submission Version 2020 – 2031

Report of Examination

April 2022

**Undertaken for Tewkesbury Borough Council with the support of
Ashchurch Rural Parish Council on the submission version of the plan.**



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Contents

Summary	3
1. Introduction and Background	4
1.1 Neighbourhood Development Plans.....	4
1.2 Independent Examination.....	4
1.3 Planning Policy Context.....	6
2. Plan Preparation and Consultation	7
2.1 Pre-submission Process and Consultation	7
2.2 Regulation 16 Consultation Responses.....	8
3. Compliance with the Basic Conditions Part 1	9
4. Compliance with the Basic Conditions Part 2: National Policy and the Development Plan	11
5. The Referendum Boundary	18

Abbreviations used in the text of this report:

The Ashchurch Rural Neighbourhood Plan is referred to as ‘the Plan’ or ‘ARNDP’.

Ashchurch Rural Parish Council is abbreviated to ‘Ashchurch RPC’.

Tewkesbury Borough Council is abbreviated to ‘Tewkesbury BC’ and sometimes referred to as the Local Planning Authority (LPA).

The National Planning Policy Framework is abbreviated to ‘NPPF’.

The National Planning Practice Guidance is abbreviated to ‘NPPG’.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-31 is abbreviated to ‘JCS’.

The Tewkesbury Borough Plan 2011-31 (emerging) is abbreviated to ‘eTBP’.

The Tewkesbury Borough Local Plan to 2011 (saved policies) is abbreviated to (TLP2011).

Regulations 14 and 16 are abbreviated to ‘Reg14’ and ‘Reg16’ respectively.

Summary

- I have undertaken the examination of the ARNDP during March 2022 and detail the results of that examination in this report.
- The Ashchurch Rural PC and Steering Group have undertaken consultation over several years on this Plan, and it complies with legislative requirements. The Plan is a concise and well-presented document, in a complex planning environment. The strategic policy framework as defined by the Local Planning Authority is the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. The Tewkesbury Borough Local Plan 2011-31 currently at examination has some policy weight.
- I have considered the comments made at the Regulation 16 Publicity Stage, and where relevant these have to an extent informed some of the recommended modifications. I have also considered further submissions from the LPA regarding strategic policy.
- Subject to the modifications recommended, the Plan meets the basic conditions and may proceed to referendum.
- I recommend the referendum boundary is the designated neighbourhood plan area.

Acknowledgements: Thanks to Local Authority and qualifying body staff for their assistance with this examination. My compliments to the local community volunteers and Ashchurch Rural Parish Council, who have produced their Plan in difficult planning circumstances.

1. Introduction and Background

1.1 Neighbourhood Development Plans

1.1.1 The Localism Act 2011 empowered local communities to develop planning policy for their area by drawing up neighbourhood plans. For the first time, a community-led plan that is successful at referendum becomes part of the statutory development plan for their planning authority.

1.1.2 Giving communities greater control over planning policy in this way is intended to encourage positive planning for sustainable development. The National Planning Policy Framework (NPPF para 29) states that:

“neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood Plans can ... help to deliver sustainable development”.

Further advice on the preparation of neighbourhood plans is contained in the Government’s Planning Practice Guidance website:

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/>

1.1.3 Neighbourhood plans can only be prepared by a ‘qualifying body’, and in the Ashchurch area that is the Ashchurch Rural Parish Council (RPC). Drawing up the Neighbourhood Plan was undertaken by the Ashchurch Rural Neighbourhood Plan Steering Group (the Steering Group), working to the Parish Council.

1.2 Independent Examination

1.2.1 Once Ashchurch RPC had prepared their neighbourhood plan and consulted on it, they submitted it to Tewkesbury BC. After publicising the plan with a further opportunity for comment, Tewkesbury BC were required to appoint an Independent Examiner, with the agreement of Ashchurch RPC to that appointment.

1.2.2 I have been appointed to be the Independent Examiner for this Plan. I am a chartered Town Planner with over thirty years of local authority and voluntary sector planning experience in development management, planning policy and project management. I have been working with communities for many years, and have recently concentrated on supporting groups producing neighbourhood plans. I have been appointed through the Neighbourhood Plan Independent Examiners Referral Service (NPIERS). I am independent of any local connections to the Ashchurch area and Tewkesbury BC, and have no conflict of interest that would exclude me from examining this plan.

