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## MELKSHAM WITHOUT PARISH COUNCIL

Clerk: Mrs Teresa Strange

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Monday 12 August 2024

To all members of the Council Planning Committee: Councillors Richard Wood (Chair of Planning), Alan Baines (Vice Chair of Planning), John Glover (Chair of Council) David Pafford (Vice Chair of Council), Terry Chivers, Mark Harris and Peter Richardson

You are summoned to attend the Planning Committee Meeting which will be held on **Monday 19 August at 7.00pm at Melksham Without Parish Council Offices (First Floor), Melksham Community Campus, Market Place, SN12 6ES** to consider the agenda below:

**TO ACCESS THE MEETING REMOTELY, PLEASE FOLLOW THE ZOOM LINK BELOW. THE LINK WILL ALSO BE POSTED ON THE PARISH COUNCIL WEBSITE WHEN IT GOES LIVE SHORTLY BEFORE 7PM.**

Click link here:

<https://us02web.zoom.us/j/2791815985?pwd=Y2x5T25DRlVWVU54UW1YWWE4NkNrZz09&omn=86727436011>

Or go to [www.zoom.us](http://www.zoom.us) or Phone 0131 4601196 and enter: **Meeting ID: 279 181 5985**  
**Passcode: 070920**. Instructions on how to access Zoom are on the parish council website [www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk). If you have difficulties accessing the meeting please call (do not text) the out of hours mobile: 07341 474234

**YOU CAN ACCESS THE AGENDA PACK HERE**

Yours sincerely,

Teresa Strange, Clerk



Serving rural communities around Melksham

# AGENDA

## 1. Welcome, Announcements & Housekeeping

- i) To note work commenced on Gompels warehouse extension (PL/2024/01458)

## 2. To receive Apologies and approval of reasons given

## 3. Declarations of Interest

- a) To receive Declarations of Interest.
- b) To consider for approval any Dispensation Requests received by the Clerk and not previously considered.
- c) To note standing Dispensations relating to planning applications.

## 4. To consider holding items in Closed Session due to confidential nature

*Under the Public Bodies (Admission to Meetings) Act 1960, the public and representatives of the press and broadcast media be excluded from the meeting during consideration of agenda items where publicity would be prejudicial to the public interest because of the confidential nature of the business to be transacted.*

## 5. Public Participation

## 6. To consider the following new Planning Applications:

**PL/2024/06557**: **4 Elm Close, Bowerhill.** Side extension, works to front parking area and alter garage to accommodation. Applicant Mr S Jackson (Comments by 15 August). (The parish council have been granted an extension on their commends until 20 August)

**PL/2024/06422**: **38 Hornchurch Road, Bowerhill.** Proposed garden shed (retrospective). Applicant Marcia Cox. (Comments by 23 August)

**PL/2024/06272**: **48-54 Blenheim Park, Bowerhill.** Proposed modular extension. Applicant Tesco (Comments by 2 September)

## 7. Revised/Amended Plans/Additional Information: To comment on any revised/amended plans/additional information on planning applications received within the required timeframe (14 days).

**PL/2024/05437**: **17 Park Road, Bowerhill.** Proposed Two Storey Rear Extension. Applicant Jason Mack (Comments by 14 August). (The parish council have been granted an extension on their comments until 20 August)

## 8. Lime Down Solar Farm:

- a) To note response from Nic Thomas, Director of Planning regarding Wiltshire Council's response to the scope of the Environmental Impact Assessment (EIA).
- b) To note parish council's response to the Planning Inspectorate on the EIA.

9. **Current planning applications:** Standing item for issues/queries arising during period of applications awaiting decision.
- a) **Blackmore Farm (Planning Application PL/2023/11188):** Outline permission for demolition of agricultural outbuildings and development of up to 500 dwellings; up to 5,000m<sup>2</sup> of employment (class E(g)(i) & class E(g)(ii)); land for primary school (class F1); land for mixed use hub (class E/class F); open space; provision of access infrastructure from Sandridge Common; and provision of all associated infrastructure necessary to facilitate the development of the site.
    - i) To consider objection from Wiltshire Council Ecology on proposals.
  - b) **Proposed Primary School, Land at Pathfinder Way, Bowerhill. Reserved Matters application (PL/2023/08046)** pursuant to outline permission 16/01123/OUT relating to the appearance, landscaping, layout and scale of the proposed primary school (including Nursery and SEN provision).
10. **Planning Enforcement:** To note any new planning enforcement queries raised and updates on previous enforcement queries.
- a) **Pathfinder Way Development (16/01123/OUT), Pathfinder Way, Bowerhill.** To receive update on public open space.
  - b) **489a Semington Road.** To receive update on enforcement action concerning breaches of planning conditions relating to recently built garage (PL/2021/06824) being used as a dwelling.
11. **Planning Policy**
- a) **Melksham Neighbourhood Plan:** To receive update.
  - b) **Proposed changes to the National Planning Policy Framework (deadline 24 September).**
    - i) To consider feedback from Wiltshire Council webinar on 14<sup>th</sup> August on initial thoughts.
    - ii) **New Government Housing Targets.** <https://www.gov.uk/government/news/housing-targets-increased-to-get-britain-building-again> To note response from Councillor Clewer, Leader of Wiltshire Council.
    - iii) To consider how to respond to the consultation: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>
  - c) **South East Strategic Reservoir Option (SESRO).** To consider a response to the public consultation. (deadline 28 August) in relation to the Wilts & Berks canal restoration project. [South East Strategic Reservoir Option \(SESRO\) - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://www.thames-wrmp.co.uk/south-east-strategic-reservoir-option)
  - d) **Semington Neighbourhood Plan.** To note Regulation 16 consultation is taking place between 7 August-24 September and to consider a response at a later date.
12. **S106 Agreements and Developer meetings: (Standing Item)**
- a) **Updates on ongoing and new S106 Agreements**
    - i) **Pathfinder Place:**



- To note any update on outstanding issues and consider way forward.
  - ii) Buckley Gardens, Semington Road (PL/2022/02749: 144 dwellings)**
    - To note any updates and consider a way forward.
  - iii) Land to rear of Townsend Farm for 50 dwellings (PL/2023/00808)**
    - To note any updates and consider a way forward.
  - iv) Land South of Western Way for 210 dwellings and 70 bed care home (PL/2022/08504).**
    - To note any updates and consider a way forward.
- b) To note any S106 decisions made under delegated powers**
- c) Contact with developers**

**Copy to all Councillors**



08 July 2024

Dear Resident

As I am sure you are aware from the planning notification you would have received, we plan to extend our current warehouse to the South, utilising the old railway line to gain some desperately needed extra space.

The works are due to start this week. The first stage of the work will be groundworks to lower the ground level and form the extension to our rear bund. The bund will help screen you from the building and associated construction noise.

The works are due to take around 6 months and we plan to have the building in use before the end of the year.

We will write to you again and let you know when the floor concrete is due to be poured. This should be the only element that may run out of hours, into the night, and unfortunately cannot be avoided, however it will only be one or two days/nights.

We will aim to keep any disruption to an absolute minimum, but should you wish to discuss any concerns please do give us a ring on 0345 450 2420, or drop us an email [sales@gompels.co.uk](mailto:sales@gompels.co.uk).

Finally, apologies for the short notice, even we were a little shocked by the quick turnaround time of the builders!

Kind Regards

Sam Gompels

# Melksham Without Parish Council's comment

- Planning Application

[PL/2024/05437](#): 17 Park Road, Bowerhill. Proposed two storey extension.

- Stance

Object

## Text

To object to proposals given the impact on adjacent properties with regard to loss of light, privacy and over-shadowing. To request the planning application is 'called in' for consideration at a Wiltshire Council Planning Committee.

## Lorraine McRandle

---

**From:** Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>  
**Sent:** 31 July 2024 17:36  
**To:** Teresa Strange  
**Cc:** Drainage; Alford, Phil; Lorraine McRandle; CAWS; Botterill, Nick  
**Subject:** RE: Melksham Without Parish Council's comments to the Lime Down Solar PINS current consultation

Good evening Teresa.

Thank you for your e-mail and for sharing these documents.

Yes, we have been asked to comment on the Scoping document for the Environmental Impact Assessment and officers will be pulling together and submitting a response to meet the deadline. It is important that we only respond from a factual and professional perspective, with no stated or implied bias as to whether the council would support or oppose the scheme.

It is of course a matter for the Parish Council to decide how it responds to the consultation.

I will share your e-mail and attachments with colleagues for information.

Kind regards,

**Nic Thomas**  
**Director - Planning**

**Wiltshire Council**

Tel: 01225 713283

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Web: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

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**From:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Sent:** Wednesday, July 31, 2024 12:15 PM  
**To:** Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>; Botterill, Nick <Nick.Botterill@wiltshire.gov.uk>  
**Cc:** Drainage <Drainage@wiltshire.gov.uk>; Alford, Phil <Phil.Alford@wiltshire.gov.uk>; Lorraine McRandle <office@melkshamwithout-pc.gov.uk>; CAWS <whitley.and.shaw@gmail.com>  
**Subject:** Melksham Without Parish Council's comments to the Lime Down Solar PINS current consultation

Dear Nic

Thank you for your response.

I write again at the request of the parish council, as your email explains that Wiltshire Council will not likely be responding to the Lime Down application until 2025.

Since then the Planning Inspectorate is currently out for consultation on the scoping document for the Environment Impact Assessment with a deadline of 14<sup>th</sup> August. <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010168>

We assume therefore, that as the parish council has been considered as a statutory consultee, that Wiltshire Council have been consulted too.

The parish council's response is still a work in progress, as there may be additional comments to add, the 845 page document is a lengthy read, but at this stage we do want to put forward for your consideration the points raised by the local community action group in Whitley, with their questions raised specifically about the proposed BESS in Whitley; and the parish council's comments to the initial Lime Down consultation, with the bits highlighted that would fall into the scope of the EIA.

We do hope that the points raised, from the local knowledge and community view point of view is taken into consideration in Wiltshire Council's response.

Perhaps you could confirm for us that Wiltshire Council are indeed submitting a response?

With kind regards, Teresa

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**Wellbeing Statement** I may send emails outside office hours but never with any expectation of response. Please just get back to me when you can within your own working hours. Thank you.

**Upcoming leave: 9<sup>th</sup> to 16<sup>th</sup> August returning to work Monday 19<sup>th</sup> August 024**

Want to keep in touch?

Follow us on facebook: [Melksham Without Parish Council](#) or [Teresa Strange \(Clerk\)](#) for additional community news

On twitter: [@melkshamwithout](#)

On Instagram: [melkshamwithoutpc](#)

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**From:** Thomas, Nic <[Nic.Thomas@wiltshire.gov.uk](mailto:Nic.Thomas@wiltshire.gov.uk)>

**Sent:** 11 July 2024 16:21

**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>; Botterill, Nick <[Nick.Botterill@wiltshire.gov.uk](mailto:Nick.Botterill@wiltshire.gov.uk)>

**Cc:** Drainage <[Drainage@wiltshire.gov.uk](mailto:Drainage@wiltshire.gov.uk)>; Alford, Phil <[Phil.Alford@wiltshire.gov.uk](mailto:Phil.Alford@wiltshire.gov.uk)>; Lorraine McRandle <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>

**Subject:** RE: Melksham Without Parish Council's comments to the Lime Down Solar consultation

Dear Teresa,

Thank you for your e-mail.

## **Clerk's Note:**

To follow is what has been submitted to the Planning Inspectorate for the parish council's submission to the EIA scoping consultation. CAWS sent their submission directly to the Inspectorate but they were unable to accept it as not a statutory consultee. Therefore the parish council's submission includes theirs too, incorporated so it looks like the parish council submission so their comments are taken account of (but in the introduction I have referenced that it includes the view of the community as well following public meetings).

The version that has gone to the Inspectorate does not have all the colours but for the benefit of you and CAWS, they are there so you can see the sources.

**Red** is from the Clerk, extra comments under delegated powers after reading this week, and as agreed, references to the NHP and Local Plan etc.

**Blue** is the comments from what the parish council originally sent to the Lime Down consultation and you agreed to submit to this consultation.

**Black** is the original submission of CAWS.

## **Melksham Without Parish Council response to the Environment Impact Assessment scoping document consultation by the Planning Inspectorate ref. EN010168 for Lime Down Solar Park**

**8<sup>th</sup> August 2024**

This is the formal response of Melksham Without Parish Council to the proposed Lime Down Solar EIA scoping document as a statutory consultee, with particular reference to the areas that are located in the parish. It has been formulated following review at both the parish council's Planning Committee and Full Council public meetings at the end of July, and with input from local community members, particularly from Whitley.

For context, Melksham Without Parish Council is one of the largest rural parishes in Wiltshire, with a population of approximately 7,200. Two of the villages in the parish are **Whitley**, which is referred to in the Lime Down documentation as "Land at the Melksham Substation" and **Beanacre** which is the site of the National Grid 400kV "Melksham Substation" and the southerly end of the Cable Route Search Corridor. We believe the Lime Down documentation is very misleading in its description of these two sites as they are named throughout the documentation, as they do not accurately portray the historic, rural settlements that they are but imply that they are urban, industrial areas in the town.

Melksham Without Parish surrounds the town of Melksham on three sides – the northern, eastern and southern. In the past, the three villages in the north –

Beanacre, Shaw and Whitley – were ancient centres of population. Whitley is mentioned in the Domesday book.

Through the passage of time, the villages of Whitley and Shaw have grown but continue to be distinct settlements. Whitley was probably settled around the same time as Shaw and the origin of both names means a white clearing or wood/copse. At its heart, the village is an agricultural centre with a number of working farms, and farms that have been converted to residential use but the agricultural land associated with them dispersed to other local farms. The village is rich with listed buildings. The agricultural heritage, the listed buildings, along with some other significant 20<sup>th</sup> centre residential development, give Whitley its unique character, charm and local distinctiveness. Medieval Shaw was a small community centred on its manor house and the chapel. The settlement remained small and rural but by the 17<sup>th</sup> century there were a reasonable number of houses. The population grew during the 19<sup>th</sup> century and a church and school were provided. Whitley and Shaw are considered to be a “Large Village” by Wiltshire Council in their adopted Core Strategy and emerging Local Plan (Reg 19 stage at Sept 23).

Beanacre [Benneacar/Benecar] (Beanfield) is the ribbon development, interspersed with open frontages, along the busy, main A350 between the northern boundary of the town of Melksham and the village of Lacock. It is one of the oldest settlements in the area, first mentioned in estate records of 1275, the earliest surviving dwelling is the Grade I listed Old Manor which lies off the Old Road.

The parish council also feel that the project location is misleading on the PINS portal, “land north of Hullavington, Wiltshire” may cover the solar farm but not the supporting infrastructure, the BESS proposed in Whitley or the proposed underground cable connection to the substation through Beanacre, both of which are south of Hullavington and the M4 and in West Wiltshire. Whilst 5 parcels of land are located to the north of Hullavington, the 6<sup>th</sup>, and the cable route search corridor, are not. To a member of public looking at the website, they would believe all the proposals are for the north of the county.

Item	Doc Ref	Comment
60 Year Life	2.2.11 4.3.9 20.4.2 20.4.1 4	A 60-year BESS life is, for all intents and purposes, permanent. Describing the BESS as “temporary” is inappropriate as it sets an incorrect context/expectation regarding the life of the scheme.  The ability of any Decommissioning Bond to be effective so far in the future is remote. This means there is a high risk that the land will never return to agricultural use.



		<p>A 60-year BESS life implies the same timescale for access tracks and land for any related infrastructure and equipment. In fact the scoping document refers to the BESS, access tracks, substations and units being permanent and this needs to be considered within the EIA.</p> <p>The Scoping Study should therefore explore these risks and set out a methodology to assess and mitigate them.</p> <p>Risks associated with proposed equipment upgrades, refits, replacements, and maintenance over a 60-year life also need to be included in the EIA and this should also therefore be part of the scoping.</p>
Land at Melksham Substation	4.1.4	<p>Throughout the scoping document the BESS site is described as “Land at Melksham Substation”. This descriptor suggests the proposed site is brownfield and that it is colocated with the substation.</p> <p>As the proposed site is actually a greenfield site which is in productive agriculture use we submit that the developers description is misleading and should be changed throughout the document to something more illustrative such as “Agricultural Land at Whitley”.</p> <p>We also note references to the “Village of Melksham” demonstrating a lack of local research.</p>
	7.5.10 2	<p>The land at Melksham Substation is located within the parish of Melksham <b>Without</b>, not the parish of Melksham</p>
Screening	2.2.12 7.3.2	<p>We note that any screening will not be effective for circa 15 years. We do not consider a baseline 15 year period for screening maturity, 25% of the project timescale, to be remotely acceptable.</p>

		<p>The scoping study should therefore properly set out a methodology to satisfactorily mitigate such matters, including plans for how those mitigants will be implemented, such that screening becomes effective during the first 5 years of the project.</p> <p>The new 400kV substation will be 13m to the top of the bushbars, that is the height of a 4 storey building, will vegetation and trees be sufficient to screen?</p>
Safety	<p>2.3.5 11.4's 11.4.10 11.5.1 21.2.6 Table 22.2</p>	<p>It is unacceptable to delay an assessment of safety until after the DCO application is made (we note the current proposal that the Outline Battery Storage Safety Management Plan (BSMP) will not be available until it is submitted with the DCO application).</p> <p>The scoping should therefore include a methodology for a preliminary safety assessment which should include fire, pollution and contamination risks. Regulators, including the HSE and the EA, and the Fire Service should be consulted on that methodology.</p> <p>The development of a pollution and contamination prevention strategy should be developed as part of the EIA and the scoping should set the methodology for that process.</p> <p>Arrangements should be included for an independent technical expert review of all the proposed safety management and risk prevention method statements.</p> <p>It is unacceptable to predetermine and scope out such risks at this stage of the project.</p> <p>There are several concerns about fire risk. That the batteries will ignite, and then be very difficult to extinguish. They are very close together, and the fire</p>

		<p>could easily spread, with no means of fire engines to gain access between the batteries. Anecdotal evidence to date is that the fires need water on them for days, not hours, to put them out (as evidenced by fires in electric cars which are not allowed to be unattended for 2/3 days). This will have a huge impact on the community, with the toxic fumes, but also the impact of the water used then running off to heavily increase the surface water flooding potential. The water runoff will be contaminated by the lithium and will flow into the water course and saturate the ground. There are also anecdotal concerns raised at the risk of explosion from these type of electric storage batteries; these are physically much larger in scale compared to the fires in electric cars and scooters that are reported in the press with regularity. The parish council are keen to see any comments submitted by the Fire Service to be scoped into this EIA.</p> <p>Concerns are also raised about the widescale use of lithium on the site, with no research into possible long-term harm of the lithium as it's a new technology. This should be scoped in.</p> <p>Details of the risk management of the site must be scoped in, who will maintain the installation and what processes will be put in place? Will the batteries be monitored and tested for any change in temperatures, moisture content in the batteries for example? And if so, what is the plan to address any increased risks?</p>
<p>Status of Consultation</p>	<p>1.5.3</p>	<p>It is noted that the developer claims Stage 1 Non-Statutory consultation is complete and that community engagement is ongoing. This is incorrect. CAWS have set out in writing to the developer why Stage 1 was ineffective and why it cannot be claimed to be complete. Engagement with the community since then has been almost non-existent evidenced by a raft of unanswered questions and correspondence.</p> <p>Building on this feedback, the scoping document should set out an ongoing community engagement methodology</p>

