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## MELKSHAM WITHOUT PARISH COUNCIL

Clerk: Mrs Teresa Strange

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Melksham Community Campus,  
Market Place, Melksham,  
Wiltshire, SN12 6ES  
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Email: [clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)  
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Friday 6<sup>th</sup> March 2026

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

You are summoned to attend the Planning Committee Meeting which will be held on **Monday 16<sup>th</sup> March 2026 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.**

<https://us02web.zoom.us/j/2791815985?pwd=Y2x5T25DRIVWVU54UW1YWWE4NkNrZz09&omn=89777254950>

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**
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.
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, including Permission in Principle applications received within the required timeframe (14 days):**
  - a. [PL/2026/00931](#) - **Plastic Engineering Solutions Ltd, Unit 4, Hercules Way, Melksham, Wiltshire, SN12 6TS**. Prior approval Part 14 Class J: Installation or alteration etc of solar equipment on non-domestic premises: Installation of Solar PV on roofs of Plastic Engineering Solutions Limited. Applicant name: Plastic Engineering Solutions Limited. **Comments by: 17 March 2026**
  - b. [PL/2026/01104](#) - **LOVES FARM, BOWERHILL, MELKSHAM, SN12 6RB**. Householder planning permission: Demolition of Existing Side Conservatory, New Door Openings and Single Storey Rear Extension. Applicant name: Mr & Mrs Oehlers. **Comments by 24 March 2026**
  - c. [PL/2026/01249](#) - **Land at Westlands Lane, to the North of Melksham Substation, Melksham, Wiltshire, SN12 7QF**. Full planning permission: Construction of Bellmouth Access to Melksham Substation from Westlands Lane. Applicant name: National Grid. **Comments by 03 April 2026**
7. **Amended Plans/Additional Information: To comment on any revised/amended plans/additional information on planning applications received within the required timeframe (14 days).**
  - a. [PL/2025/07391](#) - **Land South of Western Way, Melksham, Wiltshire**. Reserved Matters (appearance, landscaping, layout and scale) for 210 residential dwellings (Use Class C3), along with associated open space, landscaping, and parking, pursuant to Condition 2 of Outline Planning Permission ref. PL/2022/08504. Applicant name: BWD Trading. **Comments by 24 March 2026**
    - To note response from developer on construction traffic site access and egress
  - b. [PL/2025/07044](#) - **Former Countrywide Site, Bradford Road, Melksham**. Full planning permission: The construction of a new discount foodstore, car parking, access and landscaping on land at Bradford Road, Melksham. Applicant name: Anthony Best Dynamics Limited and Aldi Stores Ltd - C/O Agent. **Comments by 23 March 2026**

8. **Current planning applications:** Standing item for issues/queries arising during period of applications awaiting decision.
- a. **[PL/2024/10345 \(FULL\)](#) & **[PL/2025/09780 \(OUT\)](#) Land north of the A3102, Melksham (New Road Farm)**  
The construction of 295 homes; public open space, including formal play space and allotments; sustainable drainage systems; and associated infrastructure; with 0.4ha of land safeguarded for a nursery. The principal point of access is to be provided from a new northern arm on the existing Eastern Way/A3102 roundabout junction, with a secondary access onto the A3102. Additional access points are proposed for pedestrians and cyclists. Applicant: Bloor Homes South West
 
    - To note new comments from Drainage, Urban Design, Public Open Space, Active Travel and the Environment Agency on PL/2025/09780 (OUT).**
  - b. **[PL/2025/06749](#) - Land North of Bath Road (A365), Melksham (Adjacent to Melksham Oak Community School)**  
Outline planning application (with all matters except access reserved) for mixed use development comprising residential (up to 205 dwellings), land reserved for expansion of secondary school, public open space, landscaping and associated engineering works. Applicant Name: Hannick Homes & Developments Ltd
    - No new documents or comments.
  - c. **[PL/2025/06105](#) Land at Bowerhill Lane, Bowerhill, Melksham (*Old Loves Farm*)**  
Outline Planning Permission: Erection of up to 50 No. dwellings and associated works
    - No new documents or comments.
  - d. **[PL/2024/11426](#): Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wilts (Gompels):** Outline planning permission: All matters reserved. Construction of warehouse with office space, parking and associated landscaping including site access.
    - No new documents or comments.
  - e. **[PL/2025/00626](#) Land North of Berryfield Lane, Melksham, SN12 6DT:** Outline planning application for up to 68 dwellings and formation of new access and associated works (All matters reserved other than access).
    - No new documents or comments.
  - f. **[PL/2024/09725](#) Land off Corsham Road, Whitley, Melksham (Middle Farm)**  
Outline planning application (with access, layout and landscaping to be approved) for up to 22 dwellings, new access off Corsham Road, public open space, drainage and associated works.
    - To note correspondence with the developer.
9. **To consider response to Public Consultations:**
- a. East of Blackmore Farm <https://www.blackmorefarmconsultation.co.uk/>  
Note consultation deadline Monday 9<sup>th</sup> March 2026 – extension requested
    - To receive feedback from the meeting held on 5<sup>th</sup> March 2026 with the developer of the Land East of Blackmore Farm site and to approve meeting notes (if available)

- b. Lidl [melksham.newsite.lidl.co.uk](http://melksham.newsite.lidl.co.uk)
- To receive feedback on the meeting with Lidl to discuss their proposed relocation and to approve meeting notes (if available)

## 10. Proposed Developments in Bowerhill and East Melksham

- To note proposed cumulative impact meeting with Wiltshire Council.
- To consider Employment Land availability

## 11. Proposed Energy Installations

- a. Lime Down Solar
- Update on request to Wiltshire Council for Local Impact Report
- b. Cable Route for Norrington Spring Park Project (Aureos for SSEN Distribution) and Studley Solar Farm (DNOC for Verdant Energy)
- To note responses received from Aureos on questions raised.
- c. [PL/2025/05552](#) Land South of Brockleaze, Neston, Corsham, SN13 9TE. Full planning permission: Battery Energy Storage System with associated infrastructure.
- To note the comparison of the Brockleaze submission with the new NFCC (National Fire Chiefs Council) guidance and to consider next steps.
- d. Wiltshire Council Engagement about Cumulative Impact.
- To consider Wiltshire Council response to 12 recommendations from the parish council (if received).
  - To note further communication with Highways.
- e. Future Energy Landscapes
- To note the change of date and venue for the community energy workshop for Staverton, Hilperton, Semington and Great Hinton – Staverton Social Club on Tuesday 2<sup>nd</sup> April 2026 from 6 pm to 8:30 pm

## 12. Planning Policy:

- a. **Joint Melksham Neighbourhood Plan (NHP):**
- To reflect on responses to planning applications and recent appeal for future review of the Neighbourhood Plan (standing item)
  - To note the submission of the Joint Melksham Neighbourhood Plan 2 for a Royal Town Planning Institute (RTPI) Plan making award.
- b. **Wiltshire Council's Draft Local Plan Examination:** To consider any updates <https://www.localplanservices.co.uk/wiltshirelpexamination>
- To note the Inspectors' Response to Wiltshire Council's Suggested Work Programme and Next Steps and to consider implications.
- c. **National Planning Policy Framework (NPPF)**
- To note responses submitted to consultation on changes to NPPF

- 13. Premises Licenses applications and decisions:**
- a. [PR202602-597116](#) Oakfield Stadium, Melksham Football & Rugby Club, Eastern Way, Melksham, SN12 7GU (for Wiltshire Throwback Festival 2026)  
**Consultation ends 23<sup>rd</sup> March 2026.**
- To approve notes of meeting held with the applicant, Jarboom, if available.
  - To consider the license application
- 14. Appeals**
- a. To note appeal decisions (if determined)
- b. To note letters sent to the Secretary of State from stakeholders regarding the Snarlton Farm appeal.
- 15. Planning Enforcement: To note any new planning enforcement queries raised and updates on previous enforcement queries.**
- 16. S106 Agreements and Developer meetings: (*Standing Item*)**
- a. **Updates on ongoing and new S106 Agreements**
- i. Pathfinder Place
- ii. To consider correspondence regarding the bus stop opposite the Townsend Farm development
- iii. To note any S106 decisions made under delegated powers
- b. **Contact with developers:**
- i. To receive feedback from the meeting held on 24<sup>th</sup> February 2026 with the developer for the former Library site and to approve meeting notes (if available)

Copy to all Councillors

## [PL/2026/01378](#) – Land South of Western Way: Discharge of Condition 18 (Construction Management Statement) of PL/2022/08504

This application has recently been added to Wiltshire Council Planning portal. The application is for discharge of Condition 18 from the outline planning application (PL/2022/08505 – approved at appeal) for Land South of Western Way and relates to provision of the Construction Management Statement. For information Condition 18 is provide at the end of this note.

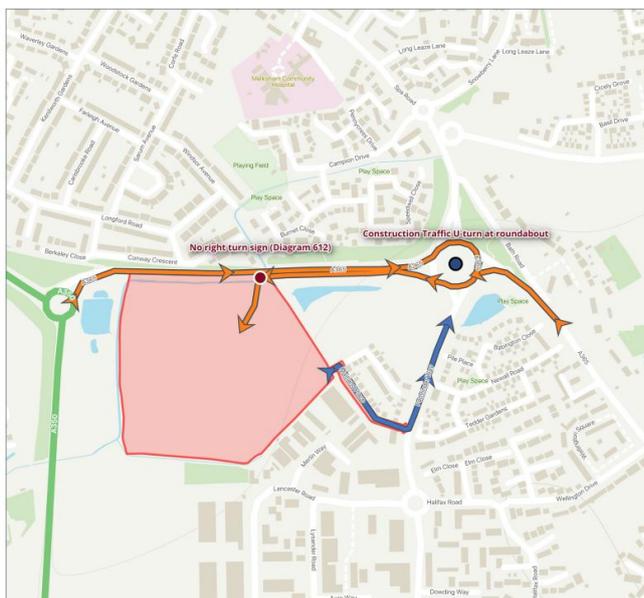
The documents provided in PL/2026/01378 include the Construction Method Statement and Technical Note 1 - Construction Access Evidence Note.

In the Construction Method Statement, the section on construction access states:

“To minimise disruption to residents of recently completed neighbouring residential areas (Maitland Place), it is proposed that this emergency access temporarily serves as construction access during the site’s development. Construction vehicles will have a left-turn-in-only arrangement, entering from Western Way and exiting via Maitland Place and Pathfinder Way. The proposed construction traffic routing is illustrated in Figure 8.”

“Construction vehicles will exit via Maitland Place and Pathfinder Way. Swept path assessment results provided in Drawing “a100144-SK-003-02” confirm that a 16.5m articulated vehicle can effectively use this route. Vehicles will then turn left at the Maitland Place/Pathfinder Way junction, returning to the A365 Western Way.”

### Construction Traffic Routing



In Technical Note 1 - Construction Access Evidence Note alternative access/egress arrangements are considered.



The note concludes:

“Having considered the SPAs, the fixed physical constraints at the Western Way frontage, the more strategic function of the A365 and the temporary nature of the construction phase, the proposed arrangement comprising left turn entry from Western Way with construction egress via Maitland Place and Pathfinder Way is found to be favourable.”

“The alternative options would introduce greater operational impact on Western Way and would require long term traffic management and/or structural alteration to established highway infrastructure. On this basis, the proposed construction access strategy represents the most appropriate solution.”

Appeal Decision APP/Y3940/W/23/3324031 Condition 18:

No development shall commence on site (including any works of demolition), until a Construction Management Statement (CMS), together with a site plan has been submitted to and approved in writing by the Council. The CMS shall include the following:

- point of access into the site for construction vehicles;
- the parking of vehicles of the site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- wheel washing facilities;
- measure to control the emission of dust and dirt during the construction;
- a scheme for the recycling/disposing of waste resulting from demolition and construction work;

- working hours, including deliveries
- details of drainage arrangements during the construction phase;
- large vehicle and delivery routing plan;
- communication procedures with the Council and local community regarding key construction issues (newsletters, fliers etc.)

The approved CMS shall be adhered to throughout the construction period.

The development shall not be carried out otherwise than in accordance with the approved CMS.

# Have your say on new homes at Blackmore Farm

Gleeson Land is bringing forward proposals for a landscape-led development that will deliver up to 275 new homes on land east of Melksham, including 30% affordable housing. With approximately 70% of the site dedicated to green landscaping, the scheme would enhance residents' connection to nature, creating outdoor social spaces for leisure, recreation and wellbeing.



- Planning Application Boundary
- Other Land within Applicant Control
- Blackmore Farm consented development Site Boundary

Site location plan

**gleeson** land

## The proposals

-  Up to 275 high-quality homes featuring a range of types and sizes, including 83 affordable homes, to meet local needs
-  Simple, safe access for vehicles from Sandridge Common
-  A network of accessible green spaces including areas for recreation and play for both children and teenagers
-  New planting and biodiversity enhancements, achieving a minimum 10% Biodiversity Net Gain
-  Enhanced footpaths and cycle routes connecting the site in all directions

## Have your say

We are holding a period of community consultation and would like to hear your views.

-  Please complete and return this **freepost leaflet**
-  Please visit the consultation website from 23<sup>rd</sup> February at [www.blackmorefarmconsultation.co.uk](http://www.blackmorefarmconsultation.co.uk) or scan the QR code to learn more about the plans.

Alternatively, you can get in touch via:

-  [contact@blackmorefarmconsultation.co.uk](mailto:contact@blackmorefarmconsultation.co.uk)
-  Freephone 0808 168 8296



We would be grateful for your feedback by **Monday 9<sup>th</sup> March.**

[www.blackmorefarmconsultation.co.uk](http://www.blackmorefarmconsultation.co.uk)

## Survey

1. The scheme should include affordable homes as well as market homes.

Strongly agree   
  Agree   
  Neutral   
  Disagree   
  Strongly disagree

2. A mix of housing types and sizes should be provided

Strongly agree   
  Agree   
  Neutral   
  Disagree   
  Strongly disagree

3. The local area would benefit from additional open space and play areas for a variety of age groups

Strongly agree   
  Agree   
  Neutral   
  Disagree   
  Strongly disagree

4. The proposed approach to access is appropriate for this location

Strongly agree   
  Agree   
  Neutral   
  Disagree   
  Strongly disagree

5. Do you have any other comments?

### Other Ways to Get in Touch

If you would prefer not to complete the survey, you can also contact us using the contact methods.

Please cut along the dotted line before posting



# 2

Business Reply Plus  
Licence Number  
RUHL-AYCB-CBEH



Gleeson Land Limited  
Arena Business Centres  
Building B  
Riverside Way  
Camberley  
Surrey  
GU15 3YL

The information you provide will be used only for the purposes of keeping you informed about the proposals and for understanding public opinion on the project. It will be stored securely until completion of the project, after which this information will be deleted. Your information will only be shared with third parties for the express purpose of keeping you informed of the proposals, and with Gleeson and/or the relevant local authority where there is a legal obligation to do so. It will not be forwarded on to any other third parties. You can contact us at any time to request the deletion of your information. Please contact us at [contact@blackmorefarmconsultation.co.uk](mailto:contact@blackmorefarmconsultation.co.uk)

### About You (optional)

Name:

Responding as (resident, Cllr, group etc.):

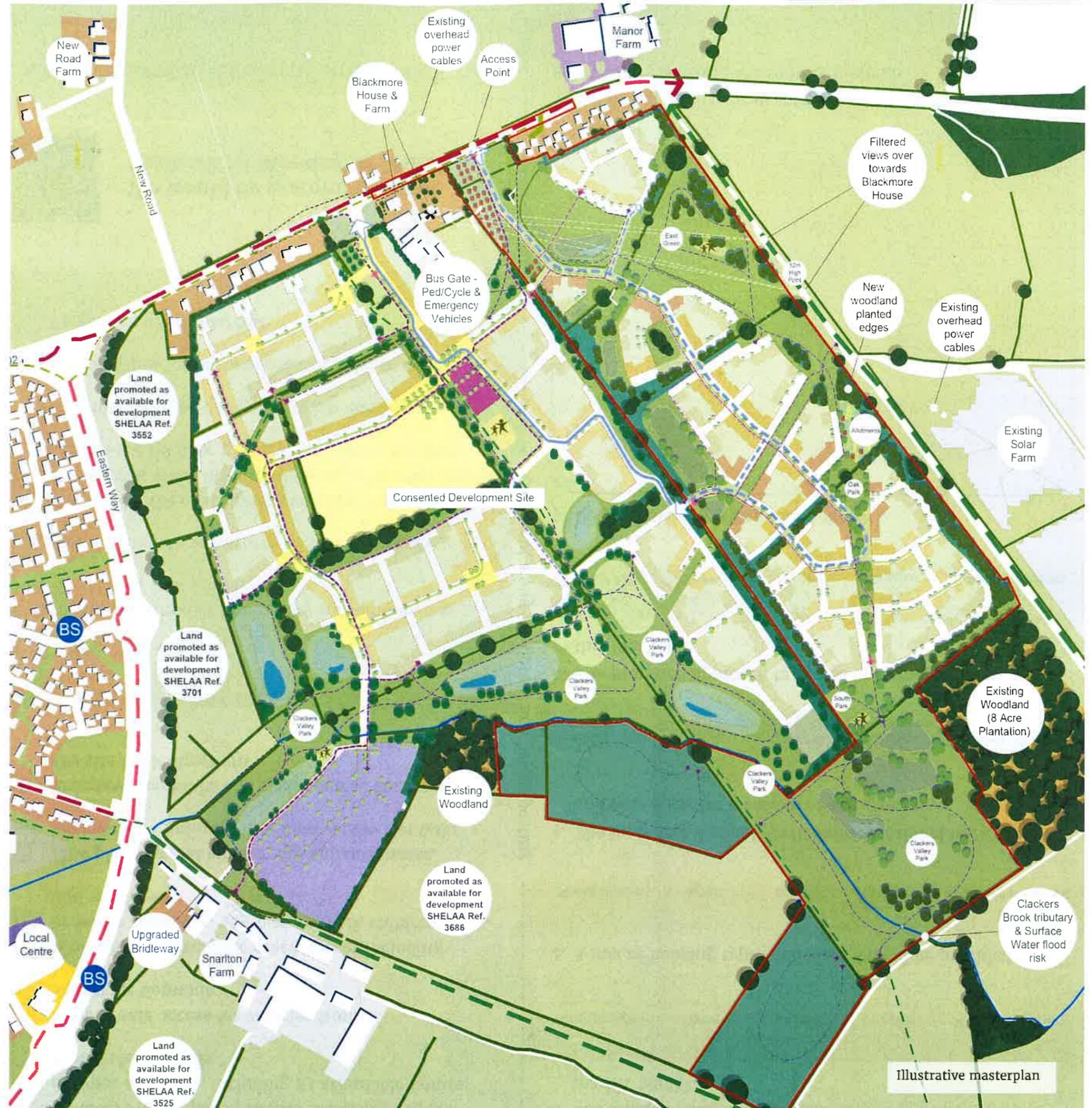
Email:

Address:

Age:

Please submit all feedback by **Monday 9<sup>th</sup> March 2026**

Should you wish to be contacted about the project, please tick here



- Site Area (Land East of Blackmore Farm)
- Indicative Residential Blocks
- Accessible POS Greenspace inc Park with Destination Equipped Play
- Allotments & Orchards

- Natural Characterised Landscape (inc Accessible Greenspace, stream corridor, SUDs basins / drainage infrastructure, hedgerows and habitat areas)
- (indicative SUDs basins)
- Urban Spaces & Highway Areas
- New highway connections

- Existing PRoWs / Existing Bridleways
- Proposed key pedestrian routes on-site
- Land identified for ecological habitat enhancement, with managed footpath access
- Scope for Foot/Cycle routes on-site

- Scope for Foot/Cycle connections
- Existing trees & hedgerows
- Existing deciduous woodland
- Proposed trees & planting area
- Proposed orchard trees