1.2.3 As the Independent Examiner I am required to produce this report and recommend either:

- (a) That the neighbourhood plan is submitted to a referendum without changes; or
- (b) That modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
- (c) That the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.2.4 The legal requirements are firstly that the Plan meets the 'Basic Conditions', which I consider in sections 3 and 4 below. The Plan also needs to meet the following requirements under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990:

- It has been prepared and submitted for examination by a qualifying body;
- It has been prepared for an area that has been properly designated by the Local Planning Authority;
- It specifies the period during which it has effect;
- It does not include provisions and policies for excluded development;
- It does not relate to land outside the designated neighbourhood area.

The ARNDP complies with the requirements of Paragraph 8(1). The Neighbourhood Area was designated on the 8th January 2014 by Tewkesbury BC. The plan does not relate to land outside the designated Neighbourhood Area. It specifies the period during which it has effect as 2020 – 2031 and has been submitted and prepared by a qualifying body and people working to that qualifying body. It does not include policies about excluded development; effectively mineral and waste development or strategic infrastructure.

1.2.5 I made an unaccompanied site visit to the Ashchurch Rural Parish to familiarise myself with the area and visit relevant sites and areas affected by the policies. This examination has been dealt with by written representations, as I did not consider a hearing necessary.

1.2.6 I am also required to consider whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to a referendum. I make my recommendation on this in section 5 at the end of this report.

1.3 Planning Policy Context

1.3.1 The Development Plan for Ashchurch and Tewkesbury, not including documents relating to excluded mineral and waste development, is the Joint Core Strategy (JCS) for Gloucester, Cheltenham and Tewkesbury 2011-31 adopted December 2017 and the saved policies of the Tewkesbury Borough Local Plan to 2011, adopted March 2006. The Tewkesbury Borough Plan 2011-31 is currently at examination, and policies in this document while not formally part of the development plan need to be taken into account (NPPG ID:41-009-20190509). The LPA have informed me that all policies in the JCS are strategic policies, but the Local Plan policies are not.

1.3.2 The National Planning Policy Framework 2021 (NPPF) sets out government planning policy for England, and the National Planning Practice Guidance (NPPG) website offers guidance on how this policy should be implemented.

1.3.3 During my examination of the ARNDP I have considered the following documents:

- National Planning Policy Framework (NPPF) 2021
- National Planning Practice Guidance 2014 and as updated
- Town and Country Planning Act 1990 (as amended)
- Planning and Compulsory Purchase Act 2004
- The Localism Act 2011
- The Neighbourhood Planning Regulations 2012 (as amended)
- Submission version of the Ashchurch Rural Neighbourhood Development Plan (ARNDP)
- The Basic Conditions Statement submitted with the ARNDP
- The Consultation Statement submitted with the ARNDP
- The SEA Environmental Report for the ARNDP
- The HRA Report for the ARNDP
- Neighbourhood Area Designation (map)
- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) 2011-2031
- Tewkesbury Borough Local Plan 2011 (adopted 2006 -saved policies)
- Tewkesbury Borough Plan 2011-2031 (emerging Local Plan)
- Representations received during the publicity period (reg16 consultation)
- Email 14th April from Tewkesbury BC
- Appeal Decision Land at Fiddington, Ashchurch APP/G1630/W/18/3210903

2. Plan Preparation and Consultation

2.1 Pre-submission Process and Consultation

2.1.1 Ashchurch Rural is a parish just to the east and bordering the town of Tewkesbury. Besides the urban area of Ashchurch and an adjacent large army base, the rural area is flat agricultural land with small settlements and rural roads and paths. The M5 and the A46 strategic highways run through the Parish, and development pressure is considerable, with proposals for major strategic development in the neighbourhood area currently in progress.

2.1.2 The Steering Group, made up of Parish Councillors and community volunteers, worked on developing the Plan with help from a planning consultant. Evidence of previous extensive consultation with residents was offered to me during the progress of this examination. Surveys and other consultation exercises were undertaken with the help of a professional consultation organisation in 2014-15.