		<p>consistent with the principles of paras 39-46 of the NPPF. That methodology should provide for community involvement in discharging the various studies and assessments set out elsewhere in the scoping document.</p>
<p>“No Development”</p>	<p>2.4.4</p> <p>4.2.12</p>	<p>We submit that the BESS proposal is unnecessary to realise the benefits of the proposed solar generation scheme and the government's Net Zero ambitions, and that a “no development” for the BESS component of the scheme should be fully evaluated.</p> <p>Our assertion is based on <b>our community group's</b> detailed research regarding the position of batteries in the electricity generation supply chain. We would be happy to make a copy of <b>their</b> paper available on request.</p> <p><b>The document states that “excess energy from the grid can also be imported to the batteries” but that should not be the <b>only</b> reason for the BESS.</b></p>
<p>Developments in Technology</p>	<p>2.5.2</p>	<p>We submit that the proposed technical design of the scheme should be frozen for the purposes of the EIA and that the scoping should therefore clearly set that out.</p> <p>Without a technical baseline we do not believe any meaningful conclusions can be drawn during the EIA and that the implementation of technical alternatives in the future may undermine EIA conclusions and potentially introduce new risks.</p>
<p>Consistency</p>		<p>The document contains many inconsistencies. For example, heritage information in some parts of the document is at odds with other parts of the document suite.</p> <p>The scoping should be reviewed and updated throughout to ensure consistency.</p>

		We also submit that there should be a consistent assessment methodology across all sites regardless of whether they are for BESS or solar panels.
Mineral Safeguarding Area	3.3.117 11.3.64 11.3.65 Appendix 11.2	<p>In light of the Mineral Safeguarding Area and the abundance of closed stone mines, some of which have been repurposed into alternative businesses, the scoping should set out a methodology for working in these areas and how to assess the future impact on such areas from building and operating the BESS. That methodology should include a risk assessment that should include fire, toxic fumes, and ground and water contamination.</p> <p>Given the known close proximity of some workings and the likelihood that some shafts exist either under the site or close to the boundary, we submit that the scoping should include a methodology for reviewing the existence of underground workings and the risks associated with heavy and dangerous BESS equipment above or nearby.</p>
Weight	4.2.8	<p>There is no process or methodology to assess the weight impact of equipment on the Site especially in relation to heritage assets, underground workings (we note "...the quality of the received plans is poor and the exact location of some of the workings in relation to the Site are difficult to establish"), soil, hydrology and drainage.</p> <p>The scoping should include a defined process for assessing weight.</p>
Neighbourhood Plan	5.5.1 7.4.18	<p>The scoping makes no reference to the emerging Joint Melksham Neighbourhood Plan 2020-2038 which is currently undergoing its second regulation 14 consultation (<b>Version B: June 24</b>). This is a major deficiency and should be corrected. <b>Lime Down Solar were consulted on the second Reg 14 consultation in June, and so are well aware of it.</b></p>

Boundary and Buffer Distances	1.1.2 3.2.1 7.5.10 2 7.5.10 7	<p>There appears to be no standard methodology for the measurement of boundary and buffer distances. As a result, for example, distances between the site and residential properties are inconsistent. Some appear to be measured from the centre of the site, some from the northern or southern boundaries and therefore vary by over 100m across the scoping document giving an inaccurate and confusing description of the proposals.</p> <p>The scoping should set out a standard method for the statement of such distances.</p>
Vistas and Landscape	7.2.18 7.6.67 7.6.95 Fig 7.1 Fig 7.1.6 Fig 7.2 Fig 7.3 Fig 7.7.6 Fig 7.8 Fig 7.8.6 Fig 7.9.6 Fig 7.10 Fig 7.10.6	<p>As the site is dominant in the regional landscape the search areas need to be widened to include, as a minimum, Bowden Hill, Sandridge, Seend Cleeve, Berryfield and Westbury White Horse. We submit that the search areas should include 10km and 15km zones.</p> <p>Given local topography, it makes no sense to centre the search areas on the site (as the site is not highly visible from the north). These search areas should therefore be replaced by splays radiating east, west and south from the centre of the site.</p> <p>All designated and non-designated assets with a direct line of sight should be assessed.</p>

Bats	Table 8.3 Table 8.4 8.3.32	The scoping does not appear to acknowledge the Bat colony at Park Lane Quarry or the Drews Pond Bat Migration Route.  A methodology needs to be included to consider these and any similar matters.
Trees and Woodland	Table 8.5 8.3.4 Fig 8.11 Fig 9.1.6  4.2.28  9	The scoping does not appear to consistently recognise TPOs on or around the site, and important woodlands such as Buttonhole Wood, The Plantations and Brittle Wood are either not addressed, or are addressed inconsistently.  The methodologies need to be revised to include all TPOs and all relevant woodlands and include these in scope.  Site access should be included in the scope of the trees and existing mature hedgerows that will have to be removed to secure the road visibility splays that are needed to accommodate 16.5m HGVs on the B3353 at Whitley.  Arboriculture. Please refer to the adopted Melksham Neighbourhood Plan 1 (July 21) Policy 16 Trees and hedgerows and the emerging Neighbourhood Plan 2 Policy 17 Trees and hedgerows and the Wiltshire Design Guide
Heritage	1.1.2 3.3.10 8 - 3.3.111  7.5.10 6 7.8.7	The scoping is inconsistent with regard to the existence and likely location of the mediaeval settlement. The likelihood of a Roman settlement is not considered at all.  A methodology needs to be included to better locate all ancient settlements along with a mitigation strategy for any such assets.



	<p>12.3.1 5</p>	<p>Non-designated heritage assets should be listed not just referenced on a map. That approach will better allow all such assets to be captured in the analysis.</p> <p>Vistas from all heritage assets should be assessed.</p> <p>We dispute the developers position regarding the lack of Scheduled Monuments within a 2km radius of the Site, as the Wiltshire HER shows many. The scoping document should therefore demonstrate how the HER will be fully analysed and how that information will be used to inform the workstreams set out elsewhere in the document.</p> <p>Given the unique characteristics of Whitley and nearby settlements, the review area for designated and non-designated assets should extend to 3km and 4km respectively.</p> <p>The method to assess impacts on the Gastard Conservation Area should be expanded given its close proximity to the site.</p> <p>The Roman road, the Wansdyke, the Grade II listed buildings and their setting, evidence of medieval farming and the other items of historic interest in the villages will all be impacted by the proposals. Archaeological investigations will need to be undertaken as part of evidence gathering to inform the decision-making.</p>
<p>Cumulative Impact</p>	<p>7.7.6</p> <p>Page 11 2.2.34</p>	<p>The methodology for assessments of cumulative impact should be clearly set out.</p> <p>Tier one should include those solar farms and BESS that have already been constructed, not just those under construction.</p>

	7.3.14	<p>Concerns are raised about the cumulative effect of the sheer amount of battery storage facility installations in the surrounding area. Residents feel that at every turn on walks on Rights of Way, they see a sea of solar panels or battery storage already. Please refer to Appendix 1 for a snapshot from the Wiltshire Council online mapping with the current battery storage installations surrounding Whitley. Likewise, Appendix 2 for the cumulative effect of the amount of solar farms in the area.</p> <p>“ Due to the dispersed nature of the Sites within the Scheme, an assessment of the in combination landscape and visual effects of Lime Down A to E will be undertaken to determine the effects of the Scheme as a whole”. The cumulative and in combination effect of the “land at Melksham sub station” site proposed for the BESS at Whitley, and the existing Melksham Substation at Beanacre should also be in the scope, there is no reason to exclude them.</p>
Water	<p>3.3.118 to 3.3.119</p> <p>8.3.34</p> <p>10.4.2 2</p> <p>10.5.1</p> <p>10.5.2</p> <p>10.6.3</p> <p>10.6.6</p> <p>10.7.2</p> <p>11.3.63</p> <p>Fig 10.3</p> <p>Table 10.6</p>	<p>Mapping not appropriate for scale of location.</p> <p>Local knowledge shows that topographical surveys have not been thorough, omitting known ditches which contribute to local flooding. The document also shows that surveys have been conducted only in summer months, as all ditches are referred to as dry, when they are incredibly wet / flooded in winter.</p> <p>All surveys should be conducted again in wet winter conditions to ensure baselines reflect actual wet winter conditions on the ground.</p> <p>The EIA needs to include flooding, surface water and groundwater and contamination risks both within the Site (which is shown as scoped in) AND outside the site (which is shown as scoped out). The impact of the proposed development on surrounding communities and downstream is significant and the water related risks are</p>

	<p>high. Given the expected life of the project (60 years) and the risks associated with climate change, it is imperative that scoping considers all these matters, both on-site and off-site, properly.</p> <p>Regarding the safety risks, the scoping needs to consider contaminated water from firefighting, both inside and outside the site.</p> <p>Given the local geology, the aquifers that run close to the site are considered highly vulnerable. Those aquifers need to be in scope and the scoping document should set a methodology for how any risks are to be assessed and mitigated during the EIA.</p> <p>We note no new connections to the water supply main are proposed. Given the significant safety risks the scoping should set out a methodology for calculating emergency water supply needs and how they might be satisfied.</p> <p>The scoping also needs to consider the extent to which water (contaminated or not) will be caught in SuDS. This is especially important given the topography of the site and pre-existing significant flood risks.</p> <p>Construction of the BESS will inevitably lead to increased levels of silt, sediment and nutrients entering the local surface water and river systems. Given the significant water risks associated with the Whitley site those matters should be brought inscope of the EIA.</p> <p>Modelling needs to take into consideration Wiltshire Council data and local data as well as EA data.</p> <p>The methodology and risk assessment also needs to consider the 100+ wells in Whitley most of which are still in some form of use.</p>
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	<p>10.3</p> <p>Page 175</p>	<p>We note runoff from the solar panels is considered but runoff from the BESS is not. BESS runoff needs to be scoped in.</p> <p>10. Hydrology, the adopted Neighbourhood Plan 1 and the emerging NHP2 should be considered here, Policy 3: Flood Risk and natural flood management especially as it specifically references the South Brook catchment area, see page 31 &amp; 33 of the adopted NHP1.</p> <p>There have been several instances of extensive internal property flooding in both Whitley and Beanacre, the Wiltshire Council drainage team must be consulted on these aspects for their local knowledge.</p> <p>Surface water runoff from the BESS should <b>not</b> be scoped out</p> <p>The villages of Shaw and Whitley suffer from surface water flooding regularly; with regular instances of internal flooding of properties that are well documented. The volunteer flood wardens are regularly deployed to protect properties with sandbags and pump out water to prevent property flooding. There is telemetry installed in the watercourse opposite Shaw School to inform the Environment Agency and the flood wardens. The catchment area is “flashy”, it comes very quickly, and leaves quickly but with devastation often left in its place. There are concerted efforts to install flood mitigation measures as part of community benefits in planning obligations as well as new Environment Agency funding to help with flooding of properties further downstream at Dunch Lane. BART (Bristol &amp; River Avon Trust) have installed natural flood management measures north of Whitley. Wiltshire Council’s drainage team have installed a drainage scheme on Corsham Road and First Lane in the last ten years.</p> <p>The community and stakeholders are working hard, and together, to minimize the risk of further flooding in the two villages and it is felt that the hard surfaces of the battery storage units, and the hardstanding concrete slabs that they will sit on could dramatically raise the risk of flooding to properties in Shaw and Whitley and further</p>
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		downstream. The effects of this must be scoped in. The size of any flood attenuation would also have to be very large scale and give an industrial feel; with some 50 acres of hard landscaping.
Soil		We note that this is scoped out in the operational phase. For BESS this should be scoped in due to permanent disturbance, especially when elsewhere in report the BESS is referred to as permanent.
Traffic	13.3.3 3	The scoping should consider traffic flows for the B3353.
Technical Studies	Page 17 3.1.5	This states that the BESS will be either at “D. Hullavington” or “Land at Melksham Substation” and that “ongoing technical studies will determine which location is most appropriate” – is this part of the scope of the EIA? What technical studies are being used to inform this decision, they fall within the scope of the EIA.
Wider Context	Page 17 3.2.3	Wider context, the report makes no mention of the villages that are close to “Land at Melksham Substation”, Whitley for the BESS and Beanacre for the substation
Ecology Mitigation	4.2.32  8.3.47 8.3.49	<p>The ecological mitigation and enhancement measures should not just include “bird and bat boxes” as detailed and they should not just be for the “range of species recorded within the local areas” but they should be aiming to <b>increase</b> the biodiversity too. In 8.3.49 &amp; 8.3.47 it states that there is evidence of amphibians and reptiles at Land at Melksham Substation, including Great Crested Newts.</p> <p>The advice of the Melksham and Wiltshire separate Design Guides should be adhered to and included in the scope; as too the National Design Guide references N1, N2 and N3 provide information on what is expected at a national level.</p> <p>As per DC.03.10 of the Melksham Design Guidelines and Code July 2023  <a href="https://www.melkshamneighbourhoodplan.org/_files/ugd/c4c117_deba1f1a4db7400590f1268b0e78c591.pdf">https://www.melkshamneighbourhoodplan.org/_files/ugd/c4c117_deba1f1a4db7400590f1268b0e78c591.pdf</a></p> <p>“New development should propose small interventions into the built environment to provide species with cover</p>

	<p>from predators and shelter during bad weather. Some examples are bird, bat and bee bricks, reptile refugia and hibernacula within the development, in order to increase biodiversity.”</p> <p>As per the Wiltshire Design Guide (March 2024) <a href="https://www.wiltshire.gov.uk/media/13005/Wiltshire-Design-Guide-Printable/pdf/Final_Sign_off_8320_WiltshireDesignGuide_Consultation-1.0-.pdf?m=1711381358013">https://www.wiltshire.gov.uk/media/13005/Wiltshire-Design-Guide-Printable/pdf/Final_Sign_off_8320_WiltshireDesignGuide_Consultation-1.0-.pdf?m=1711381358013</a></p> <p>6.6.4 in new woodlands and meadows and on the advice of qualified ecologists incorporate plant species that will attract pollinating insects, dead wood, log piles, reptile refugia and hibernacula.</p> <p>New development should protect the identified priority habitats in the area like ponds, hedges, water courses, chalk grasslands, TPOs and woodland blocks. Additional actions to protect the specific habitats are set out in the Wiltshire Biodiversity Action Plan.</p> <p>New development should help increase movement of species between isolated wildlife populations.</p> <p>Biodiversity, woodlands, hedgerows, ditches should be protected and enhanced where possible and be an integrated part of the design process rather than an afterthought.</p> <p>Land sown as grassland and meadow management – as per the Wiltshire Design Guide 6.2.3 this should be looking for opportunities to extend designated wildlife sites and increase provision of pollen/nectar rich wildflower habitats.</p> <p>There will be an inevitable impact on the wildlife and biodiversity of the Whitley BESS site. This is not fields of solar panels with compatible uses of agriculture, wildlife and biodiversity; this is fields of metal boxes full of live electrical equipment, sitting on concrete pads and gravel. The requirement for biodiversity net gain, which came into force in February 2024, cannot surely find a realistic way to be put in place for an increase of 10% on what is already a site rich in biodiversity. How this can be achieved must be scoped in.</p>
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Green Infrastructure	7.3.13	<p>“Green infrastructure scale interventions will be in line with the Biodiversity Opportunity Mapping Study undertaken by the Greater Lincolnshire Nature Partnership” why is this not in line with the Wiltshire Council Green and Blue Infrastructure plans, the Neighbourhood Plans in the scheme areas, and the Local Natural Recovery Strategy that Wiltshire Council are currently working on.</p> <p>One assumes that it’s a “cut and paste” and it should refer to Wiltshire and not Lincolnshire?</p>
Soil Compaction	8.4.5	<p>This section states that the “reduced movement of agricultural machinery will result in reduced soil compaction and/or damage to root systems” due the solar panels. The scope also needs to be looking at the effect of the soil compaction of the BESS, and of the run off from the solar panels as well as the disruption to the root systems from construction and the under ground cabling. See Appendix 3 for photos of potential issues.</p>
Noise	14.4.9	<p>“Noise effects due to construction activities would be temporary in nature will generally only occur during daytime hours (07:00 to 23:00 hours) As such, it is considered that noise effects due to construction are unlikely to result in significant effects. However, it is not possible to conclude that construction effects would be 'not significant' when localised temporary. “</p> <p>Construction activity should not be between 7am and 11pm, this is unacceptable.</p>
	14.4.10	<p>“During the operation phase, noise would be generated by the substations, inverters, battery storage systems and transformers associated with the Scheme at the Solar PV sites and the Land at Melksham Substation. The level of noise at nearby receptors would be dependent on the plant noise emission levels and distance to the receptors. Operational noise levels will be predicted at the nearest residential receptors and assessed to determine the magnitude of any effect. Any effects of operational noise shall be temporary for the duration of the site’s operational lifespan.”</p> <p>60 years is not temporary</p>



		<p>There will be 200no. unit operating at 65Db each, which we understand will give a combined noise level of 88Db in a flat area. For comparison, the noise level coming from the M4 is 85Db, and this will be the noise inflicted on residents of Top Lane. Due to all the hard surfaces and sharp edges the noise will bend and refract and will be quieter for some residents but noisier for others, and will feel like a Chinook helicopter overhead with the “pulsing/beating” sound/feeling that brings. The noise will be very different in character to the noise of the natural environment currently experienced.</p> <p>The effects of the noise impact must be scoped in.</p>
Matters to be scoped out	14.6.2	<p>Vibration from operation, there is no mention of the operation of the new 400kV substation or the BESS, just the solar arrays, this should be addressed. They should <b>not</b> be scoped out.</p> <p>Concerns have been raised about the weight of the battery storage units on site and any potential vibration, especially as the area is littered with historic underground quarries and a network of tunnels.</p> <p>Operational traffic – it says there will be little operational traffic but omits to mention the traffic for the replacement of the BESS and the solar panels several times over the lifetime, only the day to day operations, these should be scoped in.</p>
Glint and glare	15.4.8	<p>Whilst the solar arrays are not at “Land at Melksham substation” and at the Melksham Substation should you also be identifying the Wiltshire Air Ambulance base that is within 10km of those sites? The Wiltshire Air Ambulance is in the parish of Melksham Without, and south of Melksham, but with its flight path to and from the base for servicing all over Wiltshire</p> <p><a href="https://www.wiltshireairambulance.co.uk/our-lifesaving-work/our-airbase">https://www.wiltshireairambulance.co.uk/our-lifesaving-work/our-airbase</a></p>
Air Quality	17	<p>There is no mention of Air Quality in Melksham, but its one of the main drivers in the business case for a Melksham Eastern A350 Bypass</p> <p><a href="https://www.wiltshire.gov.uk/media/4983/A350-">https://www.wiltshire.gov.uk/media/4983/A350-</a></p>

		<p><a href="https://www.wiltshireintelligence.org.uk/melksham-bypass-strategic-outline-business-case-2017/pdf/A350_Melksham_Bypass_SOBC_2017.pdf?m=1604514276497">Melksham-Bypass-Strategic-Outline-Business-Case-2017/pdf/A350 Melksham Bypass SOBC 2017.pdf?m=1604514276497</a></p> <p>Just because it does not currently have an air quality monitoring station in Melksham, it does not mean that there are not air quality issues, this should be scoped in.</p>
Socio-Economics, Tourism & Recreation	18	<p>There is comprehensive documentation on the JSNA (Joint Strategic Needs Assessment) for Wiltshire, by area, so you can look for Melksham for example, but this has not been referenced or used as a source of reference. This brings together over 140 indicators spanning 10 different topics. This should be scoped in. As should the Wiltshire Intelligence website, which provides a location for a wide range of data sets, indicators and assessments that have relevance to Wiltshire's residents.</p> <p><a href="https://www.wiltshireintelligence.org.uk/jsna/">https://www.wiltshireintelligence.org.uk/jsna/</a></p> <p><a href="https://www.wiltshireintelligence.org.uk/cajsna/">https://www.wiltshireintelligence.org.uk/cajsna/</a></p> <p><a href="https://www.wiltshireintelligence.org.uk/">https://www.wiltshireintelligence.org.uk/</a></p>
	18.3.10	<p>“The Scheme is predominantly set within agricultural land which is not in itself a key tourist attraction or destination. The land does however play a role in providing a landscape context to recreational use of pedestrian and cycling routes and trails, and to the enjoyment and appreciation of the neighbouring Cotswolds National Landscape, which the Scheme borders”</p> <p>The setting of the tourism in Wiltshire should be scoped in, for example, the effect on the Pear Tree Inn and other B&amp;Bs in Top Lane Whitley who will be adjacent to and with a view of the BESS; it's not enough to just consider the field it's proposed to be built in.</p>
	18.5.1	<p>“Impacts on tourism and recreation during construction and operation. Effects on tourism and recreation are likely to be limited to those facilities immediately impacted by the Scheme, such as PRow and heritage assets within close proximity to the Scheme boundaries”</p> <p>There is no mention of the impact on any local businesses, and tourism providers, no one will be going to the pub for a meal after their walk to the heritage asset</p>