Illustrative masterplan

# Land at Blackmore Farm, Melksham

Melksham Without Parish Council

5 March 2026

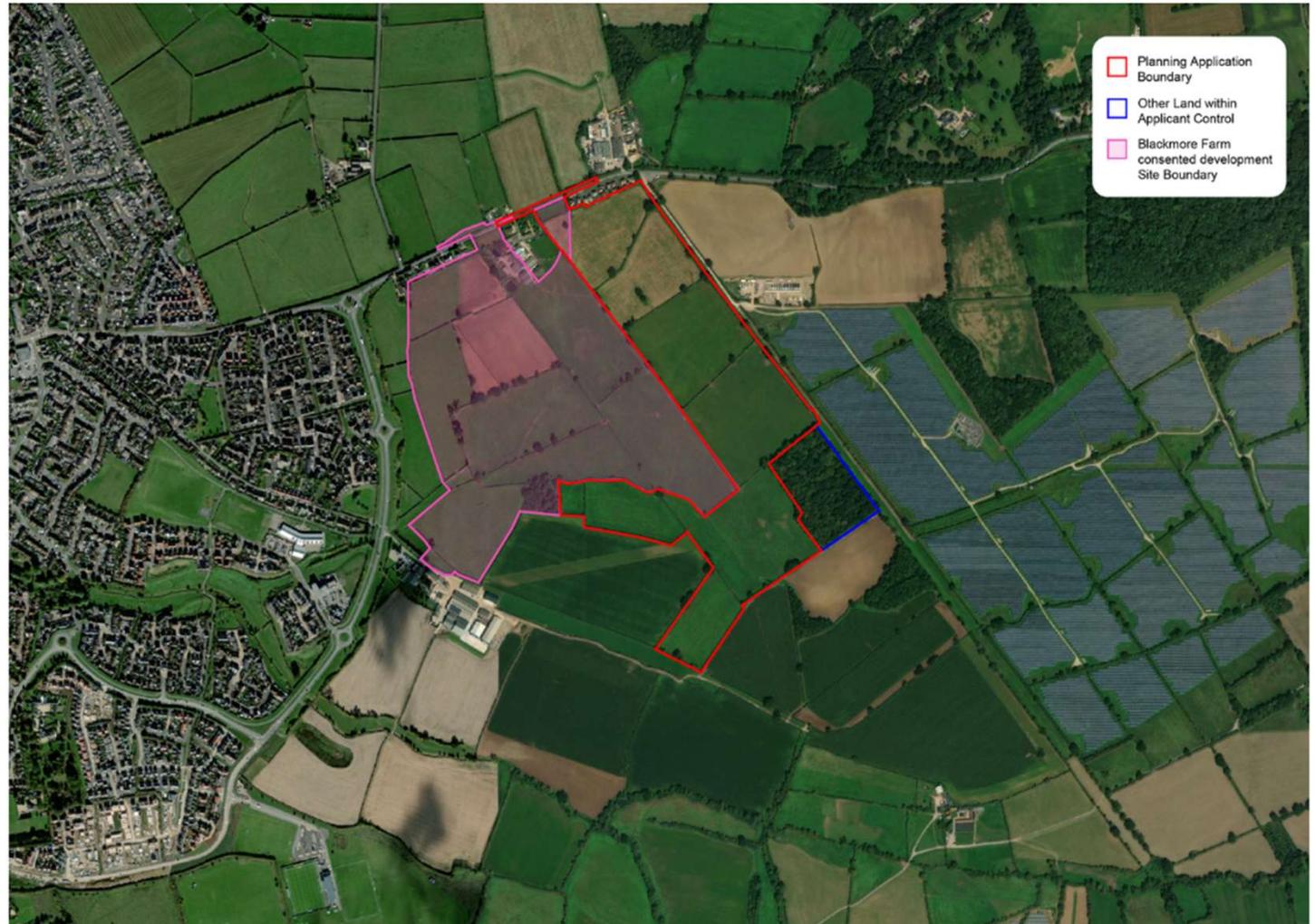
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Promoting Land. Unlocking Value.



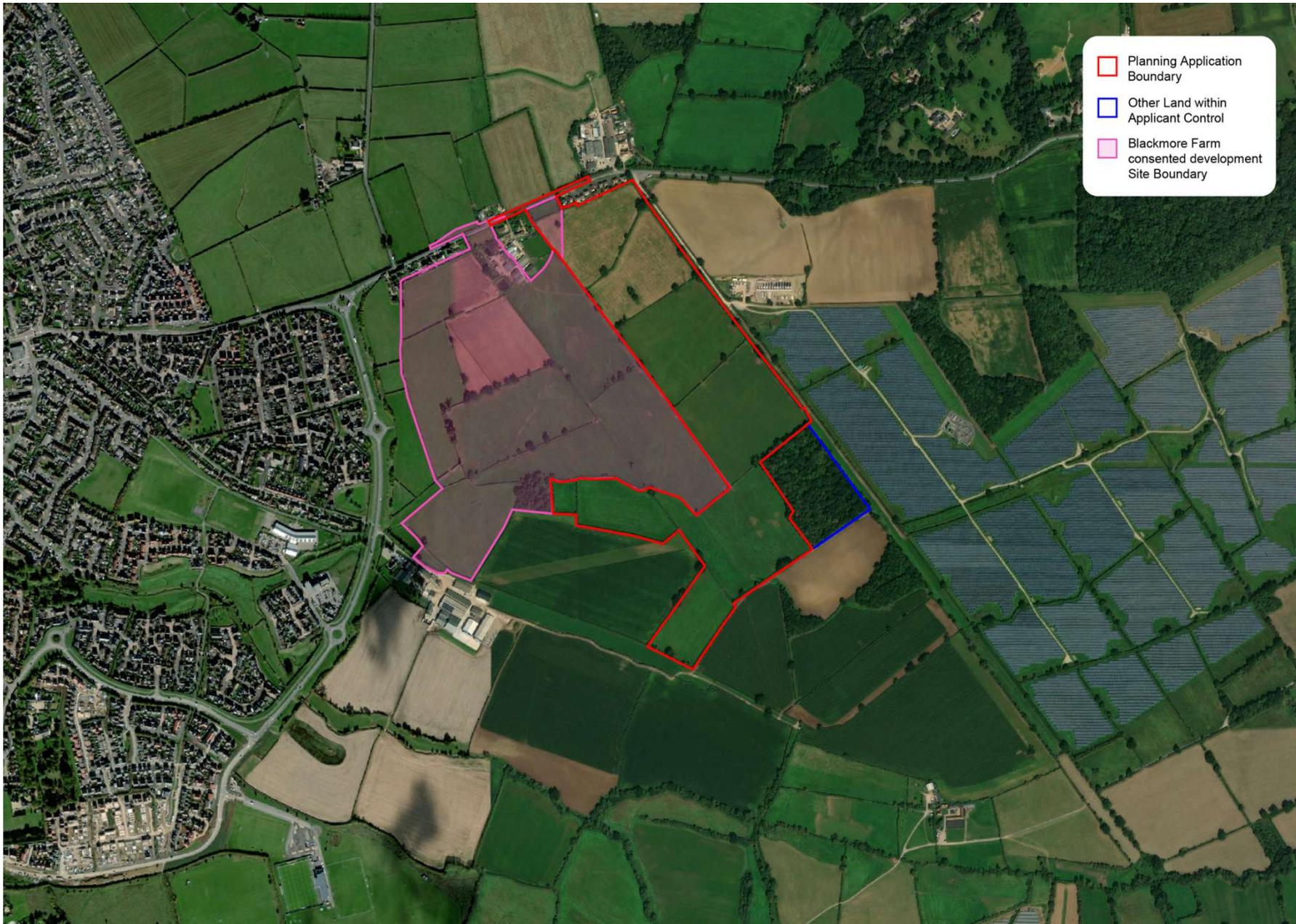


## The Site

- Located on land at Blackmore Farm east of Melksham
- Adjoins the consented Blackmore farm site to the west
- Emerging Regulation 19 Wiltshire Local Plan identifies land east of Melksham as suitable for residential development.
- Sustainably located within walking distance of services, facilities and schools



Site location plan





# The Proposals

- Seeking outline planning permission for **275** new homes, including **30% affordable** across a range of types and sizes
- Vehicular access from Sandridge Common
- Approximately **70% of the site will be green open space**, providing recreation spaces, allotments, orchards and play areas for children and teens
- The scheme will deliver a **10% Biodiversity Net Gain** through tree planting, meadows, and ecological enhancements
- Contributions through **Community Infrastructure Levy** and **Section 106 contributions** will support local schools, healthcare, and other community facilities, subject to identified needs



# 04 | Design

## 4.1 LAYOUT



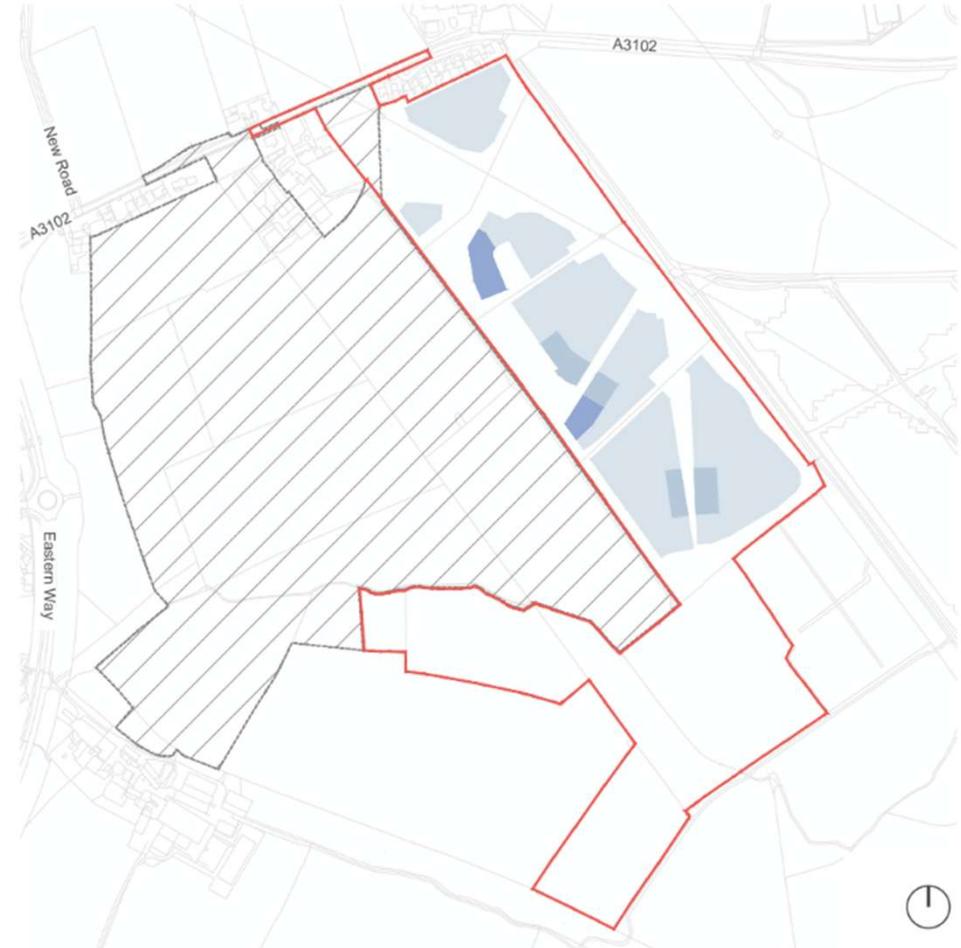


# Heights Parameters Plan

## HEIGHTS KEY

### Maximum Development Height Parameters

-  Development up to 2 storey or lower acceptable  
2 storey = Where Ridge Height may be up to 10.0m above existing ground levels to allow for localised changes in ground levels during construction
-  Development up to 2.5 storeys or lower acceptable  
2.5 storey = FFL to Ridge Height of 11.5m above existing ground levels to allow for localised changes in ground levels during construction
-  Development up to 3 storeys or lower acceptable  
3 storey = FFL to Ridge Height of 12.9m above existing ground levels to allow for localised changes in ground levels during construction
-  Application Site Boundary
-  Consented Blackmore Farm Site





# Illustrative Masterplan

- Site Area (Land East of Blackmore Farm)
- Indicative Residential Blocks
- Accessible POS Greenspace inc Park with Destination Equipped Play
- Allotments & Orchards
- Natural Characterised Landscape (inc Accessible Greenspace, stream corridor, SUDs basins / drainage infrastructure, hedgerows and habitat areas)
- (indicative SUDs basins)
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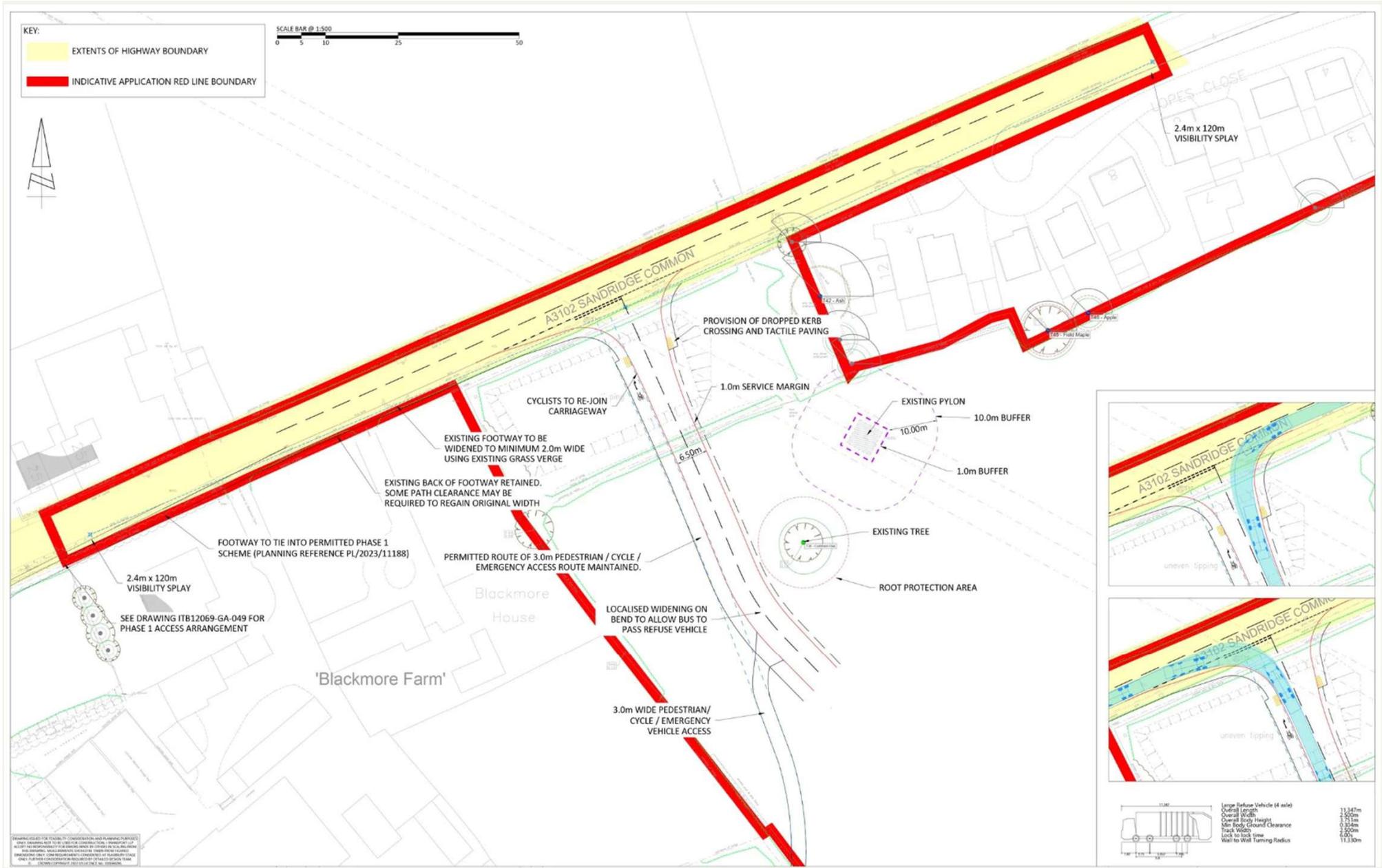
# Landscape

Landscape features include:

- **East Green** - an extensive natural open space
- **An extension to the Clackers Valley Park** - creating new open green space alongside the stream, and further supporting wildlife
- **A new Eastern green corridor** - linking Clackers Valley Park to the nearby bridleway, with walking routes, play space and allotments
- **Two new parks**
  - **Oak Park**, designed around the existing oak trees and connected to the green corridor
  - **South Park**, which could include space for teenagers and informal active play
- **Sustainable Urban Drainage features** will be incorporated to capture water runoff and retain rainwater at the site's lowest points











# Connectivity

- Existing Local Highway Corridors
- Existing Retained PRoW
- Existing Bridleway
- Consented Primary Highway in west
- Consented Secondary Highway in west
- Consented Cycle corridors in West
- Consented Indicative GI connections in West
  
- Proposed Connections
- Primary Highway Corridor (with Bus Capacity)
- Connection points into Western Site
- Side Road
- Cycle Corridors (with Pedestrian Links)
- Indicative GI Footpath Links





# Consultation and Next Steps

- Public consultation: **23 February to 9 March 2026**
- Information leaflets distributed to **593 addresses** in Melksham
- Website **blackmorefarmconsultation.co.uk**
- – **427** visitors and **538** page views
- – **23** feedback submissions (website & email)
- Feedback channels:
  - Online feedback form
  - Project email address: [contact@blackmorefarmconsultation.co.uk](mailto:contact@blackmorefarmconsultation.co.uk)
  - Freephone number **0808 1688 296**
- Target application submission date: **spring 2026**




**Welcome**

**Gleeson Land is bringing forward proposals for a landscape-led new development on land east of Melksham.**

The outline planning application will deliver up to 275 new homes including 30% affordable housing and extensive areas of public open green space. The proposals have been designed to incorporate a significant amount of green landscaping, completing approximately 70% of the site. With excellent connectivity and easy access to existing facilities in Melksham, the proposals would provide a natural and sustainable extension to the

### Have your say on new homes at Blackmore Farm

Gleeson Land is bringing forward proposals for a landscape-led development that will deliver up to 275 new homes on land east of Melksham, including 30% affordable housing. With approximately 70% of the site dedicated to green landscaping, the scheme would enhance residents' connection to nature, creating outdoor social spaces for leisure, recreation and wellbeing.

**The proposals**

- Up to 275 high-quality homes featuring a range of types and sizes, including 83 affordable homes, to meet local needs
- Simple, safe access for vehicles from Sandridge Common
- A network of accessible green spaces including areas for recreation and play for both children and teenagers
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- [contact@blackmorefarmconsultation.co.uk](mailto:contact@blackmorefarmconsultation.co.uk)
- Freephone 0808 168 8296

**Survey**

- The scheme should include affordable homes as well as market homes.
 

Strongly agree  Agree  Neutral  Disagree  Strongly disagree
- A mix of housing types and sizes should be provided.
 

Strongly agree  Agree  Neutral  Disagree  Strongly disagree
- The local area would benefit from additional open space and play areas for a variety of age groups.
 

Strongly agree  Agree  Neutral  Disagree  Strongly disagree
- The proposed approach to access is appropriate for this location.
 

Strongly agree  Agree  Neutral  Disagree  Strongly disagree
- Do you have any other comments?

Please cut along the dotted line before posting

Other Ways to Get in Touch  
If you would prefer not to complete the survey, you can also contact us using the contact methods.

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[www.blackmorefarmconsultation.co.uk](http://www.blackmorefarmconsultation.co.uk)

# Thank you



**gleeson** land  
Promoting Land. Unlocking Value.

# Consultation leaflet distribution area (593 addresses)





## Sustainability

- Alignment with **Gleeson Homes sustainability ambitions**

Key features of the proposals:

- Highly energy efficient buildings, adopting a '**fabric first**' approach
- **Zero carbon ready**
- **Air source heat pumps** for heating and hot water
- Renewable energy generation via **solar panels**
- Dedicated **EV charging**
- **25% reduction** in potable water use against national average



## About Lidl GB

Since establishing itself in Great Britain in 1994, Lidl GB has experienced continuous growth and today has over **35,000 employees**, over **1,000 stores** and **14 distribution centres** in **England, Scotland** and **Wales**.

We take pride in providing our customers with the highest quality products at the lowest possible prices throughout Great Britain, from Kirkwall to the Isle of Wight.

Lidl GB is passionate about working with British producers and sources two thirds of its products from British suppliers.

For more information about Lidl GB visit [corporate.lidl.co.uk](http://corporate.lidl.co.uk)

## Location Plan



## Working at Lidl

From March, Lidl colleagues will receive industry-leading pay with a starting rate of £13.45, increasing with length of service. The majority of colleagues are recruited from within the local community. Recruitment is via Lidl's career website [careers.lidl.co.uk](http://careers.lidl.co.uk) where you can search for jobs in your local Lidl stores.



