Andrea Pellegram Ltd.

Highworth Neighbourhood Plan 2 Pre-Regulation 14 Modification Statement

1. The Highworth Neighbourhood Plan was made in March 2017 with a plan period of 2015-2026. The Highworth NDP time period is now approaching expiration in 2026. The National Planning Policy Framework has been subject to significant amendments. The Environment Act 2021 has led to the identification of nature recovery networks and the preparation of a Local Nature Recovery Strategy for Wiltshire (which covers Swindon also). A new regime for ensuring that biodiversity net gain results from new developments is in place.

2. The Highworth NDP requires a significant update to create a local development plan framework for the Parish which looks forward to 2036 and takes account of updated national and local policy and development contexts. Highworth Town Council has therefore prepared a revised draft Neighbourhood Development Plan (the Highworth Neighbourhood Plan 2).

3. Neighbourhood Plan Regulation 14 (a) (v) requires that Highworth Town Council (as the Qualifying Body) publishes *'in relation to a modification proposal, a statement setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion'*.

4. Planning Practice Guidance (Paragraph: 106 Reference ID: 41-106-20190509) says that there are 3 types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves:

- Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
- Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
- Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

5. This modification statement considers the significance of proposed changes to the Highworth NDP prior to Regulation 14 Consultation. The table below sets out the Vision, Objectives and Policies of the Made Neighbourhood Plan 2015-2026 **(termed MNDP1)** and compares these with updated policies in the Highworth Neighbourhood Plan 2 **(termed NDPR2).** The third column describes the changes between the policies in both plans. It considers the materiality and significance of policy deletions and of new policies which are proposed, with reasons given for reaching a conclusion. The column is colour coded to indicate the significance of the modifications.

6. **It is concluded that the majority of modifications proposed to the Made Highworth NDP are material modifications which do change the nature of the plan and would require examination and referendum.**

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
Time Period 2015-2026	**Time Period** 2022-2037	The remaining time period for the MNDP1 is not sufficient (one year remaining) and so an extended period is needed for NDPR2. The extension of the time period by 11 years to 2037 is a significant change and by itself is considered to be a material modification (substantial/significant).
Vision ~~We see a future~~ where everyone has the opportunity to live healthy and fulfilling lives, enjoying Highworth's rich cultural heritage and living in a safe, strong and supportive community. Highworth will become a sustainable community offering lifestyle and work opportunities in an attractive environment; meeting the needs of residents, business partners and visitors. We recognise the importance of attracting wealth into our community and forging a future where poverty and exclusion have been removed.	**Vision** The Highworth Neighbourhood Area is a place where everyone has the opportunity to live healthy and fulfilling lives, enjoying its rich cultural heritage and living in a safe, strong, supportive and inclusive community. It is a sustainable community offering lifestyle and work opportunities in an attractive environment that meets the needs of local residents, businesses, and visitors. The Highworth Neighbourhood Area recognises the importance of attracting wealth into the local community. The Town Council will forge a future where poverty and exclusion has been removed.	The change has been made to make clear the area to which the Vision relates. The change of wording to the Vision is considered to be a minor modification (Non-material).
Objectives **Housing** 1. Meet the strategic housing requirement of the Local Plan in a way that benefits the town. 2. Provide a mix of housing to meet local need as evidenced at the time.	**Objectives** **Housing** 1. Meet the strategic housing requirement of the Local Plan in a way that benefits the town. 2. Provide a mix of housing to meet local need as evidenced at the time.	The changes have been made to make them simpler and clearer and represent format alterations and minor edits of language. The changes to the objectives are not substantive. The content of the objectives remains unchanged – the only changes are to:

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
3. Promote shared ownership schemes as part of the affordable housing provision. **Economic Development** 1. Sustainable business: Encourage economic development in Highworth to be sustainable. 2. Town Centre: Rejuvenate the town centre to create a lively, thriving and attractive focus for the town. 3. Tourism: Promote and develop the tourism industry and visitor facilities within Highworth. 4. Business development: Support and encourage existing businesses including home-working, while attracting new companies into the area. **Transport** 1. Traffic Management: Promote traffic and road solutions that meets current needs and plans for the future. 2. Sustainable Mobility: A town in which people can choose to travel in ways that benefit their health and the environment. 3. Protect and extend the Rights of Way and off-road Cycle routes to promote informal recreation and access to the countryside, sustainable travel and tourism. **Arts and Culture** 1. Protect Community buildings, resist the loss of community facilities and extend and improve facilities where possible. 2. Use development contributions to fund Community projects and infrastructure.	3. Promote shared ownership schemes as part of the affordable housing provision. **Economic Development** 1. Encourage sustainable business. 2. Rejuvenate the Town Centre to create a lively, thriving and attractive focus for the town. 3. Promote and develop the tourism industry and visitor facilities within Highworth. 4. Support and encourage existing businesses including home-working, while attracting new companies into the area. **Transport** 1. Promote traffic and road solutions that meets current needs and plans for the future. 2. <u>Promote sustainable transport so that Highworth is a</u> town in which people can choose to travel in ways that benefit their health and the environment. 3. Protect and extend the Public Rights of Way and off-road cycle routes to promote informal recreation and access to the countryside, sustainable travel and tourism. **Arts and Culture** 1. Protect community buildings, resist the loss of community facilities and extend and improve facilities where possible.	• remove sub-headings • split the third environmental objective into two separate points. • Remove the words 'where appropriate' regarding the designation of Local Green Spaces (which is considered to be implicit). • Add introductory words to the second transport objective The changes are considered to be minor modifications (non-material)

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
3. Protect buildings and features of local historic interest to preserve the rich and unique cultural heritage of Highworth. **Environment** 1. Promote good design in the built environment. 2. Protect open space, sport and recreation facilities and designate Local Green Spaces where appropriate. 3. Promote biodiversity and protect and preserve local wildlife sites.	2. Use development contributions to fund community projects and infrastructure. 3. Protect buildings and features of local historic interest to preserve the rich and unique cultural heritage of Highworth. **Environment** 1. Promote good design in the built environment. 2. Protect open space, sport and recreation facilities 3. Designate Local Green Spaces. 4. Promote biodiversity and protect and preserve local wildlife sites.	
Policy 1 – Housing Provision Land at Crane Furlong and Redlands, as shown on Figure 5, is allocated for residential development. Development on these sites should take into account the guidance in the development briefs in Appendix 1 of this Plan. Proposals on these sites shall provide a mix of dwelling types for both affordable and open market dwellings to conform to the current evidenced housing need in Highworth in the briefs in Appendix 1 or the latest available survey. Residential development will be allowed on other sites within the settlement boundary in accordance with policy 3, below, and other policies in this Plan and the SBLP 2026.	**Policy 1: Housing provision and mix** A. Residential development in the Conservation Areas of Highworth, Sevenhampton and Hampton that is the result of the conversion of commercial buildings (Class E and sui generis) should have regard to HNP2 Policy 3. B. The provision of specialist accommodation for older people, including an affordable component, will be supported. C. New housing should be designed to be adaptable and accessible throughout all life stages. D. Development schemes should seek to provide the following mix of housing sizes when complying with Swindon Borough Local Plan policies HA1 and HA2:	The changes have been made to reflect partial delivery of the previous policy and to reflect updated evidence of housing requirements with regard to size and type, affordable housing tenures and specialist housing provision that were previously in another policy. It was considered preferably to combine the requirements in a single policy. The changes are as follows: Redlands allocation site is removed as it is being built out(clause I)