		<p>on the PRow if they are impacted. This must be scoped in.</p> <p>Concerns have been raised about the impact on the local facilities and businesses. The Pear Tree Inn and Spindles bike shop/Sprockets Café both on Top Lane attract visitors from all over the locality and further afield for the accommodation at the Pear Tree and holiday rentals in the village. Visitors come for the views from these venues, and the surrounding countryside, and these will be impacted by the countryside and landscape being altered beyond recognition as so widescale. The local estate agent has already reported two house sales in the village that have fallen through since the start of the Lime Down public consultation, as a direct result of the proposals and others on hold. Residents have chosen to live in the village for the views and neighbouring countryside amenities and are upset at the prospect of that changing, and the lowering of their house prices as a result, if they then decide to relocate. Some of the existing residential development is only 100m from the proposed site.</p>
Scoped out of the EIA	18.5.2	<p>“The following matters are proposed to be scoped out of the EIA:</p> <p>Specific matters. Impacts upon property value, and crime are proposed to be scoped out of any stage of the assessment due to these matters being very unlikely to be significantly affected by the Scheme. This is as there is little conclusive evidence that property value is significantly affected by the development of utility scale solar farms or that any negative effect is felt over a large area.”</p> <p>What about any evidence that the siting of a BESS or 400kV sub station has on the impact on property value, this should be scoped in.</p>
Other Environmental matters	21.2.6 Table 21.2	<p>“Major Accident or Disaster Potential</p> <p>Flooding</p> <p>Properties and people in areas of increased flood risk. Both the vulnerability of the Scheme to flooding, and its potential to exacerbate flooding, will be addressed in the Hydrology, Flood Risk and Drainage chapter of the ES. The Scheme does not propose large expanses of</p>

		<p>hardstanding that would be likely to cause significant increase to surface water flooding”</p> <p>The scheme does propose a large expanse of hardstanding for the BESS at the “Land at Melksham substation” in an area known to flood with internal property flooding (14 properties in Whitley in 2014) and therefore should be considered and scoped in. This should also include the impact of the underground cabling at Beanacre which also should be scoped in, due to the changes to water flow and ditch management during construction.</p>
<p>Other relevant planning documents</p>	<p>5.6</p>	<p>Recent decisions on planning applications should be considered as planning precedent and scoped in.</p> <p>Recently refused application (21/3/24) for a battery storage facility at Land at Somerford Farm, Brinkworth (Planning application PL/2022/02824) by Wiltshire Council.</p> <p>The proposed battery storage facility and ancillary development will result in uncharacteristic and harmful landscape and visual effects. The loss of existing agricultural land and replacement with a new urban industrial use is considered to have an unacceptable adverse landscape effect on the quiet rural tranquility and character of the surrounding fields and more importantly, on the very close existing residential development.</p> <p>The proposal is thereby objected to by reason of its size, scale, design, appearance as it would have a harmful impact on the landscape character and appearance of the area in conflict with Core Policy 51 ii, iv, vi v11 and Core Policy 57 I, iii of the Wiltshire Core Strategy and Paragraphs 135 and 180 of the NPPF.</p> <p>Policy 2: Renewable Energy in both the adopted Melksham Neighbourhood Plan and the emerging draft Melksham Neighbourhood Plan 2 (Regulation 14 version October 2023) as proposals are only supported if it can be demonstrated that:</p>

		<p>a. the siting and scale of the proposal is appropriate to its setting;</p> <p>b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated;</p> <p>c. the proposal does not create an unacceptable impact on local amenity and safety;</p> <p>d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance.</p> <p>e. there are direct benefits to the local community.</p> <p>Proposals for <b>energy storage</b> will be supported, where it meets one or more of the following:</p> <p>a. it is located on or near, existing or proposed renewable energy generation sites;</p> <p>b. it alleviates grid constraints; and</p> <p>c. it enables the delivery of further renewable developments.</p>
<p><b>Human Health and Wellbeing</b></p>	<p>19</p>	<p>The proposed BESS at Whitley is huge, and we understand it will be the largest in Europe and will completely alter the feel of the village and surrounding countryside. From the indicative plan it looks as though it is the same size as the village itself. The impact on the wellbeing of the residents must be scoped in.</p> <p>The well-being of residents in the village of Whitley and the surrounding villages has already been impacted. The prospect of this proposed battery storage site is already making residents feel anxious and spoiling their quiet enjoyment of where they live. The thoughts of the impact of the delivery and construction period; the impact of any</p>

		final installation on the daily life of residents – on their daily dog walk on the adjacent Right of Way, the view out the window, the feel of the village - are already being keenly felt.
<b>Light Pollution</b>	<b>21.3</b>	There are concerns relating to the light pollution at the site. For both the neighbouring residents and the established wildlife. Presumably, the security lighting will be triggered by motion sensors, and by the local wildlife, including the badgers, rabbits, and deer that are regularly seen on the fields? This is very impactful on nocturnal wildlife, and is known to affect migrating wildlife, affect pollinators (butterflies and bees) as well as impact on the amenity of the neighbouring residents. The impacts of this must be scoped in.
<b>Delivery and Construction</b>	<b>4.3</b>	A very detailed delivery and construction method programme and plan will presumably be required as part of any application but the parish council and residents are clear that any agreed plan must be adhered to, with a suitable penalty clause arrangement in place if the construction is not to plan to act as a strong deterrent. Unfortunately, the delivery of the solar farm at neighbouring Norrington (W/12/02072/FUL) brought the area to a standstill for days, with it regularly reported on the national traffic bulletins on the radio. Due to a short timescale for a deadline to be connected to the grid with financial implications for the developers, the construction and delivery plan was ignored. Deliveries were continuous through the night, with foreign drivers knocking on residents' doors in the small hours of the night seeking directions. This is unacceptable and there seemed to be no recourse to halt this impact on the residents and the major highway delays in the area. There is currently a battery site being installed southwest of the Beanacre substation, which has raised numerous issues and visits to the site and residents' gardens due to the impact the installation is making on the residents; particularly noise from machinery which is currently being investigated by Wiltshire Council's public protection environmental health team to establish if its still construction noise or the finished installed equipment noise (17/04116 & PL/22/02615 refers).

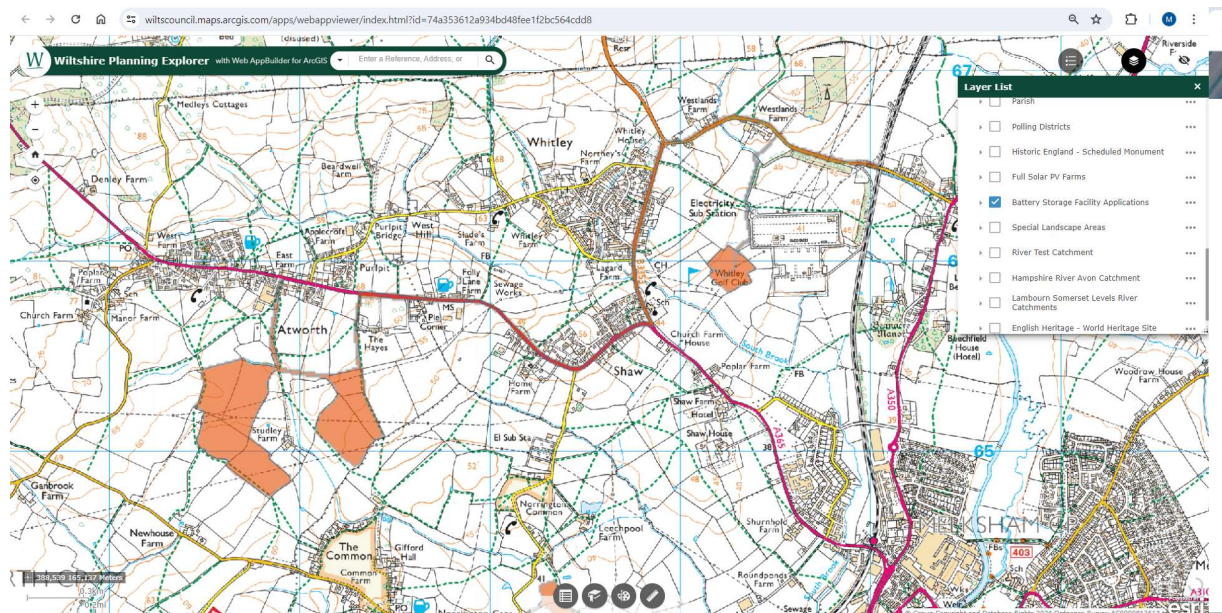


The parish council are seeking more than reassurance, but tangible measures to ensure that this type of impact on the local community cannot happen in the future for any proposed installations.

It is understood that the access to the proposed BESS site will only be via Goodes Hill, with only emergency access via Littleworth Lane which is used constantly for access to the Right of Ways MELW65 & MELW72, with many visitors to the area parking in Littleworth Lane to access the RoW as it's a popular dog walking area.

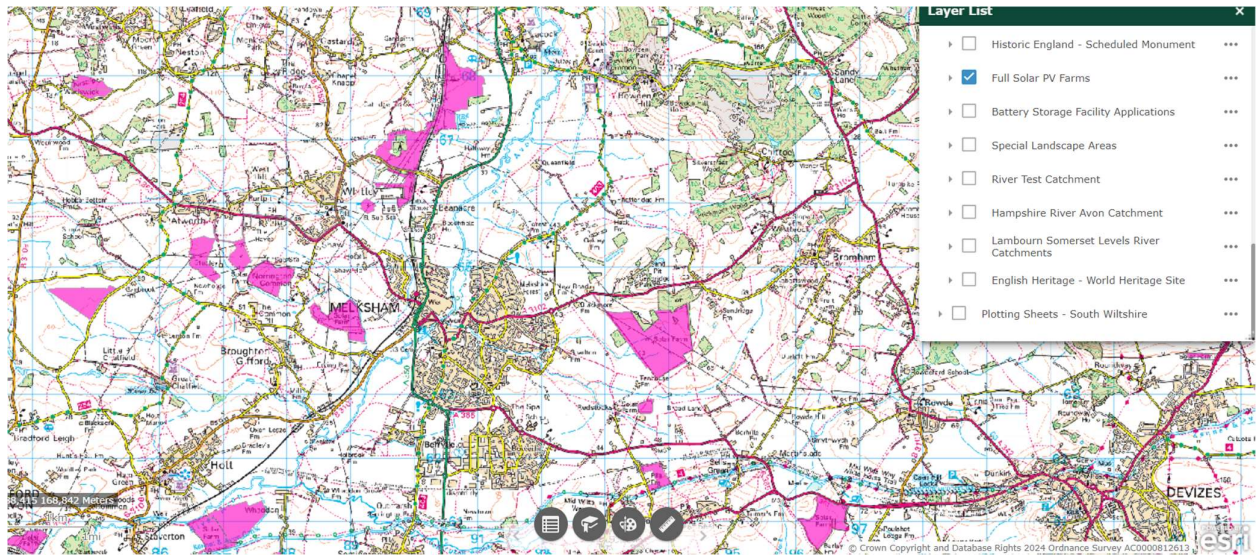
These elements must be scoped in and considered as part of the CEMP.

### Appendix 1: BESS in the area surrounding Whitley and Beanacre





## Appendix 2: Solar Farms in the area surrounding Melksham including Whitley and Beanacre



## Appendix 3: Potential soil compaction and rivulets





## **Melksham Without Parish Council response to the Environment Impact Assessment scoping document consultation by the Planning Inspectorate ref. EN010168 for Lime Down Solar Park**

**8<sup>th</sup> August 2024**

This is the formal response of Melksham Without Parish Council to the proposed Lime Down Solar EIA scoping document as a statutory consultee, with particular reference to the areas that are located in the parish. It has been formulated following review at both the parish council's Planning Committee and Full Council public meetings at the end of July, and with input from local community members, particularly from Whitley.

For context, Melksham Without Parish Council is one of the largest rural parishes in Wiltshire, with a population of approximately 7,200. Two of the villages in the parish are **Whitley**, which is referred to in the Lime Down documentation as "Land at the Melksham Substation" and **Beanacre** which is the site of the National Grid 400kV "Melksham Substation" and the southerly end of the Cable Route Search Corridor. We believe the Lime Down documentation is very misleading in its description of these two sites as they are named throughout the documentation, as they do not accurately portray the historic, rural settlements that they are but imply that they are urban, industrial areas in the town.

Melksham Without Parish surrounds the town of Melksham on three sides – the northern, eastern and southern. In the past, the three villages in the north – Beanacre, Shaw and Whitley – were ancient centres of population. Whitley is mentioned in the Domesday book.

Through the passage of time, the villages of Whitley and Shaw have grown but continue to be distinct settlements. Whitley was probably settled around the same time as Shaw and the origin of both names means a white clearing or wood/copse. At its heart, the village is an agricultural centre with a number of working farms, and farms that have been converted to residential use but the agricultural land associated with them dispersed to other local farms. The village is rich with listed buildings. The agricultural heritage, the listed buildings, along with some other significant 20<sup>th</sup> century residential development, give Whitley its unique character, charm and local distinctiveness. Medieval Shaw was a small community centred on its manor house and the chapel. The settlement remained small and rural but by the 17<sup>th</sup> century there were a reasonable number of houses. The population grew during the 19<sup>th</sup> century and a church and school were provided. Whitley and Shaw are considered to be a "Large Village" by Wiltshire Council in their adopted Core Strategy and emerging Local Plan (Reg 19 stage at Sept 23).

Beanacre [Bennecar/Benecar] (Beanfield) is the ribbon development, interspersed with open frontages, along the busy, main A350 between the northern boundary of the town of Melksham and the village of Lacock. It is one of the oldest settlements in the area, first mentioned in estate records of 1275, the earliest surviving dwelling is the Grade I listed Old Manor which lies off the Old Road.

The parish council also feel that the project location is misleading on the PINS portal, “land north of Hullavington, Wiltshire” may cover the solar farm but not the supporting infrastructure, the BESS proposed in Whitley or the proposed underground cable connection to the substation through Beanacre, both of which are south of Hullavington and the M4 and in West Wiltshire. Whilst 5 parcels of land are located to the north of Hullavington, the 6<sup>th</sup>, and the cable route search corridor, are not. To a member of public looking at the website, they would believe all the proposals are for the north of the county.

Item	Doc Ref	Comment
60 Year Life	2.2.11 4.3.9 20.4.2 20.4.1 4	<p>A 60-year BESS life is, for all intents and purposes, permanent. Describing the BESS as “temporary” is inappropriate as it sets an incorrect context/expectation regarding the life of the scheme.</p> <p>The ability of any Decommissioning Bond to be effective so far in the future is remote. This means there is a high risk that the land will never return to agricultural use.</p> <p>A 60-year BESS life implies the same timescale for access tracks and land for any related infrastructure and equipment. In fact, the scoping document refers to the BESS, access tracks, substations and units being permanent and this needs to be considered within the EIA.</p> <p>The Scoping Study should therefore explore these risks and set out a methodology to assess and mitigate them.</p> <p>Risks associated with proposed equipment upgrades, refits, replacements, and maintenance over a 60-year life also need to be included in the EIA and this should also therefore be part of the scoping.</p>
Land at Melksham Substation	4.1.4	Throughout the scoping document the BESS site is described as “Land at Melksham Substation”. This descriptor suggests the proposed site is brownfield and that it is co-located with the substation.

	7.5.10 2	<p>As the proposed site is actually a greenfield site which is in productive agriculture use, we submit that the developer’s description is misleading and should be changed throughout the document to something more illustrative such as “Agricultural Land at Whitley”.</p> <p>We also note references to the “Village of Melksham” demonstrating a lack of local research.</p> <p>The land at Melksham Substation is located within the parish of Melksham <b>Without</b>, not the parish of Melksham</p>
Screening	2.2.12 7.3.2	<p>We note that any screening will not be effective for circa 15 years. We do not consider a baseline 15-year period for screening maturity, 25% of the project timescale, to be remotely acceptable.</p> <p>The scoping study should therefore properly set out a methodology to satisfactorily mitigate such matters, including plans for how those mitigants will be implemented, such that screening becomes effective during the first 5 years of the project.</p> <p>The new 400kV substation will be 13m to the top of the bushbars, that is the height of a 4-storey building, will vegetation and trees be sufficient to screen?</p>
Safety	2.3.5 11.4’s 11.4.10 11.5.1 21.2.6 Table 22.2	<p>It is unacceptable to delay an assessment of safety until after the DCO application is made (we note the current proposal that the Outline Battery Storage Safety Management Plan (BSMP) will not be available until it is submitted with the DCO application).</p> <p>The scoping should therefore include a methodology for a preliminary safety assessment which should include fire, pollution and contamination risks. Regulators,</p>



	<p>including the HSE and the EA, and the Fire Service should be consulted on that methodology.</p> <p>The development of a pollution and contamination prevention strategy should be developed as part of the EIA and the scoping should set the methodology for that process.</p> <p>Arrangements should be included for an independent technical expert review of all the proposed safety management and risk prevention method statements.</p> <p>It is unacceptable to predetermine and scope out such risks at this stage of the project.</p> <p>There are several concerns about fire risk. That the batteries will ignite, and then be very difficult to extinguish. They are very close together, and the fire could easily spread, with no means of fire engines to gain access between the batteries. Anecdotal evidence to date is that the fires need water on them for days, not hours, to put them out (as evidenced by fires in electric cars which are not allowed to be unattended for 2/3 days). This will have a huge impact on the community, with the toxic fumes, but also the impact of the water used then running off to heavily increase the surface water flooding potential. The water runoff will be contaminated by the lithium and will flow into the water course and saturate the ground. There are also anecdotal concerns raised at the risk of explosion from these type of electric storage batteries; these are physically much larger in scale compared to the fires in electric cars and scooters that are reported in the press with regularity. The parish council are keen to see any comments submitted by the Fire Service to be scoped into this EIA.</p> <p>Concerns are also raised about the widescale use of lithium on the site, with no research into possible long-</p>
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		<p>term harm of the lithium as it's a new technology. This should be scoped in.</p> <p>Details of the risk management of the site must be scoped in, who will maintain the installation and what processes will be put in place? Will the batteries be monitored and tested for any change in temperatures, moisture content in the batteries for example? And if so, what is the plan to address any increased risks?</p>
Status of Consultation	1.5.3	<p>It is noted that the developer claims Stage 1 Non-Statutory consultation is complete and that community engagement is ongoing. This is incorrect. CAWS have set out in writing to the developer why Stage 1 was ineffective and why it cannot be claimed to be complete. Engagement with the community since then has been almost non-existent evidenced by a raft of unanswered questions and correspondence.</p> <p>Building on this feedback, the scoping document should set out an ongoing community engagement methodology consistent with the principles of paras 39-46 of the NPPF. That methodology should provide for community involvement in discharging the various studies and assessments set out elsewhere in the scoping document.</p>
"No Development"	2.4.4	<p>We submit that the BESS proposal is unnecessary to realise the benefits of the proposed solar generation scheme and the government's Net Zero ambitions, and that a "no development" for the BESS component of the scheme should be fully evaluated.</p> <p>Our assertion is based on our community group's detailed research regarding the position of batteries in the electricity generation supply chain. We would be happy to make a copy of their paper available on request.</p>
	4.2.12	<p>The document states that "excess energy from the grid can also be imported to the batteries" but that should not be the <b>only</b> reason for the BESS.</p>