0800 089 0361



[lidl@new-stores.co.uk](mailto:lidl@new-stores.co.uk)

## A new Lidl for Melksham



A similar Lidl store



**Lidl GB is consulting on exciting new plans to relocate its existing store in Melksham and build a new foodstore on land off Eastern Way.**

Lidl is proud to have served the local community for many years from our Bath Road store. The existing store is constrained by its internal size and car park and efforts to improve the store have proven unviable.

We want to offer the very best possible shopping experience for Melksham residents and the best working environment for our colleagues. We are therefore proposing a multi-million-pound investment in our latest and most sustainable store format. This would create around 10 new jobs on top of the existing jobs, and secure our long-term future in Melksham.

## Have your say

We would like to know what the local community thinks of the proposals. You can complete and return the attached feedback survey for free using our FREEPOST return. You can also visit our website and complete the survey.



[melksham.newsite.lidl.co.uk](http://melksham.newsite.lidl.co.uk)

# The proposals

This proposed investment in a new and enhanced Lidl store reflects our ongoing commitment to Melksham and to providing an even better service to our customers. The proposals include:



**A brand new modern Lidl store built to our very latest specification**, including in-store facilities like our popular bakery, customer toilets and a more spacious sales area including all your favourite products



**132 customer parking spaces** including 6 accessible, 9 parent & child, 2 EV chargers (with capacity for more), and cycle parking. This would significantly improve on the existing offer at Bath Road



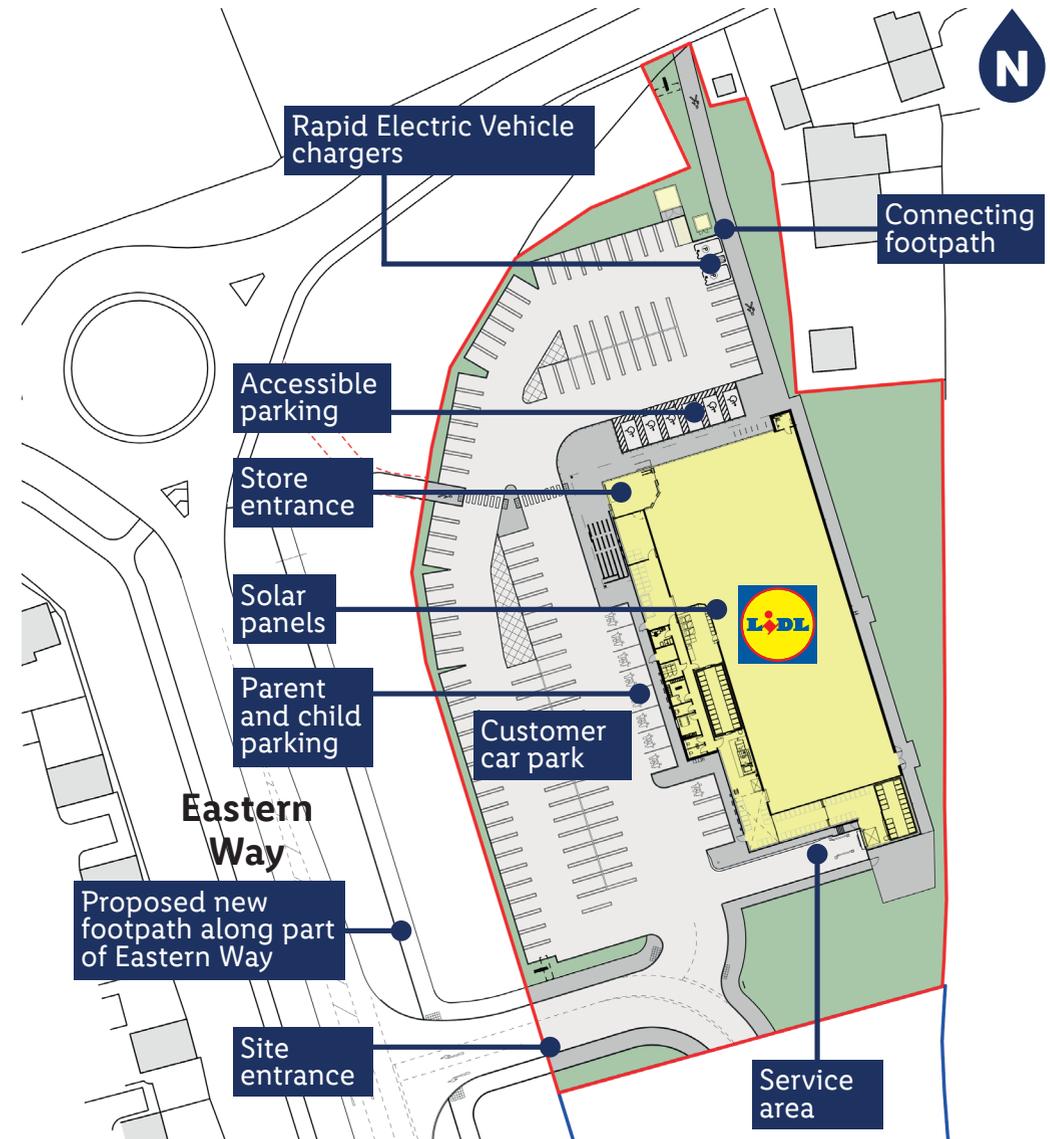
**A landscaping scheme will propose planting on the boundaries** where possible to support biodiversity on the site



**A store with enhanced sustainable technology to minimise energy use**, such as heat recovery systems and air source heat pumps. Rapid electric vehicle charging bays are provided in the car park and solar panels on the roof would provide up to 25% of the store's energy requirements



**New jobs for local people**, including full and part-time roles. Lidl GB pay rates for hourly paid colleagues is a minimum of £13.45 per hour. Existing colleagues would transfer and the new store would provide around 10 additional jobs



## Awards

Lidl was named Grocer of the Year at The Grocer Gold Awards 2025.



Lidl is the proud winner of the Retail Industry Supermarket of the year for the third year running.



Our previous plans to extend the existing Bath Road store onto the Unicorn car park do not provide the additional space we need to serve our growing customer base. The new store location will enable us to enhance the shopping environment for our customers, and improve store parking, especially parent & child spaces and accessible spaces.



## Teresa Strange

---

**From:** Holder, Nick <Nick.Holder@wiltshire.gov.uk>  
**Sent:** 25 February 2026 21:26  
**To:** Tucker, Paula  
**Cc:** Teresa Strange  
**Subject:** RE: Cumulative Impact of the Developments at Bowerhill/ Update on the Planning Appeal for Land at Snarlton Farm.

Hi Paula,  
Good to see you the other day and thanks for your help.

See note below from Adrian, ref a meeting. He says he is back on 11<sup>th</sup> March, so if this helps with diaries, I have some availability on either the 11<sup>th</sup> of 12<sup>th</sup> March. The following week I could do the 18<sup>th</sup> either before or after the local plan briefing.

I wait to hear back from you.  
Nick

**Nick Holder**  
**Councillor for Bowerhill**  
**Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN**

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**Wiltshire Council**

**Tel: 07931 905520**  
**Email: [nick.holder@wiltshire.gov.uk](mailto:nick.holder@wiltshire.gov.uk)**  
**Facebook@Cllr Nick Holder for Bowerhill**

---

**From:** Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>  
**Sent:** 25 February 2026 17:59  
**To:** Holder, Nick <Nick.Holder@wiltshire.gov.uk>  
**Cc:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Dawson, Carol <Carol.Dawson@wiltshire.gov.uk>; Tucker, Paula <Paula.Tucker@wiltshire.gov.uk>  
**Subject:** RE: Cumulative Impact of the Developments at Bowerhill/ Update on the Planning Appeal for Land at Snarlton Farm.

Dear Nick,  
Please do call me Adrian, I'm not one for titles. I am 100% behind what you suggests, I had a similar conversation with CPRE at the local MP's suggestions and Martin Smith and I agree this is a big issue. Your suggestion of a meeting is a good one, can I recommend we also include David Bullock head of highways as I think the obstruction to this joined up thinking is highways rather than planning. Regarding timing My Diary is full on Friday and Monday and I will then be taking a weeks holiday returning on the 11<sup>th</sup> March.  
I recommend liaising with Carol or Paula in Carols absence to arrange a date With Martin, David, Teresa yourself and myself.  
Regards

Adrian

Cllr Adrian Foster

---

**From:** Holder, Nick <[Nick.Holder@wiltshire.gov.uk](mailto:Nick.Holder@wiltshire.gov.uk)>  
**Sent:** 25 February 2026 16:30  
**To:** Foster, Adrian <[Adrian.Foster@wiltshire.gov.uk](mailto:Adrian.Foster@wiltshire.gov.uk)>  
**Cc:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** Cumulative Impact of the Developments at Bowerhill/ Update on the Planning Appeal for Land at Snarlton Farm.

Dear Cllr Foster,

My division in Bowerhill is coming under increasing attack from speculative developments, two new ones this week alone, and whilst we are awaiting the decision of the SOS on the Snarlton Farm site, I am preparing for the worst.

A number of planned and the unplanned development are located very close to one another, and should they all proceed, my community and my Parish Council would like to see an element of joined up thinking, in particular the highways conditions. We have already tried to explain to the planning and the highways team the issue of cumulative impact, but to be honest the response has been very disappointing. I wonder, therefore, if you would be prepared to have a face-to-face meeting with me and one or two representatives from the Parish Council to discuss this with you to include Nic Thomas or a senior member of his team. If so, we would also like to discuss the Planning Appeal which is with the SOS.

I am not sure what your diary is like for the next week or so, but initially I wonder if this could be arranged after the next Cabinet meeting on 10<sup>th</sup> March in County Hall.

I await your response.

Regards,

Nick

**Nick Holder**  
**Councillor for Bowerhill**  
**Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN**

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**Wiltshire Council**

**Tel: 07931 905520**  
**Email: [nick.holder@wiltshire.gov.uk](mailto:nick.holder@wiltshire.gov.uk)**  
**Facebook@Cllr Nick Holder for Bowerhill**

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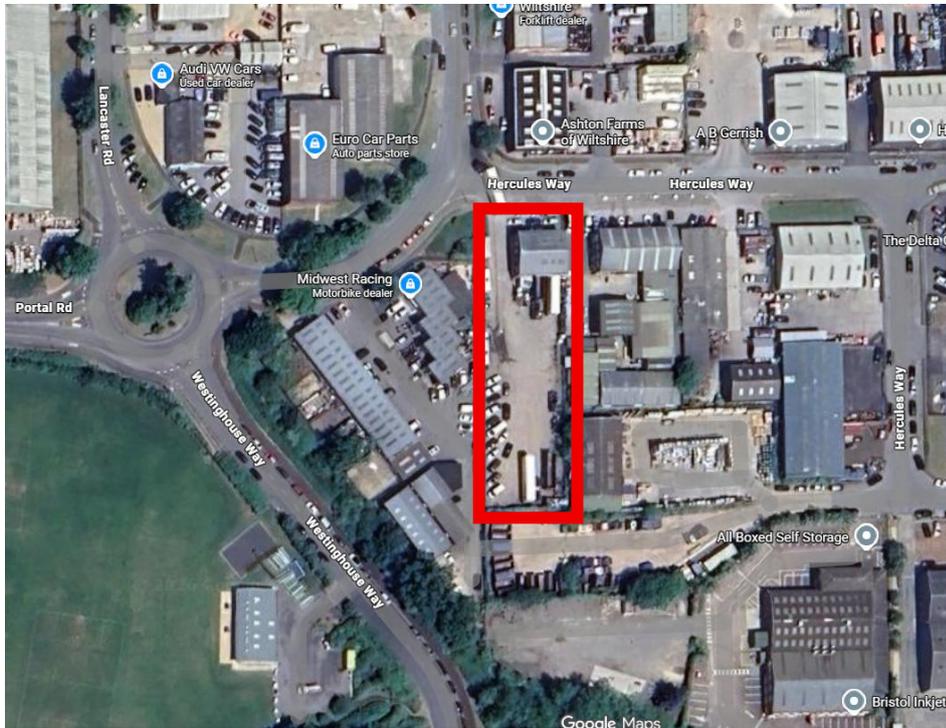
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**PL/2025/03307 - Land West of Oakleigh Acres, Draycot Cerne, Chippenham, SN15 5LH**

**Proposal:** Erection of B8 unit and associated works.

**Applicant:** DK Barnsley

Current Location in Bowerhill



Proposed Location M4/North of Chippenham



Consultee Comments:

Parish – Kington Langley: OBJECT

Neighbouring Parish – Sutton Bengier: OBJECT

Neighbouring Parish – Stanton St Quintin: No Objection

Neighbouring Parish – Kington St Michael: Comment

Economic Development

Economic Development's Comment

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Comment Number



WC-25-10-352917

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Text



DATED 12/05/2025

Economic Development position: Support

This planning application to erect a B8 Business Unit in an area that is already a logistics hub will allow an existing Wiltshire based business to expand, creating additional jobs that will benefit the economy of Wiltshire.

There are few, if any opportunities to find a suitable site at the company's existing location in Melksham and providing the application is successful, once the company has moved from Melksham it should allow other companies based in the town the opportunity to expand. We are aware of a number that have been looking for extra space for some time.

This application would also have the beneficial effect of reducing HGV traffic from Junction 17 down the A350 to Melksham, reducing carbon dioxide emissions and improving the efficiency of the business.

Kind regards,

Russell

Russell Frith  
Inward Investment Manager,  
Wiltshire Council

## Wiltshire Live's post



Wiltshire Live

3h · 🌐



Plans to build a new lorry depot next to the M4 in Wiltshire have been revealed.

Melksham-based haulage firm DK Barnsley & Sons wants to build a lorry park, lorry servicing building, and offices next to the Indurent Park logistics hub at Junction 17.

The site is currently used as agricultural grazing land, and the firm is seeking the permission of Wiltshire Council to relocate its operations there from Bowerhill Industrial Estate.

The firm, which employs 20 permanent lorry drivers, as well as outsourcing work to an additional 20 drivers, says it has outgrown its existing base.

Relocation would allow it to create an extra 14 jobs as soon as it opens.

A new single-storey office would house the firm's five administrative staff, while a second building would be erected for the servicing of lorries.

A hardstanding surface would be created for lorry parking.

The firm says the plans would cut down on lorry miles, reducing pollution and cutting greenhouse gas emissions, the company suggests.

The applicant's vehicles travel 2.1 million kilometres a year, with 98 per cent of trips using the M4 – 21.5 kilometres from their existing base.

The firm says each lorry travels a minimum of 85 kilometres a week between the yard and the M4. The company says it could eradicate 3,371 kilometres of road travel every year by relocating.

Wiltshire Council's economic development team are supportive of the planning, saying: "This planning application... in an area that is already a logistics hub will allow an existing Wiltshire-based business to expand, creating additional jobs that will benefit the economy of Wiltshire.

"There are few, if any, opportunities to find a suitable site at the company's existing location in Melksham and providing the application is successful, once the company has moved from Melksham it should allow other companies based in the town the opportunity to expand.

"We are aware of a number that have been looking for extra space for some time.

"This application would also have the beneficial effect of reducing HGV traffic from Junction 17 down the A350 to Melksham, reducing carbon dioxide emissions and improving the efficiency of the business."

But Sutton Benger Parish Council has lodged an objection, pointing out the proposed development's proximity to an existing lorry park and the household recycling centre.

"The vehicles trying to enter the recycling centre have to queue in the road while waiting to enter the site," the parish council notes.

"This reduces the two-lane road to a single lane. This single lane is on a blind bend and has to be shared by lorries coming and going to the lorry park mixed in with the rest of the vehicles using this busy route.

"The vehicles meet each other head-on in the middle of the queue for recycling."

Meanwhile, Kington Langley Parish Council has objected on the grounds of visual impact.

"Although there is the Pit Stop, warehousing and the recycling centre nearby, the countryside south, east and towards Draycot Cerne is characteristically open and agricultural," says the council.

"This visual amenity should be protected as much as possible and only allowed to be degraded if the economic benefits outweigh the harm."

A decision by Wiltshire Council is expected before 20 May.

👉 Original copy via Local Democracy Service by Peter Davison



## Plans for new lorry depot off M4 revealed

## **Teresa Strange**

---

**From:** Teresa Strange  
**Sent:** 27 February 2026 18:37  
**To:** Thomas, Nic; Collins, Gary; Foster, Adrian  
**Cc:** Alford, Phil (Phil.Alford@wiltshire.gov.uk); Peter Richardson; CAWS  
**Subject:** Lime Down Solar Project (NSIP) – Local Impact Report  
**Attachments:** CAWS LDS Submission Final V4 endorsed by MWPC.pdf

Dear Nic, Gary and Cllr Foster

### **Lime Down Solar Project – Local Impact Report**

We were pleased to read in your newsletter below that Wiltshire Council will continue to engage in the Lime Down DCO examination process to ensure Wiltshire and its residents' interests are protected.

In that context, Melksham Without Parish Council writes regarding the forthcoming deadline for submission of Local Impact Reports (LIRs), which we understand is Friday 1 May 2026.

We would be grateful if Wiltshire Council could confirm that it intends to submit an LIR and that this will include assessment of impacts within the Melksham Without Parish area - in particular the proposed cable route and the connection to Melksham Substation.

In our opinion, the LIR is a particularly important document within the NSIP process. While submission is voluntary, if provided it must be considered by the Secretary of State in reaching a decision. It therefore provides a valuable opportunity for the Council to set out, in a clear and policy-led manner, the likely impacts on its area and how these weigh in the overall planning balance.

We fully recognise the detailed and substantive Relevant Representation submitted by Wiltshire Council in January 2026 and we appreciate the work undertaken in preparing it. However, our understanding is that the Local Impact Report serves a distinct role within the examination process, specifically as the formal document setting out the likely impact of the development on the authority's area. As such, we consider that an LIR would not duplicate the Relevant Representation but rather provide an opportunity to expand upon and consolidate those matters within the statutory framework that must be taken into account by the Secretary of State.

For ease of reference, we also enclose the Relevant Representation submitted by Community Action: Whitley & Shaw (CAWS), which was formally endorsed and supported by Melksham Without Parish Council. That representation highlights cumulative infrastructure effects and associated risk pathways - including landscape saturation, hydrological interaction, infrastructure clustering and emergency response capacity - which, in our view, would further reinforce Wiltshire Council's policy position if reflected within the LIR.

From the Parish perspective, matters we consider especially relevant to the Melksham Without area include:

- Construction and traffic impacts associated with the cable route;
- Effects on residential amenity and agricultural land;
- Substation-related impacts, including noise, landscape and operational considerations;
- Drainage and flood risk implications;
- Cumulative impacts arising from the concentration of grid and energy infrastructure in and around Melksham.

As you are aware, Melksham Without Parish Council and CAWS are already engaged in ongoing discussions regarding cumulative impact across multiple energy infrastructure proposals within the locality. Cumulative impact issues were also raised at the Wiltshire Council Cabinet meeting on 6<sup>th</sup> January 2026, reflecting the wider strategic importance of this matter. In our view, the LIR provides a timely and appropriate opportunity to draw together and further develop those discussions within the formal examination framework - presenting a coherent, spatially-based assessment of cumulative effects both within the Lime Down scheme itself and in combination with other existing and proposed infrastructure.

Melksham Without Parish Council would be pleased to provide any local information or context that may assist in preparation of the report, and we look forward to your confirmation.

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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Want to keep in touch?

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

On X: [@melkshamwithout](#)

On Instagram: [melkshamwithoutpc](#)

On LinkedIn: [Melksham Without Parish Council](#)

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**From:** Wiltshire Council <[wiltshirecouncilnews@news.wiltshire.gov.uk](mailto:wiltshirecouncilnews@news.wiltshire.gov.uk)>  
**Sent:** 25 February 2026 14:40  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** Planning newsletter February: Next stages of Local Plan examination and more...



## **Spring Park data centre expansion approved**

Wiltshire Council's Strategic Planning Committee has approved a planning application to extend the existing Spring Park data centre campus in Neston.

The application, submitted by Ark Estates 4 Ltd, is for a new standalone structure, including new access arrangements, security measures, changes to public rights of way and landscaping.

Permission has been granted subject to a detailed set of conditions, covering drainage, environmental protection, highways, landscaping and the long-term management of the site.

The committee carefully considered the significant number of objections received, alongside technical assessments and planning policy, before reaching its decision.

[More information](#)



## **Council opposes Lime Down Solar Park**

Wiltshire Council's Cabinet has approved the council's Relevant Representation for the proposed Lime Down Solar Park, confirming that it does not support the Development Consent Order (DCO) application.

The Lime Down Solar Park, promoted by Green Island Power, is a Nationally

Significant Infrastructure Project under the Planning Act 2008 and will be decided by the Secretary of State, not the council. The proposal covers approximately 1,237 hectares of land north of the M4 and includes solar PV arrays, battery storage and a 22km cable route corridor through the county.