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The Plan shall be monitored every three years by the Town Council in consultation with Swindon Borough Council with respect to the housing allocations and the ability to meet the Plan's housing targets, in a reasonable and consistent manner, through the Plan period. In the event that within 3 years of the date this Plan is made, it is not proven, by the grant of planning permission that the site at Crane Furlong is able to deliver the requisite number of dwellings to meet objectively assessed housing supply targets for the Plan area, the Plan shall be updated to demonstrate how the housing targets for the Plan area can be met. *Figure 5: Highworth Allocated Housing Sites and Settlement Boundary.*	a. 4% four bedroom b. 52% three bedroom c. 24% two bedroom d. 20% one bedroom E. Affordable housing provision should include shared ownership housing according to local evidence of housing need. F. Land at Crane Furlong, as shown in Figure 3, is allocated for residential development and should take account of the guidance in Appendix 1 of this plan. *Figure 3: Site allocation at Crane Furlong* 	• A more specific mix of housing types is set out (Clause G) • Reference to support for development on other land within the settlement boundary (cross referenced to MNDP1 Policy 3) has been removed. • Monitoring commitment has been removed from the policy and are contained with another section of the plan specifically related to monitoring. • Commitment to future review to meet updated housing requirements removed and is contained within a specific monitoring section. • New policy (B) to support provision of specialist accommodation for the elderly

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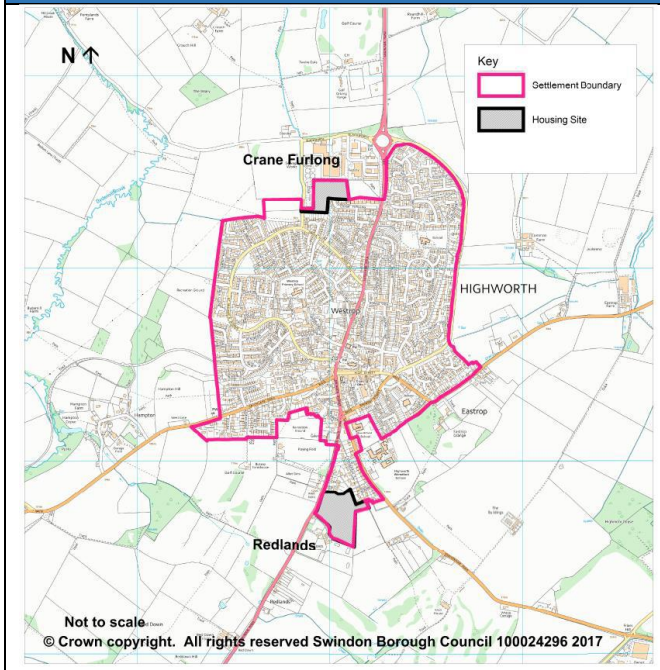		• New requirement for adaptable and accessible homes (C) • Incorporation of a revised requirement in relation to affordable housing shared ownership (previously set out in Policy 2 of MNDP1) Taken together, the proposed changes to housing policy from MNDP1 to NDPR2 are material modifications (substantial/significant)
Policy 2 - Shared Ownership Affordable Housing When affordable housing is required under Swindon Borough Council's Local Plan 2026, Policy HA2, shared ownership housing shall be provided as part of the affordable housing provision in accordance with the evidenced demand at the time.	**Deleted**	The reason for the deletion was to create a single policy on housing requirements of all types reflective of updated evidence on local housing needs. The policy provision is incorporated into NDPR2 Policy 1H and so by itself the deletion of MNDP1 policy 2 a minor modification (non-material)

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Policy 3 - Development and the Rural Settlement Boundary Land enclosed within the red outline shown on Figure 5 is defined as the settlement of Highworth. Within this defined area infill and other development consistent with planning policy in the development plan will normally be acceptable. Outside the defined settlement boundary land is defined as 'open countryside' and development here will not normally be permitted unless it complies with rural development policies in the Swindon Development Plan. *Figure 5: Highworth Allocated Housing Sites and Settlement Boundary.*	**Policy 2: Highworth's Development and Rural Settlement Boundary** Land enclosed ~~within~~ in the ~~solid red outline~~ blue line as shown on Figure ~~5~~ 4 is defined as the settlement of Highworth. Within this defined area, infill and other development consistent with policies in the Development Plan will normally be acceptable. Outside the defined settlement boundary, land is defined as "open countryside" and development here will not be permitted unless it complies with the rural development policies of the Swindon Development Plan. *Figure 4: Highworth Settlement Boundary*	The Rural Settlement Boundary needed to be updated to reflect the current extent of the built settlement of Highworth (including allocation sites) following development which has occurred in recent years. The policy amends the settlement boundary for Highworth to reflect the extent of built development on the ground only. The amendments proposed are small. The proposed amendments to the settlement boundary are considered to be material modifications but are not considered to change the nature of the plan.

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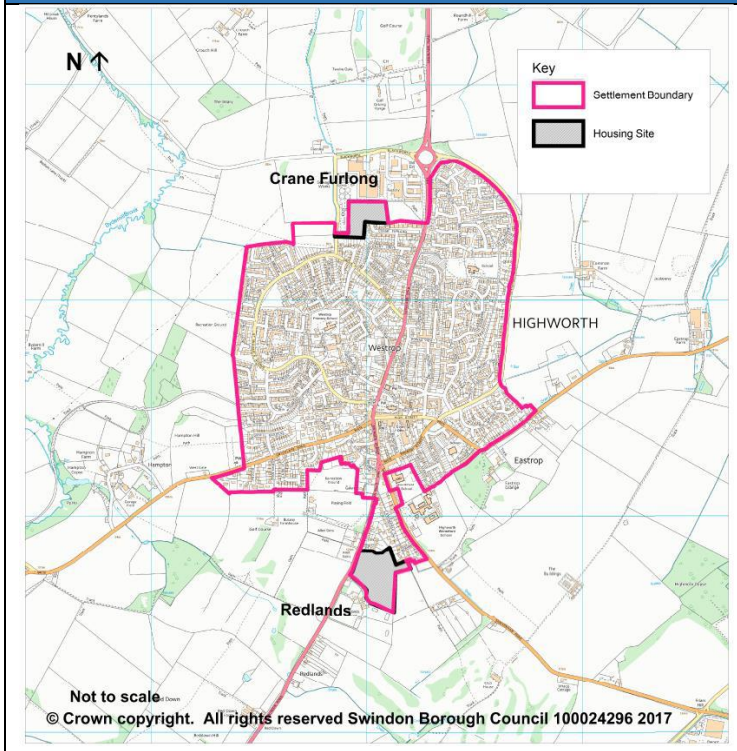	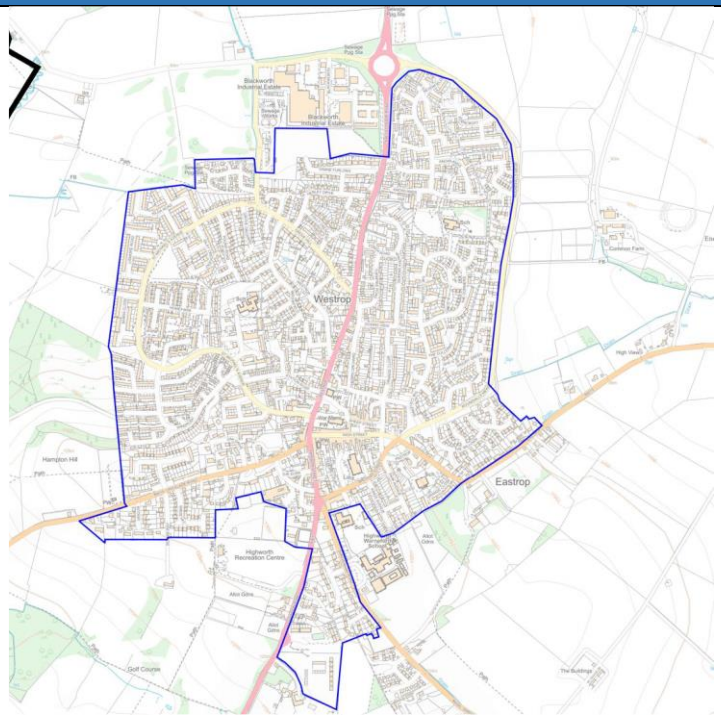	
Policy 4 – Town Centre The town centre is defined as a Primary Rural Centre in the Local Plan (policy EC3) and the continuation and rejuvenation of its retail and social hub in the town is strongly supported. Traffic and other environmental improvements that enhance the pedestrian and	**Policy 3: Highworth Town Centre** A. The Town Centre boundary, shown as a solid orange line in Figure 5, under Swindon Borough Local Plan policy EC3 is designated as the Primary Shopping Area. Its role and function will be preserved and proposals for new commercial businesses, and service users, particularly Class E, will be supported.	The policy has been updated to reflect changes in Permitted Development Rights which have reduced the ability to control changes of use within the town centre. It also considered necessary