2.1.3 The planning policy and site availability in Ashchurch Rural has been complex – including uncertainty around the availability, or not, of the former army base for development. An initial draft ARNDP was drawn up and a formal Reg14 consultation, as required by the Neighbourhood Planning Regulations 2012 was undertaken around November - December 2018, but the Plan was changed extensively as a result of feedback received and errors identified. When revisions were completed, a second Reg14 consultation was undertaken, running for longer than the required 6 week minimum, from the 20th July 2020 until the 11th September 2020.

2.1.4 The Pandemic impacted the nature of this consultation, but a leaflet advertising the consultation was sent to all households in the Parish, and hard copies were made available as required. Responses could be made online or by hard copy on a standard response form provided. Statutory consultees as identified by the LPA and including local community groups and businesses and all those consulted in the previous Reg14 were emailed with links to the documentation.

2.1.5 Representations were received from 31 respondents during this second Reg14 consultation period, and several amendments have been made to the Plan as a result of constructive suggestions for changes. A third Reg14 consultation was run from the 10th May to the 21st June 2021 to allow comments to be received on the SEA and HRA reports as amended. Fourteen comments were received during this consultation including from the LPA, and as a result minor corrections made to the site allocation boundary and Policy V1 made reference to biodiversity net gain. I am satisfied

that due process has been followed during the consultation undertaken on the Plan, although it is not correct to describe the 2021 consultation as the 'second' Reg14 consultation – it is the third (page 10 para 40 of the Consultation Statement).

2.1.6 As required, the amended plan, together with a Basic Conditions Statement, a Consultation Statement, a Habitats Regulation Assessment, a Strategic Environmental Assessment and a plan showing the neighbourhood area was submitted to Tewkesbury BC on the 14th July 2021.

2.2 Regulation 16 Consultation Responses

2.2.1 Tewkesbury BC undertook the Reg 16 consultation and publicity on the ARNDP for six weeks, from the 24th September 2021 to the 7th November 2021. Thirteen representations were received during this consultation, from residents, landowners and their agents and statutory bodies. Four statutory bodies had no specific comments to make on this Plan but offered general guidance. Other comments, and the issues they raise that are pertinent to my consideration of whether the Plan meets the basic conditions, are considered in sections 3 and 4 of this report below.

2.2.2 I am specifically limited by legislation to correcting with recommended modifications the Plan's compliance with the Basic Conditions and other legal requirements. Notification of minor corrections needed to the text are very useful, but again cannot be the subject of any modifications I recommend. The LPA will be aware however that it is authorised to correct minor errors that may have been missed so far [Town and Country Planning Act 1990 Schedule 4B section 12(6)]. This also applies to the need to update explanatory text in the Plan and other background material if necessary.

3. Compliance with the Basic Conditions Part 1

3.1 General legislative requirements of the 1990 Town and Country Planning Act (TCPA) other than the Basic Conditions are set out in paragraph 1.2.4 above. The same section of this report considers that the ARNDP has complied with these requirements. What this examination must now consider is whether the Plan complies with the Basic Conditions, which state it must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations and comply with human rights law; and
- Not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (*prescribed basic condition since December 2018*).

3.2 The Basic Conditions Statement sets out in Table 2 and para11 on page 5 how the Plan promotes the social, economic and environmental goals of sustainable development. I accept that the Plan does contribute to sustainable development in line with the Basic Conditions.

3.3 An Environmental Report and Habitat Regulations Assessment (HRA) Report have been submitted with the ARNDP, as both Strategic Environmental Assessment (SEA) and HRA were required for the Plan. Ashchurch Rural Parish is within the catchment of Dixton Wood and Bredon Hill Special Areas of Conservation (SAC).

3.4 The Environmental Report April 2021 for the SEA of the ARNDP considers that the Plan is broadly neutral in terms of SEA themes of Biodiversity and land soil and water resources, and is likely to have minor positive effects in relation to the remaining SEA themes. It was suggested in comments at Reg16, that due to the lack of any consideration of alternatives in the SEA process, the Basic Conditions have not been met. However the Environmental Report has dealt with this issue (Chapter 5 paras 5.12-15 in particular). Due to the ongoing review of strategic options by the LPA that include land within the neighbourhood area, no appropriate reasonable alternatives were realistically available for the ARNDP and this SEA process. I am satisfied that the Plan is compatible with EU regulations and complies with the Basic Conditions in this regard.