Development s in Technology	2.5.2	<p>We submit that the proposed technical design of the scheme should be frozen for the purposes of the EIA and that the scoping should therefore clearly set that out.</p> <p>Without a technical baseline we do not believe any meaningful conclusions can be drawn during the EIA and that the implementation of technical alternatives in the future may undermine EIA conclusions and potentially introduce new risks.</p>
Consistency		<p>The document contains many inconsistencies. For example, heritage information in some parts of the document is at odds with other parts of the document suite.</p> <p>The scoping should be reviewed and updated throughout to ensure consistency.</p> <p>We also submit that there should be a consistent assessment methodology across all sites regardless of whether they are for BESS or solar panels.</p>
Mineral Safeguarding Area	3.3.117 11.3.64 11.3.65 Appen dix 11.2	<p>In light of the Mineral Safeguarding Area and the abundance of closed stone mines, some of which have been repurposed into alternative businesses, the scoping should set out a methodology for working in these areas and how to assess the future impact on such areas from building and operating the BESS. That methodology should include a risk assessment that should include fire, toxic fumes, and ground and water contamination.</p> <p>Given the known close proximity of some workings and the likelihood that some shafts exist either under the site or close to the boundary, we submit that the scoping should include a methodology for reviewing the existence of underground workings and the risks associated with heavy and dangerous BESS equipment above or nearby.</p>



Weight	4.2.8	<p>There is no process or methodology to assess the weight impact of equipment on the Site especially in relation to heritage assets, underground workings (we note "...the quality of the received plans is poor and the exact location of some of the workings in relation to the Site are difficult to establish"), soil, hydrology and drainage.</p> <p>The scoping should include a defined process for assessing weight.</p>
Neighbourhood Plan	5.5.1 7.4.18	<p>The scoping makes no reference to the emerging Joint Melksham Neighbourhood Plan 2020-2038 which is currently undergoing its second regulation 14 consultation (Version B: June 24). This is a major deficiency and should be corrected. Lime Down Solar were consulted on the second Reg 14 consultation in June, and so are well aware of it.</p>
Boundary and Buffer Distances	1.1.2 3.2.1 7.5.10 2 7.5.10 7	<p>There appears to be no standard methodology for the measurement of boundary and buffer distances. As a result, for example, distances between the site and residential properties are inconsistent. Some appear to be measured from the centre of the site, some from the northern or southern boundaries and therefore vary by over 100m across the scoping document giving an inaccurate and confusing description of the proposals.</p> <p>The scoping should set out a standard method for the statement of such distances.</p>
Vistas and Landscape	7.2.18 7.6.67 7.6.95 Fig 7.1 Fig 7.1.6 Fig 7.2	<p>As the site is dominant in the regional landscape the search areas need to be widened to include, as a minimum, Bowden Hill, Sandridge, Seend Cleeve, Berryfield and Westbury White Horse. We submit that the search areas should include 10km and 15km zones.</p> <p>Given local topography, it makes no sense to centre the search areas on the site (as the site is not highly visible from the north). These search areas should therefore be</p>

	<p>Fig 7.3 Fig 7.7.6 Fig 7.8 Fig 7.8.6 Fig 7.9.6 Fig 7.10 Fig 7.10.6</p>	<p>replaced by splays radiating east, west and south from the centre of the site.</p> <p>All designated and non-designated assets with a direct line of sight should be assessed.</p>
Bats	<p>Table 8.3 Table 8.4 8.3.32</p>	<p>The scoping does not appear to acknowledge the Bat colony at Park Lane Quarry or the Drews Pond Bat Migration Route.</p> <p>A methodology needs to be included to consider these and any similar matters.</p>
Trees and Woodland	<p>Table 8.5 8.3.4 Fig 8.11 Fig 9.1.6 4.2.28</p>	<p>The scoping does not appear to consistently recognise TPOs on or around the site, and important woodlands such as Buttonhole Wood, The Plantations and Brittle Wood are either not addressed, or are addressed inconsistently.</p> <p>The methodologies need to be revised to include all TPOs and all relevant woodlands and include these in scope.</p> <p>Site access should be included in the scope of the trees and existing mature hedgerows that will have to be removed to secure the road visibility splays that are</p>

	9	<p>needed to accommodate 16.5m HGVs on the B3353 at Whitley.</p> <p>Arboriculture. Please refer to the adopted Melksham Neighbourhood Plan 1 (July 21) Policy 16 Trees and hedgerows and the emerging Neighbourhood Plan 2 Policy 17 Trees and hedgerows and the Wiltshire Design Guide</p>
Heritage	<p>1.1.2</p> <p>3.3.10</p> <p>8 -</p> <p>3.3.111</p> <p>7.5.10</p> <p>6</p> <p>7.8.7</p> <p>12.3.1</p> <p>5</p>	<p>The scoping is inconsistent with regard to the existence and likely location of the mediaeval settlement. The likelihood of a Roman settlement is not considered at all.</p> <p>A methodology needs to be included to better locate all ancient settlements along with a mitigation strategy for any such assets.</p> <p>Non-designated heritage assets should be listed not just referenced on a map. That approach will better allow all such assets to be captured in the analysis.</p> <p>Vistas from all heritage assets should be assessed.</p> <p>We dispute the developers position regarding the lack of Scheduled Monuments within a 2km radius of the Site, as the Wiltshire HER shows many. The scoping document should therefore demonstrate how the HER will be fully analysed and how that information will be used to inform the workstreams set out elsewhere in the document.</p> <p>Given the unique characteristics of Whitley and nearby settlements, the review area for designated and non-designated assets should extend to 3km and 4km respectively.</p>

		<p>The method to assess impacts on the Gastard Conservation Area should be expanded given its close proximity to the site.</p> <p>The Roman road, the Wansdyke, the Grade II listed buildings and their setting, evidence of medieval farming and the other items of historic interest in the villages will all be impacted by the proposals. Archaeological investigations will need to be undertaken as part of evidence gathering to inform the decision-making.</p>
Cumulative Impact	<p>7.7.6</p> <p>Page 11 2.2.34</p> <p>7.3.14</p>	<p>The methodology for assessments of cumulative impact should be clearly set out.</p> <p>Tier one should include those solar farms and BESS that have already been constructed, not just those under construction.</p> <p>Concerns are raised about the cumulative effect of the sheer amount of battery storage facility installations in the surrounding area. Residents feel that at every turn on walks on Rights of Way, they see a sea of solar panels or battery storage already. Please refer to Appendix 1 for a snapshot from the Wiltshire Council online mapping with the current battery storage installations surrounding Whitley. Likewise, Appendix 2 for the cumulative effect of the number of solar farms in the area.</p> <p>“Due to the dispersed nature of the Sites within the Scheme, an assessment of the in combination landscape and visual effects of Lime Down A to E will be undertaken to determine the effects of the Scheme as a whole”. The cumulative and in combination effect of the “land at Melksham sub station” site proposed for the BESS at Whitley, and the existing Melksham Substation at Beanacre should also be in the scope, there is no reason to exclude them.</p>

Water	<p>3.3.118 to 3.3.119</p> <p>8.3.34</p> <p>10.4.2 2</p> <p>10.5.1</p> <p>10.5.2</p> <p>10.6.3</p> <p>10.6.6</p> <p>10.7.2</p> <p>11.3.63</p> <p>Fig 10.3</p> <p>Table 10.6</p>	<p>Mapping not appropriate for scale of location.</p> <p>Local knowledge shows that topographical surveys have not been thorough, omitting known ditches which contribute to local flooding. The document also shows that surveys have been conducted only in summer months, as all ditches are referred to as dry, when they are incredibly wet / flooded in winter.</p> <p>All surveys should be conducted again in wet winter conditions to ensure baselines reflect actual wet winter conditions on the ground.</p> <p>The EIA needs to include flooding, surface water and groundwater and contamination risks both within the Site (which is shown as scoped in) AND outside the site (which is shown as scoped out). The impact of the proposed development on surrounding communities and downstream is significant and the water related risks are high. Given the expected life of the project (60 years) and the risks associated with climate change, it is imperative that scoping considers all these matters, both on-site and off-site, properly.</p> <p>Regarding the safety risks, the scoping needs to consider contaminated water from firefighting, both inside and outside the site.</p> <p>Given the local geology, the aquifers that run close to the site are considered highly vulnerable. Those aquifers need to be in scope and the scoping document should set a methodology for how any risks are to be assessed and mitigated during the EIA.</p> <p>We note no new connections to the water supply main are proposed. Given the significant safety risks the scoping should set out a methodology for calculating emergency water supply needs and how they might be satisfied.</p>
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	<p data-bbox="435 1350 499 1384">10.3</p> <p data-bbox="435 1720 512 1787">Page 175</p>	<p data-bbox="568 259 1382 409">The scoping also needs to consider the extent to which water (contaminated or not) will be caught in SuDS. This is especially important given the topography of the site and pre-existing significant flood risks.</p> <p data-bbox="568 501 1382 689">Construction of the BESS will inevitably lead to increased levels of silt, sediment and nutrients entering the local surface water and river systems. Given the significant water risks associated with the Whitley site those matters should be brought in scope of the EIA.</p> <p data-bbox="568 781 1302 851">Modelling needs to take into consideration Wiltshire Council data and local data as well as EA data.</p> <p data-bbox="568 943 1369 1048">The methodology and risk assessment also needs to consider the 100+ wells in Whitley most of which are still in some form of use.</p> <p data-bbox="568 1140 1337 1245">We note runoff from the solar panels is considered but runoff from the BESS is not. BESS runoff needs to be scoped in.</p> <p data-bbox="568 1283 1382 1471">10. Hydrology, the adopted Neighbourhood Plan 1 and the emerging NHP2 should be considered here, Policy 3: Flood Risk and natural flood management especially as it specifically references the South Brook catchment area, see page 31 &amp; 33 of the adopted NHP1.</p> <p data-bbox="568 1503 1362 1653">There have been several instances of extensive internal property flooding in both Whitley and Beanacre, the Wiltshire Council drainage team must be consulted on these aspects for their local knowledge.</p> <p data-bbox="568 1744 1286 1814">Surface water runoff from the BESS should <b>not</b> be scoped out</p> <p data-bbox="568 1906 1382 2011">The villages of Shaw and Whitley suffer from surface water flooding regularly; with regular instances of internal flooding of properties that are well documented. The</p>
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		<p>volunteer flood wardens are regularly deployed to protect properties with sandbags and pump out water to prevent property flooding. There is telemetry installed in the watercourse opposite Shaw School to inform the Environment Agency and the flood wardens. The catchment area is “flashy”, it comes very quickly, and leaves quickly but with devastation often left in its place. There are concerted efforts to install flood mitigation measures as part of community benefits in planning obligations as well as new Environment Agency funding to help with flooding of properties further downstream at Dunch Lane. BART (Bristol &amp; River Avon Trust) have installed natural flood management measures north of Whitley. Wiltshire Council’s drainage team have installed a drainage scheme on Corsham Road and First Lane in the last ten years.</p> <p>The community and stakeholders are working hard, and together, to minimize the risk of further flooding in the two villages and it is felt that the hard surfaces of the battery storage units, and the hardstanding concrete slabs that they will sit on could dramatically raise the risk of flooding to properties in Shaw and Whitley and further downstream. The effects of this must be scoped in. The size of any flood attenuation would also have to be very large scale and give an industrial feel; with some 50 acres of hard landscaping.</p>
Soil		We note that this is scoped out in the operational phase. For BESS this should be scoped in due to permanent disturbance, especially when elsewhere in report the BESS is referred to as permanent.
Traffic	13.3.3 3	The scoping should consider traffic flows for the B3353.
Technical Studies	Page 17 3.1.5	This states that the BESS will be either at “D. Hullavington” or “Land at Melksham Substation” and that “ongoing technical studies will determine which location is most appropriate” – is this part of the scope of the EIA? What technical studies are being used to inform this decision, they fall within the scope of the EIA.

Wider Context	Page 17 3.2.3	Wider context, the report makes no mention of the villages that are close to “Land at Melksham Substation”, Whitley for the BESS and Beanacre for the substation
Ecology Mitigation	4.2.32  8.3.47 8.3.49	<p>The ecological mitigation and enhancement measures should not just include “bird and bat boxes” as detailed and they should not just be for the “range of species recorded within the local areas” but they should be aiming to <b>increase</b> the biodiversity too. In 8.3.49 &amp; 8.3.47 it states that there is evidence of amphibians and reptiles at Land at Melksham Substation, including Great Crested Newts.</p> <p>The advice of the Melksham and Wiltshire separate Design Guides should be adhered to and included in the scope; as too the National Design Guide references N1, N2 and N3 provide information on what is expected at a national level.</p> <p>As per DC.03.10 of the Melksham Design Guidelines and Code July 2023  <a href="https://www.melkshamneighbourhoodplan.org/files/ugd/c4c117_deba1f1a4db7400590f1268b0e78c591.pdf">https://www.melkshamneighbourhoodplan.org/files/ugd/c4c117_deba1f1a4db7400590f1268b0e78c591.pdf</a></p> <p>“New development should propose small interventions into the built environment to provide species with cover from predators and shelter during bad weather. Some examples are bird, bat and bee bricks, reptile refugia and hibernacula within the development, in order to increase biodiversity.”</p> <p>As per the Wiltshire Design Guide (March 2024)  <a href="https://www.wiltshire.gov.uk/media/13005/Wiltshire-Design-Guide-Printable/pdf/Final_Sign_off_8320_WiltshireDesignGuide_Consultation-1.0-.pdf?m=1711381358013">https://www.wiltshire.gov.uk/media/13005/Wiltshire-Design-Guide-Printable/pdf/Final_Sign_off_8320_WiltshireDesignGuide_Consultation-1.0-.pdf?m=1711381358013</a></p> <p>6.6.4 in new woodlands and meadows and on the advice of qualified ecologists incorporate plant species that will attract pollinating insects, dead wood, log piles, reptile refugia and hibernacula.</p> <p>New development should protect the identified priority habitats in the area like ponds, hedges, water courses, chalk grasslands, TPOs and woodland blocks. Additional actions to protect the specific habitats are set out in the Wiltshire Biodiversity Action Plan.</p>



		<p>New development should help increase movement of species between isolated wildlife populations.</p> <p>Biodiversity, woodlands, hedgerows, ditches should be protected and enhanced where possible and be an integrated part of the design process rather than an afterthought.</p> <p>Land sown as grassland and meadow management – as per the Wiltshire Design Guide 6.2.3 this should be looking for opportunities to extend designated wildlife sites and increase provision of pollen/nectar rich wildflower habitats.</p> <p>There will be an inevitable impact on the wildlife and biodiversity of the Whitley BESS site. This is not fields of solar panels with compatible uses of agriculture, wildlife and biodiversity; this is fields of metal boxes full of live electrical equipment, sitting on concrete pads and gravel. The requirement for biodiversity net gain, which came into force in February 2024, cannot surely find a realistic way to be put in place for an increase of 10% on what is already a site rich in biodiversity. How this can be achieved must be scoped in.</p>
Green Infrastructure	7.3.13	<p>“Green infrastructure scale interventions will be in line with the Biodiversity Opportunity Mapping Study undertaken by the Greater Lincolnshire Nature Partnership” why is this not in line with the Wiltshire Council Green and Blue Infrastructure plans, the Neighbourhood Plans in the scheme areas, and the Local Natural Recovery Strategy that Wiltshire Council are currently working on.</p> <p>One assumes that it’s a “cut and paste” and it should refer to Wiltshire and not Lincolnshire?</p>
Soil Compaction	8.4.5	<p>This section states that the “reduced movement of agricultural machinery will result in reduced soil compaction and/or damage to root systems” due the solar panels. The scope also needs to be looking at the effect of the soil compaction of the BESS, and of the run off from the solar panels as well as the disruption to the</p>

		root systems from construction and the underground cabling. See Appendix 3 for photos of potential issues.
Noise	14.4.9	<p>“Noise effects due to construction activities would be temporary in nature will generally only occur during daytime hours (<b>07:00 to 23:00 hours</b>) As such, it is considered that noise effects due to construction are unlikely to result in significant effects. However, it is not possible to conclude that construction effects would be 'not significant' when localised temporary. “</p> <p>Construction activity should not be between 7am and 11pm, this is unacceptable.</p>
	14.4.10	<p>“During the operation phase, noise would be generated by the substations, inverters, battery storage systems and transformers associated with the Scheme at the Solar PV sites and the Land at Melksham Substation. The level of noise at nearby receptors would be dependent on the plant noise emission levels and distance to the receptors. Operational noise levels will be predicted at the nearest residential receptors and assessed to determine the magnitude of any effect. Any effects of operational noise shall be temporary for the duration of the site’s operational lifespan.”</p> <p>60 years is not temporary</p> <p>There will be 200no. unit operating at 65Db each, which we understand will give a combined noise level of 88Db in a flat area. For comparison, the noise level coming from the M4 is 85Db, and this will be the noise inflicted on residents of Top Lane. Due to all the hard surfaces and sharp edges the noise will bend and defract and will be quieter for some residents but noisier for others, and will feel like a Chinook helicopter overhead with the “pulsing/beating” sound/feeling that brings. The noise will be very different in character to the noise of the natural environment currently experienced.</p> <p>The effects of the noise impact must be scoped in.</p>
Matters to be scoped out	14.6.2	Vibration from operation, there is no mention of the operation of the new 400kV substation or the BESS, just the solar arrays, this should be addressed. They should <b>not</b> be scoped out.

		<p>Concerns have been raised about the weight of the battery storage units on site and any potential vibration, especially as the area is littered with historic underground quarries and a network of tunnels.</p> <p>Operational traffic – it says there will be little operational traffic but omits to mention the traffic for the replacement of the BESS and the solar panels several times over the lifetime, only the day-to-day operations, these should be scoped in.</p>
Glint and glare	15.4.8	<p>Whilst the solar arrays are not at “Land at Melksham substation” and at the Melksham Substation should you also be identifying the Wiltshire Air Ambulance base that is within 10km of those sites? The Wiltshire Air Ambulance is in the parish of Melksham Without, and south of Melksham, but with its flight path to and from the base for servicing all over Wiltshire  <a href="https://www.wiltshireairambulance.co.uk/our-lifesaving-work/our-airbase">https://www.wiltshireairambulance.co.uk/our-lifesaving-work/our-airbase</a></p>
Air Quality	17	<p>There is no mention of Air Quality in Melksham, but it’s one of the main drivers in the business case for a Melksham Eastern A350 Bypass  <a href="https://www.wiltshire.gov.uk/media/4983/A350-Melksham-Bypass-Strategic-Outline-Business-Case-2017/pdf/A350_Melksham_Bypass_SOBC_2017.pdf?m=1604514276497">https://www.wiltshire.gov.uk/media/4983/A350-Melksham-Bypass-Strategic-Outline-Business-Case-2017/pdf/A350_Melksham_Bypass_SOBC_2017.pdf?m=1604514276497</a></p> <p>Just because it does not currently have an air quality monitoring station in Melksham, it does not mean that there are not air quality issues, this should be scoped in.</p>
Socio-Economics, Tourism & Recreation	18	<p>There is comprehensive documentation on the JSNA (Joint Strategic Needs Assessment) for Wiltshire, by area, so you can look for Melksham for example, but this has not been referenced or used as a source of reference. This brings together over 140 indicators spanning 10 different topics. This should be scoped in. As should the Wiltshire Intelligence website, which provides a location for a wide range of data sets, indicators and assessments that have relevance to Wiltshire’s residents.  <a href="https://www.wiltshireintelligence.org.uk/jsna/">https://www.wiltshireintelligence.org.uk/jsna/</a></p>