Following a detailed review, Cabinet concluded that while the scheme offers long-term renewable energy benefits, significant concerns remain unresolved. These include landscape and visual impact, ecology and biodiversity, carbon and climate considerations, heritage and archaeology, highways and transport, and economic and community impact.

Cabinet agreed with officers that further information, stronger mitigation measures and enforceable commitments are required before a balanced planning judgement can be made. Until these issues are addressed, the council cannot support the proposal.

Wiltshire Council will continue to engage in the DCO examination process to ensure Wiltshire and its residents' interests are protected.



## **Council wins appeal to enforce planning rules at mobile park**

Wiltshire Council has successfully defended an appeal against its enforcement action at Greenacres Mobile Park in Semington.

The council served an enforcement notice on the site's owner on 26 February 2025 to require all non-Travellers to vacate the site within nine months and reduce the number of pitches to comply with the existing planning permission for 28

## Fiona Dey

---

**From:** Amy Welbourn <Amy.Welbourn@aureos.com>  
**Sent:** 04 March 2026 15:10  
**To:** Fiona Dey  
**Cc:** Teresa Strange; Peter Richardson; Mundy, Andrew (Distribution); Dosanjh, Sandy (Distribution)  
**Subject:** RE: Website Link please  
**Categories:** To Do, Planning

Hi Fiona,

Please see below answers to the questions which have been raised below.

- General update on the works on Westlands Lane. Are the works on track to complete on time? Have there been any issues?  
**We are on track to complete the works during the permit time. No issues to report on works.**
- To note that initially there was confusion about 'maintaining access' for Westlands Lane residents  
**We have learnt from this and will avoid this type of confusion moving forward.**
- Road repairs once the work is complete – is resurfacing being planned?  
**We have resurfaced the line of the trench; however we will not be Carrying out any further re-surfacing works on Westlands lane.**
- Residents have been complaining about the state of the general road surface and want the whole lane resurfaced once the work is complete and the grass verges reinstated. It is not 100% clear who is responsible for the damage - it could be Wicks Farm, NG, Aureos for Studley Farm or all 4.  
**We will be reinstating grass verges once we have completed our works and we will ensure the road will swept from mud upon completion. We have been sweeping the road weekly to ensure we keep on top of the mud etc for residents travelling to homes.**
- Are the Aureos and Studley cables in the same trench?  
**No**
- It appears they could be but we are not 100% sure. Keen to know because if the same trench can be used after all that might provide some more options on Shaw Hill etc.  
**The cables are not within the same trench, so utilising the same trench is not possible.**
- What is the plan for the next phase of the works, particularly the rest of Corsham Road and Shaw Hill?  
**We are continuing our discussions with Wiltshire Council regarding Corsham Road. There are several points that still need to be worked through before we can share any information about the ducting works. Regarding Shaw Hill, we have been addressing a few final queries over the past few days to close out the remaining details. We have currently submitted a proposed start date of 16/03 for commencement at Shaw Hill; however, we are working collaboratively with Wiltshire Council on some amendments.**
- Is the road closure on Norrington Lane between 13<sup>th</sup> April and 8<sup>th</sup> May part of the Spring Park Project?  
**Yes correct, the road closure will be for the Norrington – Melksham reinforcement.**
- Any update on the culvert crossing on Corsham Road?

**We are still in discussion with Wiltshire Council's specialist team, we will cascade information further to you all once we are further forward.**

- At our last meeting Matthew was going to look into options for a bigger culvert  
**Discussions are still being had with Wiltshire Council, to understand plans both sides.**

Unfortunately due to circumstances beyond our control, we are not able to attend tomorrow, please may we ask any further queries are sent to us to answer or we re-schedule please? We are sorry for any inconvenience this may cause.

Thank you.



**Amy Welbourn**

Stakeholder Engagement

07964 449 645

Amy.Welbourn@aureos.com

The Grain Silos, Weyhill Road, Andover, SP10 3NT



**REGISTERED OFFICE:** 2nd Floor, One Lindsey Street, London, EC1A 9HP

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**From:** Fiona Dey <office@melkshamwithout-pc.gov.uk>  
**Sent:** 02 March 2026 16:54  
**To:** Amy Welbourn <Amy.Welbourn@aureos.com>  
**Cc:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Peter Richardson <peter.richardson@melkshamwithout-pc.gov.uk>  
**Subject:** RE: Website Link please

Dear Amy,

We don't have a formal agenda for the meeting but below are the questions we have and progress updates we would like to hear about:

- General update on the works on Westlands Lane. Are the works on track to complete on time? Have there been any issues?
  - To note that initially there was confusion about 'maintaining access' for Westlands Lane residents
- Road repairs once the work is complete – is resurfacing being planned?
  - Residents have been complaining about the state of the general road surface and want the whole lane resurfaced once the work is complete and the grass verges reinstated. It is not 100% clear who is responsible for the damage - it could be Wicks Farm, NG, Aureos for Studley Farm or all 4.
- Are the Aureos and Studley cables in the same trench?
  - It appears they could be but we are not 100% sure. Keen to know because if the same trench can be used after all that might provide some more options on Shaw Hill etc.
- What is the plan for the next phase of the works, particularly the rest of Corsham Road and Shaw Hill?
- Do have dates for the works will be done outside the school?
- Is the road closure on Norrington Lane between 13<sup>th</sup> April and 8<sup>th</sup> May part of the Spring Park Project?

- Any update on the culvert crossing on Corsham Road?
  - At our last meeting Matthew was going to look into options for a bigger culvert

Many Thanks  
Fiona

Fiona Dey  
Parish Officer  
Melksham Without Parish Council  
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Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
01225 705700  
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[www.melkshamwithout-pc.gov.uk](http://www.melkshamwithout-pc.gov.uk)

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**From:** Amy Welbourn <[Amy.Welbourn@areos.com](mailto:Amy.Welbourn@areos.com)>  
**Sent:** 02 March 2026 13:21  
**To:** Fiona Dey <[office@melkshamwithout-pc.gov.uk](mailto:office@melkshamwithout-pc.gov.uk)>  
**Cc:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** RE: Website Link please

Good Afternoon Fiona,

Please may you provide you send me across the agenda, so we can prepare accordingly?

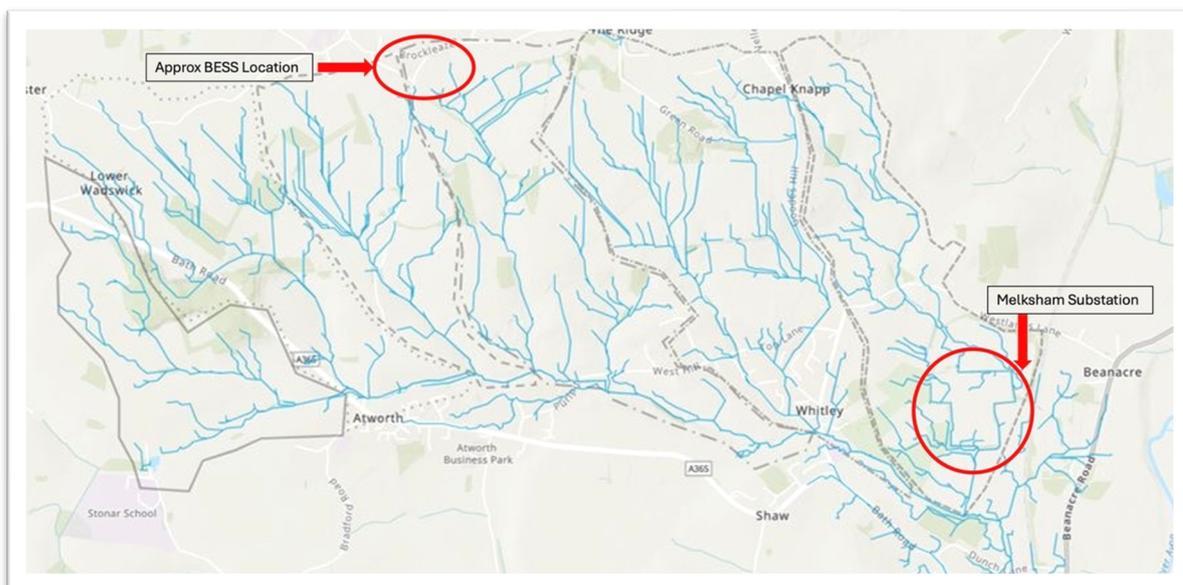
Thank you.



**Amy Welbourn**  
Stakeholder Engagement  
07964 449 645



## Brockleaze BESS



South Brook Catchment. Source: Bristol Avon Rivers Trust. Annotated by CAWS.

## Seventh Addendum to CAWS Document Dated 22 August 2025

PL/2025/05552

## Brockleaze Battery Energy Storage System with associated infrastructure

9 March 2026

## 1. Introduction

This document constitutes the Seventh Addendum to the formal objection submitted by Community Action: Whitley and Shaw (CAWS) in August 2025 in respect of planning application PL/2025/05552. It should be read alongside, and forms part of, CAWS' original objection and all subsequent addenda, all of which remain material and extant.

CAWS has previously addressed issues relating to drainage, hydrology and groundwater protection in its original submission and subsequent addenda. However, the publication of the Wiltshire Council Drainage Team consultation response dated 2 March 2026 provides an appropriate opportunity to update and clarify those comments.

In particular, the Wiltshire Council Drainage Team consultation response raises a number of matters that appear to rely heavily on assumptions presented by the developer while omitting key elements of the site's environmental context, including its location within Source Protection Zone 2 and its position within the complex headwater hydrology of the South Brook catchment. These issues are not new; they arise directly from the characteristics of the site and should have formed part of the original assessment of the application.

CAWS has reviewed the Wiltshire Council Drainage Team consultation response dated 2 March 2026 relating to planning application PL/2025/05552. While the consultation response moves from a holding objection to "no objection subject to conditions", the issues identified within the response indicate that the drainage strategy submitted with the application remains incomplete and that several important environmental risks have not been fully assessed.

For the reasons set out below, CAWS considers that the Wiltshire Council Drainage Team consultation is deficient and that the application fails to demonstrate compliance with fundamental planning policy requirements.

***Accordingly, CAWS formally objects to the application and respectfully requests that planning permission be refused.***

## 2. Deficiencies in the Wiltshire Council Drainage Consultation

The Wiltshire Council Drainage Team consultation identifies several areas where additional information is required from the applicant.

However, the consultation response itself omits several material issues that are central to understanding the environmental risks associated with the proposal.

In particular:

- the site's location within Source Protection Zone 2 is not discussed;
- the hydrological complexity of the South Brook headwater catchment is not addressed;
- key assumptions regarding firewater containment and storage capacity appear to be accepted without independent scrutiny;
- the feasibility of removing contaminated water by tanker is assumed rather than demonstrated;

- the assertion that boundary cooling will generate limited contamination appears to be accepted without supporting evidence.

***Taken together, these omissions mean that the Wiltshire Council Drainage Team consultation does not provide a complete assessment of the hydrological and pollution risks associated with the development.***

### **3. Source Protection Zone (SPZ2) Is Not Addressed**

The Wiltshire Council Drainage Team consultation response does not refer to the fact that the site lies within Source Protection Zone 2 (SPZ2).

Source Protection Zones exist to protect groundwater used for public drinking water supplies from contamination.

Development within SPZs requires particular care because pollutants entering groundwater may ultimately affect drinking-water sources.

The absence of any discussion of SPZ2 raises several important questions:

- What assessment has been undertaken of the vulnerability of groundwater resources beneath the site?
- How would contaminated firewater be prevented from reaching groundwater pathways?
- How do the proposed drainage and containment measures interact with groundwater protection requirements?

***Given the purpose of Source Protection Zones, the absence of any explicit SPZ assessment represents a significant omission.***

### **4. The Hydrology of the South Brook Catchment Has Not Been Considered**

The Wiltshire Council Drainage Team consultation considers only the drainage behaviour of the individual site and does not examine the wider hydrological system within which the site sits.

The Brockleaze site lies within the South Brook headwater catchment, which forms a connected drainage network flowing through Shaw, Whitley and the surrounding area.

Evidence compiled by CAWS demonstrates that this catchment is environmentally sensitive and that hydrological impacts may propagate through interconnected surface-water pathways.

Construction disturbance, soil compaction and trenching associated with infrastructure works can alter infiltration and runoff behaviour across the catchment.

Despite this, the drainage consultation does not evaluate:

- the wider catchment hydrology;
- downstream receptors;
- the interaction between this development and other infrastructure projects affecting the same drainage system.

***Without considering the South Brook catchment as a whole, it is not possible to determine whether the proposal could increase flood or pollution risk elsewhere.***

## **5. Firewater Volumes and Containment Capacity Have Not Been Independently Verified**

Concerns regarding the adequacy of the developer's firewater demand calculations and containment capacity have been raised consistently in CAWS' original submission and subsequent addenda. Those concerns remain unresolved. The Wiltshire Council drainage consultation appears to accept key elements of the developer's approach without demonstrating that worst-case firewater volumes and contaminated runoff scenarios have been independently assessed.

The developer proposes that contaminated firewater generated during a battery incident would be contained within a lined attenuation basin controlled by a penstock valve.

However, the Wiltshire Council Drainage Team consultation does not demonstrate that the Council has independently verified:

- the maximum credible volume of firewater generated during a BESS incident;
- the worst-case contaminated water volume;
- whether the proposed basin capacity is sufficient under extreme conditions.

Battery Energy Storage System incidents are known to generate significant volumes of contaminated runoff.

It is also important to distinguish between surface-water attenuation infrastructure designed for rainfall events and infrastructure specifically designed to contain large volumes of contaminated firewater generated during an emergency incident. Attenuation basins associated with sustainable drainage systems are typically designed to manage stormwater runoff over defined return periods and release rates. They are not necessarily designed to safely contain large volumes of contaminated firefighting water generated over a short period of time, nor to prevent the mobilisation of hazardous substances during such events. In the absence of clear evidence that the proposed basin has been specifically designed and sized to contain a credible worst-case firewater scenario, it cannot be assumed that the proposed attenuation infrastructure would perform this function safely.

***Without independently verified worst-case calculations, it cannot be assumed that the proposed containment infrastructure is adequate.***

### **Persistent Contamination Risk from PFAS**

A further concern arising from contaminated firewater relates to the potential presence of per- and polyfluoroalkyl substances (PFAS) and other fluorinated compounds associated with lithium battery materials and combustion products.

PFAS are widely recognised by environmental regulators as substances of very high concern because they are persistent, highly mobile in water and capable of accumulating in humans, animals and crops. Once released into groundwater or surface water systems they can remain in the environment for decades.

During a Battery Energy Storage System incident, large volumes of contaminated firewater may contain a complex mixture of hazardous substances including fluorinated compounds, heavy metals, acidic by-products and combustion residues. Evidence compiled by CAWS demonstrates that PFAS-related contamination is a credible pathway arising from battery decomposition products and the mobilisation of contaminants during firefighting operations.

In a location within Source Protection Zone 2 and connected to the South Brook headwater catchment, the potential release of persistent contaminants significantly increases the importance of demonstrating that firewater containment infrastructure is capable of preventing any escape to groundwater or downstream watercourses.

***The current application does not demonstrate that such risks have been adequately assessed or mitigated.***

## **6. Removal of Contaminated Water by Tanker Is Assumed Rather Than Demonstrated**

The Wiltshire Council Drainage Team consultation notes that contaminated water could be removed from the site by licensed tanker.

However, the practical feasibility of this approach has not been demonstrated.

Several key questions remain unanswered:

- what total contaminated water volume is assumed;
- how many tanker movements would be required;
- how quickly contaminated water would need to be removed;
- whether site access and surrounding roads could safely accommodate such operations during an emergency.

A further practical issue concerns the availability of a robust supply chain capable of managing the removal and disposal of potentially large volumes of contaminated firewater. The application provides no evidence that suitable tanker capacity, licensed hazardous-waste operators and approved disposal facilities would be available within the timeframes required during an emergency incident. Nor has the developer identified a viable disposal route for such material or demonstrated that sufficient capacity exists within the hazardous-waste management system to accommodate these volumes.

The challenges associated with managing lithium-battery fire residues are well illustrated by current practice in the automotive sector, where damaged electric vehicles are sometimes transported to specialist facilities and submerged in containment tanks for extended periods before treatment or disposal.

***In the absence of evidence demonstrating a viable collection, transport and disposal pathway for contaminated firewater, reliance on tanker removal cannot be regarded as a credible mitigation strategy.***

## **7. Assumptions Regarding Boundary Cooling and Reduced Contamination Are Unproven**

The Wiltshire Council Drainage Team consultation appears to repeat the developer's assertion that the firefighting strategy relies on boundary cooling, meaning water would be applied to adjacent containers rather than directly onto a burning battery unit.

This approach is presented as evidence that the volume of contaminated firewater runoff may be limited.

However, the consultation response does not provide any independent analysis demonstrating that a boundary cooling strategy would materially reduce either firewater demand or the resulting volume of contaminated runoff.

Even where water is applied only to surrounding containers, it would inevitably pass through the toxic plume and combustion products generated by the incident, mobilising hazardous substances released during thermal runaway and fire. As set out earlier in this submission, such runoff may contain a mixture of contaminants including heavy metals, acidic compounds and persistent fluorinated substances such as PFAS.

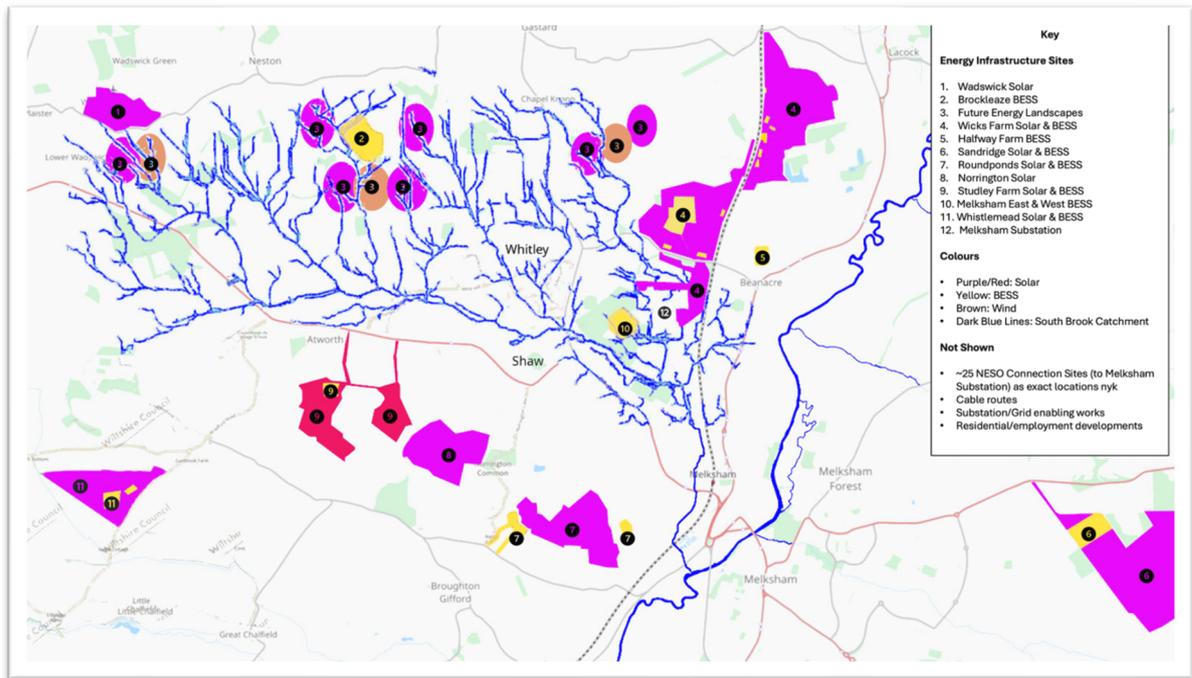
Emergency response to battery incidents is complex and unpredictable, and the actual firefighting strategy adopted by responding fire crews will depend on operational circumstances rather than the developer's assumptions.