3.5 The HRA Report Dec2020 has considered the site allocations and policies for likely significant effect on the European sites (SACs), screened out this possibility.

3.6 The ARNDP in my view complies with Human Rights Legislation. It has not been challenged with regard to this, and the consultation statement showed that the need to consult with a wide cross-section of the community was appreciated.

4. Compliance with the Basic Conditions Part 2: National Policy and the Development Plan

4.1 The final and most complex aspect of the Basic Conditions to consider is whether the ARNDP meets the requirements as regards national policy and the development plan. This means firstly that the Plan must have regard to national policy and guidance, which for this neighbourhood plan is the NPPF 2021 and the NPPG. Secondly the Plan must be in general conformity with the strategic policies of the development plan, seen by the LPA as being those in the JCS. The phrase 'general conformity' allows for some flexibility. If I determine that the Plan as submitted does not comply with the Basic Conditions, I may recommend modifications that would rectify the non-compliance.

4.2 The Plan and its policies are considered below in terms of whether they comply with the Basic Conditions as regards national policy and the development plan. If not, then modifications required to bring the plan into conformity are recommended.

Modifications are boxed in this report, with text to *remain in italics*, new text **highlighted in Bold** and text to be deleted ~~shown but struck through~~. Instructions for alterations are underlined.

4.3 The ARNDP is a well-presented document, with a clear vision to retain the amenity and rural character that currently exists within the new development. Ten policies have been developed to promote this, in line with stated development principles. It is a minor point, and not a Basic Conditions issue, but Policies S1, E1, E2, C2 all use a single bullet point 'A' despite there being no further bullet points in the policy, which I found confusing.

4.4 **Policy S1: Site allocation at Fiddington** This policy allocates a large site, that has obtained outline planning permission granted on appeal, for residential and other related development. The policy was objected to at the Reg16 consultation, as serving no purpose but to obtain protection from Para 14 of the NPPF. This was felt to be inappropriate as the allocation would not increase the existing housing supply. Objections also mentioned that it was not the result of any assessment of housing requirement, and that there was a Basic Conditions issue with the SEA as alternative site allocations had not been considered. The latter point is dealt with in para 3.4 of this report above.

4.4.1 Whether or not the allocation will give the protection offered by para 14 of the NPPF is not for my examination to determine. As development has not commenced on the site, an allocation does offer policy support for the proposed development, and updates the allocation of part of the site for employment uses in the JCS. It is not just repetition.

4.4.2 The LPA have argued (email 14th April 2022) that allocating a site this size makes it a strategic allocation and neighbourhood plans may not deal with strategic matters. This is true in as much as neighbourhood plans are required by the Basic Conditions to be in 'general conformity' with the strategic policies of the development plan. The Appeal was called in by the Secretary of State (SoS), and in the Decision Notice the view of the SoS concurs with that of the Inspector that the proposal would be classed as a strategic site, and is in conflict with policy SD10 of the JCS (para 14 and 15 page 3). However the appeal report goes on to state that the site would have been included in the strategic sites of the JCS were it not for highway objections. The highway objections were resolved by the time of this planning application and appeal, and the Inspector on summarising the Statement of Common Ground (report para 25 page 4) states that

"Both parties agree that the appeal should be allowed and would represent sustainable development."

The situation is further complicated by policy REV1 in the JCS which states that:

"A partial review of the housing supply for Gloucester and Tewkesbury will commence immediately upon adoption of the JCS. On adoption, the authorities will publish a Local Development Scheme to set out the timescales for completion. The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities."

Although the JCS was adopted in 2017, the Review of it is still at an early stage and was agreed at the appeal to have no planning weight.

4.4.3 The Appeal decision was given in January 2020. Since that date the emerging Tewkesbury Borough Local Plan (eTLP) has gained considerable planning weight and is currently at examination. This document however changes nothing with regard to any strategic allocation at the site allocated in Policy S1. Policy SD10 (2) of the JCS states that

"2. Housing development will be permitted at sites allocated for housing through the development plan, including Strategic Allocations and allocations in district and neighbourhood plans."