	<p>18.3.1 0</p> <p>18.5.1</p>	<p><a href="https://www.wiltshireintelligence.org.uk/cajsna/">https://www.wiltshireintelligence.org.uk/cajsna/</a></p> <p><a href="https://www.wiltshireintelligence.org.uk/">https://www.wiltshireintelligence.org.uk/</a></p> <p>“The Scheme is predominantly set within agricultural land which is not in itself a key tourist attraction or destination. The land does however play a role in providing a landscape context to recreational use of pedestrian and cycling routes and trails, and to the enjoyment and appreciation of the neighbouring Cotswolds National Landscape, which the Scheme borders”</p> <p>The setting of the tourism in Wiltshire should be scoped in, for example, the effect on the Pear Tree Inn and other B&amp;Bs in Top Lane Whitley who will adjacent to and with a view of the BESS; it’s not enough to just consider the field its proposed to be built in.</p> <p>“Impacts on tourism and recreation during construction and operation. Effects on tourism and recreation are likely to be limited to those facilities immediately impacted by the Scheme, such as PRow and heritage assets within close proximity to the Scheme boundaries”</p> <p>There is no mention of the impact on any local businesses, and tourism providers, no one will be going to the pub for a meal after their walk to the heritage asset on the PRow if they are impacted. This must be scoped in.</p> <p>Concerns have been raised about the impact on the local facilities and businesses. The Pear Tree Inn and Spindles bike shop/Sprockets Café both on Top Lane attract visitors from all over the locality and further afield for the accommodation at the Pear Tree and holiday rentals in the village. Visitors come for the views from these venues, and the surrounding countryside, and these will be impacted by the countryside and landscape being altered beyond recognition as so widescale. The local estate agent has already reported two house sales in the village that have fallen through since the start of the Lime Down public consultation, as a direct result of the proposals and others on hold. Residents have chosen to live in the village for the views and neighbouring countryside amenities and are upset at the prospect of that changing, and the lowering of their house prices as a result, if they then decide to relocate.</p>
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		Some of the existing residential development is only 100m from the proposed site.
Scoped out of the EIA	18.5.2	<p>“The following matters are proposed to be scoped out of the EIA:</p> <p>Specific matters. Impacts upon property value, and crime are proposed to be scoped out of any stage of the assessment due to these matters being very unlikely to be significantly affected by the Scheme. This is as there is little conclusive evidence that property value is significantly affected by the development of utility scale solar farms or that any negative effect is felt over a large area.”</p> <p>What about any evidence that the siting of a BESS or 400kV sub station has on the impact on property value, this should be scoped in.</p>
Other Environmental matters	21.2.6 Table 21.2	<p>“Major Accident or Disaster Potential</p> <p>Flooding</p> <p>Properties and people in areas of increased flood risk. Both the vulnerability of the Scheme to flooding, and its potential to exacerbate flooding, will be addressed in the Hydrology, Flood Risk and Drainage chapter of the ES. The Scheme does not propose large expanses of hardstanding that would be likely to cause significant increase to surface water flooding”</p> <p>The scheme does propose a large expanse of hardstanding for the BESS at the “Land at Melksham substation” in an area known to flood with internal property flooding (14 properties in Whitley in 2014) and therefore should be considered and scoped in. This should also include the impact of the underground cabling at Beanacre which also should be scoped in, due to the changes to water flow and ditch management during construction.</p>
Other relevant planning documents	5.6	<p>Recent decisions on planning applications should be considered as planning precedent and scoped in.</p> <p>Recently refused application (21/3/24) for a battery storage facility at Land at Somerford Farm, Brinkworth</p>

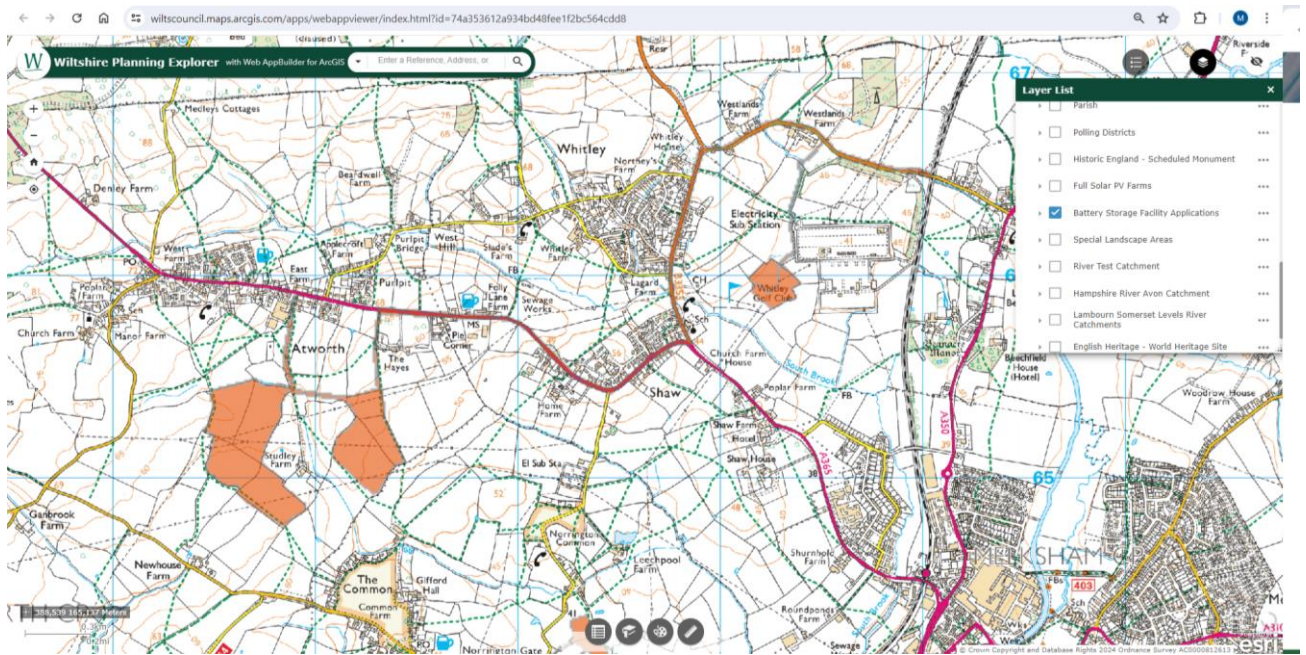
	<p>(Planning application PL/2022/02824) by Wiltshire Council.</p> <p>The proposed battery storage facility and ancillary development will result in uncharacteristic and harmful landscape and visual effects. The loss of existing agricultural land and replacement with a new urban industrial use is considered to have an unacceptable adverse landscape effect on the quiet rural tranquillity and character of the surrounding fields and more importantly, on the very close existing residential development.</p> <p>The proposal is thereby objected to by reason of its size, scale, design, appearance as it would have a harmful impact on the landscape character and appearance of the area in conflict with Core Policy 51 ii, iv, vi v11 and Core Policy 57 I, iii of the Wiltshire Core Strategy and Paragraphs 135 and 180 of the NPPF.</p> <p>Policy 2: Renewable Energy in both the adopted Melksham Neighbourhood Plan and the emerging draft Melksham Neighbourhood Plan 2 (Regulation 14 version October 2023) as proposals are only supported if it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. the siting and scale of the proposal is appropriate to its setting;</li> <li>b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated;</li> <li>c. the proposal does not create an unacceptable impact on local amenity and safety;</li> <li>d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance.</li> <li>e. there are direct benefits to the local community.</li> </ul>
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		<p>Proposals for <b>energy storage</b> will be supported, where it meets one or more of the following:</p> <ul style="list-style-type: none"> <li>a. it is located on or near, existing or proposed renewable energy generation sites;</li> <li>b. it alleviates grid constraints; and</li> <li>c. it enables the delivery of further renewable developments.</li> </ul>
Human Health and Wellbeing	19	<p>The proposed BESS at Whitley is huge, and we understand it will be the largest in Europe and will completely alter the feel of the village and surrounding countryside. From the indicative plan it looks as though it is the same size as the village itself. The impact on the wellbeing of the residents must be scoped in.</p> <p>The well-being of residents in the village of Whitley and the surrounding villages has already been impacted. The prospect of this proposed battery storage site is already making residents feel anxious and spoiling their quiet enjoyment of where they live. The thoughts of the impact of the delivery and construction period; the impact of any final installation on the daily life of residents – on their daily dog walk on the adjacent Right of Way, the view out the window, the feel of the village - are already being keenly felt.</p>
Light Pollution	21.3	<p>There are concerns relating to the light pollution at the site. For both the neighbouring residents and the established wildlife. Presumably, the security lighting will be triggered by motion sensors, and by the local wildlife, including the badgers, rabbits, and deer that are regularly seen on the fields? This is very impactful on nocturnal wildlife, and is known to affect migrating wildlife, affect pollinators (butterflies and bees) as well as impact on the amenity of the neighbouring residents. The impacts of this must be scoped in.</p>

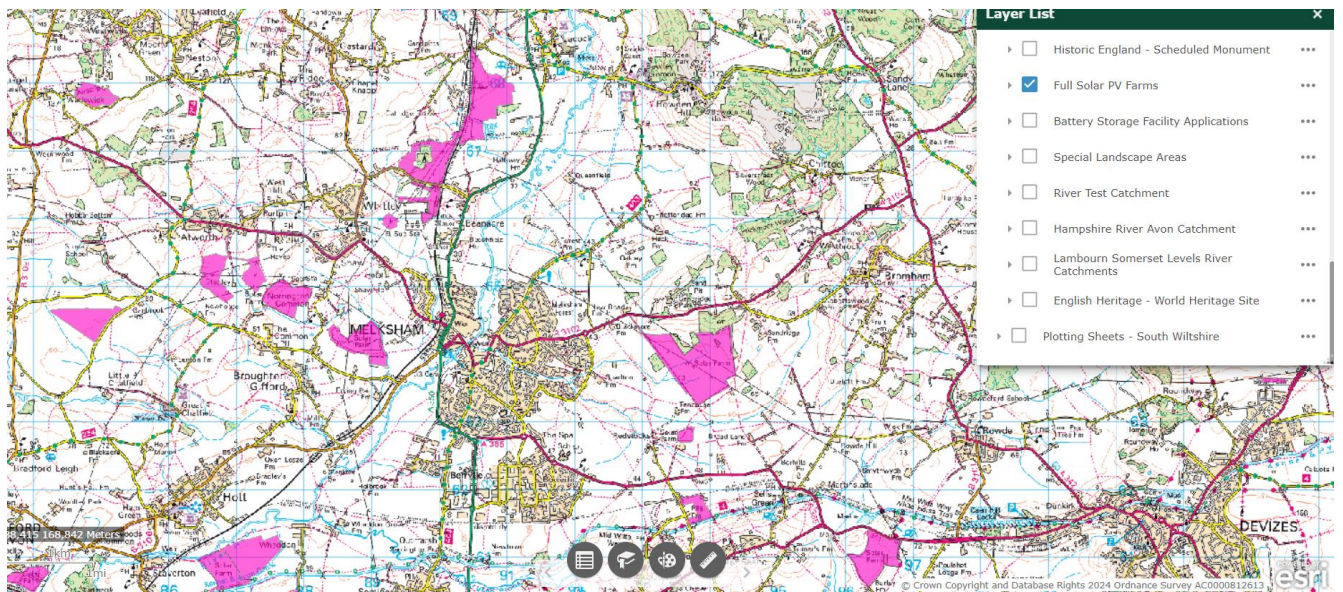
Delivery and Construction	4.3	<p>A very detailed delivery and construction method programme and plan will presumably be required as part of any application but the parish council and residents are clear that any agreed plan must be adhered to, with a suitable penalty clause arrangement in place if the construction is not to plan to act as a strong deterrent. Unfortunately, the delivery of the solar farm at neighbouring Norrington (W/12/02072/FUL) brought the area to a standstill for days, with it regularly reported on the national traffic bulletins on the radio. Due to a short timescale for a deadline to be connected to the grid with financial implications for the developers, the construction and delivery plan was ignored. Deliveries were continuous through the night, with foreign drivers knocking on residents' doors in the small hours of the night seeking directions. This is unacceptable and there seemed to be no recourse to halt this impact on the residents and the major highway delays in the area. There is currently a battery site being installed southwest of the Beanacre substation, which has raised numerous issues and visits to the site and residents' gardens due to the impact the installation is making on the residents; particularly noise from machinery which is currently being investigated by Wiltshire Council's public protection environmental health team to establish if it's still construction noise or the finished installed equipment noise (17/04116 &amp; PL/22/02615 refers).</p> <p>The parish council are seeking more than reassurance, but tangible measures to ensure that this type of impact on the local community cannot happen in the future for any proposed installations.</p> <p>It is understood that the access to the proposed BESS site will only be via Goodes Hill, with only emergency access via Littleworth Lane which is used constantly for access to the Right of Ways MELW65 &amp; MELW72, with many visitors to the area parking in Littleworth Lane to access the RoW as it's a popular dog walking area.</p> <p>These elements must be scoped in and considered as part of the CEMP.</p>
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## Appendix 1: BESS in the area surrounding Whitley and Beanacre



## Appendix 2: Solar Farms in the area surrounding Melksham including Whitley and Beanacre





### Appendix 3: Potential soil compaction and rivulets



## Teresa Strange

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**From:** Lime Down Solar <limedown@planninginspectorate.gov.uk>  
**Sent:** 02 August 2024 16:36  
**To:** CAWS  
**Cc:** Teresa Strange; brian.mathew.mp@parliament.uk; Phil Alford; Atworth Clerk; townCouncil@corsham.gov.uk; John Doel; Martin Franks; Terrence Chivers; [REDACTED]  
**Subject:** RE: EN010168 - Lime Down Solar Park - EIA Scoping Notification and Consultation  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr Richardson

Thank you for your email. As you know Lime Down Solar Park Limited has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

To inform the Scoping Opinion, the Planning Inspectorate must consult with the prescribed consultation bodies, which is the consultation exercise you refer to in your email and is currently ongoing with a deadline of 14 August 2024.

The Planning Inspectorate, under the terms of Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), has a duty to consult:

- a body prescribed under section 42(1)(a) (duty to consult) of the Planning Act 2008 and listed in column 1 of the table set out in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 [(as amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024)] where the circumstances set out in column 2 of that table are satisfied in respect of that body;
- the Marine Management Organisation, where the proposed development would affect, or be likely to affect, areas specified in section 42(2);
- each local authority that is within section 43 (local authorities for purposes of section 42(1)(b)); and
- if the land to which the application, or proposed application, relates or any part of that land is in Greater London, the Greater London Authority.

The Planning Inspectorate also has a duty to notify certain bodies under Regulation 11 of the EIA Regulations of their duty under the EIA Regulations to make available to the Applicant information they possess which is considered relevant to the preparation of the ES.

Under 'the circumstances' in the first bullet point above, you are not a prescribed consultation body for the purposes of scoping in this case.

The Planning Inspectorate can also exercise its discretion in choosing whether to take into account responses from non-prescribed consultation bodies or individuals. The position that the Planning Inspectorate takes on consulting non-prescribed bodies is described in Advice Note Three: EIA Notification and Consultation.

As you are not identified as one of the non-prescribed bodies in Advice Note 3, the Planning Inspectorate would not take into account any comments that you may provide in the scoping opinion.

The Applicant has its own duty to undertake a wide consultation to inform its Application under the Planning Act 2008. If you have comments on the scope of the ES, I encourage you to make these available to the Applicant if you have not already done so.

Lime Down Solar Park Limited contact details can be found on the bottom of the Lime Down Solar Project webpage on our National Infrastructure Planning website at the following link: [Lime Down Solar Project - Project information \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/planninginspectorate.gov.uk)

I also refer you to the Planning Inspectorate's Advice Notes available on the Advice page collection on gov.uk: <https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>

In particular, Advice Note Three sets out the EIA notification and consultation process, and the Advice Note Eight series give information about how to become involved in the Planning Act 2008 process.

I trust this information has been helpful.

Kind regards

Todd Brumwell



**Todd Brumwell** | EIA Advisor  
The Planning Inspectorate  
T 0303 444 5348

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**From:** CAWS <[whitley.and.shaw@gmail.com](mailto:whitley.and.shaw@gmail.com)>

**Sent:** Tuesday, July 30, 2024 7:47 AM

**To:** Lime Down Solar <[limedown@planninginspectorate.gov.uk](mailto:limedown@planninginspectorate.gov.uk)>

**Cc:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>; brian.mathew.mp@parliament.uk; Phil Alford <[phil.alford@wiltshire.gov.uk](mailto:phil.alford@wiltshire.gov.uk)>; Atworth Clerk <[atworthclerk@gmail.com](mailto:atworthclerk@gmail.com)>; townccouncil@corsham.gov.uk; john.doel@melkshamwithout-pc.gov.uk; Martin Franks <[martin.franks@melkshamwithout-pc.gov.uk](mailto:martin.franks@melkshamwithout-pc.gov.uk)>; Terrence Chivers <[terry.chivers@melkshamwithout-pc.gov.uk](mailto:terry.chivers@melkshamwithout-pc.gov.uk)>; [REDACTED] CAWS <[whitley.and.shaw@gmail.com](mailto:whitley.and.shaw@gmail.com)>; [REDACTED]

**Subject:** EN010168 - Lime Down Solar Park - EIA Scoping Notification and Consultation

You don't often get email from [whitley.and.shaw@gmail.com](mailto:whitley.and.shaw@gmail.com). [Learn why this is important](#)

Dear PINS

I refer to the above scheme and your invitation to comment on the reference document.

I am the Chair of Community Action: Whitey and Shaw (CAWS). CAWS is leading a local review regarding the proposed BESS development at Whitley. I set out at the end of this email more information about CAWS and our local mandate.

Whilst you have not identified CAWS as a formal consultee on EIA Scoping, we believe the extent of our local knowledge is unique and therefore extremely relevant to this development. We therefore attach our comments on the developers EIA Scoping proposal which we would be grateful if you would consider.

We note that Melksham Without Parish Council (for which I am also a Parish Councillor representing Whitley) is a formal consultee. I am aware from the Full Council Meeting yesterday that the council supports this CAWS position, but that the Council will also be making their own separate submission.

We would be delighted to discuss the content of the attachment with you and to share our other experience in dealings with the developer since the launch of the non-statutory consultation if you think that would be helpful.

Kind Regards

Peter Richardson  
CAWS Chair

### **About CAWS**

Community Action: Whitley and Shaw (CAWS) is a community group set up in 2015 to represent local residents and businesses, seeking to achieve changes and improvements to the quality of life and wellbeing of local people. It promotes community cohesion, coordinates community action, increases awareness and consults on future developments, and provides a vital link between residents, businesses and the local authorities. CAWS campaigns and projects are wide ranging, from trying to improve road safety for drivers and pedestrians, to providing input to the Neighbourhood and Local Plans. CAWS is run entirely by volunteers with a commitment to recycle any funds raised through local events etc. back into the community.

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DPC:76616c646f72



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## Wiltshire Council Planning Consultation Response

### ECOLOGY

<b>Officer name:</b>	Max Hemmings
<b>Date:</b>	29/02/2024 <b>02/07/2024</b>
<b>Application number:</b>	PL/2023/11188
<b>Proposal:</b>	Demolition of agricultural buildings and development of up to 500 dwellings; up to 5,000 square metres of employment (class E(g)(i)) & class E(g)(ii); land for primary school (class F1); land for mixed-use hub (class E / class F); open space; provision of access infrastructure from Sandridge Common (A3102); and provision of all associated infrastructure necessary to facilitate the development of the site (Outline application relating to access)
<b>Site address:</b>	Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS
<b>Case officer:</b>	Steven Sims

#### Recommendations:

<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input type="checkbox"/>	No objection
<input type="checkbox"/>	Condition (no objection subject to conditions)
<input checked="" type="checkbox"/>	Objection - further information required
<input type="checkbox"/>	Objection in principle
<input type="checkbox"/>	<b>HRA completed</b>

#### Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Biodiversity Net Gain (BNG)	CP50, CP52 NPPF	<b>29/02/2024</b> <ul style="list-style-type: none"> <li>- The unlocked version of the Biodiversity Metric.</li> <li>- Re-evaluation of the proposed grassland.</li> <li>- Updated mapping.</li> </ul>	<b>Partially</b> Biodiversity Metric 4.0 Calculation Tool - final version (Blackmore Farm, Melksham) - EAD Ecology 1.12.2023  <b>02/07/2024</b>
2	Ecological Parameters Plan (EPP)	Hab Regs, WCA, CP50, CP52 NPPF	<b>29/02/2024</b> Please see the comment.	<b>NO</b>



**The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.**

**Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.**

This response should be read in conjunction with the Ecology response for the previous application (PL/2023/01949) which has been used as a template for this application response.

The ecology reports submitted to this application are of a high standard and are welcome.

It should be noted that the comments below are reliant on the accuracy and completeness of the submitted reports (EclA and BNG metric calculation), and we do not take any responsibility for incorrect data or interpretation made by the authors.

The ecology surveys were largely conducted in 2021 and in accordance with best practice guidelines <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf> are considered likely to become invalid in the very near future. For the purposes of this application, the survey effort is considered to be valid to inform the ecological baseline and overall proposed design for planning purposes. However, further relevant ecology surveys will need to be included in the conditioned Construction Environment Management Plan (CEMP) if this application is approved.