***It cannot therefore be assumed that boundary cooling would prevent or reduce the generation of contaminated firewater or materially reduce the associated contamination risks.***

## **8. Relationship to Cumulative Impact**

The South Brook headwater catchment forms a connected hydrological system flowing through Shaw and Whitley. Figure 1 below illustrates the concentration of proposed and existing energy infrastructure developments within this catchment, including solar farms, Battery Energy Storage Systems and associated grid infrastructure centred on Melksham Substation. The map shows that the proposed Brockleaze BESS does not occur in isolation but sits within a cluster of developments that share the same drainage network and hydrological pathways. In such a connected system, disturbance associated with construction activity, land-use change and potential contamination events may propagate through interconnected surface-water channels and groundwater systems. Independent evidence indicates that risks associated with clustered infrastructure can escalate non-linearly as development density increases. In this context, hydrological impacts cannot be understood solely at the scale of an individual site, as disturbance from multiple developments may cumulatively alter infiltration behaviour and runoff patterns across the South Brook catchment.

***Without considering these cumulative effects, a site-based drainage assessment may significantly underestimate environmental risk.***



**Figure 1 – Energy infrastructure development within the South Brook catchment**

### 9. Cable Route and Construction Methodology Remain Undefined

The planning application does not define the route or construction methodology for the high-voltage cable connection between the Brockleaze site and the Melksham Substation. Instead, these matters are proposed to be addressed after planning permission has been granted.

This approach is particularly problematic in the context of the drainage and hydrological issues identified in the Wiltshire Council consultation response.

The cable connection is not a minor ancillary detail but a fundamental component of the development. Its route and construction methodology determine the extent of ground disturbance, trenching works and potential interaction with surface-water pathways and groundwater systems.

As demonstrated in CAWS' previous submissions, the South Brook headwater catchment is a highly interconnected hydrological system, where surface water flows through Shaw and Whitley before ultimately reaching the River Avon. Disturbance caused by trenching, joint bays and temporary construction works has the potential to intercept natural drainage pathways, alter infiltration behaviour and create preferential pathways for water and contaminants.

These risks are particularly significant in an area that lies within Source Protection Zone 2 and contains sensitive groundwater resources.

Without a defined cable route and construction methodology, it is not possible to assess:

- the extent of trenching across hydrological pathways;

- the interaction with groundwater and surface-water systems;
- construction-phase drainage and pollution risks;
- cumulative disturbance alongside other infrastructure works occurring within the same catchment.

The absence of this information therefore prevents the Local Planning Authority from undertaking a proper assessment of the environmental impacts of the development.

These matters cannot appropriately be deferred to planning conditions. The route and construction method of the cable connection are integral to the development itself and materially affect its environmental impacts.

***Granting planning permission in the absence of this information would therefore mean approving a development before its full environmental effects have been assessed.***

## **10. Key Technical Questions Remain Unanswered**

The Wiltshire Council Drainage Team consultation response confirms that several fundamental issues remain unresolved.

Key unanswered questions include:

### **Ground conditions**

- What are the infiltration characteristics of the site soils?
- What are the seasonal groundwater levels?

### **Surface water management**

- How will the scheme achieve Wiltshire Council's required 30% runoff reduction?
- How will exceedance flows behave during extreme rainfall events?

### **Firewater containment**

- What is the maximum credible firewater volume associated with a battery incident?
- Is the proposed containment infrastructure sized for that volume?

### **Emergency water removal**

- How many tanker movements would be required to remove contaminated water?
- How quickly would contaminated water need to be removed to maintain containment capacity?

### **Catchment interaction**

- How does the site drainage interact with the wider South Brook catchment?

***Until these questions are answered, the environmental risks associated with the proposal remain uncertain.***

## 11. Planning Policy Implications

Planning policy requires that development proposals demonstrate that they will:

- manage surface water sustainably;
- avoid increasing flood risk elsewhere;
- prevent pollution of groundwater and surface waters.

The application currently fails to demonstrate these matters.

In particular, the proposal has not demonstrated compliance with:

- Core Policy 67 of the Wiltshire Core Strategy
- Wiltshire Council Drainage Betterment Strategy
- national planning policy relating to flood risk and sustainable drainage.

These matters go to the acceptability of the development itself, rather than the detailed design of an otherwise acceptable scheme.

The burden of demonstrating that development can safely manage flood and pollution risks lies with the applicant.

***In the absence of the necessary technical evidence, the proposal cannot be regarded as compliant with planning policy.***

## 12. Inappropriateness of Reliance on Planning Conditions

The Wiltshire Council Drainage Team consultation moves from a holding objection to “no objection subject to conditions.”

However, several of the matters proposed to be addressed by condition relate to fundamental aspects of the safety and environmental acceptability of the development, including:

- the adequacy of firewater containment capacity;
- the management and removal of contaminated firewater;
- the interaction between drainage systems and groundwater pathways;
- the behaviour of surface water within the South Brook catchment.

Where the ability to satisfy a condition is uncertain, it is not appropriate to grant planning permission on the basis that such matters will be resolved at a later stage.

Planning conditions are intended to control the implementation and detailed design of an otherwise acceptable development, not to resolve fundamental uncertainties about whether the development itself can operate safely.

In this case, several of the assumptions relied upon by the developer - including firewater volumes, containment capacity, tanker removal of contaminated water and the effectiveness of boundary cooling in limiting contamination - remain unproven and unsupported by independently verified evidence.

Granting permission subject to conditions in these circumstances would therefore mean that planning consent is issued before it has been demonstrated that the proposal can safely manage flood and contamination risks.

This would be particularly inappropriate given the site's location within Source Protection Zone 2, its position within the South Brook headwater catchment, and the growing concentration of energy infrastructure within the same drainage system, where cumulative impacts may significantly increase environmental risk.

It is well established that planning conditions should not be used where there is no reasonable prospect that the required works or safeguards can be delivered, and therefore where critical elements of flood protection, contamination containment and environmental safety remain unproven, reliance on conditions would be inappropriate.

***For these reasons, reliance on conditions cannot resolve the fundamental deficiencies identified in the developer's submission, and the application should therefore be refused rather than approved subject to conditions.***

### **13. Conclusion and Formal Objection**

The Wiltshire Council drainage consultation highlights several important issues but does not address key aspects of the environmental context of the site.

In particular:

- the site's location within Source Protection Zone 2 has not been assessed;
- the hydrology of the South Brook catchment has not been considered;
- assumptions regarding firewater containment capacity have not been independently verified;
- the feasibility of removing contaminated water by tanker has not been demonstrated;
- assumptions regarding reduced contamination through boundary cooling remain unproven.

These omissions are particularly significant in an area already experiencing a concentration of energy infrastructure developments interacting across shared environmental systems.

Taken together, the deficiencies identified above mean that the environmental safety of the proposal has not been demonstrated. This is particularly significant given the site's location within Source Protection Zone 2 and the sensitive headwaters of the South Brook catchment, where any failure of firewater containment or emergency water management could allow persistent contaminants, including substances such as PFAS, to enter interconnected groundwater and surface-water systems. In these circumstances, reliance on untested assumptions regarding firewater volumes, containment capacity and emergency water removal creates unacceptable uncertainty about whether the development can operate safely. These are fundamental matters that cannot appropriately be deferred to planning conditions where there is no clear evidence that the necessary safeguards can be delivered. Granting planning permission on that basis would therefore risk approving a development whose flood-risk and contamination controls remain unproven in a sensitive catchment already experiencing a growing concentration of energy infrastructure.

***In these circumstances the precautionary and policy-compliant course of action is to refuse the application.***

## Annex A

### CAWS Objection History

The documents set out below represent the totality of the CAWS submission as at 07 January 2026 and should be considered collectively. Please note that the summaries set out below are highly abridged.

| Submission     | Summary  | Page Count | Word Count |
|----------------|--|------------|------------|
| 22 August 2025 | <p>The project is presented by the developer as a renewable and low-carbon energy development, but that is misleading. The BESS will not generate renewable energy; neither is it connected to a renewable source of energy. In fact, it may increase our reliance on fossil fuels. The scheme would therefore be better described as a high-carbon industrial development, with negligible local employment benefits, in a greenfield location.</p> <p>The developer’s fire safety strategy is non-compliant with UK National Fire Chiefs Council (NFCC) guidance, and it vastly underestimates its own water and containment requirements.</p> <p>The site sits in a Source Protection Zone near aquifers and flood-prone villages. The drainage and containment plans are inadequate, risking catastrophic contamination of a wide area.</p> <p>Noise mitigation is unproven. The site overlaps with Park Lane Mine, with no evidence of any assessment having been done by the developer of the effects of vibration, weight and traffic conflicts.</p> <p>Construction is unlikely to start before 2030, with grid connection not expected until 2037, making the application premature.</p> <p>Inadequate construction, traffic, and decommissioning plans have been submitted, leaving the application incomplete.</p> <p>No mitigation or coordination plan has been provided for concurrent projects.</p> <p>No community benefits are offered.</p> <p>CAWS’ consultation inputs have largely been ignored.</p> | 21         | 6,523      |

|                                     |  |    |       |
|-------------------------------------|--|----|-------|
|                                     | <p>A further round of public consultation is requested, once the cable route is defined.</p> <p>CAWS urges Wiltshire Council to seek independent expert advice.</p>  |    |       |
| First Addendum<br>02 September 2025 | The application is largely non-compliant with planning policies including those set out in the NPPF, Wiltshire Core Strategy, draft Wiltshire Local Plan, and the made Melksham Neighbourhood Plan 2.  | 14 | 2,543 |
| Second Addendum<br>03 October 2025  | <p>The inclusion of two water tanks to replace two fire hydrants makes no material change to CAWS previous submissions.</p> <p>The Fire Strategy Plan is incomplete.</p> <p>The proposed tank calculations are inconsistent.</p> <p>The tanks do not have sufficient capacity.</p>   | 3  | 1,091 |
| Third Addendum<br>06 October 2025   | Evidence that the Brockleaze BESS will not contribute to net zero.   | 3  | 979   |
| Fourth Addendum<br>07 October 2025  | CAWS Submission History.   | 3  | 472   |
| Fifth Addendum<br>07 January 2026   | <p>CAWS objects to the Brockleaze proposal because it would introduce a large-scale, standalone Battery Energy Storage System into an already saturated cluster of energy infrastructure centred on Melksham Substation, where Wiltshire Council has acknowledged that landscape and system capacity is extremely limited. The proposal is mischaracterised as renewable energy despite not generating electricity, not being intrinsically linked to renewable generation, and delivering negligible long-term employment or socio-economic benefit.</p> <p>Evidence assembled by CAWS demonstrates that sufficient Battery Energy Storage capacity is already deployed to meet Firm Frequency Response and grid-balancing requirements, and that additional large-scale BESS capacity is not required to maintain grid stability. In this context, reliance on site-by-site assessment and assumptions of effectively unlimited capacity in shared systems — including hydrology, groundwater, emergency services and transport — fails to address cumulative and non-linear impacts and materially underestimates risk. There is therefore no justification for</p> | 16 | 5057  |

|                                   |   |           |               |
|-----------------------------------|---|-----------|---------------|
|                                   | accepting elevated environmental, safety or cumulative harm in this location  |           |               |
| Sixth Addendum<br>7 February 2026 | The Sixth Addendum updates and reinforces matters raised previously in light of material new evidence and authoritative guidance, including updated NESO data, the implementation of NESO Connections Reform, recent Planning Inspectorate decisions on grid uncertainty, and representations relating to the Lime Down Solar NSIP. It confirms that the Brockleaze proposal has no demonstrable system need, relies on an unprotected and speculative grid position with a provisional 2037 connection date, excludes essential enabling infrastructure from assessment, and cannot be lawfully determined without a cumulative impact assessment. The Sixth Addendum concludes that, once system need is absent, there is no planning basis for attributing positive weight to the proposal and that planning permission should be refused.   | 9         | 2177          |
| Seventh Addendum<br>9 March 2026  | The Seventh Addendum addresses points raised by the Wiltshire Council Drainage Team consultation response dated 02/03/2026, which reveals significant deficiencies and appears to rely heavily on untested assumptions. In particular, it does not address the site's location within Source Protection Zone 2, does not consider the complex hydrology of the South Brook headwater catchment, and appears to accept without independent scrutiny the developer's assumptions regarding firewater volumes, containment basin capacity, tanker removal of contaminated water and the effectiveness of boundary cooling in limiting contamination. These omissions are especially concerning given the growing concentration of energy infrastructure developments within the same catchment, where cumulative disturbance may alter infiltration and runoff behaviour across interconnected drainage systems. Until these fundamental issues are resolved, the application fails to demonstrate compliance with Core Policy 67, the Wiltshire Drainage Betterment Strategy and national flood risk policy, and should therefore be refused. | 15        | 4058          |
| <b>Total</b>                      |   | <b>84</b> | <b>22,900</b> |

## Annex B

### Abbreviations

| <b>Abbreviation</b> | <b>Meaning</b>  |
|---------------------|---|
| <b>BESS</b>         | Battery Energy Storage System                                 |
| <b>CAWS</b>         | Community Action: Whitley and Shaw                            |
| <b>CP</b>           | Core Policy (Wiltshire Core Strategy)                         |
| <b>DCO</b>          | Development Consent Order                                     |
| <b>DWFRS</b>        | Dorset & Wiltshire Fire and Rescue Service                    |
| <b>EA</b>           | Environment Agency  |
| <b>EN-1</b>         | National Policy Statement for Energy (Overarching Energy)     |
| <b>EN-3</b>         | National Policy Statement for Renewable Energy Infrastructure |
| <b>FRA</b>          | Flood Risk Assessment   |
| <b>FRR</b>          | Firm Frequency Response                                       |
| <b>GW</b>           | Gigawatt  |
| <b>LFP</b>          | Lithium Iron Phosphate (battery chemistry)                    |
| <b>LPA</b>          | Local Planning Authority                                      |
| <b>MW</b>           | Megawatt  |
| <b>MWh</b>          | Megawatt hour   |
| <b>NFCC</b>         | National Fire Chiefs Council                                  |
| <b>NPPF</b>         | National Planning Policy Framework                            |
| <b>NSIP</b>         | Nationally Significant Infrastructure Project                 |
| <b>PFAS</b>         | Per- Polyfluoroalkyl Substances                               |
| <b>SPZ</b>          | Source Protection Zone  |
| <b>TCPA</b>         | Town and Country Planning Act 1990                            |
| <b>UK</b>           | United Kingdom  |

### Brockleaze NFCC Compliance Review

A detailed comparison of the submitted Fire Safety Technical Note against the National Fire Chiefs Council (NFCC) guidance indicates that the developer’s submission is largely assertion-based rather than evidence-based. While relevant standards such as NFPA 855, NFPA 68/69 and UL 9540A are referenced, the primary supporting documentation anticipated by NFCC - including full-scale UL 9540A test reports, configuration-specific certification, hydraulic fire-water deliverability calculations, independently verified suppression demand assessments, explosion venting calculations, plume modelling inputs, and documented Fire & Rescue Service consultation responses - has not been appended or independently evidenced.

Of particular concern is the reliance on UL 9540A performance assumptions and reduced separation distances while the specific BESS product has not yet been selected, rendering the safety case necessarily provisional.

In addition, the submission presents internal inconsistencies regarding contaminated firewater, provides volumetric water storage figures without demonstrating functional deliverability, and draws definitive conclusions on community impact based on modelling of “similar” units rather than defined equipment.

Taken together, these gaps materially limit the weight that can reasonably be afforded to the claimed NFCC compliance at this stage.

| NFCC Expectation / Requirement   | What the Developer States   | Compliance Gap / Missing Evidence   | Why This Matters (NFCC Context)  | Exact Reference Location (NFCC + Developer)   |
|--|---|---|--|---|
| <b>Performance claims must be supported by evidence; standards and certification demonstrable.</b> | Confirms compliance with NFPA standards and UL 9540A certification.     | No UL 9540A report appended; no certificates; no third-party verification; no competent person confirmation; no test boundary conditions disclosed. | NFCC requires reviewable primary evidence, not compliance statements.              | <b>NFCC:</b> “Information required from developers” section – evidence and certification expectations<br><b>Developer:</b> Section 2 (Compliance & Standards), paras 2.3–2.7; Appendix references |
| <b>Equipment should be clearly defined where reliance is placed on UL 9540A outcomes.</b>          | States specific BESS unit not yet selected; procurement at later stage. | Safety case relies on product-specific test results and modelling   | UL 9540A results are configuration-specific; hazard profile and spacing validation | <b>NFCC:</b> “Has the proposed equipment undergone full-scale fire testing?”  |

| NFCC Expectation / Requirement  | What the Developer States   | Compliance Gap / Missing Evidence  | Why This Matters (NFCC Context)   | Exact Reference Location (NFCC + Developer)  |
|---|---|--|---|--|
|   |   | assumptions but product remains undefined.   | depend on fixed equipment.  | (Developer Information section)<br><b>Developer:</b> Section 3.1–3.3 (Battery selection and procurement stage)                                     |
| <b>Reduced separation (0.914m / 3ft) only justified through UL 9540A + competent advice; NFPA 855 must be applied in entirety.</b>                                  | States 3ft spacing applicable based on UL 9540A certification.  | No UL 9540A report; no confirmation tested configuration matches proposed layout; no independent engineer confirmation supporting reduced separation.    | NFCC cautions against applying reduced distances without documented evidence.                               | <b>NFCC:</b> Section “Separation distances / NFPA 855 considerations”<br><b>Developer:</b> Section 4.4–4.6 (Layout and separation distances)       |
| <b>Water supply: if 25 l/s unavailable, ~180,000L static supply over 120 mins; tanks ≥10m; hydrant deliverability; suppression demand independently calculated.</b> | Proposes 2 × 120,000L tanks (240,000L).   | No hydraulic flow/pressure modelling; no hydrant test data; no confirmation tanks ≥10m; no independent fire engineer calculation for suppression demand. | NFCC requires functional demonstration of deliverability, not just stored volume.                           | <b>NFCC:</b> “Water supplies and fire-fighting media” section<br><b>Developer:</b> Section 5.2–5.5 (Fire water provision)                          |
| <b>Environmental protection: anticipate contaminated firewater; containment based on anticipated water application rates.</b>                                       | States isolation valve will retain contaminated water but also asserts cooling water unlikely to contain toxic chemicals. | Internal inconsistency; no quantified containment volume; no worst-case runoff modelling; no pollutant pathway assessment.                               | NFCC adopts precautionary contamination assumption; containment should be demonstrated on worst-case basis. | <b>NFCC:</b> “Environmental protection and firewater run-off” section<br><b>Developer:</b> Section 6.1–6.4 (Environmental management and drainage) |
| <b>Explosion/deflagration control: competent design; vent discharge identified; cable route gas migration considered; evidence required.</b>                        | References NFPA 68/69; states vents typically directed upwards.   | No explosion venting calculations; no mapped vent hazard zones; no cable trench gas migration  | NFCC expects demonstrable explosion management  | <b>NFCC:</b> “Explosion / deflagration risk management” section<br><b>Developer:</b> Section 4.7–4.9 (Explosion mitigation)                        |

| NFCC Expectation / Requirement  | What the Developer States   | Compliance Gap / Missing Evidence  | Why This Matters (NFCC Context)  | Exact Reference Location (NFCC + Developer)   |
|---|---|--|--|---|
|   |   | analysis; no third-party verification.   | strategy, not standard citation alone.   |   |
| <b>Impact on surrounding area: assess neighbourhood disruption; multi-hour incidents; plume modelling scenario-based and by competent person.</b> | Provides 1km receptor plan; modelling on “similar” BESS units; concludes no community impact. | Modelling not tied to defined product; modelling inputs not disclosed; no scenario matrix; no independent FRS validation provided. | NFCC expects scenario-based modelling with transparent assumptions; summary conclusions limit evidential weight. | <b>NFCC:</b> “Impact on surrounding area / plume modelling” section<br><b>Developer:</b> Section 7.2–7.6 (Community impact and modelling conclusions) |
| <b>FRS engagement should inform SSRI and layout; consultation outcomes evidenced.</b>   | States DWFRS engaged and layout acceptable.   | No appended DWFRS consultation response; no SSRI documentation; no record of agreed assumptions.                                   | Developer statements are not equivalent to documented Fire & Rescue Service endorsement.                         | <b>NFCC:</b> “Engagement with Fire and Rescue Service / SSRI” section<br><b>Developer:</b> Section 8.1–8.3 (FRS liaison statements)                   |

## Teresa Strange

---

**From:** Collins, Gary <Gary.Collins@wiltshire.gov.uk>  
**Sent:** 18 February 2026 16:36  
**To:** CAWS; Foster, Adrian; Green, Kenny  
**Cc:** Teresa Strange; phil.alford@wiltshire.gov.uk; CAWS; Peter Richardson  
**Subject:** RE: Cumulative Impact

Dear Peter

It was good to meet you and Teresa again in person on Monday.

As you have requested, the Council will respond to your specific recommendations. I will coordinate this but I will need inputs from other parts of the Council so please bear with me.