There is an indication here that allocations in district and neighbourhood plans will not be strategic. Policy SD2 (4 and 5) allows for smaller-scale development meeting local needs in larger villages in Tewkesbury Village to be allocated in neighbourhood plans. Fiddington is not a service village for the purposes of this policy, and the scale of the proposed development is strategic not 'smaller-scale'.

It could be that the allocation in Policy S1 is a 'specific exception' as suggested in JCS policy SD10 (4iv), but this was not the decision reached in the appeal decision allowing this site. I therefore concur with the decision at the Appeal that the site conflicts with policy in the JCS, and that no strategic policy since then has altered this situation.

4.4.4 My role is to consider whether the ARNDP meets the Basic Conditions, and in particular whether this site allocation is 'in general conformity with the strategic policies of the development plan.' Particularly pertinent is Policy SP2(8) which states:

"The identification of any additional urban extensions to help meet the unmet needs of a Local Planning Authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option"

The situation is complicated by the acceptance of the LPA of residential development on this site, and the requirement of Policy REV1 in the JCS that further strategic residential allocations will need to be made. However much circumstances since the adoption of the JCS would suggest that the site has effectively been accepted as a residential allocation, it has not been formally adopted as a strategic policy allocation. My examination must be based on conformity with the development plan, not wider planning circumstances, even if they post-date the development plan. Thus I find this policy is not in general conformity with the development plan, and in order that the ARNDP meets the Basic Conditions I recommend that Policy S1 is deleted.

Modification 1: Policy S1 to be deleted

Text of Plan to be altered: para 132 last sentence to be deleted. Other references to Policy S1 to be deleted. Para 154 – 159 to be deleted.

4.5 **Policy T1: Modal shift for major development proposals** There is a Reg16 objection to the use of the term 'will' in the 2nd paragraph of bullet point point C, as the list of requirements will not always be relevant for every development. It is a point I accept, and for the clarity of policy as

required by the NPPF (para 16d) this should be amended. Bullet point C vi. is dealing with the nature of bus services, which is not a land-use issue, and therefore not acceptable in a planning policy. In order that Policy T1 has paid due regard to government policy and guidance, and thus complies with the Basic Conditions, I recommend that it is amended as shown in Modification 2.

Modification 2: Criteria C of Policy T1 to be amended as follows:

... “C. Proposals for major development will only be supported where they demonstrate measures to integrate the new community with existing communities, where applicable, within the parish by encouraging a shift from car-based travel to walking, cycling and public transport.

These requirements ~~may~~ **will** include, but are not limited to:

....

vi. ~~Provision of quality (frequent, convenient and modern) bus services along the A46/A438 corridor. “.....”~~

4.6 Policy T2: Road safety for walking and cycling Policy T2 at Criteria B is specifying a planning condition that needs to be attached to a future planning permission in certain circumstances. It is not the role of planning policy to pre-judge any future planning permission, and aspects of the wording where it is effectively doing this need to be amended in order that the policy deals with land-use issues as required by the NPPG (ID: 41-004-20190509), and does not stray beyond this into development control and management. In order that Policy T2 has paid due regard to government policy and guidance and complies with the Basic Conditions, I recommend that it is amended as shown in Modification 3:

Modification 3: Criteria B of Policy T2 to be amended as follows:

... “B. Where freight and HGV traffic will arise from the **development scheme**, including during construction, scheme proposers should provide a plan showing routes that will avoid rat-running along minor roads or through settlements **as part of the development proposals**. ~~The submitted plan should form part of the development proposal and if not, will be attached to any permission as a planning condition.~~ “....”

4.7 **Policy E1: Employment and traffic** Complies with the Basic Conditions.

4.8 **Policy E2: Modification of existing B2, B8 and E class development** Tewkesbury BC have indicated concern with the use of the word 'type' in relation to a use class. I agree that it is redundant and could cause confusion. The NPPF requires policy to be clear to decision-makers (para 16d), and thus in order that Policy E2 has due regard to government policy and complies with the Basic Conditions, I recommend that it is amended as shown in Modification 4.