The protected and notable species and ecology features confirmed to be within the Zone of Influence of the proposed development include:

- Hazel dormice
- Badgers
- Reptiles (grass snake and slow worm)
- Brown hare
- 51 species of bird including barn owl, little owl, two rookeries and four Red-listed, Priority Species which are possibly using the site for breeding.
- Corky-fruited water-dropwort
- Ten species of bat including at least three of the four UK Annex II species. It is possible that Bechstein's bat (being the fourth Annex II species) could also be using the site.

The tree roost bat surveys identified a total of seven trees which contained bat roosts:

1. Tree 3 – Common pipistrelle day roost (one individual recorded)
2. Tree 5 – Noctule and common pipistrelle day roost (one individual of each species recorded on separate evenings)
3. Tree 6 – Myotis bat and Myotis bat / long-eared bat day roost (one individual recorded on two occasions)
4. Tree 16 – Common pipistrelle day roost (three individuals recorded)
5. Tree 19 – Common pipistrelle day roost (eight individuals recorded)
6. Tree 21 – Common pipistrelle day roost (one individual recorded)
7. Tree 66 – Day roost; one individual confirmed as pipistrelle species and a second individual that was not echolocating (both likely to be common pipistrelle based on proximity to other confirmed common pipistrelle roosts, but the non-echolocating individual could potentially have been a Myotis bat / long-eared bat)

The surveys scoped out the presence of great crested newt (GCN), otter and water vole. However, this area has historic biological records (2006, 2021 & 2014 respectively) and site still hosts potential habitat for these species. In addition, other species such as but not limited to common toad, water shrew, harvest mouse and hedgehog are assumed to be present on site.

As evidenced from the protected and notable species list above this site has an abundance of ecological interest for a wide variety of species. The southern side of the site hosts a key wildlife

commuting corridor with Clackers brook tributary extending east-west. There is also a network of hedgerows that support dormice with a particularly important central east-west band of mature trees that provides a significant roost resource for bats. The grassland on site was reported to be used as pasture which creates a valuable invertebrate food resource for various protected species.

The site is located between existing development of residential areas to the west and an extensive solar park to the east. This has created a pinch point for wildlife to be able to readily commute and expand their territories north-south around the eastern side Melksham.

Any development within this pinch point cannot avoid impacting this biodiversity corridor. Therefore, any development in this area will need to retain and create a suitable wildlife corridor which will also need to consider the potential Melksham Bypass alignment route. Currently the potential combination of these projects will significantly deplete this Green Infrastructure and wildlife corridor.

The below request for further information/amendments is for clarification on the information submitted to the application and to help ensure the overarching strategic plan for significant green space and wildlife corridor creation will be suitably designed and successfully implemented.

A European Protected Species (EPS) dormice Mitigation Licence will be needed. In addition, a EPS bat mitigation licence and/or a badger mitigation licence from Natural England might be required (subject to the results of pre-commencement surveys) for the lawful construction of this development. Planning permission for development does not provide a defence against prosecution under these legislations.

## **1. Biodiversity Net Gain (BNG)**

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver a net gain. The NPPF also encourages applications to deliver measurable net gains (para 174 d) and the government has signalled its intention to bring forward legislation to require development to deliver 10% net biodiversity gain.

The Biodiversity Net Gain Assessment report (Date December 2023 by EAD ecology) submitted to this application is welcomed. The available Metric at the time was Natural England's Biodiversity Metric 4.0 which was used to inform the submitted assessment. For continuity purposes this version of the metric should be used for the remainder of this application.

The excel unlocked Biodiversity Metric calculation spreadsheet needs to be submitted to this application. Unfortunately, the mapping in the report has glitched and the entire map along with reference legend are missing. An amended report with corrected maps is required. However, it is advised the below issues (including those in Section 2 of this response) are addressed before the metric and updated mapping are submitted.

The proposed grassland within the site is considered unlikely to achieve a greater habitat distinctiveness than Modified Grassland due to the historic use of the land and the recreational impacts during the occupational use. Therefore, the proposed grassland should be Modified Grassland unless an area of grassland is created that is clearly separated from the recreational areas by a feature such as a hedge or suitably designed fence.



Further issues are discussed in the context of the Ecological Parameters Plan (EPP) in Section 2 of this response.

The issue of biodiversity net gain must be addressed prior to determination of this application.

**02/07/2024** - Insufficient evidence has been submitted support the conclusion that Other neutral grassland in moderate condition can be created within the publicly accessible areas of a major residential development. When the submitted metric is amended to show Modified Grassland instead of Other neutral grassland (in cell E12 of tab A-2 On-Site Habitat Creation) the proposed development will result in a total loss of 13.10 habitat units (-13.65%). It is agreed that *some* Other neutral grassland can be created on site but only when it is clearly separated from impacts such as but not limited to recreational pressures associated with public amenity space. The metric and mapping do not show any suitable separation measures to provide reasonable certainty that it is possible to create the proposed extent of Other natural grassland.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver a net gain. The current proposal does not provide sufficient certainty that a net gain will be achievable on site and consequentially the current proposed BNG strategy cannot be supported.

## **2. Ecological Parameters Plan (EPP)**

An Ecological Parameters Plan (EPP) is required. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

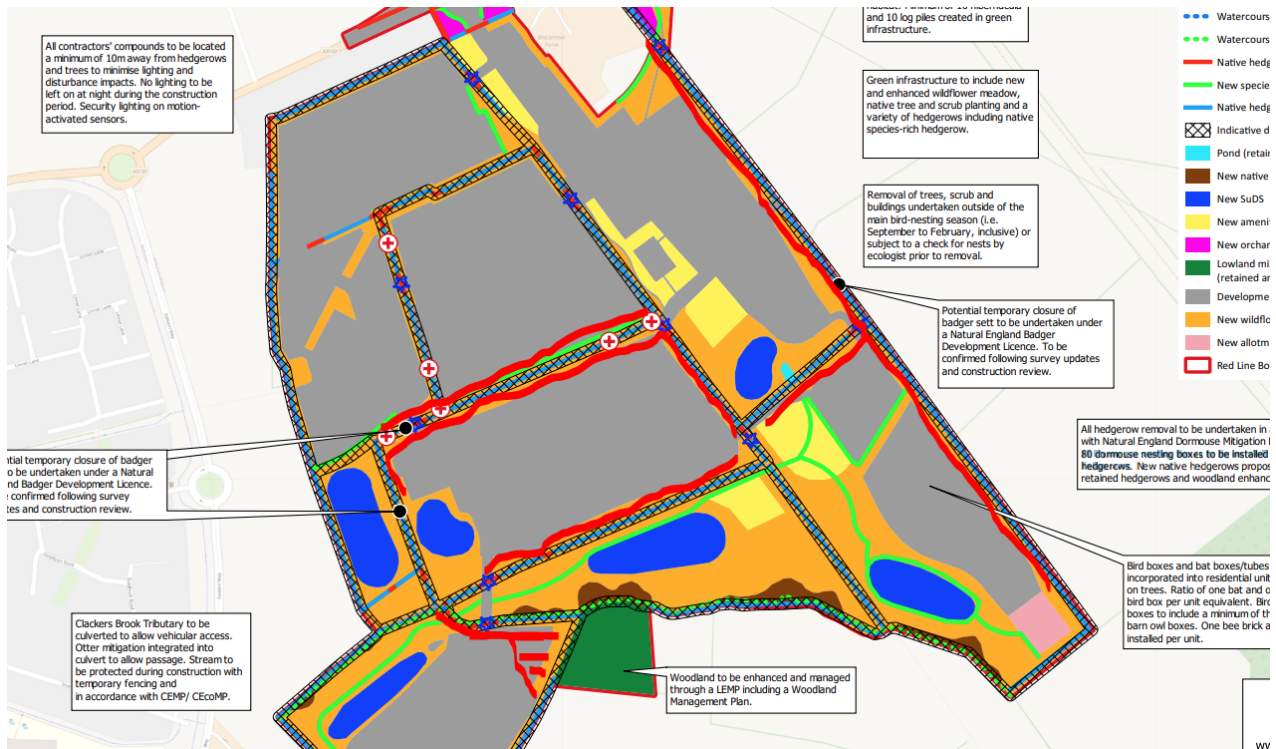
The Ecological Constraints and Opportunities Plan (Date: 14/12/2023 by ead ecology) within Chapter 10 of the Environmental Statement is a suitable template however the following needs to be incorporated into the Plan.

- The retention of existing reptile hibernacula/basking habitat where possible such as but not limited to the log pile shown as target note 16 on the Phase 1 Habitat Survey Plan.
- The location of the reptile/amphibian translocation receptor site(s) for any of these species that are identified within the Zone of Influence during the construction phase.
- The indicative dark corridor is welcomed, however this area needs to cover the other mitigation habitat such as the woodland, SUDs and large sections of the proposed grassland. The mapping of the dark corridor on the Ecological Constraints and Opportunities Plan might make the drawing too difficult to interpret so it is suggested the dark corridor is mapped on a separate drawing. Any new dark corridor drawing should be referenced in the amended Ecological Constraints and Opportunities Plan.
- The specification of "bat hop-over point" needs to be defined and suitably detailed on the plan i.e. suitable tree planting on either side of the gap to establish a connecting canopy. This mitigation will also be needed for dormice habitat connectivity.

- The proposed landscaping north of Clackers Brook needs to be reviewed and amended to create a more robust corridor for bats, dormice and other species from the woodland on site to the Eight Acre Plantation that is east of the site. As a minimum, a continuous species rich hedgerow (with trees) corridor should be created that runs parallel to the Brook. The creation of marginal vegetation and tussocky grassland/wildflower area between the brook and the hedgerow would also be supported.
- The amphibian mitigation: “Drop/inset kerbs proposed for highways and internal measures within gully pots” needs to be included in this plan.
- Clarification is required if the statement “80 dormouse nesting boxes to be installed in retained hedgerows” should also include “and woodland”.
- The inclusion of barn owl boxes needs to be carefully considered. Although welcomed, clarification is required if any existing barn owl roosts/nests will be impacted. If not, then the addition of barn owl roost/nest habitat to the area could come at the expense of the bat and small bird populations confirmed to be on site. If only foraging barn owls were confirmed then the mitigation should focus on creating more prey resource for barn owls. For instance, the creation of tussocky grassland can greatly increase the small mammal population in the area.
- Specify the minimum distance from the edge of boundary habitat features to the footprint of the built development areas. Confirmation is required that any retained or newly planted trees/hedgerows are not within or form the border to private dwellings. The perimeter for private land should be a suitable distance away to ensure the habitat remains functional for biodiversity. The size of this buffer depends on the ecological sensitivity of the habitat and its importance as part of the mitigation strategy. A buffer of at least 2m is required from the edge of the vegetation for safe access for maintenance.

The bat roost and activity surveys identified the genus group of *Myotis* bats to be roosting and foraging/commuting within the site. Bechstein’s bat is included in the *Myotis* genus and it is an Annex II species of bat which is highly associated with tree roosts and woodland habitat. Trees which host *Myotis* species of bat and mature woodland is present within the Zone of Influence of the proposed development. Bechstein’s bat along with other species of bat confirmed to use the site are very sensitive to noise, light and other disturbances associated with residential use. A change in the proposed development layout will likely be needed in some sections to ensure the key wildlife corridors remain functional. The size of the buffers from the wildlife corridors to the development boundaries needs to be carefully reviewed. Wiltshire Council’s Trowbridge Bat Mitigation Strategy ([https://www.wiltshire.gov.uk/media/8861/Trowbridge-Bat-Mitigation-Strategy-summary-document-of-TBMS-for-planners-and-public/pdf/TBMS\\_summary\\_document\\_rev03.pdf?m=637842476566570000](https://www.wiltshire.gov.uk/media/8861/Trowbridge-Bat-Mitigation-Strategy-summary-document-of-TBMS-for-planners-and-public/pdf/TBMS_summary_document_rev03.pdf?m=637842476566570000)) provides a useful reference for suitable buffer dimensions around core bat habitat.

Some key areas of concern where the development could conflict with a suitable mitigation buffer are shown in red below:



**02/07/2024** – A suitable Ecological Parameters Plan has not been submitted and consequentially this objection remains. This objection can be readily overcome if the previously requested information is included in an Ecological Parameters Plan.

In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

**DRAFT CONDITIONS: to be finalised when all information detailed above has been submitted and approved.**

### 1. Construction Environment Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b) Working method statements for protected/priority species, such as nesting birds, bats, amphibians, hazel dormice, badgers and reptiles.
- c) Mitigation strategies already agreed with the local planning authority prior to determination, such as for badgers, dormice, reptiles and bats; this should comprise the pre-construction/construction related elements of strategies only.

- d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
- f) Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

## **2. Landscape and Ecology Management Plan (LEMP)**

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP should encompass the on-site and off-site mitigation areas and will include:

- a. Long term objectives and targets in accordance with the Calculation of Biodiversity Net Gain using Defra Metric 4.0 report (REF TBC).
- b. Monitoring, management and maintenance responsibilities and schedules for each ecological feature within the development for a period of no less than 30 years from the commencement of the scheme.
- c. The mechanism for monitoring success of the management prescriptions with reference to the appropriate Biodiversity Metric target Condition Assessment Sheet(s).
- d. A procedure for review and necessary adaptive management in order to attain targets.
- e. Details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

## **3. Lighting**

No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge Bat Mitigation Strategy

**Final sign off – all matters addressed:**

Ecologist	Date
-----------	------

## Lorraine McRandle

---

**From:** Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>  
**Sent:** 12 August 2024 10:34  
**To:** Lorraine McRandle  
**Cc:** Teresa Strange  
**Subject:** RE: ENF/2024/00544

Thanks,

The planning agent for this matter has come back to the LPA with a further email regarding legislation, I have therefore emailed my manager for further advice. Once he has got back to me I will let you know.

Thanks

**Natalie Rivans**  
Planning Enforcement Officer  
Planning Enforcement Team

## Wiltshire Council

External Tel: 01225 770502  
E-mail: [natalie.rivans@wiltshire.gov.uk](mailto:natalie.rivans@wiltshire.gov.uk)  
Website: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)  
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The views expressed in this e-mail represent an officer's opinion only and are not binding on any future decisions made by elected members of the Council or under powers delegated to officers.

---

**From:** Lorraine McRandle <office@melkshamwithout-pc.gov.uk>  
**Sent:** Friday, August 9, 2024 2:06 PM  
**To:** Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>  
**Cc:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Subject:** FW: ENF/2024/00544

Hi Natalie

Further to your email below, we are just wondering if there is an update on the use of the garage (Coach House) as a dwelling, as the 14 days have expired.

We have a Planning meeting on 19 August at which we can update Members.

Thanks

Lorraine McRandle  
Parish Officer

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On twitter: @melkshamwithout On Instagram: melkshamwithoutpc

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---

**From:** Rivans, Natalie <[Natalie.Rivans@wiltshire.gov.uk](mailto:Natalie.Rivans@wiltshire.gov.uk)>  
**Sent:** Monday, July 22, 2024 11:31:40 AM  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** ENF/2024/00544

Dear Teresa,

To update you on this one. I have spoken with my manager, and we are of the opinion that the Coach House should not be resided in under the circumstances presented.

Therefore, I am emailing the agent today requesting that either a temporary planning permission comes forward if there is a legitimate reason for the owner to reside there, or he moves out within 12 weeks. This time period allows him to find suitable accommodation.

I will ask the agent for an update on the chosen course of action within 14 days and will update you once I hear back.

Regards

**Natalie Rivans**  
Planning Enforcement Officer  
Planning Enforcement Team

**Wiltshire Council**

External Tel: 01225 770502  
E-mail: [natalie.rivans@wiltshire.gov.uk](mailto:natalie.rivans@wiltshire.gov.uk)  
Website: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)  
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# Ministry of Housing, Communities & Local Government

**Rt Hon Angela Rayner MP**

*Deputy Prime Minister and Secretary of State for  
Housing, Communities & Local Government*

2 Marsham Street  
London  
SW1P 4DF

**To:** all local authority Leaders in England

**Cc:** all local authority Chief Executives in  
England

30 July 2024

## **Playing your part in building the homes we need**

Earlier today, I set out to the House of Commons the Government's plan to build the homes this country so desperately needs. Our plan is ambitious, it is radical, and I know it will not be without controversy – but as the Prime Minister said on the steps of Downing Street, our work is urgent, and in few areas is that urgency starker than in housing.

As the Leaders and Chief Executives of England's local authorities, you know how dire the situation has become and the depth of the housing crisis in which we find ourselves as a nation. You see it as you place record numbers of homeless children in temporary accommodation; as you grapple with waiting lists for social housing getting longer and longer; and as your younger residents are priced out of home ownership.

It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because it falls to you and your authorities not only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home.

To that end, and in a spirit of collaboration and of shared endeavour, I wanted to set out the principal elements of our plan – including what you can expect of the Government, and what we are asking of you.

### *Universal coverage of local plans*

I believe strongly in the plan making system. It is the right way to plan for growth and environmental enhancement, ensuring local leaders and their communities come together to agree the future of their areas. Once in place, and kept up to date, local plans provide the stability and certainty that local people and developers want to see our planning system deliver. In the absence of a plan, development will come forward on a piecemeal basis, with much less public engagement and fewer guarantees that it is the best outcome for your communities.



That is why **our goal has to be for universal coverage of ambitious local plans as quickly as possible**. I would therefore like to draw your attention to the proposed timelines for plan-making set out in Chapter 12 of the National Planning Policy Framework (NPPF) consultation. My objective is to drive all plans to adoption as fast as possible, with the goal of achieving universal plan coverage in this Parliament, while making sure that these plans are sufficiently ambitious.

This will of course mean different things for different authorities.

- For **plans at examination** this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, we will expect authorities to begin a plan immediately in the new system.
- For **plans at an advanced stage of preparation** (Regulation 19), it means allowing them to continue to examination unless there is a significant gap between the plan and the new local housing need figure, in which case we propose to ask authorities to rework their plans to take account of the higher figure.
- **Areas at an earlier stage of plan development**, should prepare plans against the revised version of the National Planning Policy Framework and progress as quickly as possible.

I understand that will delay the adoption of some plans, but I want to balance keeping plans flowing to adoption with making sure they plan for sufficient housing. I also know that going back and increasing housing numbers will create additional work, which is why we will provide financial support to those authorities asked to do this. The Government is committed to taking action to ensure authorities have up-to-date local plans in place, supporting local democratic engagement with how, not if, necessary development should happen. On that basis, and while I hope the need will not arise, I will not hesitate to use my powers of intervention should it be necessary to drive progress – including taking over an authority's plan making directly. The consultation we have published today sets out corresponding proposals to amend the local plan intervention criteria.

We will also empower Inspectors to be able to take the tough decisions they need to at examination, by being clear that they should not be devoting significant time and energy during an examination to 'fix' a deficient plan – in turn allowing Inspectors to focus on those plans that are capable of being found sound and can be adopted quickly.

### *Strategic planning*

We know however that whilst planning at the local authority level is critical, it's not enough to deliver the growth we want to see. That is why the Government was clear in the Manifesto that housing need in England cannot be met without planning for growth on a larger than local scale, and that it will be necessary to introduce effective new mechanisms for cross-boundary strategic planning.

This will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure, building the economy, and improving climate resilience. Strategic planning will also be important in planning for local growth and Local Nature Recovery Strategies.

We will therefore take the steps necessary to enable universal coverage of strategic planning within this Parliament, which we will formalise in legislation. This model will support elected Mayors in overseeing the development and agreement of Spatial Development Strategies (SDSs) for their areas. The Government will also explore the most effective arrangements for developing SDSs outside of mayoral areas, in order that we can achieve universal coverage in England, recognising that we will need to consider both the appropriate geographies to use to cover functional economic areas, and the right democratic mechanisms for securing agreement.

Across all areas, these arrangements will encourage partnership working but we are determined to ensure that, whatever the circumstances, SDSs can be concluded and adopted. The Government will work with local leaders and the wider sector to consult on, develop and test these arrangements in the months ahead before legislation is introduced, including consideration of the capacity and capabilities needed such as geospatial data and digital tools.