In the meantime, I didn't want to miss the opportunity to signpost you to the current consultation on the revised NPPF which runs until 10<sup>th</sup> March. A large part of how the Council has to operate is constrained by national policy, and so the current review of national planning policy (including new National development management policies) is a good opportunity to seek to influence the approach taken. The consultation can be accessed here: [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK](#)

Regards

Gary

**Gary Collins**  
**Head of Development Management**

**Wiltshire Council**

Tel: 01249 706648 / 07729 229090  
Email: [Gary.Collins@wiltshire.gov.uk](mailto:Gary.Collins@wiltshire.gov.uk)  
Web: [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

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**From:** CAWS <whitley.and.shaw@gmail.com>  
**Sent:** 16 February 2026 17:47  
**To:** Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>; Collins, Gary <Gary.Collins@wiltshire.gov.uk>; Green, Kenny <Kenny.Green@wiltshire.gov.uk>  
**Cc:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Alford, Phil <Phil.Alford@wiltshire.gov.uk>; CAWS <whitley.andshaw@gmail.com>; Peter Richardson <peter.richardson@melkshamwithout-pc.gov.uk>  
**Subject:** Cumulative Impact

Dear Adrian, Gary and Kenny

Thank you for your time today.

I said I would send over a few documents...

The first document is an extract from the CAWS Evidence and Supporting Information pack which includes the map we were looking at, the 11 Cumulative Impact Pathways I referred to, and our 12 recommendations to Wiltshire Council.

The other documents are the briefing document we sent round before the meeting that was postponed at the end of January, and the documents I had in hard copy today for Adrian and Gary.

As I mentioned, our Body of Knowledge is extensive so please let me know if there is anything else you would like to see at this juncture.

Kind Regards

Peter Richardson  
CAWS Chair and Parish Councillor

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## Fiona Dey

---

**From:** Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>  
**Sent:** 05 March 2026 10:01  
**To:** Teresa Strange  
**Cc:** phil.alford@wiltshire.gov.uk; Corps, Kimberly; Fiona Dey; Peter Richardson  
**Subject:** RE: Follow up after meeting to discuss highway concerns of cumulative cable routes to Melksham substation and streetworks issues

**Categories:** Planning

Teresa,

Thank you for your message.

Our Street Works Technicians are regularly monitoring the compliance of the ongoing works by Verdant Energy and SSEN in Westlands Lane. Prior to the road reopening all works will have been inspected and any non-compliance with the Specification for the Reinstatement of Openings in Highways (4th Edition) will have be addressed.

Colleagues in the Local Highways team, who are responsible for general highway maintenance, have been given the opportunity to undertake any planned maintenance during the closure. We will also arrange for a further inspection of the highway prior to opening and any further work identified that can be completed under the closure will be considered.

I hope this gives you some reassurance that your concerns will be addressed.

Regards

David M Thomas IEng MICE  
Head of Highways Asset Management and Commissioning

01225713312

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**From:** Teresa Strange <clerk@melkshamwithout-pc.gov.uk>  
**Sent:** 03 March 2026 15:46  
**To:** Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>  
**Cc:** Alford, Phil <Phil.Alford@wiltshire.gov.uk>; Corps, Kimberly <Kimberly.Corps@wiltshire.gov.uk>; Fiona Dey <office@melkshamwithout-pc.gov.uk>; Peter Richardson <peter.richardson@melkshamwithout-pc.gov.uk>  
**Subject:** RE: Follow up after meeting to discuss highway concerns of cumulative cable routes to Melksham substation and streetworks issues

Dear David

Thank you for your response, which the parish council have now considered at their latest Planning Committee meeting.

Melksham Without Parish Council does recognise the efforts made to coordinate the two cable schemes under a single road closure. Residents have also experienced considerable disruption from the volume and duration of works associated with the solar farm connections and SSEN and National Grid upgrades. Whilst we recognise the statutory rights of undertakers, the Parish Council is seeking reassurance that the longer-term condition of the highway will not be adversely affected as a result of the concentration of works in this location.

We understand that reinstatement will be undertaken in accordance with the Specification for the Reinstatement of Openings in Highways (4th Edition) and that this is the statutory framework governing such

works. Nevertheless, Westlands Lane has now been subject to multiple trenching operations and associated works over an extended period. The cumulative impact of repeated excavations is a matter of significant concern locally, both in terms of the structural integrity and the visual condition of the carriageway.

A mains drainage scheme was installed by Wessex Water in Westlands Lane in 2023 and with the current two cable runs being installed by SSEN and Verdant, as well as other works (requiring the 20mph temporary limit) to upgrade National Grid assets at the sub station, the current installation of Wick Solar Farm ( 20/06849) and 2no BESS schemes Melksham Substation East (17/04110 & PL/2024/01378) and West (17/04116 & PL/2024/01377).

Whilst Wessex Water and Aureos/Verdant are making good the cable trench, the rest of the surface on Westlands Lane is now in a very poor state. The grass verges that have been maintained for decades by the farmer at Westlands Farm are now pretty much destroyed, and the farmer and family are upset at the current state of them. How you attribute the damage to a particular contractor with all the work taking place is very difficult; it's the cumulative impact that the parish council feels is in play here.

The Parish Council therefore asks whether Wiltshire Council as the Highway Authority would consider:

- Whether extended reinstatement provisions may be appropriate in this location, given the cumulative nature of the work being undertaken there at present
- Whether resurfacing of a full lane width, or a longer continuous section, could be required in order to restore the integrity of the carriageway;
- Close inspection and enforcement of verge reinstatement to ensure proper topsoil replacement, compaction and reseeded, so that the verges are returned to a condition consistent with their former standard.

Residents are experiencing considerable disruption from the volume and duration of works associated with the solar farm connections and substation upgrades. Whilst we recognise the statutory rights of undertakers, the Parish Council is seeking reassurance that the longer-term condition of the highway will not be adversely affected as a result of the concentration of works in this location.

On another note, we see that the planning application PL/2025/05856 for the laying of underground electricity cables in association with Wick Solar Farm and Studley Solar Farm was approved on 13<sup>th</sup> February 2026 and yet they started on site on 26<sup>th</sup> January, and we will be taking that up with Planning Enforcement separately.

With kind regards, Teresa

Teresa Strange  
Clerk & Responsible Financial Officer  
Melksham Without Parish Council  
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Melksham Community Campus  
Market Place, Melksham  
Wiltshire, SN12 6ES  
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.

Want to keep in touch?

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

On X: [@melkshamwithout](#)

On Instagram: [melkshamwithoutpc](#)

# Workshop on energy in your community

**Date and venue change!**

Explore renewable energy in **Staverton, Hilperton, Semington and Great Hinton**, and see how it could benefit, or be owned by, the local community.

**Thursday 2 April  
6pm-8.30pm**

Staverton Social Club,  
New Terrace, Staverton  
BA14 6PA

**Everyone is welcome** - you don't need any prior knowledge. There will be a **complimentary buffet**. Please **sign up** if you can.

For more event info contact **communities@cse.org.uk** or call **0117 934 1400**.



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2 March 2026



# Wiltshire Council LOCAL PLAN

Update on Wiltshire Local Plan

On Friday 27 February 2026, we received the response from the Inspectors, appointed by the government to examine our Local Plan, to the proposed programme of work submitted to them on 30 January 2026.

The two timelines that we set out for the proposed programme of work sought to positively address the concerns they had raised in their letter received at the end of last year.

Having reviewed the council's proposed work programmes, the Inspectors have set out two options for the council, to either (i) withdraw the Local Plan from examination or (ii) request that the Inspectors draft a final report (which would recommend non-adoption). They don't require an immediate decision but have requested the council to provide an anticipated timescale for formally advising them of their decision on their options by 13 March 2026.

The letter, which can be found on the [examination website](#), is extremely disappointing given the significant work already undertaken and our willingness to address the issues raised. We will be considering how best to proceed in the coming days, and a further update will follow.

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## Response ID ANON-C9BS-2SYR-1

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2026-03-09 14:32:15

### Respondent details

a What is your name?

Name:  
Fiona Dey

b What is your email address?

Email:  
office@melkshamwithout-pc.gov.uk

c What is your organisation?

Organisation:  
Melksham Without Parish Council

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

### Consultation Introduction

1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

Answer:

2) Do you agree with the new format and structure of the NPPF which comprises separate plan-making policies and national decision-making policies?

Not Answered

a) Please provide your reasons, particularly if you disagree :

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

Not Answered

a) Please provide your reasons, particularly if you disagree :

4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

Not Answered

a) Please provide your reasons, particularly if you disagree :

### Chapter 1: Introduction

5) Do you agree with the proposed approach to simplifying the terminology in the NPPF where weight is intended to be applied?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

Weight should be something that can be established at a local level, it should not require Barristers to argue the nuances of weight at Appeal stage - this just causes delays (both to the application development and others in the pipeline that are awaiting the Appeal decision), loss of confidence and understanding in the process, huge cost to the public purse, local authorities erring on the side of caution to avoid going through the costly Appeal process.

### Chapter 2: Plan-making policies

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

PM1 should include details of how the focus on "cross boundary issues" should work; it must reflect how it works for neighbouring counties that may have no Mayor or different Mayors. For example, Wiltshire is not a Mayor led authority and yet Wiltshire residents regularly travel to Bath/Bristol/Gloucester/Dorset/Hampshire/New Forest for employment, education, healthcare, entertainment - how are the public transport and active travel aspects taken into account?

Support the text in PM1 i) monitoring its implements and adopting a replacement no later than 10 years after current version, or earlier for ii) changes to infrastructure will have a significant impact on land use (eg Cumulative impact of BESS, Solar, Energy related schemes, AND iii) significant change or new evidence of need eg evidence of employment land need

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?

Partly agree

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?:

Yes, this makes more sense, BUT HOW when they take years to complete? We understand the delay on Wiltshire draft Local Plan for several months has been due to lack of inspectors

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

9) Do you agree with the role, purpose and content of local plans set out in policy PM2?

Partly agree

a) Please provide your reasons, particularly if you disagree :

PM2. 2c) Identifying contributions expected from development towards meeting affordable housing requirements and on- and off-site infrastructure necessary to support delivery IS IMPORTANT but must ensure these have local input, and flexibility across other sites that come forward that may not be plan led. The local authority must be held account for providing infrastructure in their Local Plan and not just a wish list (eg Melksham Cemetery extension set out in Core Strategy & CIL list but no funding)

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?

Not Answered

a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why. :

Comment on PM5 Neighbourhood Plans - HOW will these will be produced if no funding or technical support? It only allows towns and affluent villages/parishes to produce NHPs. How are they sustainable, as need professional assistance?

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

Not Answered

a) Please provide your reasons, particularly if you disagree :

12) Do you agree with the approach to initiating plan-making in PM7?

Not Answered

a) Please provide your reasons, particularly if you disagree :

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8?

Not Answered

a) Please provide your reasons, particularly if you disagree :

PM8 2b "Consider using relevant evidence produced by other plan-makers, where doing so could avoid duplication and support alignment between Plans" - can this be made stronger? Wiltshire Council would not share their info on Local Plan site allocation with Melksham Neighbourhood Plan 2 - so both did the same exercise

14) Do you agree with the approach to identifying land for development in PM9?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

PM9 2b "likely viability" too onerous for every site. Joint Melksham Neighbourhood Plan 2 had 109 sites -not all sites assessed just those with constraints like brownfield and only for allocations

15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?

Strongly agree

a) Please provide your reasons, particularly if you disagree.:

Yes, as we rely on Bath for facilities, and impact of close of HGV Cleveland bridge on Wiltshire traffic

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?

Neither agree or disagree

a) Please provide your reasons, particularly if you disagree.:

Its not detailed enough to have a comment

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?

Not Answered

a) Please provide your reasons, particularly if you disagree :

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?

Not Answered

a) Please provide your reasons, particularly if you disagree :

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?

Not Answered

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?:

20) Do you have any specific comments on the content of the plan making chapter which are not already captured by the other questions in this section?

Answer:

The whole process for Local Plan adoption must be quicker. In Wiltshire's case, the Melksham Sites allocated have all come forward before/during the Plan's examination, and this means that the applications are not treated as speculative, but planned development. BUT they are not including all the benefits of the sites allocation in a strategic plan as the plan is not yet adopted. Eg lower levels of affordable housing, lower contributions for play equipment, not the site's agreed strategic site access etc

### Chapter 3: Decision-making policies

21) Do you agree with the principles set out in policy DM1?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

Like that the proposed planning obligations to be set out in Planning Statement at this early stage

22) Do you agree with the policy DM2 on information requirements for planning applications?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

23) Do you have any views on whether such a policy could be better implemented through regulations?

Answer:

24) Do you agree with the principles set out in DM3?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

Strongly agree as this is what the Neighbourhood Plan does

26) Do you have any further comments on the likely impact of policy DM5: Development viability?

Answer:

27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

a) Please explain. If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.:

Process needs to be sped up

28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.

a) Please explain. If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations:

29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?

Not Answered

Answer:

30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?

Not Answered

a) Please provide your reasons, particularly if you disagree :

31) Do you agree with the new intentional unauthorised development policy in policy DM8?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

Strongly agree as this is what the Neighbourhood Plan does and at the moment it can't be taken into account at time of application

32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?

a) If so, are there any particular additions or mitigations which we should consider?:

Please consider 'mission creep' - a development starts of temporary or with an agricultural tie and then moves to become permanent e.g. using a garage as an office/project manager accommodation then turns into a permanent accommodation

33) Do you agree with the new Article 4 direction policy in policy DM10?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

We are aware of overconcentration of HMOs in Bournemouth for example, and this would help to address the situation if it happened locally

#### Chapter 4: Achieving sustainable development

34) Do you agree with the proposed approach to setting a spatial strategy in development plans?

Partly agree

a) Please provide your reasons, particularly if you disagree :

Partly Agree as should have green gaps between settlements in neighbouring parishes in different NHPs too

35) Do you agree with the proposed definition of settlements in the glossary?

Not Answered

a) Please provide your reasons, particularly if you disagree :

36) Do you agree with the revised approach to the presumption in favour of sustainable development?

Not Answered

a) Please provide your reasons, particularly if you disagree :

Sounds good in theory!

37) Do you agree to the proposed approach to development within settlements?

Not Answered

a) Please provide your reasons, particularly if you disagree :

38) Do you agree to the proposed approach to development outside settlements?

Partly agree

a) Please provide your reasons, particularly if you disagree :

"defining the 'existing building' as the one which exists at the point this version of the Framework is finalised, as opposed to that existing on 1 July 1948, or as built originally (if constructed since then)"

Not for temporary buildings though? This could be used as route to get approval - checked and covered by new policy

"Some additional categories of development would also be permitted, including rural business and services which need to be located outside settlements"

Just rural businesses and services or general employment land if evidenced need and no other land available?

Noted that this is where the lack of 5 year housing land supply is mentioned

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

Not Answered

a) Please provide your reasons:

Suggest including employment use if there is an evidenced need and no viable alternatives

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Not Answered

a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.:

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?

Partly agree

a) If not, please provide your reasons:

PARTLY AGREE. This is what Melksham Neighbourhood Plan 2 does, but in Shaw & Whitley where not all the numbers were allocated - what happens if not enough sites are brought forward/available to meet the identified housing need??

## Chapter 5: Meeting the challenge of climate change

42) Do you agree with the approach to planning for climate change in policy CC1?

Not Answered

a) Please provide your reasons, particularly if you disagree :

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Strongly agree

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration? :

STRONGLY AGREE as CC2 talks of genuine choice of sustainable transport modes and access to facilities including premises to support local employment opportunities

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Strongly agree

a) What additional measures could be taken to ensure climate change mitigation is given appropriate consideration? :

Strongly Agree - this is flood risk, SUDS

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?

Not Answered

a) Please provide your reasons, particularly if you disagree :

Should this include BESS (Battery Energy Storage System) fires too?

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

Answer:

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

Answer:

## Chapter 6: Delivering a sufficient supply of homes

48) Do you agree the requirements for spatial development strategies and local plans in HO1 and HO2 are appropriate?

Partly agree

a) Please provide your reasons, particularly if you disagree :

Supportive of the sections about meeting differing types of need with type and tenure but worried about the understanding unmet needs in neighbouring areas - does this mean even more housing?

49) Is further guidance is required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Not Answered

If so, what elements should this guidance cover?:

50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?

Not Answered

a) Please provide your reasons, particularly if you disagree :

51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?

Not Answered

a) If so, what are the key principles this guidance should establish?:

52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?.

Strongly disagree

a) Please provide your reasons, particularly if you disagree :

Concerned that sites/locations for 6-10 and 11-15 years lets the genie out the bottle and sites will come forward even earlier but without bringing the associated infrastructure

53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision making?

Not Answered

a) Please provide your reasons, particularly if you disagree :

54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear?

Not Answered

a) Please provide your reasons, particularly if you disagree :

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

Not Answered

a) Please provide your reasons, particularly if you disagree :

Should be looking at new towns, not continually adding to sprawl of existing settlements

56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

Strongly disagree

a) Please provide your reasons, particularly if you disagree :

DISAGREE - 'parish' is the wrong definition, as some parishes are one village and some cover lots of villages

57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?

Not Answered

a) Please provide your reasons, particularly if you disagree :

58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion?

Not Answered

a) Please provide your reasons, and would you support an alternative minimum percentage requirement?:

59) Do you agree the proposals to support the needs of different groups, through requiring authorities to set identify sites or set requirements for parts of allocated sites are proportionate?

Not Answered

a) Please provide your reasons, particularly if you disagree :

60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?

Strongly agree

a) Please provide your reasons and indicate if an alternative site size threshold would be preferable? :

61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?

Not Answered

a) Please provide your reasons:

HO6 1 b. Local Plans should allocate sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive especially where this will support local services - how is this to be evidenced and established? Shaw school is full, how is this demonstrated for Shaw & Whitley identified need of 70+ houses?

62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Answer:

63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes?

Not Answered

a) Please provide your reasons, particularly if you disagree :

64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?

Not Answered

a) Please provide your reasons, particularly if you disagree :

65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?

Not Answered

a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?:

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?

a) If so, what changes would be beneficial?:

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?

Not Answered

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided - for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.:

Concern that these will not be built - or delayed - if reliant on the local authority to provide them

b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances - for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer:

68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

Answer:

69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.

Answer:

70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?

Not Answered

a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite. :

71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?

Not Answered

a) Please provide your reasons, particularly if you disagree :

HO8 3 - concerned that different market value types can be defined while meeting the affordable housing criteria however there is still a need to meet housing needs

72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

STRONGLY AGREE - as an example the Melksham Neighbourhood Plan 2 policy 7.2 former library site

73) Do you agree with the criteria set out regarding the locations of specialist community-based accommodation, including changes to the glossary?

Not Answered

a) Please provide your reasons, particularly if you disagree :

74) Do you agree with the criteria set out regarding the locations of purpose built student accommodation and large scale shared living accommodation, including changes to the glossary?

Not Answered

a) Please provide your reasons, particularly if you disagree :

75) Do you agree the proposals provide adequate additional support for Rural Exception Sites?

Not Answered

a) Please provide your reasons, including what other changes may be needed to increase their uptake?:

76) Do you agree with proposals to remove First Homes Exception Sites as a discrete form of exception site?

Not Answered

a) Please provide your reasons, particularly if you disagree :

77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?

Not Answered

a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?:

HO11 support, rural tie, enabling heritage asset etc

78) Do you agree the proposals to set out requirements for traveller sites at HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?

Not Answered

79) Please provide your reasons to Question 78, particularly if you do not agree

Answer:

80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?

Strongly Agree

a) Please provide your reasons, particularly if you disagree :

STRONGLY AGREE - would hopefully prevent land banking

81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?

Not Answered

a) Please provide your reasons, particularly if you disagree :

82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

Not Answered

a) Please provide your reasons:

83) Do you agree with the proposed changes to the Housing Delivery Test rule book?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 7: Building a strong , effective economy

84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

Concerned that employment land and grid connection etc have been intertwined due to cumulative impact concerns - however they are separate topics

85) Do you agree with the approach to meeting the need for business land and premises in policy E2?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

This would support a Gompels type application as it specifically mentions freight and logistics

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

Also include provision of lorry driver overnight facilities and parking including overnight  
The policy should be related to employment numbers so not just empty warehouses with no jobs

87) Do you agree with the approach to rural business development in policy E4?

Partly agree

a) Please provide your reasons, particularly if you disagree :

Seems sensible

## Chapter 8: Ensuring the vitality of town centres

88) Do you agree with the proposed changes to policy for planning for town centres?