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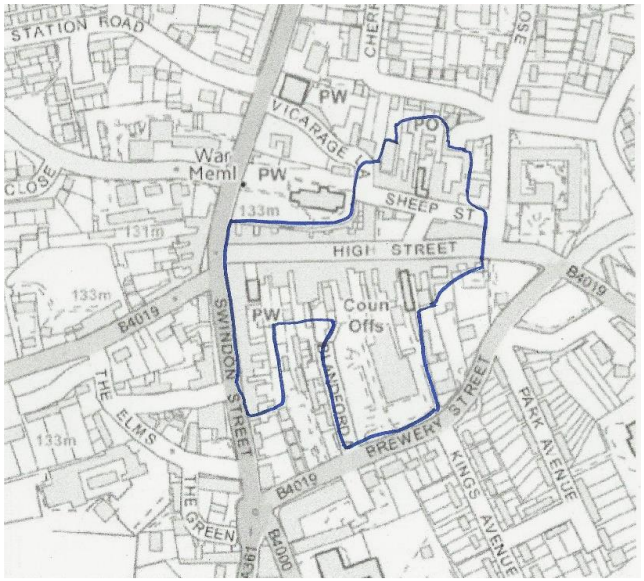
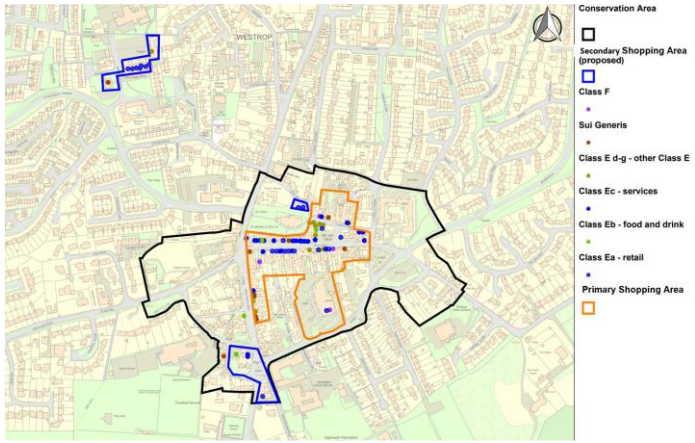
visitor experience, commercial vitality and viability of the town centre will be sought. *Figure 6: Primary Rural Centre - retail area (blue outline).* 	B. The areas identified with a blue line in Figure 5 are designated as the Secondary Shopping Areas which provide local services and meet daily needs of people within walking distance. C. Class MA development within the Conservation Area will be restricted to upper floors where Class E will be retained on the ground floor. D. Proposals for improvements of the street scene to allow for a café culture to evolve on the High Street are supported. Traffic and other environmental improvements that enhance the pedestrian and visitor experience, commercial vitality and viability of the town centre will be sought. *Figure 5: Primary and Secondary Shopping Areas, Conservation Area and Town Centre Land Uses (Refer to Appendix 2 for individual land uses)* 	to address secondary shopping areas within this context. The Policy designates a wider Secondary Shopping Area, sets new requirements in relation to the development of class MA uses and supports enhancements to the town centre environments. The proposals are considered to represent material modifications (substantial/significant).

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Policy 5 - Proposals for Daytime Cafes and Restaurant Uses (A3) in the Primary Rural Centre Within the defined Primary Rural Centre daytime A3 uses (restaurants and cafes) will be encouraged, provided that A1 retail uses occupy at least 51% of the street frontage.	**Deleted**	The deleted policy contained requirements relating to the percentage of street frontage given over to retail uses in the primary shopping area. The policy requirement was removed in recognition of the evolution of uses within high streets, to a mixed arrangement of retail, cafe/restaurants, services and community uses, and the need to retain a vibrant town centre. NDPR2 Policy 3 does not retain the requirement. The removal of this requirement is a material modification (substantial/significant).
	NEW Policy 4: Tourist attractions and accommodation A. Proposals for the provision of new or improved visitor attractions including cafes, pubs and restaurants and other enhancements to the visitor experience of Highworth will be supported. B. Proposals for accommodation will be supported where they are in compliance with other development plan policies.	This new policy has been proposed to provide planning policy support for the delivery of a published local tourism strategy which has already led to the delivery of a Visitor Centre, Craft Centre and museum. This is a new policy and as such is considered to be a material modification (substantial/significant).
	NEW Policy 5: Blackworth Employment Area	This new policy has been proposed to provide more detailed local

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	As a designated key employment area as per the Swindon Borough Local Plan any planning application should take into account Policy EC2 of the local plan. The provisions of Swindon Borough Local Plan Policy RA1(b), as shown on Figure 7, allocates land to the north of the Blackworth Industrial Estate for B class purposes. Proposals for Class B2 general industrial must consider operational noise and residential amenity. Proposals for Class B8 storage and distribution must not exceed 50% of the total permitted floorspace. Proposals for Class E(g) offices must provide for operational/administrative functions, research and development of products/processes and industrial processes. Proposals for Class E(a), Retail E(b) sale of food and drink and E(c) financial services will not be supported as they should be directed to Highworth's town centre. Proposals for residential institutions (C2) and dwellinghouses (C3) will not be permitted. In all cases, due regard must be given to the job creation capability of the activity, the choice of sustainable transport modes (walking, cycling and public transport), the operational car parking and the servicing. *Figure 7: Designated Employment Area*	planning policy support for the development of new and retention of existing employment activities in the Brockworth Employment Area taken as a whole. This is a new policy and as such is considered to be a material modification (substantial/significant).

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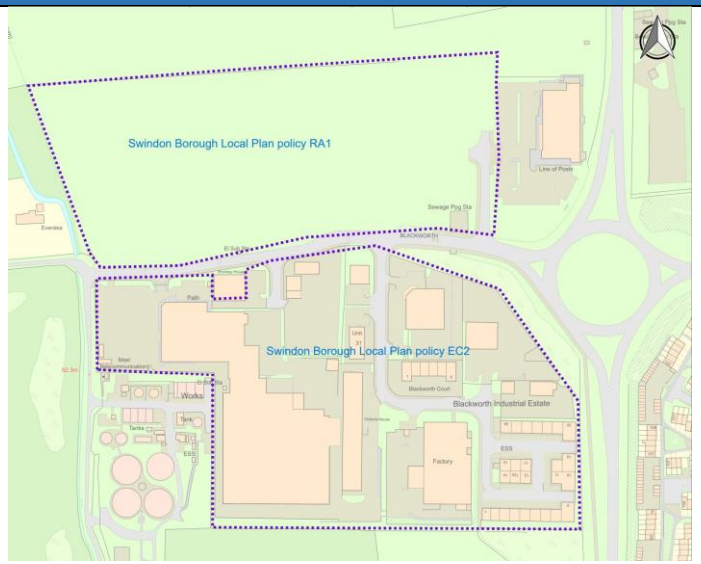
		
	NEW Policy 11: Sustainable transport A. Development will be expected to protect and where appropriate enhance the network of existing public rights of way in the Neighbourhood Plan Area shown in Figures 14 to 17. Enhancements to include, wherever possible making the paths accessible to those with special access needs and completing missing links in the network and severance due to traffic and other obstacles. B. Existing patterns of permeability offered by networks of pedestrian paths through residential developments highlighted in Figure 14 will be protected and extended in new residential schemes.	The new policy has been proposed in order to create an integrated and comprehensive NDP policy approach to active travel and sustainable transport. Part A of the policy includes the requirements set out in MNDP1 Policy 6. The figure references are updated and extended. Part B sets out a new requirement in relation to permeability (for