While this is the right approach in the medium-term, we do not want to wait where there are opportunities to make progress now. We are therefore also taking three immediate steps.

- First, in addition to the continued operation of the duty to cooperate in the current system, we are strengthening the position in the NPPF on cooperation between authorities, in order to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues where plans are being progressed in the short-term.
- Second, we will work in concert with Mayoral Combined Authorities to explore extending existing powers to develop an SDS.
- Third, we intend to identify priority groupings of other authorities where strategic planning – and in particular the sharing of housing need – would provide particular benefits, and engage directly with the authorities concerned to structure and support this cooperation, using powers of intervention as and where necessary.

### *Housing targets*

Underpinning plan making – at the strategic and local level – must be suitably ambitious housing targets. That is why we have confirmed today that we intend to **restore the standard method as the required approach for assessing housing needs and planning for homes**, and reverse the wider changes made to the NPPF in December 2023 that were detrimental to housing supply.

But simply going back to the previous position is not enough, because it failed to deliver enough homes. So, we are also consulting on a **new standard method** to ensure local plans are ambitious enough to support the Government's commitment to build 1.5 million new homes over the next five years. The new method sees a distribution that will drive growth in every corner of the country. This includes a stretching yet credible target for London, with what was previously unmet need in the capital effectively reallocated to see homes built in areas where they will be delivered. The new method increases targets across all other regions relative to the existing one, and significantly boosts expectations across our city regions – with targets in Mayoral Combined Authority areas on average growing by more than 30%.

I want to be clear that local authorities will be **expected to make every effort to allocate land in line with their housing need as per the standard method**, noting it is possible to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery, such as flood risk. Any such justification will need to be evidenced and explained through consultation and examination, and local authorities that cannot meet their development needs will have to demonstrate how they have worked with other nearby authorities to share that unmet need.

And we are also committed to making sure that **the right kind of homes are delivered through our planning system as quickly as possible**. That is why we are proposing to remove the prescriptive approach to affordable home ownership products, which can squeeze out Social and Affordable rent homes despite acute need. This will free authorities to secure more Social Rent homes, ensuring you get the homes you need in your local areas. We also want to promote the delivery of mixed use sites which can include a variety of ownership and rental tenures, including rented affordable housing and build to rent, and which provide a range of benefits – including creating diverse communities and supporting timely build out rates.

### *Green Belt and Grey Belt*

If targets tell us what needs to be built, the next step is to make sure we are building in the right places. The first port of call is rightly brownfield land, and we have proposed some changes today to support such development.

But brownfield land can only be part of the answer, which is why we are consulting on changes that would see councils **required to review boundaries and release Green Belt land where necessary to meet unmet housing or commercial need**.

I want to be clear that this Government is committed to protecting nature. That is why land safeguarded for environmental reasons will maintain its existing protections. But we know that large parts of the Green Belt have little ecological value and are inaccessible to the public, and that the development that happens under the existing framework can be haphazard – too often lacking the affordable homes and wider infrastructure that communities need. Meanwhile, low quality parts of the Green Belt, which we have termed ‘grey belt’ and which make little contribution to Green Belt purposes, like disused car parks and industrial estates, remain undeveloped.

We will therefore ask authorities to prioritise sustainable development on previously developed land and other low quality ‘grey belt’ sites, before looking to other sustainable locations for meeting this need. We want decisions on where to release land to remain locally led, as we believe that local authorities are in the best position to judge what land within current Green Belt boundaries will be most suitable for development. But we also want to ensure enough land is identified in the planning system to meet housing and commercial need, and so we have proposed a clear route to bringing forward schemes on ‘grey belt’ land outside the plan process where delivery falls short of need.

To make sure development on the Green Belt truly benefits your communities, we are also **establishing firm golden rules**, with a target of at least 50% of the homes onsite being affordable, and a requirement that all developments are supported by the infrastructure needed – including GP surgeries, schools and transport links - as well as greater provision of accessible green space.

### *Growth supporting infrastructure*

Building more homes is fundamental to unlocking economic growth, but we need to do so much more. That is why we are also proposing changes to make it **easier to build growth-supporting infrastructure** such as laboratories, gigafactories, data centres, electricity grid connections and the networks that support freight and logistics – and seeking views on whether we should include some of these types of projects in the Nationally Significant Infrastructure Projects regime.

Having ended the ban on onshore wind on our fourth day in office, we are also proposing to: boost the weight that planning policy gives to the benefits associated with **renewables**; bring larger scale onshore wind projects back into the Nationally Significant Infrastructure Projects regime; and change the threshold for solar development to reflect developments in solar technology. In addition, we are testing whether to bring a broader definition of water infrastructure into the scope of the Nationally Significant Infrastructure Projects regime.

And recognising the role that planning plays in the **broader needs of communities**, we are proposing a number of changes to: support new, expanded or upgraded public service infrastructure; take a vision-led approach to transport planning, challenging the now outdated default assumption of automatic traffic growth; promote healthy communities, in particular tackling the scourge of childhood obesity; and boost the provision of much needed facilities for early-years childcare and post-16 education.

### *Capacity and fees*

I recognise that delivering on the above ambition will demand much from you and your teams, and your capacity is strained. We want to **see planning services put on a more sustainable footing**, which is why we are consulting on whether to use the Planning and Infrastructure Bill to allow local authorities to set their own fees, better reflecting local costs and reducing financial pressures on local authority budgets.

While legislative change is important, we also do not want to wait to get extra resource into planning departments – which is why I am consulting on increasing planning fees for householder applications and other applications, that for too long have been well below cost recovery. We know that we are asking a lot more of local authorities, and we are clear that this will only be possible if we find a way to give more resource.

It is also important that you are supported in the critical role you play when the infrastructure needed to kickstart economic growth and make Britain a clean energy superpower is being consented under the Nationally Significant Infrastructure Projects regime. I am therefore consulting on whether to make provision to allow host upper and lower tier (or unitary) authorities to recover costs for relevant services provided in relation to applications, and proposed applications, for development consent.

### *Social and affordable housing*

Overhauling our planning system is key to delivering the 1.5 million homes we have committed to build over the next five years – but it is not enough. We need to diversify supply, and I want to make sure that you have the tools and support needed to deliver quality affordable and social housing, reversing the continued decline in stock. This is vital to help you manage local pressures, including tackling and preventing homelessness.

Within the current Affordable Homes Programme (AHP), we know that particularly outside London, almost all of the funding for the 2021-2026 AHP is contractually committed. That is why I have confirmed that we will **press Homes England and the Greater London Authority (GLA) to maximise the number of Social Rent homes in allocating the remaining funding.**

The Government will also bring forward details of future Government investment in social and affordable housing at the Spending Review, so that social housing providers can plan for the future and help deliver **the biggest increase in affordable housebuilding in a generation.** We will work with Mayors and local areas to consider how funding can be used in their areas and support devolution and local growth.

In addition, I have confirmed that the Local Authority Housing Fund (LAHF) 3 will be going ahead, with £450 million provided to councils to acquire and create homes for families at risk of homelessness. This will create over 2,000 affordable homes for some of the most vulnerable families in society.

I recognise that councils and housing associations need support to build their capacity if they are to make a greater contribution to affordable housing supply. We will set out plans at the next fiscal event to **give councils and housing associations the rent stability they need** to be able to borrow and invest in both new and existing homes, while also ensuring that there are appropriate protections for both existing and future social housing tenants.

As we work to build more affordable homes, we also need to do better at maintaining our existing stock – which is why I have announced three updates on the Right to Buy scheme:

- First, we have started to review the increased Right to Buy discounts introduced in 2012, and we will bring forward secondary legislation to implement changes in the autumn;
- Second, we will review Right to Buy more widely, including looking at eligibility criteria and protections for new homes, bringing forward a consultation also in the autumn; and
- Third, we are increasing the flexibilities that apply to how councils can use their Right to Buy receipts.

With respect to the third point, from today we are removing the caps on the percentage of replacements delivered as acquisitions (which was previously 50%) and the percentage cost of a replacement home that can be funded using Right to Buy receipts (which was also previously 50%). Councils will also now be able to combine Right to Buy receipts with section 106 contributions. These flexibilities will be in place for an initial 24 months, subject to review. My department will be writing to stock-holding local authorities with more details on the changes, and I would encourage you to make the best use of these flexibilities to maximise Right to Buy replacements and to achieve the right balance between acquisitions and new builds.

Finally, I would like to emphasise the importance of homes being decent, safe and warm. That is why this Government will introduce Awaab's Law into the social rented sector. We will set out more detail and bring forward the secondary legislation to implement this in due course. We also intend to bring forward more detail in the autumn on our plans to raise standards and strengthen residents' voices.

## *Next phase of reform*

The action we have announced today will get us building, but as I said to the House of Commons it represents only a downpayment on our ambitions.

As announced in the King's Speech, we will introduce a Planning and Infrastructure Bill later in the first session, which will: modernise planning committees by introducing a national scheme of delegation that focuses their efforts on the applications that really matter, and places more trust in skilled professional planners to do the rest; enable local authorities to put their planning departments on a sustainable footing; further reform compulsory purchase compensation rules to ensure that what is paid to landowners is fair but not excessive; streamline the delivery process for critical infrastructure; and provide any necessary legal underpinning to ensure we can use development to fund nature recovery where currently both are stalled.

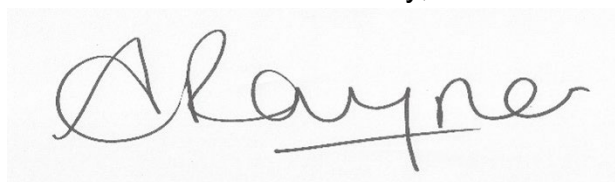
We will consult on the right approach to strategic planning, in particular how we structure arrangements outside of Mayoral Combined Authorities, considering both the right geographies and democratic mechanisms.

We will say more imminently about how we intend to deliver on our commitment to build a new generation of new towns. This will include large-scale new communities built on greenfield land and separated from other nearby settlements, but also a larger number of urban extensions and urban regeneration schemes that will work with the grain of development in any given area.

And because we know that the housing crisis cannot be fixed overnight, the Government will publish a long-term housing strategy, alongside the Spending Review, which the Chancellor announced yesterday.

We have a long way to go, but I hope today proves to be a major first step for all of us as we seek to put the housing crisis behind us. I look forward to working with you all, and am confident that together, we can achieve significant improvements that will benefit our citizens.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'ARayner', written on a light-colored background.

**RT HON ANGELA RAYNER MP**

Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government

## Lorraine McRandle

---

**From:** Teresa Strange  
**Sent:** 31 July 2024 12:54  
**To:** David Pafford; Alan Baines; John Glover; Mark Harris; Richard Wood; Terrence Chivers; Peter Richardson  
**Cc:** Lorraine McRandle  
**Subject:** New Govt consultation on the NPPF

Dear Planning Committee

Please find link to the consultation on the proposed changes to the NPPF that was announced by the Government yesterday, I am yet to read!

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

Deadline for comments is 24<sup>th</sup> September, so time for a couple of planning committee meetings and full council to have a look at in detail (and see what other stakeholders think).

I was encouraged by the interview on the BBC this morning, which was about having “plan led and not speculative development” and the retention and encouragement of Local Plans and Neighbourhood Plans – but the devil is in the detail of course.

Kind regards, Teresa

Teresa Strange  
Clerk & Responsible Financial Officer  
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Melksham Community Campus  
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01225 705700  
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**Wellbeing Statement** I may send emails outside office hours but never with any expectation of response. Please just get back to me when you can within your own working hours. Thank you.

**Upcoming leave: 9<sup>th</sup> to 16<sup>th</sup> August returning to work Monday 19<sup>th</sup> August 024**

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Open consultation

# Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Updated 2 August 2024

## Applies to England

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# Scope of consultation

## Topic of this consultation

This consultation seeks views on our proposed approach to revising the National Planning Policy Framework in order to achieve sustainable growth in our planning system. We are also seeking views on a series of wider policy proposals in relation to increasing planning fees, local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects.

## Scope of this consultation

The Ministry of Housing, Communities and Local Government is seeking views on how we might revise national planning policy to support our wider objectives. Full details on the scope of consultation are found within chapter 1. Chapter 14 contains a table of all questions within this document and signposts their relevant scope. In responding to this consultation, we would appreciate comments on any potential impacts on protected groups under the Public Sector Equality Duty. A consultation question on this is found in chapter 13.

## Geographical scope

These proposals relate to England only.

## Basic Information

### Body/bodies responsible for the consultation

The Ministry of Housing, Communities and Local Government

## Duration

This consultation will begin on Tuesday 30 July 2024 at 2pm and close at 11.45pm on Tuesday 24 September 2024.

## Enquiries

For any enquiries about the consultation please contact:

[PlanningPolicyConsultation@communities.gov.uk](mailto:PlanningPolicyConsultation@communities.gov.uk)

## How to respond

Citizen Space is the department's online consultation portal and our preferred route for receiving consultation responses. We strongly encourage responses are made via Citizen Space, particularly from organisations with access to online facilities such as local planning authorities, representative bodies and businesses. Consultations receive a high-level of interest across many sectors. Using the online survey greatly assists our analysis of the responses, enabling more efficient and effective consideration of the issues raised.

[Respond via Citizen Space \(https://consult.levellingup.gov.uk/planning/planning-reform\)](https://consult.levellingup.gov.uk/planning/planning-reform)

If you cannot respond via Citizen Space, you may send your response by email to: [PlanningPolicyConsultation@communities.gov.uk](mailto:PlanningPolicyConsultation@communities.gov.uk)

Written responses should be sent to:

Planning Policy Consultation Team  
Planning Directorate – Planning Policy Division  
Ministry of Housing, Communities and Local Government  
Floor 3, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

When you reply, it would be very useful if you please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name

- your position (if applicable)
- the name of organisation (if applicable)

Please make it clear which question or paragraph number each comment relates to and ensure that the text of your response is in a format that allows copying of individual sentences or paragraphs, to help us when considering your view on particular issues. Thank you for taking time to submit responses to this consultation. Your views will help improve and shape our national planning policies.

## Chapter 1 – Introduction

**1. The Government has made clear that sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people.** Our approach to delivering this growth will focus on three pillars: stability, investment and reform.

**2. Nowhere is decisive reform needed more urgently than in our planning system.** The December 2023 changes to the National Planning Policy Framework (NPPF) were disruptive to the sector and detrimental to housing supply. The Chancellor's speech on 8 July committed to consulting on reforms to the NPPF to take a different, growth-focused approach.

**3. Today, we set out specific changes we propose to make immediately to the NPPF following this consultation.** These changes – amending the planning framework, and universal, ambitious local plan coverage – are vital to deliver the Government's commitments to achieve economic growth and build 1.5 million new homes. Specifically, they will:

a. make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options;

b. reverse other changes to the NPPF made in December 2023 which were detrimental to housing supply;

need to see if its just that Wiltshire Council now need a 5 year land supply again, or whether the bit that NHPs have 5 year protection under para 14 or back to 2 - question for WC webinar as not clear

c. implement a new standard method and calculation to ensure local plans are ambitious enough to support the Government's manifesto commitment of 1.5 million new homes in this Parliament;

This is the housing targets being discussed in the media, the question for WC webinar is about whether they can still submit their Local Plan as at Reg 19 but only if % of their housing target per annum is within new target figures

d. broaden the existing definition of brownfield land, set a strengthened expectation that applications on brownfield land will be approved and that plans should promote an uplift in density in urban areas;

- e. identify grey belt land within the Green Belt, to be brought forward into the planning system through both plan and decision-making to meet development needs; this is for "previously developed land", and land around it, so could include farms and farmland as Whitley Farm for example in the NHP is not technically Brownfield but Previously developed land. Would the proposed BESS at Whitley be classed as PDL?
- f. improve the operation of 'the presumption' in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development; this is the clause that gives speculative development the green light if no 5 year land supply in place - at first sight this looks a welcome addition
- g. deliver affordable, well-designed homes, with new "golden rules" for land released in the Green Belt to ensure it delivers in the public interest;
- h. make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector; this might be useful, as the JMNP2 wants to tie the type and tenure to the Melksham Housing Needs Assessment findings, and WC want to keep to a Wiltshire split
- i. support economic growth in key sectors, aligned with the Government's industrial strategy and future local growth plans, including laboratories, gigafactories, datacentres, digital economies and freight and logistics – given their importance to our economic future;
- j. deliver community needs to support society and the creation of healthy places; and is this the infrastructure we keep asking for in line with development?
- k. support clean energy and the environment, including through support for onshore wind and renewables. suggestion of site allocations for renewables in local plans

**4. The proposed changes are explained in this document and set out in an accompanying draft NPPF.** The Government will respond to this consultation and publish NPPF revisions before the end of the year, so that policy changes can take effect as soon as possible.

**5. Alongside these specific changes, the document also calls for views on:**

- a. whether to reform the way that the Nationally Significant Infrastructure Projects (NSIP) regime applies to onshore wind, solar, data centres, laboratories, gigafactories and water projects, as the first step of the Government's NSIP reform plans; at what size they become national infrastructure
- b. whether the local plan intervention policy criteria should be updated or removed, so the Government can intervene where necessary to ensure housing delivery; and need to research what this is about
- c. proposals to increase some planning fees, including for householder applications, so that local planning authorities are properly resourced to support a sustained increase in development and improve performance to assist with lack of planning officers in place

**6. Finally, it sets out how and when we expect every local planning authority to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth.**

## Chapter 2 – Policy objectives

1. **By fixing the foundations of our economy we can rebuild Britain and make every part of our country better off; decisive reform to the planning system is urgently needed to achieve that.** New homes create jobs and investment in construction and ensure people can afford to live where they wish and access high-quality, productive jobs. And yet planning permissions for new homes have fallen to a record low. Clean energy lowers the cost of living and the cost of doing business, but the average time taken to approve large infrastructure projects has grown to more than four years. Commercial development lets businesses expand and support the economy, but the existing planning framework makes no reference to the specific types of development our modern economy needs.
2. **Our antiquated planning system delays too many of these projects, stymieing Britain’s ability to grow its way to prosperity.**
3. **We will take the difficult decisions necessary to build what Britain needs.** That includes 1.5 million homes in England over the next five years, and crucial energy, water and commercial projects.
4. **Our objectives for reform build on our manifesto commitments.** We will:
  - a. **get Britain building again**, to build new homes, create jobs, and deliver new and improved infrastructure;
  - b. **take a brownfield first approach and then release low quality grey belt land**, while preserving the Green Belt;
  - c. **boost affordable housing**, to deliver the biggest increase in social and affordable housebuilding in a generation;
  - d. **bring home ownership into reach**, especially for young first-time buyers;
  - e. **extract more public value from development**, including through infrastructure, amenity, and transport benefits and, where necessary, through use of strengthened compulsory purchase powers;
  - f. **ensure communities continue to shape housebuilding in their areas**, demanding universal local plan coverage from all local planning authorities, while making full use of intervention powers to build the houses we need if this is not achieved; no mention of Neighbourhood Plans at all though



- g. **promote a more strategic approach to planning**, by strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning;
- h. **support the development needed for a modern economy**, to prepare the way for our modern industrial strategy; and
- i. **unlock new sources of clean energy**, supporting our mission to deliver clean energy by 2030.

**5. Delivering those objectives starts with local planning authorities planning for sufficient homes, commercial development and wider infrastructure in their local plan.** Local plans clearly spell out to developers and communities where development will and will not take place, bringing certainty to all parties. They are also the mechanism through which local communities can have their say in how homes are built. It is unacceptable for local planning authorities to not make a local plan.

**6. Those plans need to be suitably ambitious to build 1.5 million new homes.** We are therefore making the standard method the mandatory starting point for planning for homes, implementing a revised standard method so that councils will plan to achieve the delivery of the homes we need, and reversing other damaging changes to planning policy which disrupted the sector and stifled supply.

**7. They also require us to take a strategic approach to releasing land.** We are committed to preserving the Green Belt, but its current design can protect poor quality sites while communities face acute shortages of housing. We will empower authorities to release Previously Developed Land and low quality grey belt sites to ensure enough land is made available for new homes – while continuing to ensure that brownfield development is prioritised and that development is in sustainable locations.