Not Answered

a) Please provide your reasons, particularly if you disagree :

89) Do you agree with the approach to development in town centres in policy TC2?

Not Answered

a) If not, please explain how you would achieve this aim differently :

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

Answer:

91) Do you believe the sequential test in policy TC3 should be retained?

Not Answered

a) Please provide your reasons, particularly if you disagree :

92) Do you agree with the approach to town centre impact assessments in policy TC4?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 9: Supporting high quality communications

93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?

Not Answered

a) Please provide your reasons, particularly if you disagree :

94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?

Not Answered

a) Please provide your reasons, particularly if you disagree :

95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 10: Securing Clean Energy and Water

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1

Not Answered

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?:

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon development in policy W2?

Not Answered

a) Please provide your reasons, particularly if you disagree:

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

Not Answered

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy?:

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 11: Facilitating the sustainable use of minerals

100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?

Not Answered

a) Please provide your reasons, particularly if you disagree :

101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?

Not Answered

a) Please provide your reasons, particularly if you disagree :

102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'?

Not Answered

a) Please provide your reasons, particularly if you disagree :

103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development?

Not Answered

a) Please provide your reasons, particularly if you disagree :

104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?

Not Answered

a) Please provide your reasons, particularly if you disagree :

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?

Not Answered

106) Please provide your reasons in response to question 105, particularly if you disagree

Answer:

107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?

Not Answered

108) Please provide you reasons in response to question 107, particularly if you do not agree

Answer:

109) Do you agree with approach to coal, oil and gas in policy M5?

Not Answered

a) Please provide your reasons, particularly if you disagree :

110) Are there any other exceptional circumstances in which coal extraction should be permitted?

Not Answered

111) If yes in reply to question 110, please outline the exceptional circumstances in which you think coal extraction should be permitted.

Answer:

112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development?

Not Answered

a) Please provide your reasons, particularly if you disagree :

113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 12: Making effective use of land

114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Partly agree

115) If not, in response to question 114, what further guidance is needed?

Answer:

116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

Not Answered

a) Please provide your reasons, particularly if you disagree :

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?

Not Answered

a) If not, what typologies should be added or removed and why?:

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

Not Answered

a) Please provide your reasons, particularly if you disagree :

119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.

Not Answered

a) Please provide your reasons, particularly if you disagree :

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?

Not Answered

a) Please provide your reasons, particularly if you disagree :

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

Not Answered

a) If not, please explain how guidance could be clearer?:

122) Do you agree with the minimum density requirements set out within policy L3?

Not Answered

a) Please provide your reasons, particularly if you disagree :

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence.:

123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?

Not Answered

a) Please provide your reasons, particularly if you disagree :

124) Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters proposed for the number of Travel to Work Areas and service frequency appropriate for defining a 'well-connected' station?

Not Answered

a) Please provide your reasons and preferred alternatives:

125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally?

Not Answered

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be? :

126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?

Not Answered

127) In reply to question 126, if so, what should that range be, and which locations should it apply to?

Answer:

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

Not Answered

129) Please provide you reasons in response to question 128, particularly if you disagree

Answer:

### Chapter 13: Protecting Green Belt land

130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?

Not Answered

131) Please provide your reasons in response to question 130, particularly if you disagree.

Answer:

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?

Not Answered

135) Please provide your reasons in response to question 134, particularly if you disagree.

Answer:

136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?

Not Answered

a) Please provide your reasons, particularly if you disagree :

137) Do you agree policy GB7(1h) successfully targets appropriate development locations and types in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Not Answered

138) Please provide your reasons to your reply to question 137, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers

Answer:

139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

Not Answered

a) Please provide your reasons, particularly if you disagree :

140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

Answer:

141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?

Not Answered

142) Please explain your answer to question 141, including your view on the appropriate approach to setting a 'floor', and the right level for this?

Answer:

143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?

Not Answered

a) Please explain your answer.:

144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

Answer:

145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?

Not Answered

a) Please provide your reasons, particularly if you disagree :

#### Chapter 14: Achieving well-designed places

146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

Not Answered

a) Please provide your reasons, particularly if you disagree :

147) Do you agree with the approach to design tools set out in policy DP2?

Strongly Agree

a) Please provide your reasons, particularly if you disagree.:

Support using local Design Codes rather than national ones. Melksham Neighbourhood Plan 2 includes local design codes

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Not Answered

a) Please provide your reasons, particularly if you disagree.:

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4?

Not Answered

a) If not, what else would help secure better design and placemaking outcomes?:

## Chapter 15: Sustainable transport

150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?

Not Answered

a) Please provide your reasons, particularly if you disagree :

152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?

Not Answered

a) Please provide your reasons, particularly if you disagree :

153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?

Not Answered

a) Please provide your reasons, particularly if you disagree :

154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?

Not Answered

a) Please provide your reasons, particularly if you disagree :

155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?

Not Answered

a) Please provide your reasons, particularly if you disagree :

156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?

Not Answered

a) Please provide your reasons, particularly if you disagree :

157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

## Chapter 16: Promoting healthy communities

158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

Not Answered

a) Please provide your reasons, particularly if you disagree :

159) Do you agree that Local Green Space should be 'close' to the community it serves?

Not Answered

a) Please provide your reasons, particularly if you disagree :

160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

Strongly agree

a) Please provide your reasons, particularly if you disagree :

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?

Answer:

162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

Not Answered

a) Please provide your reasons, particularly if you disagree :

163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision?

Not Answered

a) Please provide your reasons, particularly if you disagree :

164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 17: Pollution, Public Protection and Security

165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans?

Not Answered

a) Please provide your reasons, particularly if you disagree :

166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?

Answer:

167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?

Not Answered

a) Please provide your reasons, particularly if you disagree :

168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?

Not Answered

a) Please provide your reasons, particularly if you disagree :

169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?

Not Answered

a) Please provide your reasons, particularly if you disagree :

170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?

Not Answered

a) Please provide your reasons, particularly if you disagree :

## Chapter 18: Managing Flood Risk and Coastal Change

171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?

Not Answered

a) Please provide your reasons, particularly if you disagree :

172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?

Not Answered

a) Please provide your reasons, particularly if you disagree :

173) Do you agree with the proposed approach to the exception test set out in policy F6?

Not Answered

a) Please provide your reasons, particularly if you disagree :

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?

Not Answered

a) Please provide your reasons, particularly if you disagree :

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?

Not Answered

a) Please provide your reasons, particularly if you disagree :

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?

Not Answered

a) Please provide your reasons, particularly if you disagree :

177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

Answer:

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?

Not Answered

a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to:

## Chapter 19: Conserving and enhancing the natural environment

179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

Not Answered

a) Please provide your reasons, particularly if you disagree:

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

Answer:

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

Not Answered

a) Please provide your reasons, particularly if you disagree :

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?

Not Answered

a) Please provide your reasons, including how policy can be improved to ensure compliance:

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

Not Answered

a) Please provide your reasons, particularly if you disagree:

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

Answer:

## Chapter 20: Conserving and enhancing the historic environment

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act?

Not Answered

a) Please provide your reasons:

186) Do you have any evidence as to the impact of implementing the additional regard duties for development?

Answer:

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3?

Not Answered

a) Please provide your reasons, particularly if you disagree :

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?

Not Answered

a) Please provide your reasons, particularly if you disagree :

189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties?

Not Answered

a) Please provide your reasons, particularly if you disagree :

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?

Not Answered

a) Please provide your reasons, particularly if you disagree :

191) Do you have any other comments on the revisions to the heritage chapter?

Answer:

## Further questions

192) Do you agree with the transitional arrangements approach to decision-making?

Not Answered

a) Please provide your reasons, particularly if you disagree :

193) Do you have any further thoughts on the policies outlined in this consultation?

Answer:

194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?

Not Answered

a) Please provide your reasons, particularly if you disagree :

#### Annex A - Data Centres / Onsite Generation

195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?

Not Answered

a) Please provide your reasons:

196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial?

Not Answered

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons. :

197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.

Answer:

198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres?

Not Answered

a) Please provide your reasons:

199) What benefits or risks do you foresee from making this change? Please provide your reasons.

Answer:

#### Annex B - Viability: Standardised inputs in viability assessment

200) Would you support the use of growth testing for strategic, multi-phase schemes?

Not Answered

a) Please explain your answer.:

201) Would you support the optional use of growth testing for regeneration schemes?

Not Answered

a) Please explain your answer.:

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty?

Not Answered

a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing:

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

a) Please explain your answer. The government is particularly keen for views on whether clarifying the appropriate profit on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision making. :

204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for

subjective expectations?

a) Please explain your answer:

205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

a) Please explain your answer:

206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?

Not Answered

a) Please explain your answer:

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

a) Please explain your answer:

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?

Not Answered

a) In what circumstances might a premium, or the usual premium, not be required?:

b) What impact (if any) would you foresee if this change were made?:

209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met?

Not Answered

a) Please explain your answer:

210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used?

Not Answered

a) If another metric, please set out your preferred approach and rationale:

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

a) Please explain your answer:

212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context?

Not Answered

a) Please explain your answer:

## Annex C - Reforming Site Thresholds

213) Do you agree that a 2.5 hectare threshold is appropriate?

Not Answered

a) Please provide your reasons, particularly if you disagree :

214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?

Not Answered

a) Please provide your reasons, particularly if you disagree :

215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development?

Not Answered

216) In relation to question 215, if so, please explain your answer and provide views on potential mitigations.

Answer:

217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

a) Please provide your reasons, particularly if you disagree :

218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

a) Please provide your reasons, particularly if you disagree :

219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.

a) Please explain your answer:

220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

Answer:

221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

Answer:

222) Do you agree with the proposal to extend the Permission in Principle application route to medium development?

Not Answered

a) Please provide your reasons, particularly if you disagree :

223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

Answer:

### Public Sector Equality Duty

224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

Not Answered

a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. :

225) Is there anything that could be done to mitigate any impact identified?

a) Please explain your answer:

## Fiona Dey

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**From:** Fiona Dey  
**Sent:** 09 March 2026 14:33  
**To:** 'PlanningPolicyConsultation@communities.gov.uk'  
**Cc:** Teresa Strange; CAWS  
**Subject:** Submission: NPPF 2025 Consultation Response from Melksham Without Parish Council  
**Attachments:** NPPF 2025 Consultation Response V2.pdf

Dear Sir/Madam

In addition to our on-line responses in respect of the proposed reforms to the National Planning Policy Framework (December 2025), Melksham Without Parish Council support and endorse the responses submitted by Community Action: Whitley & Shaw (CAWS) (attached)

The submission from CAWS focuses on the need for clearer definition, structure and operational tools in relation to cumulative impact, particularly in infrastructure-dense areas where system capacity and threshold effects are increasingly material to sound decision-making. It includes both structured responses to the consultation questions and a proposed cumulative impact framework (see Executive Summary and Annex) .

Kind regards,

Fiona Dey  
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## **Consultation Response**

### **Proposed Reforms to the National Planning Policy Framework December 2025**

**Submitted by: Community Action: Whitley & Shaw (CAWS)**

**Location: Wiltshire**

**Date: 23 February 2026**

#### **Executive Summary**

This submission responds to the consultation on the proposed reforms to the National Planning Policy Framework (December 2025).

We support the objective of creating a clearer, more rules-based and more certain planning system.

However, the draft Framework does not provide sufficient clarity or operational tools to address cumulative impact in infrastructure-dense areas. This gap is particularly significant at a time of accelerated infrastructure deployment and increasing spatial clustering of development associated with energy transition, housing delivery and transport investment.

In many parts of England, planning harm increasingly arises not from individual schemes considered in isolation, but from the interaction of multiple developments across shared, finite-capacity systems. These systems include:

- Landscape character and settlement separation
- Catchment-scale hydrology
- Emergency-response and regulated system reliance
- Grid infrastructure clustering
- Construction-phase concurrency
- Transport corridors
- Shared environmental receptors

The comments in this submission are not intended to restrict development. They are directed toward improving coordination and providing clearer national planning guidance so that expectations are transparent at the outset. Greater clarity on cumulative impact at policy stage will reduce uncertainty, minimise dispute and delay, and support faster and more predictable delivery over the life of the planning process.

Cumulative impact is not simply additive. Evidence from regulators and technical guidance indicates that infrastructure risk can escalate non-linearly once system thresholds are approached. When such thresholds are exceeded, impacts may become incapable of mitigation at individual site level.

This submission therefore recommends that cumulative impact be more clearly defined in national policy; that Cumulative Impact Zones be identified through the plan-making process on an evidence-led basis; that cumulative assessment operates at cluster or system scale; and that guidance guards against fragmentation or sequential applications that risk systematic under-assessment of shared system pressures. These measures are consistent with the draft Framework's rules-based approach and would provide clarity before applications are submitted, rather than at appeal stage.

Embedding cumulative safeguards would:

- Improve certainty for applicants and authorities
- Reduce appeal conflict and legal challenge
- Support coordinated infrastructure delivery
- Preserve public confidence in the planning system
- Strengthen the rules-based ambition of the draft NPPF

## **1. Introduction**

The December 2025 draft NPPF introduces substantial structural reform, including:

- A more directive, rules-based approach
- Separation of plan-making and decision-making policies
- A revised presumption in favour of sustainable development
- Greater emphasis on locational clarity

These reforms aim to increase certainty and support delivery.

However, the draft Framework does not sufficiently address cumulative impact - particularly in areas experiencing spatial clustering of infrastructure, housing growth, transport works and associated enabling development.

In such areas, impacts arise through system interaction rather than through individual scheme characteristics.

Without structured cumulative safeguards, decision-making risks becoming fragmented and incremental, potentially leading to system overload and increased appeal conflict.

The need for clearer policy alignment is reinforced by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which already require assessment of likely significant cumulative effects. Greater clarity within the NPPF would support consistent application of that statutory duty.

In addition, the issue of cumulative impact requires attention now because the scale and pace of infrastructure deployment is increasing. National energy transition objectives, housing delivery targets and transport investment programmes are driving multiple concurrent developments in the same geographic areas. While each project may be justified individually, their spatial concentration can create system-level pressures that existing policy tools do not adequately address.

At the same time, the draft Framework seeks to create a more rules-based and directive planning system. As discretion narrows and delivery accelerates, it becomes more important that cumulative safeguards are clearly articulated within national policy. Without structured mechanisms for

identifying system thresholds and managing infrastructure clustering, there is a risk that cumulative pressures will be addressed reactively at appeal stage rather than proactively through plan-making.

Clarifying cumulative impact within the final NPPF would therefore ensure that increased delivery is matched by equally clear safeguards for system capacity, resilience and long-term sustainability.

## 2. The Policy Gap: Cumulative Impact Is Under-Defined

The draft Framework refers to cumulative effects but does not:

- Provide an operational definition
- Distinguish additive impact from threshold-driven escalation
- Recognise infrastructure density and system saturation
- Enable spatial designation of infrastructure clustering areas
- Clarify when cumulative impact should carry determinative weight

The Framework should include a definition along the following lines:

“Cumulative impact refers to the combined and interacting effects of multiple developments on shared systems, receptors and infrastructure, including circumstances where impacts escalate non-linearly once capacity thresholds are approached or exceeded.”

This distinction is essential in infrastructure-dense contexts.

Evidence from regulators and published guidance confirms that cumulative infrastructure risks do not increase proportionately with scheme number alone<sup>1</sup>. Once system thresholds are approached, risk can escalate sharply, and site-by-site assessment may no longer capture system-level effects<sup>2</sup>.

### Clarification of Threshold Effects

In this submission, “thresholds” refers to identifiable points at which shared systems approach or exceed practical capacity, such that additional development results in disproportionate or non-linear effects. These thresholds are not necessarily fixed national numerical limits, but may be evidenced through qualitative or quantitative indicators demonstrating loss of resilience or reduced ability to mitigate impacts at individual site level.

Illustrative examples of cumulative threshold effects include:

- **Landscape capacity thresholds**, where the density or spatial arrangement of development results in settlement encirclement, loss of separation, or qualitative change in rural character.
- **Hydrological thresholds**, where combined land take and drainage alteration result in exceedance of infiltration capacity or materially increased downstream flood or contamination risk.
- **Emergency-response thresholds**, where multiple developments rely on the same access routes or response services, such that concurrent incidents would exceed realistic operational capacity.

---

<sup>1</sup> Institute of Environmental Management & Assessment (IEMA), *Environmental Impact Assessment Guide to: Cumulative Effects Assessment* (2017, updated 2020).

<sup>2</sup> Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571), Schedule 4

- **Infrastructure loading thresholds**, including grid, substation or transport corridor capacity, where cumulative demand or concurrency materially constrains operation or increases system vulnerability.
- **Construction concurrency thresholds**, where overlapping programmes generate compounded traffic, disturbance or environmental effects beyond what can be effectively mitigated on a site-by-site basis.

Once such thresholds are demonstrably exceeded, incremental mitigation may no longer be effective, and planning decisions must consider system protection rather than isolated site impact.

### 3. Recommended Amendments

#### A. Enable Identification of Cumulative Impact Zones (CIZs)

The Framework should enable Spatial Development Strategies and Local Plans to designate Cumulative Impact Zones where:

- Infrastructure density is high
- Shared systems are approaching capacity
- Landscape capacity is limited or demonstrably exceeded
- Emergency-response capacity is finite
- Catchment sensitivity is elevated

Within such zones:

- Area-wide cumulative assessment should be required
- Concurrency of development should be assessed
- Development should demonstrate that defined system thresholds are not exceeded
- Higher evidential standards should apply

Cumulative Impact Zones should be identified through plan-making, supported by area-wide evidence and subject to examination. A plan-led approach provides certainty and reduces dispute by establishing clear expectations before applications are submitted

Comparable cumulative impact frameworks already operate in other regulatory regimes<sup>3</sup>, including licensing policy. This demonstrates that spatial cumulative management is administratively workable and capable of consistent application.

Providing this structured mechanism would improve predictability and reduce dispute.

#### B. Require Cluster-Scale Cumulative Assessment

Where development is spatially concentrated or functionally linked, assessment should operate at landscape or system scale, including:

- Interaction with consented and reasonably foreseeable schemes
- Shared infrastructure loading
- Construction-phase concurrency

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<sup>3</sup> Licensing Act 2003, s.5A - Cumulative Impact Assessments

- Operational and incident-based risk pathways

Site-by-site assessment alone is insufficient in clustered environments.

Cumulative assessment should consider impact-generating components - such as generation, storage, cabling, substations, access and construction works - rather than relying solely on administrative scheme packaging. Aggregation risks systematic under-assessment where infrastructure elements operate on different receptors, spatial pathways and timescales.

### **C. Prevent Fragmentation Through Deferred Infrastructure and Systematic Under-Assessment**

The Framework should guard against the risk of cumulative under-assessment arising from administrative fragmentation of development proposals.

Where infrastructure is functionally interdependent - including generation, storage, substations, cabling, access works and construction compounds - cumulative effects may arise from the combined operation of these components, irrespective of how applications are packaged or phased.

Sequential, segmented or component-based applications may unintentionally dilute assessment of shared system effects if cumulative pathways are not evaluated holistically.

The Framework should therefore clarify that cumulative assessment must consider functionally linked and reasonably foreseeable components together, to avoid systematic under-evaluation of shared system pressures.

### **D. Incorporate Cumulative Emergency and Safety Planning**

Where development materially increases reliance on regulated systems - including emergency services, environmental protection regimes or critical infrastructure operators - cumulative system loading should be assessed within planning decision-making.

Planning does not replace or duplicate regulatory regimes. However, the existence of separate regulatory control does not remove the need for planning authorities to consider cumulative interaction between developments and shared system capacity.

In infrastructure-dense areas, multiple developments may rely on the same access routes, response resources or environmental safeguards. While each scheme may satisfy regulatory requirements individually, their combined presence may materially increase concurrency risk or system dependency.

The Framework should clarify that planning authorities may consider cumulative reliance on regulated systems where infrastructure density gives rise to foreseeable system-level pressures.

### **E. Require Catchment-Scale Hydrological Assessment in Sensitive Areas**

In headwater catchments and Source Protection Zones, cumulative hydrological and contamination pathways should be assessed at catchment scale.

Flood Zone classification alone does not capture exceedance risk in clustered infrastructure environments. Where multiple developments alter drainage, infiltration or surface-water pathways, impacts may propagate beyond site boundaries.

## **F. Recognise Landscape Capacity and Settlement Saturation**

Landscape capacity is finite.