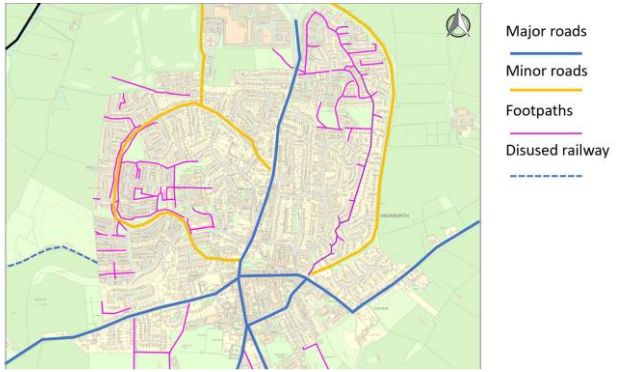
Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
	C. All cycling provision will be designed in accordance Local Transport Note 1/20 and where possible, segregated cycle paths will be provided alongside new footpaths. D. Proposals that improve the existing and proposed walking and cycling network improvements identified in Figures 14-17 will be supported. E. Links to the walking and cycling network improvements identified in Figures 14-16 will be provided by major housing and commercial schemes where the development will give rise to increased use of the network. F. The disused Swindon and Highworth Light Railway is protected within the Highworth Neighbourhood area for the purposes of sustainable transport access. Where development may impact on the route, upgrading of the surface and access to it will be required as part of the proposal. *Figure 14: Existing walking opportunities in Highworth Town identified in Neighbourhood Plan 1*  	pedestrians) of new development schemes. Part C refers to existing national and local guidance on cycle route design standards and seeks segregated cycle paths alongside new footpaths where possible (as a new element of the policy). Part D supports walking and cycling network improvements, including figure 19 suggested circular route. Part E requires developers to connect to the walking and cycling network identified in the plan. Given the specific requirements set by the new policy, these are considered to be material modifications (substantial/significant)

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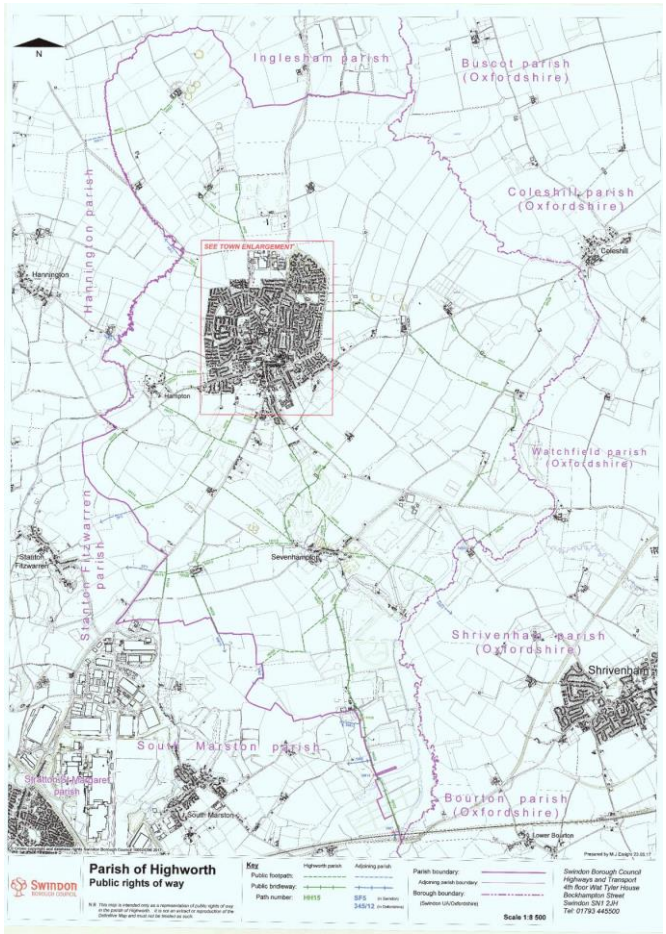
	Figure 15: Public Rights of Way in Highworth Parish 	

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	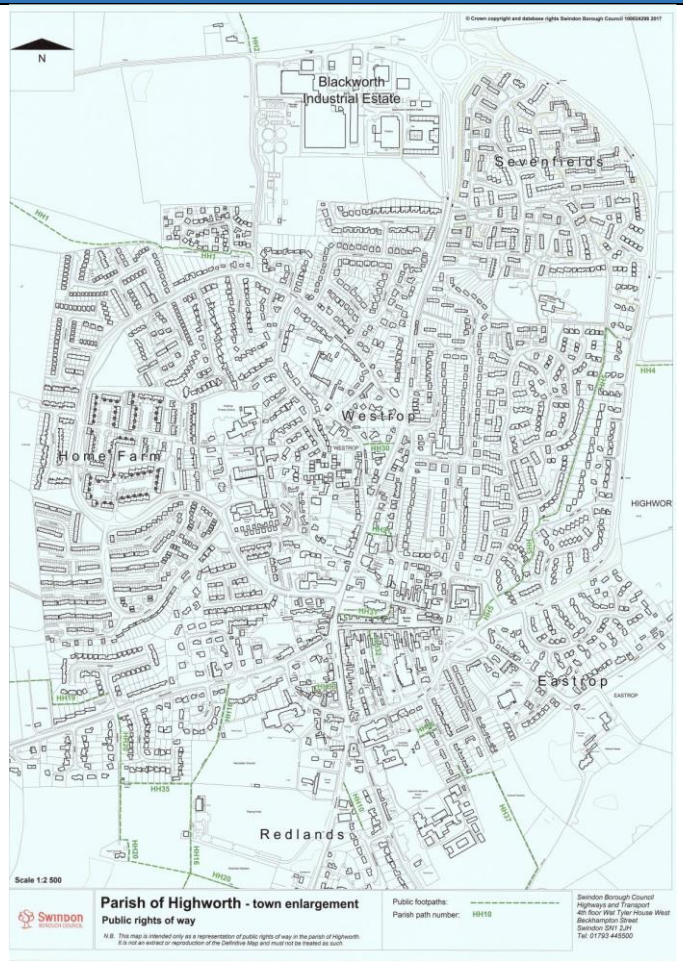	

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	Figure 16: Leisure cycling routes in Highworth identified by the LCWIP 	

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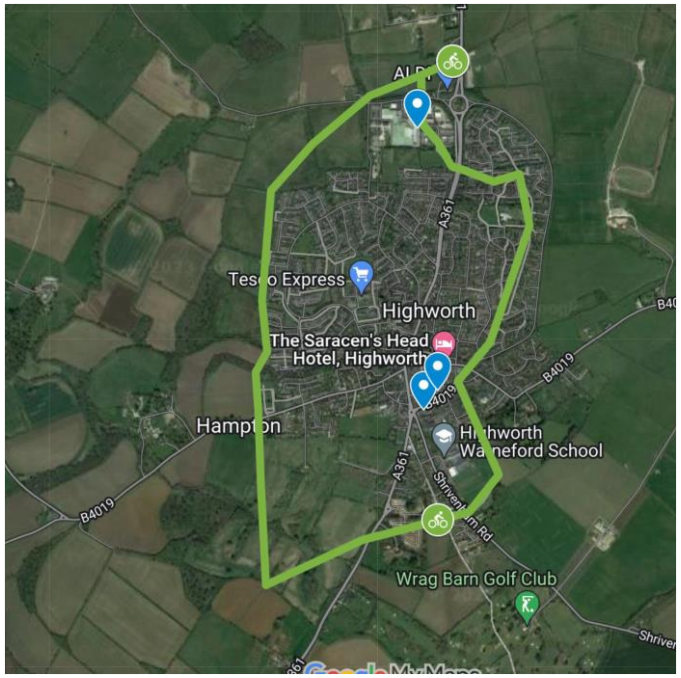
	Figure 17: Suggested High Pass Cycle Route 	
Policy 6 – Rights of Way Network Development will be expected to protect and where appropriate extend and enhance the network of existing public rights of way in the Neighbourhood Plan Area as shown on Figures 9 and 10. Enhancement to include wherever possible making the paths accessible to those with special access needs and completing	**Deleted and policy updated and incorporated into policy 11A**	The policy has been deleted in order to incorporate its provisions within a larger policy which supports efforts expand active travel and sustainable transport in the Neighbourhood Area. Given the inclusion of the requirements of MNDP1 Policy 6