**8. We must deliver more affordable, well-designed homes quickly.** We are changing national policy to support more affordable housing, including more for Social Rent, and implementing golden rules to ensure development in the Green Belt is in the public interest. Promoting a more diverse tenure mix will support the faster build out we need.

**9. We must grow the economy and support green energy.** Commercial development in Britain has been stymied by a lack of support for key growth industries; we propose to support them. Britain has the potential to be a clean energy superpower, cutting bills for local people and businesses alike – we will support this.

**10. Alongside reforms to planning policy, we are taking decisions to quickly reform the wider system in support of these objectives.** We are expanding the NSIP regime so that it can support our drive for more clean energy, as the first step of our NSIP reforms. We are reforming local plan



intervention so that if plans are not in place, the Government can intervene to ensure housing delivery. We are reforming planning fees so that local planning authorities are properly resourced to support a sustained increase in development.

**11. We will act swiftly to implement these reforms to bring stability and certainty to the sector.** The last Government's reforms to planning policy in December 2023 were damaging for housing supply, disrupting plan-making and undermining investor confidence. We are therefore acting swiftly to reverse many of these changes, and implement our manifesto commitments, so that local councils, developers and investors understand exactly how we expect the planning system to function, over this parliament and beyond. Alongside the changes we have set out here, we will complete our set of planning policy changes through consulting on National Development Management Policies, and bring forward the Planning and Infrastructure Bill to accelerate the delivery of high quality infrastructure and housing.

**12. We expect immediate action.** We are keen to engage with all stakeholders to understand the impacts of these reforms. The Deputy Prime Minister will write to all local planning authorities making clear that we expect universal coverage of local plans, and reviews of Green Belt boundaries where necessary to meet housing need. In this consultation, we have therefore set out exactly how local planning authorities should proceed to make ambitious local plans as quickly as possible.

## Chapter 3 – Planning for the homes we need

1. We are starting with how we plan for homes, because that is where we believe the system needs to start, and that is where our communities are feeling the inadequacies of our planning system most. The Government believes that decisions about what to build and where should reflect local views, and planning should be about how to deliver the housing an area needs - not whether to do so at all.

**2. We are therefore seeking views on reversing changes made to the NPPF by the previous Government in December 2023.** Those changes run counter to this Government's ambitions on increasing housing supply, so it is important that we quickly reverse them and allow local planning authorities to get on and plan for growth.

### Importance of planning to meet housing needs

# Council leader 'livid' with new housing targets

Richard Clewer said he wants to avoid "developer-led cookie cutter estates" popping up in the countryside

**Dan O'Brien**

Political reporter, BBC Radio Wiltshire

- Published

5 August 2024

**The leader of one of the West's largest councils has said he is "livid" with the new government's proposed housing targets.**

**Plans published on 30 July** show an 81% increase in the numbers expected to be built in Wiltshire Council's area, up to 3,500 per year.

Wiltshire Council's Conservative leader, Richard Clewer, said it was the equivalent of building "another Salisbury" over the next 15 years - and hit back at claims rural areas have not built enough homes.

Housing secretary Angela Rayner said Labour's plan for 1.5 million new homes across the country "won't be without controversy", but changes were required to make housing more affordable.

The annual national housing target would be increased from 300,000 homes to just over 370,000, and the rules will require 50% of new housing to be affordable "with a focus on social rent".

Ms Rayner said the plans marked "a significant step to getting Britain building again".

Although the first port of call for development will be brownfield land, the plans will also facilitate building on low-quality green belt land, set to be reclassified as "grey belt".

Wiltshire housing targets are rising from 1,917 houses a year to 3,476  
But Mr Clewer stated that the reforms drive "a bulldozer through the concept of planned development combined with public input".

"In Wiltshire, housing targets are rising by 81%, from 1,917 houses a year to 3,476," he said.

"They are proposing a new allocation system that will dump the large majority of these houses in greenfields and, in some cases, green-belt sites in rural England."

Mr Clewer added that under the new plans, cities like London - which have greater demand for housing and more suitable infrastructure - will be allowed to continue building "far below their fair share of housing".

He said: "Why should rural England be expected to build the houses that London cannot bring itself to build?"

"The hard won requirement to make new developments 'beautiful' and not to build more soulless modern estates is being dropped."

## **'Housing need'**

However, a spokesperson from the Ministry of Housing, Communities and Local Government (MHCLG) said "all areas of the country must play their part".

"Wiltshire's target has been set objectively and is in line with local housing need," the spokesperson said.

"We cannot continue with the high rents and unaffordable house prices that we see across the country."

The reforms have been announced just over three weeks after the election and the consultation is open to public comment until 24 September.

**Lorraine McRandle**

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**Subject:** FW: South East Strategic Reservoir Option (SESRO) Public Consultation

---

**From:** Oliver, Ken <[Ken.Oliver@wiltshire.gov.uk](mailto:Ken.Oliver@wiltshire.gov.uk)>

**Sent:** 07 August 2024 11:02

**Subject:** South East Strategic Reservoir Option (SESRO) Public Consultation

Dear Partnership Member

The Wilts & Berks Canal Trust team has asked me to make Canal Partnership Members aware of the South East Strategic Reservoir Option (SESRO) Public Consultation that **ends on 28<sup>th</sup> August 2024** .  
[South East Strategic Reservoir Option \(SESRO\) - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://thames-wrmp.co.uk)

The Partnership has been discussing this project for many years and has always had a neutral view about the reservoir, but notes that if it is constructed, the opportunity to restore the Wilts & Berks canal on its historic route will be lost, and therefore an alternative should be included in any reservoir plans.

WBCT is concerned that the current favoured design option C for the emergency discharge (drawdown) channel is an underground tunnel (pipeline).

This loses the opportunity of Option B to create an open water channel, which would become the new Wilts & Berks Canal route from the reservoir to the River Thames, creating sizeable economic, ecological and financial benefit. The newly created green-blue corridor would also provide a sustainable walking and cycling route from Abingdon to the proposed reservoir.

WBCT is keen that this 'once in a lifetime' opportunity is not ignored and would like to recruit the help of Partners to help make the case for Option B.

This can be done by responding to the consultation question ***We have considered several options for the Emergency Discharge and Option C is our preferred option. Do you have any comments on these plans?***

WBCT would ask that in your own words you respond by rejecting Option C and pointing out the huge public benefit of Option B ( the open water channel) .

These include significant economic ,well being and environmental benefit as well as creating a sustainable transport route and blue-green corridor .

Please contact me if you would like further information

With best regards

Ken

Ken Oliver

Projects & Canal Officer

Countryside Access

Highways & Transport

**Please Note my core working days are Wednesday & Thursday**

**Wiltshire Council**



## Lorraine McRandle

---

**Subject:** FW: Semington Parish Neighbourhood Plan (2023 – 2038) Regulation 16 Consultation

---

**From:** Neighbourhood Planning <[NeighbourhoodPlanning@wiltshire.gov.uk](mailto:NeighbourhoodPlanning@wiltshire.gov.uk)>  
**Sent:** 07 August 2024 15:08  
**To:** Neighbourhood Planning <[NeighbourhoodPlanning@wiltshire.gov.uk](mailto:NeighbourhoodPlanning@wiltshire.gov.uk)>  
**Subject:** Semington Parish Neighbourhood Plan (2023 – 2038) Regulation 16 Consultation

Dear Sir/Madam,

I am writing to inform you that Semington Parish Council have submitted the draft Semington Parish Neighbourhood Plan (2023 – 2038) to Wiltshire Council. Wiltshire Council will be coordinating a public consultation on this document between **Wednesday 7<sup>th</sup> August 2024 and Tuesday 24<sup>th</sup> September 2024**.

The draft Semington Parish Neighbourhood Plan (2023 – 2038) submission can be viewed and commented on from the [Wiltshire Council consultation portal](#).

Please be aware that documents viewed via the consultation portal may not be available to view with Internet Explorer. Please use an alternative internet web browser such as Google Chrome or Microsoft Edge.

Alternatively you can comment by completing an editable representation form downloaded from the supporting documents section of the consultation portal which can then be emailed to [neighbourhoodplanning@wiltshire.gov.uk](mailto:neighbourhoodplanning@wiltshire.gov.uk) or posted to the address:

Neighbourhood Planning  
Strategic Planning  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

Please ensure that any comments on the Draft Neighbourhood Plan are received by Wiltshire Council **no later than 5pm on Tuesday 24<sup>th</sup> September 2024**.

Please be aware that all representations will be publicly available and may also appear on the Wiltshire Council website via the consultation portal.

Following this consultation, the comments received will be passed to an independent examiner, to be appointed by the council, who will consider the representations and recommend whether the Draft Neighbourhood Plan should be put to a community referendum.

If you have any questions please do not hesitate to contact Neighbourhood Planning on Tel: 01225 713698 or by email to [neighbourhoodplanning@wiltshire.gov.uk](mailto:neighbourhoodplanning@wiltshire.gov.uk).

**Neighbourhood Planning**  
Strategic Planning

**Wiltshire Council**

Tel: 01225 713698  
Email: [neighbourhoodplanning@wiltshire.gov.uk](mailto:neighbourhoodplanning@wiltshire.gov.uk)  
Web: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)  
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## Lorraine McRandle

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**From:** Seed, Jonathon <Jonathon.Seed@wiltshire.gov.uk>  
**Sent:** 24 July 2024 11:29  
**To:** Creedy, Allan  
**Cc:** Lorraine McRandle; Holder, Nick; Wiltshire, Mark; Teresa Strange  
**Subject:** RE: S106 highway improvements relating to Buckley Gardens, David Wilson development, land east of Semington Road

Dear Allan,

Please can you look into this and see what the Council can do to move things forward?

I thought we had the agreement of the developer to proceed as the PC wants.

Jonathon

---

**From:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Sent:** Thursday, July 11, 2024 3:32 PM  
**To:** Creedy, Allan <allan.creedy@wiltshire.gov.uk>  
**Cc:** Seed, Jonathon <Jonathon.Seed@wiltshire.gov.uk>; Lorraine McRandle <office@melkshamwithout-pc.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Wiltshire, Mark <mark.wiltshire@wiltshire.gov.uk>  
**Subject:** RE: S106 highway improvements relating to Buckley Gardens, David Wilson development, land east of Semington Road

Dear Allan

Copy to:

Cllr Jonathon Seed, Wiltshire Councillor for Melksham Without West and Rural,  
Cllr Nick Holder, Wiltshire Councillor for Bowerhill and Highways Cabinet Member

I am writing to see if we can arrange a meeting with representatives from Wiltshire Council's highways/planning department and Melksham Without Parish Council to discuss the use of the s106 Highways funds from approved housing developments on Semington Road, Berryfield and to implement Informative 19 of PL/2022/02749 Reserved Matters for Buckley Gardens.

"19. The developer is encouraged to enter into a s106 deed of variation without delay to secure the repurposing of £200,000 for alternative off-site highway and pedestrian connection improvement works to improve connectivity between the development site, the town centre to the north and education facilities to the east, inclusive of Local Cycling Walking Infrastructure Plan routes, and measures to enhance the use of the pedestrian route on the eastern side of the roundabout between Old Semington Road and Melksham".

This application was approved in May 23, and a year has passed and the parish council are not aware of any progress to arrange for these funds to be repurposed. The parish council has been asking for several years to have these funds used for a new footpath along the A365 to gain access to the proposed primary school at Pathfinder Way, but understand that this will be provided via the site at Land south of Western Way (PL/20/084900/OUT) approved at Appeal in December 2023.

The parish council has several ideas that they would like to discuss for the repurposing of these highways funds; in conjunction with the funding from the site approved at Appeal also on Semington Road, at land to the west of Semington Road (behind Townsend Farm) 20/07334/OUT & PL/2023/00808 approved; some £70k for highways.

1. To provide a footway to connect to the proposed footway in the Western Way application, as there is a stretch of grass verge along the northern part of their development adjacent the A365 which would need connectivity.

2. Rather than the s106 condition in the Buckley Gardens development to “reduce the attractiveness” of the desire line on the arm of the roundabout on the A350, to use the funding to put in a pedestrian crossing.

The parish council have found difficulty over the last year in accessing the trigger for s106 funds that are held by Wiltshire Council, rather than the developer, and would like to be proactive and understand the process for these type of improvements to be in place. To date they have made contact with yourself over several months and even years now and have not had a response, and would like to see the plans put in place in a timely manner. The funds have been secured as mitigation for either sustainability or safety reasons as part of the planning process and therefore the parish council do not think it's unreasonable that they should be undertaken ready for when the site is occupied, and not years afterwards. For the David Wilson site, they have just opened their marketing suite and sold their first property, so they will not be far from first occupation.

In addition, there is another site on Semington Road, that is going through the Appeal process, and any discussions could feed into any potential Unilateral Undertaking if the appeal was successful. PL/2022/08155 Land west of Semington Road APP/Y3940/W/24/3343787 appeal hearing 10<sup>th</sup> September.

We look forward to hearing from you.

With kind regards,

Teresa

Teresa Strange  
Clerk & Responsible Financial Officer  
Melksham Without Parish Council  
First Floor  
Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

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On Instagram: [melkshamwithoutpc](#)

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**From:** Wiltshire, Mark <[mark.wiltshire@wiltshire.gov.uk](mailto:mark.wiltshire@wiltshire.gov.uk)>  
**Sent:** 11 June 2024 15:23  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Cc:** Seed, Jonathon <[Jonathon.Seed@wiltshire.gov.uk](mailto:Jonathon.Seed@wiltshire.gov.uk)>; Lorraine McRandle <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>; Alan Baines <[alan.baines@melkshamwithout-pc.gov.uk](mailto:alan.baines@melkshamwithout-pc.gov.uk)>  
**Subject:** RE: S106 highway improvements relating to Buckley Gardens, David Wilson development, land east of Semington Road

Teresa,

The £200k contribution is to be paid over on first occupation. If you notice any occupation on the development I should be grateful if you would let me know. I anticipate that the money will be usable for other active travel improvements in the area which could include improved crossing of Western Way, but that will be discussed further when the contribution is received. Your council will of course be kept informed and discussions will be held.

Kind regards,  
Mark Wiltshire

**Mark Wiltshire MIHE**  
**Major Projects Officer**  
**Transport and Development Manager (south and west)**  
**Sustainable Transport**

**Wiltshire Council**

**Trowbridge, BA14 8JN**

**01225 713448**

[mark.wiltshire@wiltshire.gov.uk](mailto:mark.wiltshire@wiltshire.gov.uk)

[www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

---

**From:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Sent:** Thursday, March 21, 2024 10:29 AM  
**To:** Wiltshire, Mark <[mark.wiltshire@wiltshire.gov.uk](mailto:mark.wiltshire@wiltshire.gov.uk)>  
**Cc:** Seed, Jonathon <[Jonathon.Seed@wiltshire.gov.uk](mailto:Jonathon.Seed@wiltshire.gov.uk)>; Lorraine McRandle <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>; Alan Baines <[alan.baines@melkshamwithout-pc.gov.uk](mailto:alan.baines@melkshamwithout-pc.gov.uk)>  
**Subject:** S106 highway improvements relating to Buckley Gardens, David Wilson development, land east of Semington Road

Hi Mark

Thank you for your time when we met in Bowerhill yesterday.

We also discussed the highway s106 funds for the new development that has just started on site at land east of Semington Road, now known as Buckley Gardens.

As we are aware, the s106 funds £200,000 were to improve the pedestrian crossing on the A350 but were undertaken by Wiltshire Council as part of the Government funding for the Hilperton – Melksham active travel route.

When we met yesterday, you said that the money could not be used for anything else, and I explained that had been dealt with at the Western Area Planning Committee meeting.



Please find attached the decision notices for the outline application 20/01938/OUT and reserved matters PL/2022/02749.

I have highlighted the relevant bits, but particularly note point 19 on the reserved matters decision notice that deals specifically with this.

I have also screen shot the bit in the s106 about making the left arm of the roundabout less desirable for pedestrians to cross.

The parish council are keen that the works secured in the s106, including works to be done by Wiltshire Council are undertaken in a timely manner.

They have been secured as mitigation for either sustainability or safety reasons as part of the planning process and therefore the parish council do not think it's unreasonable that they should be undertaken ready for when the site is occupied, and not years afterwards.

I have also highlighted the bit about the 2m high gate for services access only onto Shails Lane, which we discussed.

We look forward to hearing plans of when the highlighted items in the s106 are programmed in for works to be undertaken.

With kind regards,

Teresa

Teresa Strange  
Clerk & Responsible Financial Officer  
Melksham Without Parish Council  
First Floor  
Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

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On Instagram: [melkshamwithoutpc](#)

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## Teresa Strange

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**From:** Teresa Strange  
**Sent:** 31 July 2024 14:40  
**To:** Holder, Nick  
**Subject:** FW: Pre-application meeting re the New Road Farm site

Hi Nick For your info..... lots of highway bits coming through to you following our recent meeting!  
This is as Ward Member I think, to let you know that we tried to find someone in WC Highways to talk to Bloor about improvements they could make at New Road as part of their planning application, the answer back was that it could only be done as part of pre-app, they have done a pre-app but the issue of New Road and it being a rat run that the new development would presumably exacerbate, was not picked up by Highways. Bloor will try again.....  
All the best, Teresa

---

**From:** Jonathan Dodd <Jonathan.Dodd@bloorhomes.com>  
**Sent:** 31 July 2024 14:36  
**To:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Cc:** Lorraine McRandle <office@melkshamwithout-pc.gov.uk>; Matthew Roberts <matthew.roberts@jbp.co.uk>  
**Subject:** RE: Pre-application meeting re the New Road Farm site

Hi Teresa

No worries, thanks for trying. We did submit a pre-application enquiry some time ago, but the matter wasn't picked up by Wiltshire highways.

There appears to be a wider and existing issue with the route – next time we have a chance to speak to Wiltshire Council I will ask them if there is someone who can look at it from a more strategic perspective.

I believe Matthew will be or has already been in touch in relation to meeting you and the Town Council possibly again pre-application. We will have more detail again on the allocation to show you, and so discuss then.

Kind regards

Jon

**Jonathan Dodd**  
Senior Planning Manager

**Bloor Homes South West**  
Unit 7 Latham Road, Swindon, Wiltshire, SN25 4DL

Tel: 01793 835600  
Email: [Jonathan.Dodd@bloorhomes.com](mailto:Jonathan.Dodd@bloorhomes.com)



---

**From:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Sent:** Wednesday, July 31, 2024 12:46 PM  
**To:** Jonathan Dodd <[Jonathan.Dodd@bloorhomes.com](mailto:Jonathan.Dodd@bloorhomes.com)>; Matthew Roberts <[matthew.roberts@jbp.co.uk](mailto:matthew.roberts@jbp.co.uk)>  
**Cc:** Lorraine McRandle <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>  
**Subject:** RE: Pre-application meeting re the New Road Farm site

Hi Jonathan

Just to say that we have tried to find someone at Wiltshire Council that could discuss any improvements to the safety of New Road as part of your proposed application, but despite trying several different avenues have drawn a

blank as the only route available is via the pre application route. Have you met with Wiltshire Council at pre-app stage yet?

With kind regards, Teresa

Teresa Strange  
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Upcoming leave: 9<sup>th</sup> to 16<sup>th</sup> August returning to work Monday 19<sup>th</sup> August 024

Want to keep in touch?

Follow us on facebook: [Melksham Without Parish Council](#) or [Teresa Strange \(Clerk\)](#) for additional community news

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**From:** Jonathan Dodd <[Jonathan.Dodd@bloorhomes.com](mailto:Jonathan.Dodd@bloorhomes.com)>

**Sent:** 29 May 2024 09:45

**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>; Matthew Roberts <[matthew.roberts@jbp.co.uk](mailto:matthew.roberts@jbp.co.uk)>

**Cc:** Lorraine McRandle <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>

**Subject:** RE: Pre-application meeting re the New Road Farm site

Hi Teresa

Thank you for meeting with us, and the various points below. All very helpful.

We will be in touch.

Kind regards

Jon

**Jonathan Dodd**  
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