Modification 4: Policy E2 to be amended as follows:

~~A~~ *Extensions or modifications of existing Use Classes B2 (industrial), B8 (storage and distribution) and E must be of a scale, ~~type~~ and character commensurate with existing and surrounding development, particularly if located within an existing settlement or the countryside.*

4.9 **Policy C1: Community Infrastructure** Complies with the Basic Conditions.

4.10 **Policy C2: Broadband** Complies with the Basic Conditions.

4.11 **Policy V1: Protection of the intrinsic value of the countryside** No settlement boundaries have been defined for this Plan, although an intention to do this in the likely early review of the Plan is indicated (para 49 page 13). Policy V1 offers Claydon as a settlement that should be distinguished from the surrounding rural area. I visited Claydon as part of my site visits, and do not accept that it is in any real sense a 'settlement'. As the description of settlements deals with Fiddington and Claydon jointly, I assume that the idea is to consider this area as a dispersed settlement. Claydon is a kilometre or more from property that could be considered part of Fiddington however, and I do not consider considering them as a joint single settlement sensible. Claydon consists of a farm, a separate farm house, two cottages and maybe 2-3 other dwellings.

4.11.1 Policy RES4 in the emerging Tewkesbury Local Plan (eTBP) states that any new development in rural areas should generally be no more than 5% of current dwelling size in a rural settlement. Thus a rural settlement needs to have at least twenty dwellings in order to be considered for small-scale development, and Claydon does not. Claydon is defined as a rural area in the eTBP: it is not in a defined settlement boundary in the eTBP or identified as a service village. Policy in the eTBP is in line with the JCS (Policy SD10), which would allow for specific exceptions to be brought forward in a neighbourhood plan. However no justification for effectively allocating Claydon for limited new residential development has been attempted in this Plan. Thus the proposal to define Claydon as a settlement is not in general conformity with the strategic policies of the development plan, and in order that the Plan complies with the Basic Conditions and is in general conformity with the development plan, I recommend it is amended as shown in Modification 5 below.

Modification 5: Criteria A of Policy V1 to be amended as follows:

*A. Development proposals in rural parts of the Parish other than on sites allocated through the Development Plan, particularly south of the A46 and in other rural areas and outside the developed areas of existing settlements (~~Claydon~~, Fiddington, Pamington, **and** Walton Cardiff) will provide evidence that the tranquillity and accessibility of the countryside by foot, cycle, horse or other non-motorised mode will be protected.*

4.12 **Policy W1: Water Management** The Environment Agency have commented at Reg16 that due to the neighbourhood area now being included within a defined area of 'serious water stress' the policy could be strengthened. However the LPA were not supportive of doing this in the absence of further consultation. As the changed circumstances are likely to impact on any future planning permission, I do not see that Policy W1 will impede the need for more efficient water targets. The policy complies with the Basic Conditions.

4.13 Policy H1: Housing in Rural Areas As discussed above for Policy V1, I do not accept that Claydon is appropriately designated as a settlement. In order that Policy H1 is in general conformity with the strategic policies of the development plan and complies with the Basic Conditions, I recommend that it is amended as shown in Modification 6.

4.14 Policy H2: Design of housing in the countryside and Claydon, Fiddington, Pamington and Walton Cardiff As discussed above for Policy V1, I do not accept that Claydon is appropriately designated as a settlement. In order that Policy H is in general conformity with the strategic policies of the development plan and complies with the Basic Conditions, I recommend that it is amended as shown in Modification 6.

Modification 6: Criteria A of Policy H1 to remove reference to Claydon as a settlement.

The title of Policy H2 to remove Claydon as a specified settlement.

5. The Referendum Boundary

5.1 The Ashchurch Rural Neighbourhood Development Plan (ARNDP) 2020 – 2031 has no policy or proposals that have a significant enough impact beyond the designated Neighbourhood Plan Boundary that would require the referendum boundary to extend beyond the Plan boundary. Therefore I recommend that the boundary for the purposes of any future referendum on the ARNDP shall be the boundary of the designated Neighbourhood Area for the Plan.