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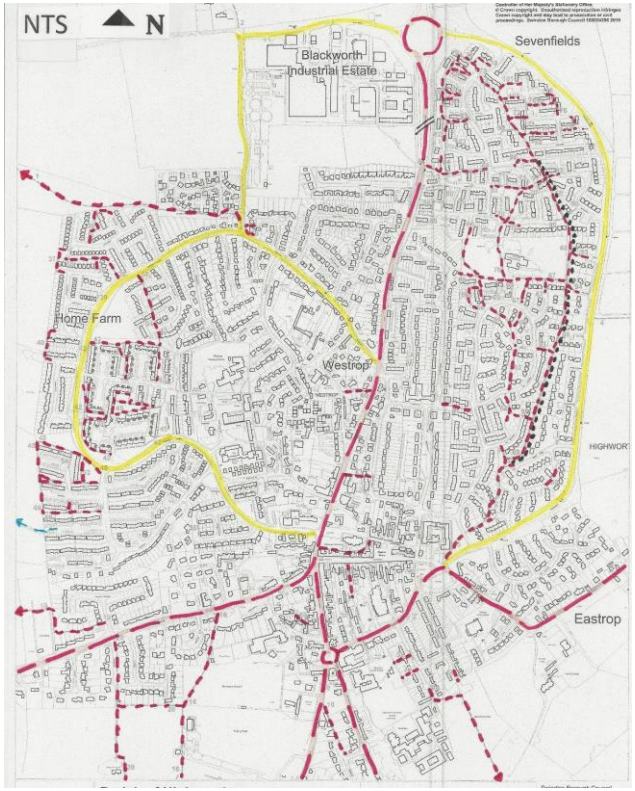
missing links in the network and severance due to traffic and other obstacles. *Figure 9: Rights of Way Network in Highworth Showing Improvement Opportunities*  		into NDPR2 Policy 11A with the changes relating to the updating of information supporting the policy, the deletion of Policy 6 by itself is considered to be a minor modification (non-material)

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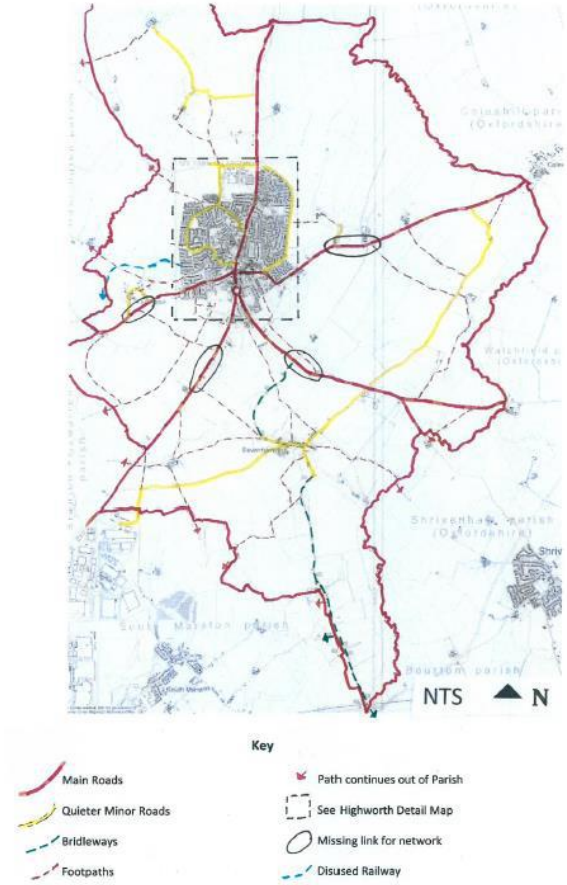
Figure 10: Rights of Way Network in Highworth Parish Showing Improvement Opportunities 		

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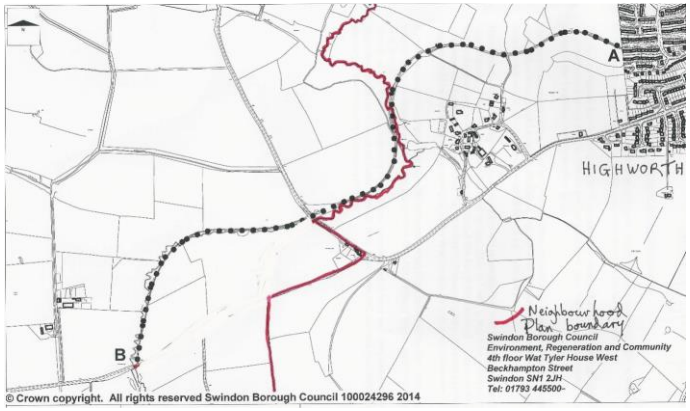
Policy 7 – Potential Cycle and Recreational Routes The disused railway shown as a potential railway path route on Figure 11 is to be protected within the neighbourhood plan boundary. Where a development proposal impacts on the route of the disused railway, upgrading of the surface and access will be required as part of that development proposal. The provision of a safe cycle facility and route alongside the A361 is encouraged as and when funds are available to strengthen safe cycle routes into and around Highworth and improve sustainable travel access to the countryside. Development proposals on the A361 should facilitate and provide this route as appropriate. *Figure 11: Route of the Disused Railway showing section within the Neighbourhood Plan* 	**Deleted some elements of policy incorporated into Policy 11F**	The policy is deleted in order to incorporate some of its provisions within new Policy 11. MNDP1 policy 7 which is deleted had two elements: The disused railway provision is incorporated with revised wording and requirements in NDPR1 Policy 11F. No specific reference to A361 cycle routes improvements is included in the new policy, but it may be included within wider references to network improvements. The amended treatment and references to provision of MNDP1 Policy 7 within NDPR2 Policy 11 are considered to be material modifications (less-substantial/significant).
Policy 8 - Maintaining and Enhancing Community Facilities	**Policy 6: Community Facilities and Infrastructure** A. Proposals for new or extended community facilities and involving the loss of such facilities will be considered in relation to Swindon	The proposed change is required in order to address current requirement for community facilities

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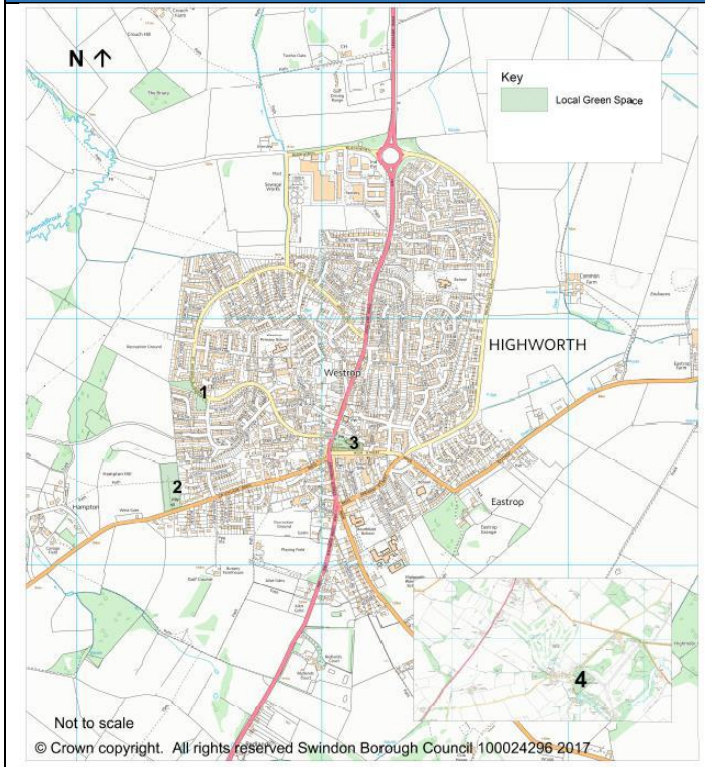
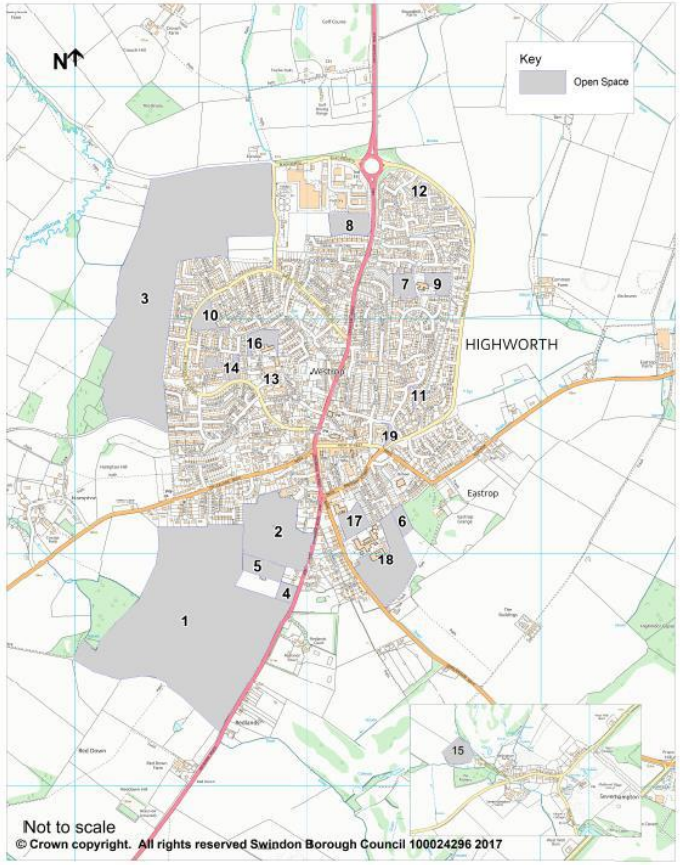
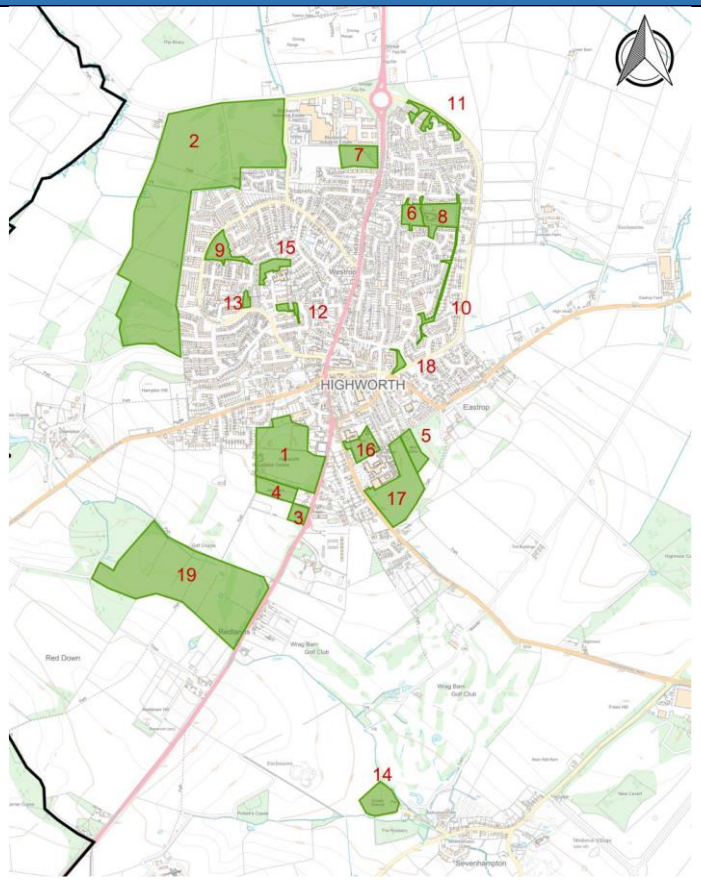
Proposals for new or extended community facilities and involving the loss of such facilities will be considered in relation to SBLP Policy CM4 and other relevant policies, including those in this Plan. Local facilities to which this policy relates have been identified as follows. This list is not exclusive. Highworth Recreation Centre Town Council Offices St Michael's Church Hall, old coach house. St Michael's Hall, Paradise Path Highworth Methodist Church United Reformed Church The Library Highworth Community Centre Youth and Community Centre Development proposals to sustain or extend the viable use of existing community facilities and the development of new facilities will normally be supported if they comply with other policies in the development Plan. Development proposals that will result in the loss, or significant reduction in the scale and value, of a community facility will not be permitted, unless alternative facilities of equal or better accessibility, size and suitability are provided. If it cannot be demonstrated that the operation of the asset is not in demand by the Community or no longer economically viable, and it has been marketed at a reasonable price for at least a year for that, or any	Borough Local Plan policy CM4 and other relevant policies for those facilities listed in Table 9. B. Development proposals that will result in the loss, or significant reduction in the scale and value of a community facility will not be permitted unless alternative facilities of equal or better accessibility, size and suitability are provided. If it can be demonstrated that the operation of the asset is not in demand by the community or no longer economically viable, and it has been Marketed at a reasonable price for at least a year for that, or any other suitable community facility use, and no interest in acquisition has been expressed, then alternatives may be considered. C. Increased GP and other NHS service capacity will be supported. D. Housing Schemes should consult with the Town Council to determine burial capacity and contribution towards provision. *Table 9: Community infrastructure priorities to be funded from developer contributions and community infrastructure levy* • *Works required in relation to Town Centre regeneration* •*Cemetery extension* •*Swindon Street* •*Environmental Improvements to Gilbert's Lane* •*Cycle facilities and network improvements* •*Children's play areas* •*Other open space improvements* •*EV charging points*	and infrastructure based on recent evidence. NDPR2 Policy 6 updates MNDP1 Policy 8. Part A - The NDPR2 policy 6 update changes the emphasis of the previous policy from protection of a list of identified community facilities to the identification of specific improvements to community infrastructure provision. The list of local facilities identified in the MNDP1 policy 8 is removed and Table 9 is referred to which sets out a list of specific requirements. Part B updates wording from the previous policy to protect existing community facilities and set marketing requirements before alternative uses will be considered. Part C supports development of health infrastructure. Which is new. Part D requires housing applicants to consult with Highworth Town Council over the need to contribute to additional burial space capacity. Taken together, the policy updates from MNDP1 Policy to NDPR2 Policy 6 are considered to be material

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
other suitable community facility use and no interest in acquisition has been expressed, then alternatives may be considered.	•*Additional benches*	modifications (substantial/significant).
Policy 9 - Local Green Spaces The following areas shown on Figure 13 are designated as Local Green Space: 1. Village Green 2. Cemetery 3. Highworth Parish Church Churchyard 4. Sevenhampton Churchyard Development on Local Green Spaces will be considered in the same manner as development in the Green Belt as explained in the National Planning Policy Framework (NPPF), section 9. This establishes a presumption of resisting most forms of development which is detrimental to the openness and character of the green spaces. *Figure 13: Local Green Space in Highworth*	**Policy 10: Local Green Spaces** The following areas shown on Figure 12 and Appendix 6 are designated as Local Green Space: 1 The Old Golf Course 2. Village Green 3. Cemetery 4. Highworth Parish Church Churchyard 5. Sevenhampton Churchyard Policies for managing development within a Local Green space should preserve a sense of openness and be consistent with those in the Green Belt. *Figure 12: Local Green Spaces in Highworth*	The policy change is proposed in response to concerns raised in community engagement over the planning status of the Old Golf Course as it relates to its use and the value/significance to the local community. NDPR2 Policy 10 updates MNDP1 Policy 9. The updated policy proposals the designation of an additional Local Green Space. The policy wording is also amended (minor amendment) The proposed designation of an additional Local Green Space Site within the policy is considered to be a material modification (substantial/significant).

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
	 Source: Andrea Pellegram Ltd. under OS licence 100002735.	
Policy 10 - Open Space Public open space assets defined on the Figure 14 will be protected from development unless: it can be demonstrated that alternative provision can be made locally of equivalent or better size, quality and accessibility; or	**Policy 9: Open Space** A. Public open space assets identified in the Figure 11 will be protected from development unless:	The policy change is proposed in response to concerns raised in community engagement over the planning status of the Old Golf Course as it relates to its use and

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
the proposed development is ancillary to the main use of the site and protects its public open space function; or the proposed development is subject to an Open Space Appraisal to ensure it does not adversely affect local needs and/or existing quality of open space within the area in accordance with the Council's Standards, as set out in Appendix 3 (of SBLP 2026) and in the most recent Open Space Audit and Assessment; or when assessed against the Open Space Appraisal, the proposed development provides community benefit which outweighs the loss of open space. 1. The Golf Course 2. Recreation Ground Upper and Lower Fields 3. Pentylands Country Park 4. Swindon road allotments 5. Allotments adjacent to Highworth Golf Complex 6. Park Avenue Allotments 7. Haresfield Play Area 8. Crane Furlong Recreation ground 9. Highworth Community Centre Playing field 10. The Triangle 11. Priory Green 12. Sevenfields Entrance 13. Newburgh Open Space	• it can be demonstrated that alternative provision can be made locally of equivalent or better size, quality and accessibility; • or the proposed development is ancillary to the main use of the site and protects its public open space function; • or the proposed development is subject to an Open Space Appraisal to ensure it does not adversely affect local needs and/or existing quality of open space within the area in accordance with the Council's Standards, as set out in Appendix 3 (of Swindon Borough Local Plan 2026) and in the most recent Open Space Audit and Assessment; • or when assessed against the Open Space Appraisal, the proposed development provides community benefit which outweighs the loss of open space. B. The open spaces are: 1. Recreation Ground Upper and Lower Fields 2. Pentylands Country Park 3. Swindon road allotments 4. Allotments adjacent to Highworth former Golf Complex 5. Park Avenue Allotments 6. Haresfield Play Area 7. Crane Furlong Recreation ground 8. Highworth Community Centre Playing field	the value/significance to the local community. The policy is an update from MNDP1 Policy 10 to NDPR2 Policy 9. The policy wording and requirements are the same. An updated Map is provided to show the location of the designations. • The Golf Course has been amended to reflect the open space based on its southern section only – the northern section has been proposed as a Local Green Space in NDPR2 Policy 10. Taken together, the proposed changes to open spaces are considered to be material modifications (substantial/significant).

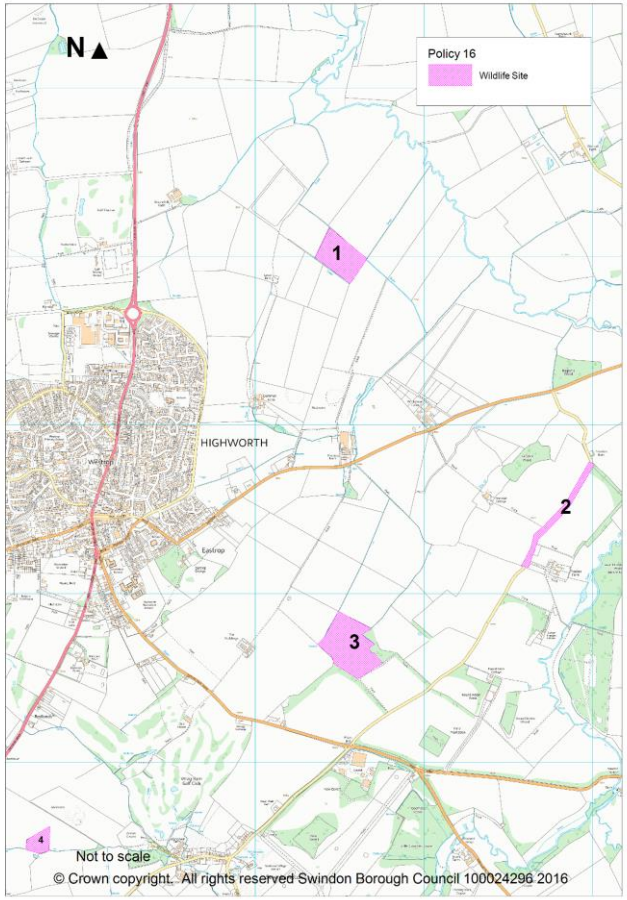
Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
14. Home Farm Green Space 15. Sevenhampton Cricket Ground 16. Westrop Primary School 17. Southfields School 18. Highworth Warneford School 19. Town Green (adjacent to Parsonage Court) *Figure 14: Open Spaces in Highworth Parish*	9. The Triangle 10. Priory Green 11. Sevenfields Entrance 12. Newburgh Open Space 13. Home Farm Green Space 14. Sevenhampton Cricket Ground 15. Westrop Primary School 16. Southfields Junior School 17. Highworth Warneford School 18. Town Green (adjacent to Parsonage Court) 19. Old Golf Course *Figure 11: Open Spaces in the Highworth Neighbourhood Plan Area*	

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
		
	NEW Policy 12: Biodiversity and nature recovery A. Development must support the green infrastructure network identified in the Swindon Local Plan Policy EN1 and as defined on	The policy is proposed in order to provide NDP policy support for development that contributes to nature recovery in accordance with

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
	the development plan Policies Map which includes the local sites identified in HNP2, and align with Wiltshire and Swindon Local Nature Recovery Strategy. B. Development proposals must seek to retain trees and hedgerows of amenity value whenever possible. Development proposals affecting trees and hedgerows must be accompanied by an arboricultural survey which justifies any felling in terms of the health of trees or danger presented by any tree as a result of its condition or position. Trees to be retained must be the subject of proposal for their protection during construction. C. Applicants for development where biodiversity net gain is a requirement should provide evidence in planning applications that the following has been investigated and, where necessary, will be implemented: i. Contact Swindon Borough Council to determine whether work has been done towards the preparation of the Nature Recovery Strategy and seek advice on any conclusions available that relate to the proposal. ii. Where biodiversity net gain cannot be delivered on site, applicants must work with Swindon Borough Council to identify ways that off-site biodiversity net gain can be delivered in Highworth Neighbourhood Area. iii. Where off-site Biodiversity Net Gain is proposed, this should be focused on the Nature Recovery Areas shown in Figure 18. iv. Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits and long-term management where necessary.	the emerging Wiltshire Local Nature Recovery Strategy. This is a new policy in NDPR2 and incorporates some of MNDP1 policy. Part A requires development to support local plan policies and align with the Wiltshire Local Nature Recovery Strategy. It includes reference to local sites identified in the Local Plan (which may include sites referenced in MNDP1 policy 12/Figure 16). Part B incorporates requirements from MNDP1 policy 11 on trees and provides more detailed wording. Part C sets out detailed requirements for applicants with regard to Biodiversity Net Gain. The policy extends policy requirements beyond MNDP1 policies 11 and 12 and so constitute material modifications (substantial/significant).

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
	v. Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered. vi. Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.	
Policy 11 - Protection of Trees and Hedgerows Development proposals must seek to retain trees and hedgerows of amenity value whenever possible. Development proposals affecting trees and hedgerows must be accompanied by an arboricultural survey which justifies any felling in terms of the health of trees or danger presented by any tree as a result of its condition or position. Trees to be retained must be the subject of proposals for their protection during construction.	**Deleted and policy incorporated into Policy 12B**	The change is proposed in order to incorporate requirements within a more comprehensive policy 12. The policy provisions are incorporated and extended in NDPR2 and so the deletion of the policy is considered by itself to be minor modification (non-material)
Policy 12 – Local Wildlife and Biodiversity Areas of local wildlife and biodiversity value will be protected and development that significantly harms or destroys the biodiversity and ecological value of the sites will not be permitted. County Wildlife Sites as shown on Figure 16 and listed below are areas of local wildlife and biodiversity value for the purposes of this policy shown on Figure 15. County Wildlife sites are: 1. Common Farm 2. Fresden Farm Verge 3. Highmoor Copse 4. Picketts Copse	**Deleted**	The change is proposed in order to incorporate requirements within a more comprehensive policy 12. The policy requirement and coverage of NDPR2 Policy 12A is different to that contained in MNDP1 Policy 12 in order to reflect a more comprehensive understanding of the local nature recovery network, and so the deletion of MNDP1 Policy 12 could be considered a material modification (less-substantial/significant)

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
Where acceptable mitigation of potential damage is possible, development may be permitted subject to requiring mitigation and protection of the asset during development. New development is encouraged to include new areas of wildlife and biodiversity value where potential exists. *Figure 16: County Wildlife Sites in Highworth Parish (numbers refer to Policy 13)*		

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
		

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
Policy 13 – Locally Responsive Design Design of development proposals should take into account the following guidelines: • Policies in the SBLP2026 in particular Policy DE1: High Quality Design; Policy DE2: Sustainable Construction: EN5: Landscape Character and Historical Landscape: Policy EN10 Historic Environment and Heritage Assets and the Swindon Residential Design Guide 2016 • In Conservation areas the respective Conservation Area Appraisal and Management Plans will be an important reference in design assessments. • The impact of development on landscape character and important views will be taken into account and resisted where it is unduly intrusive or unrelated to existing features; and • Boundary wall treatments are to preserve existing stone boundaries, and extend and reflect this local feature where possible; and • The local building materials of stone and red brick are the preferred main elevation materials particularly development which is prominent in the public realm; and • Where possible, new landmark native trees should be incorporated into soft landscaping of any development proposal; and	**Policy 7: Design** A. Planning applications will be prepared in accordance with the Highworth Design Guidance and Codes. B. In Conservation Areas the respective Conservation Area Appraisal and Management Plan will be an important point of reference in design assessments. C. Boundary wall treatments are to preserve existing stone boundaries and extend and reflect this local feature where possible. D. The local building materials of stone and red brick are the preferred main elevation materials, particularly development which is prominent in the public realm. E. Where possible, new landmark native trees, should be incorporated into the soft landscaping of any development proposal. F. Development should be designed to integrate well within the existing neighbourhood and work with the character and scale of existing buildings and the surrounding area. G. Major development proposals will be expected to undertake design review at pre-application, outline or reserved matters stages as appropriate, by means of referral to the Swindon Design Review Panel. H. All development should aim to maximise the energy efficiency of a building's performance, harvest and use rainwater effectively and make use of renewable energy technologies where possible.	NDPR2 Policy 7 updates MNDP1 policy 13. The updated policy introduces a new requirement in Part A in relation to the Highworth Design Guidance and Codes and in relation to the provision on new landmark trees in Part E. Parts B, C, D, G and H of the updated policy are retained from MNDP1 Policy 13. Some parts of the original policy have been removed, including references to specific local plan policies and guidance, impacts on landscape character and views (there is a new policy 8 on this), and geologically important sites. Taken together, the changes are considered to be material modifications, adding more detail to but not changing the nature of the plan.

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
• Development should be designed to integrate well with the existing neighbourhood and work with the character and scale of existing buildings and the surrounding area; and • Major development proposals will be expected to undertake design review at pre-application, outline or reserved mattes stage(s) as appropriate, by means of referral to the Swindon Design Review Panel; and • All development should aim to maximize the energy efficiency of a building's performance, harvest and use rainwater efficiently and make use of renewable energy technologies where possible. • The need to protect Regionally Important Geological Sites.		
	NEW Policy 8: Landscape and views A. The impact of development on landscape character and important views shown on Figures 9 and 10 will be taken into account and resisted where it is deemed to be unduly intrusive or unrelated to existing features. *Figure 9: Important views into Highworth Town that require protection*	NDPR2 Policy 8 is a new policy. The policy identifies (in Figure 9 and Figure 10) specific public viewpoints and views in the Neighbourhood Area and seeks to protect them from development that is unduly intrusive or unrelated to existing natural or man-made features. As a new policy setting specific requirements for developers, the Policy is considered to be a material modification (substantial/significant)

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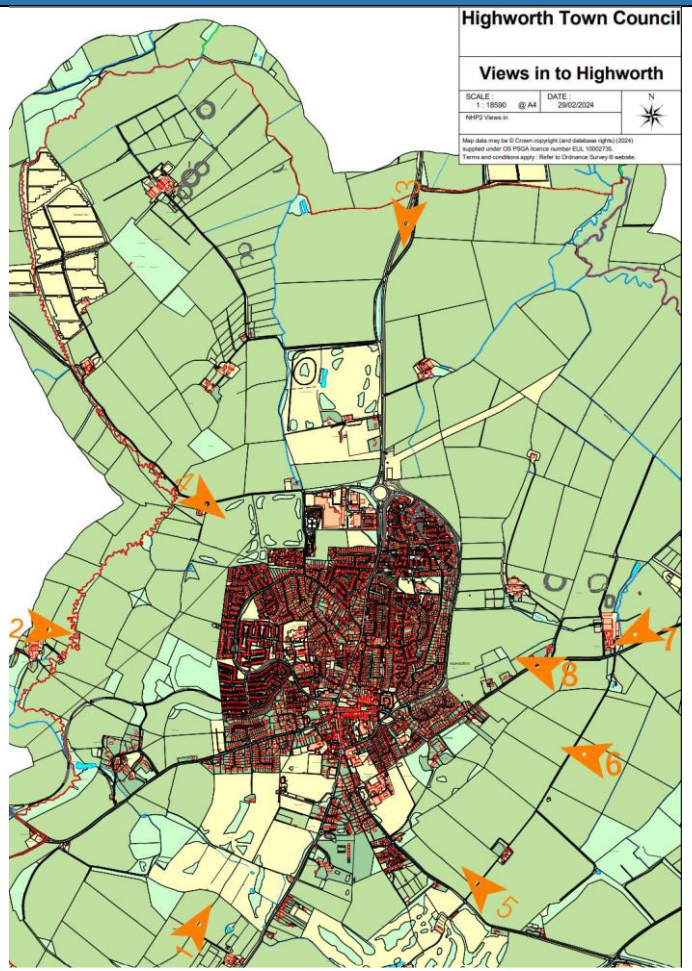
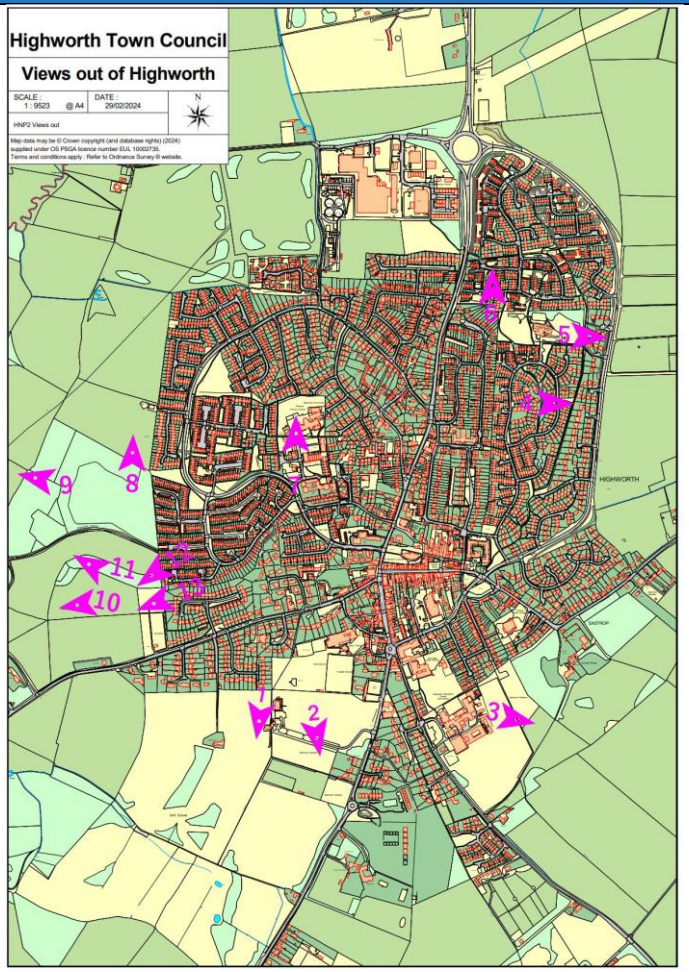
		

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change
	Figure 10: Important views looking from Highworth Town into the countryside	

Made Neighbourhood Development Plan 1 (MNDP1)	Neighbourhood Development Plan Review 2 (NDPR2)	Reasons for and materiality of proposed change