Cumulative development may:

- Encircle settlements
- Remove meaningful separation
- Materially alter rural character

The Framework should allow decision-makers to conclude that, where landscape capacity has been demonstrably exceeded, further development may be unacceptable regardless of individual mitigation.

## **G. Clarify Determinative Weight and Strategic Need**

The Framework should confirm that:

Where cumulative impacts are significant and adverse, and cannot be demonstrably mitigated or coordinated, they should carry substantial weight and may be determinative in the planning balance.

In addition, where strategic need for a particular form of infrastructure has been materially met at national or regional scale, the planning balance should more clearly allow cumulative environmental, safety and system-capacity impacts to carry increased weight. Once strategic need thresholds are satisfied, incremental benefit may diminish while cumulative harm continues to escalate.

Clearer guidance would enhance transparency and reduce appeal uncertainty.

## **4. Alignment with the Draft's Objectives**

Embedding cumulative safeguards would:

- Enhance certainty
- Reduce duplication
- Improve transparency
- Support coordinated delivery
- Protect long-term system resilience

These proposals are consistent with the draft Framework's ambition for a clearer, more rules-based planning system.

They do not restrict development; rather, they provide structured mechanisms to ensure development proceeds within identifiable system capacity constraints and in alignment with statutory duties to assess likely significant cumulative effects.

The comments in this submission are not intended to restrict development. They are directed toward improving coordination and providing clearer national planning guidance so that expectations are transparent at the outset. Greater clarity on cumulative impact at policy stage will reduce uncertainty, minimise dispute and delay, and support faster and more predictable delivery over the life of the planning process.

## **Consequences of Leaving the Position Unchanged**

If cumulative impact remains under-defined within the final Framework, there is a risk that system-level pressures will continue to be addressed incrementally at application and appeal stage rather than proactively through plan-making. This may increase dispute, reduce predictability for applicants, and create inconsistency between statutory EIA duties and policy interpretation. In a more rules-based planning system, absence of clarity around cumulative thresholds and system capacity may inadvertently slow delivery by generating avoidable uncertainty and late-stage evidential conflict. Clarifying cumulative principles at national level would therefore reduce friction in the decision-making process and support more efficient implementation of development objectives.

## **5. Conclusion**

Cumulative impact is increasingly central to modern planning decision-making.

Without structured tools:

- Shared systems risk incremental overload
- Decision-making becomes fragmented
- Appeal risk increases
- Public confidence may be eroded

With reform:

- Development remains possible
- Infrastructure capacity is respected
- Thresholds are transparent
- Planning decisions are more predictable and robust

We respectfully request that cumulative impact be more clearly defined, structured and appropriately weighted within the final NPPF.

## **ANNEX**

### **Structured Consultation Responses and Cumulative Impact Framework**

(Proposed reforms to the NPPF – December 2025)

#### **Part 1 – Structured Responses to Consultation Questions**

##### **Question 20 – Plan-Making Chapter**

The plan-making chapter would benefit from explicit provision enabling authorities to identify and manage cumulative impact at spatial and system scale.

In infrastructure-dense areas, impacts frequently arise not from individual schemes in isolation but from the interaction of multiple developments across shared, finite-capacity systems. These systems include landscape character, hydrology, emergency-response capacity, transport corridors and grid infrastructure.

Spatial Development Strategies and Local Plans should therefore be able to designate Cumulative Impact Zones (CIZs) where infrastructure density is high or system thresholds are approaching capacity. Within such zones, plans should be able to:

- Require area-wide cumulative assessment
- Consider concurrency of development
- Identify defined system thresholds
- Limit further allocations where cumulative thresholds are demonstrably exceeded
- 

Comparable cumulative impact frameworks already operate in other regulatory regimes, including licensing policy, demonstrating that spatial cumulative management is administratively workable and capable of consistent application. Embedding cumulative safeguards at plan stage would improve certainty, reduce appeal risk and align with statutory duties to assess likely significant cumulative effects.

##### **Question 21 – DM1 (Preparing Development Proposals)**

Partly agree.

The emphasis on proportionality is supported. However, proportionality must be assessed in cumulative context.

A proposal that appears modest in isolation may nevertheless make a material contribution to infrastructure saturation when assessed alongside existing, consented or reasonably foreseeable schemes. In clustered environments, incremental additions can trigger threshold exceedance even where individual impacts appear limited.

The Framework should clarify that proportionality must account for cumulative contribution to shared system capacity, not solely the scale of the individual proposal.

##### **Question 22 – DM2 (Information Requirements)**

Partly disagree.

While proportionate information requirements are appropriate, the policy does not sufficiently address cumulative assessment in spatial clusters.

Where development forms part of a concentrated infrastructure area, applications should include all material enabling works and provide area-wide cumulative modelling where shared systems are engaged. For example, in an energy related infrastructure scheme this should include:

- Grid connections
- Cable routes
- Substations
- Access arrangements
- Construction compounds
- 

Cumulative assessment should consider impact-generating components rather than relying solely on administrative scheme packaging. Aggregation risks systematic under-assessment where infrastructure elements operate on different receptors, spatial pathways and timescales.

Without full disclosure and cluster-scale assessment, cumulative impacts may be underestimated and lawful decision-making compromised.

### **Question 23 – Implementation Through Regulation**

Consideration should be given to whether cumulative assessment triggers would benefit from greater national consistency.

In areas where infrastructure density thresholds are reached, or where multiple developments rely on shared infrastructure within defined proximity, regulatory clarity may assist in ensuring consistent application of cumulative assessment requirements.

Greater national guidance would reduce dispute and improve predictability for applicants and authorities.

### **Question 24 – DM3 (Determining Development Proposals)**

Partly disagree.

The policy does not sufficiently clarify how cumulative impact should be treated within the planning balance.

Decision-makers should explicitly consider interaction with consented, operational and reasonably foreseeable schemes where shared systems are involved.

Where cumulative impacts are significant and adverse, and cannot be demonstrably mitigated or coordinated, they should carry substantial weight and may be determinative in the planning balance. In addition, where strategic need for a particular form of infrastructure has been materially met at national or regional scale, the planning balance should more clearly allow cumulative environmental, safety and system-capacity impacts to carry increased weight.

Clearer guidance would enhance transparency and reduce appeal uncertainty.

### **Question 30 – DM7 (Other Regulatory Regimes)**

Partly disagree.

While regulatory regimes should be assumed to operate effectively, planning decisions must still consider cumulative reliance on shared systems.

Emergency-response capacity, environmental protection regimes and infrastructure operators may function appropriately in isolation. However, concentrated infrastructure development can materially increase reliance on those systems beyond practical capacity.

Planning authorities should therefore be able to consider cumulative system loading even where separate regulatory controls exist, consistent with established planning practice and statutory duties to assess likely significant cumulative effects.

### **Question 36 – Presumption in Favour of Sustainable Development**

Partly disagree.

The revised presumption provides greater clarity but should explicitly recognise system capacity constraints.

Sustainable development requires long-term resilience of shared systems. Where cumulative evidence demonstrates that landscape capacity, hydrological thresholds or emergency-response capacity have been exceeded, the presumption should not operate unqualified.

Clarifying that the presumption does not override demonstrable cumulative saturation would strengthen policy integrity.

### **Question 37 – Development Within Settlements**

Partly agree.

Supporting development within settlements is appropriate in principle. However, cumulative infrastructure clustering within or at the edge of settlements may result in encirclement, loss of separation or material alteration of landscape character.

Settlement-based policy should therefore operate within cumulative capacity constraints.

### **Question 38 – Development Outside Settlements**

Partly agree.

The selective approach outside settlements is supported. However, rural areas may experience material cumulative change through density and clustering rather than through individual harm. Authorities should be empowered to refuse further development where cumulative landscape or system thresholds are demonstrably exceeded.

## **Question 40 – Development Around Stations**

Partly agree.

Higher density development around stations can support sustainable transport objectives. However, minimum density policies should operate within wider cumulative infrastructure and landscape capacity constraints.

Where station areas experience multiple concurrent developments, cumulative impacts on servicing, transport corridors, landscape character and supporting infrastructure should be assessed before density requirements are applied rigidly.

## **Part 2 – Cumulative Impact Pathways Framework**

### **1. Concept**

Cumulative impact arises through identifiable system pathways rather than simply through the number of schemes.

It occurs where multiple developments interact across shared systems with finite capacity.

Evidence from regulators and technical literature indicates that once density thresholds are approached, infrastructure risks may escalate non-linearly, and site-by-site mitigation may no longer be effective. This understanding aligns with statutory duties under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 to assess likely significant cumulative effects.

### **2. Principal Pathway Categories**

#### **Environmental Pathways**

- Catchment-scale hydrology
- Surface water exceedance
- Contamination propagation
- Habitat fragmentation

#### **Landscape and Spatial Pathways**

- Settlement encirclement
- Coalescence risk
- Visual industrialisation
- Loss of rural separation

#### **Infrastructure and Energy Pathways**

- Grid clustering and substation dependency
- Cable route stacking
- Transport corridor loading
- Shared service pressure

#### **Safety and Risk Pathways**

- Fire escalation
- Emergency-response concurrency
- Incident propagation

#### **Construction-Phase Pathways**

- Traffic stacking
- Simultaneous earthworks
- Compounded disturbance

### **3. Component-Based Assessment**

Cumulative impact should be assessed by reference to impact-generating components rather than administrative scheme packaging.

Generation, storage, cabling, substations, access and construction works may operate on different receptors and timescales. Disaggregated component assessment reduces the risk of systematic under-evaluation and aligns with EIA duties to assess likely significant cumulative effects.

### **4. Threshold Principle**

Each pathway has identifiable capacity constraints.

Once thresholds are exceeded, incremental mitigation becomes increasingly ineffective and risk may escalate non-linearly.

This threshold-based understanding is consistent with statutory duties to assess likely significant cumulative effects under the Town and Country Planning (EIA) Regulations 2017.

### **5. Operational Implications for the NPPF**

This framework supports:

- Designation of Cumulative Impact Zones
- Cluster-scale modelling requirements
- Inclusion of enabling infrastructure
- Concurrency assessment
- Clarification of determinative weight in the planning balance

It provides a structured basis for operationalising cumulative impact within a clearer, more rules-based national planning framework.

### **Part 3 – About CAWS**

Community Action: Whitley & Shaw (CAWS) is a voluntary community group representing local residents and businesses in Shaw and Whitley, Wiltshire. The group seeks to promote community cohesion and to secure improvements to the quality of life and wellbeing of local people. CAWS coordinates community action, increases awareness of proposed developments, facilitates local consultation, and provides a constructive link between residents, businesses and local authorities. The organisation is run entirely by volunteers, holds no formal statutory authority or powers, receives no formal funding, and is committed to reinvesting any funds raised through local events or initiatives directly back into the community.

## Application for a premises licence to be granted under the Licensing Act 2003

### Please read the following instructions first

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We Jarboom Ltd

*(Insert name(s) of applicant)*

**apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003**

### Part 1 – Premises details

|  |          |                 |          |
|--|----------|-----------------|----------|
| Postal address of premises or, if none, ordnance survey map reference or description |          |                 |          |
| Oakfield Stadium<br>Eastern Way<br>Melksham<br>Wilts<br>SN12 7GU                     |          |                 |          |
| <b>Post town</b>   | Melksham | <b>Postcode</b> | SN12 7GU |

|   |                    |
|---|--------------------|
| Telephone number at premises (if any)   | ██████████         |
| Non-domestic rateable value of premises | £ £10,750 - Band B |

### Part 2 - Applicant details

Please state whether you are applying for a premises license as **appropriate**

**Please tick as**

|    |                                     |  |                             |
|----|-------------------------------------|--|-----------------------------|
| a) | an individual or individuals *      |  | please complete section (A) |
| b) | a person other than an individual * |  |                             |
|    | i                                   | as a limited company/limited liability partnership | X                           |
|    | ii                                  | as a partnership (other than limited liability)    |                             |
|    | iii                                 | as an unincorporated association or                |                             |

|     |    |   |  |                             |
|-----|----|---|--|-----------------------------|
|     | iv | other (for example a statutory corporation)   |  | please complete section (B) |
| c)  |    | a recognised club   |  | please complete section (B) |
| d)  |    | a charity   |  | please complete section (B) |
| e)  |    | the proprietor of an educational establishment  |  | please complete section (B) |
| f)  |    | a health service body   |  | please complete section (B) |
| g)  |    | a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales   |  | please complete section (B) |
| ga) |    | a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England |  | please complete section (B) |
| h)  |    | the chief officer of police of a police force in England and Wales  |  | please complete section (B) |

\* If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or
- I am making the application pursuant to a statutory function or a function discharged by virtue of Her Majesty's prerogative

\* **Individual applicants** (fill in as applicable)

|  |     |                           |                    |                                |  |
|--|-----|---------------------------|--------------------|--------------------------------|--|
| Mr   | Mrs | Miss                      | Ms                 | Other Title (for example, Rev) |  |
| <b>Surname</b>   |     |                           | <b>First names</b> |                                |  |
| <b>Date of birth</b>   |     | I am 18 years old or over |                    | Please tick yes                |  |
| <b>Nationality</b>   |     |                           |                    |                                |  |
| Current residential address if different from premises address |     |                           |                    |                                |  |
| Post town  |     |                           |                    | Postcode                       |  |
| <b>Daytime contact telephone number</b>                        |     |                           |                    |                                |  |
| <b>E-mail address (optional)</b>                               |     |                           |                    |                                |  |

Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 'share code' provided to the applicant by that service (please see note 15 for information)

**Second individual applicant** (if applicable)

|   |     |                   |                    |                                      |  |
|---|-----|-------------------|--------------------|--------------------------------------|--|
| Mr  | Mrs | Miss              | Ms                 | Other Title<br>(for example,<br>Rev) |  |
| <b>Surname</b>  |     |                   | <b>First names</b> |                                      |  |
| <b>Date of birth</b><br>or over   |     | I am 18 years old |                    | Please tick yes                      |  |
| <b>Nationality</b>  |     |                   |                    |                                      |  |
| Current residential<br>address if different<br>from premises<br>address   |     |                   |                    |                                      |  |
| Post town   |     |                   |                    | Postcode                             |  |
| <b>Daytime contact telephone<br/>number</b>   |     |                   |                    |                                      |  |
| <b>E-mail address<br/>(optional)</b>  |     |                   |                    |                                      |  |
| Where applicable (if demonstrating a right to work via the Home Office on line right to work checking service), the 'share code' provided to the applicant by that service:<br>(please see note 15 for information) |     |                   |                    |                                      |  |

**(B) Other applicants**

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

|   |   |
|---|---|
| Name  | Jarboom Ltd   |
| Address   | C/o 8 Merlin Way,<br>Bowerhill,<br>Melksham,<br>Wilts<br>SN12 6TJ |
| Registered number (where applicable)  | Company Number - 15576394   |
| Description of applicant (for example, partnership, company, unincorporated association etc.) | Limited Company   |
| Telephone number (if any)   | ██████████  |
| E-mail address (optional)   | ██████████  |

**Part 3 Operating Schedule**

When do you want the premises licence to start?

| DD | MM | YYYY |
|----|----|------|
| 2  | 6  | 0626 |

If you wish the licence to be valid only for a limited period, when do you want it to end?

| DD | MM | YYYY |
|----|----|------|
| 2  | 7  | 0626 |

|   |
|---|
| <p>Please give a general description of the premises (please read guidance note 1)</p> <p>The licensable area for the festival is all the area market on the attached map (The grounds of Melksham Rugby &amp; Football clubs)<br/>Both the rugby &amp; football clubs will use their own existing licenses for any licensable activities they will be providing within their clubhouses.</p> |
|---|

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

|       |
|-------|
| 4,999 |
|-------|

What licensable activities do you intend to carry on from the premises?

(please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)

| Provision of regulated entertainment (please read guidance note 2) |  | Please tick all that apply |
|--|--|----------------------------|
| a)   | plays (if ticking yes, fill in box A)  |                            |
| b)   | films (if ticking yes, fill in box B)  |                            |
| c)   | indoor sporting events (if ticking yes, fill in box C)   |                            |
| d)   | boxing or wrestling entertainment (if ticking yes, fill in box D)  |                            |
| e)   | live music (if ticking yes, fill in box E)   | <b>X</b>                   |
| f)   | recorded music (if ticking yes, fill in box F)   | <b>X</b>                   |
| g)   | performances of dance (if ticking yes, fill in box G)  |                            |
| h)   | anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H) |                            |

|   |          |
|---|----------|
| <b><u>Provision of late night refreshment</u></b> (if ticking yes, fill in box I) |          |
| <b><u>Supply of alcohol</u></b> (if ticking yes, fill in box J)                   | <b>X</b> |

**In all cases complete boxes K, L and M**

**A**

| Plays<br>Standard days and timings (please read guidance note 7) |       |        | <b>Will the performance of a play take place indoors or outdoors or both – please tick</b> (please read guidance note 3)   | Indoors   |  |
|--|-------|--------|--|---|--|
| Day  | Start | Finish |  | Outdoors  |  |
| Mon  |       |        |  | <b>Please give further details here</b> (please read guidance note 4) |  |
| Tue  |       |        |  |   |  |
| Wed  |       |        | <b>State any seasonal variations for performing plays</b> (please read guidance note 5)  |   |  |
| Thur   |       |        |  |   |  |
| Fri  |       |        | <b>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |   |  |
| Sat  |       |        |  |   |  |
| Sun  |       |        |  |   |  |

**B**

|   |       |        |  |          |  |
|---|-------|--------|--|----------|--|
| <b>Films</b><br>Standard days and timings (please read guidance note 7) |       |        | <b><u>Will the exhibition of films take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)  | Indoors  |  |
|   |       |        |  | Outdoors |  |
| Day   | Start | Finish |  | Both     |  |
| Mon   |       |        | <b><u>Please give further details here</u></b> (please read guidance note 4)   |          |  |
| Tue   |       |        |  |          |  |
| Wed   |       |        | <b><u>State any seasonal variations for the exhibition of films</u></b> (please read guidance note 5)  |          |  |
| Thur  |       |        |  |          |  |
| Fri   |       |        | <b><u>Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list</u></b> (please read guidance note 6) |          |  |
| Sat   |       |        |  |          |  |
| Sun   |       |        |  |          |  |

**C**

| <b>Indoor sporting events</b><br>Standard days and timings (please read guidance note 7) |       |        | <b><u>Please give further details</u></b> (please read guidance note 4)   |
|--|-------|--------|---|
| Day  | Start | Finish |   |
| Mon  |       |        |   |
|  |       |        |   |
| Tue  |       |        | <b><u>State any seasonal variations for indoor sporting events</u></b><br>(please read guidance note 5)   |
| Wed  |       |        |   |
| Thur   |       |        | <b><u>Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u></b> (please read guidance note 6) |
| Fri  |       |        |   |
| Sat  |       |        |   |
| Sun  |       |        |   |
|  |       |        |   |

**D**

| <b>Boxing or wrestling entertainments</b><br>Standard days and timings (please read guidance note 7) |       |        | <b>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</b> (please read guidance note 3)  | Indoors  |  |
|--|-------|--------|---|----------|--|
|  |       |        |   | Outdoors |  |
|  |       |        |   | Both     |  |
| Day  | Start | Finish |   |          |  |
| Mon  |       |        | <b>Please give further details here</b> (please read guidance note 4)   |          |  |
| Tue  |       |        |   |          |  |
| Wed  |       |        | <b>State any seasonal variations for boxing or wrestling entertainment</b> (please read guidance note 5)  |          |  |
| Thur   |       |        |   |          |  |
| Fri  |       |        | <b>Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |          |  |
| Sat  |       |        |   |          |  |
| Sun  |       |        |   |          |  |

**E**

| Live music<br>Standard days and timings (please read guidance note 7) |       |        | Will the performance of live music take place indoors or outdoors or both – please tick (please read guidance note 3)   | Indoors  |          |
|---|-------|--------|---|----------|----------|
| Day   | Start | Finish |   | Outdoors | <b>X</b> |
|   |       |        |   | Both     |          |
| Mon   |       |        | <b>Please give further details here</b> (please read guidance note 4)<br><br>Amplified live music   |          |          |
| Tue   |       |        |   |          |          |
| Wed   |       |        | <b>State any seasonal variations for the performance of live music</b> (please read guidance note 5)  |          |          |
| Thur  |       |        |   |          |          |
| Fri   | 13:00 | 23:00  | <b>Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |          |          |
| Sat   | 13:00 | 23:00  |   |          |          |
| Sun   |       |        |   |          |          |

**F**

| Recorded music<br>Standard days and timings (please read guidance note 7) |       |        | Will the playing of recorded music take place indoors or outdoors or both – please tick (please read guidance note 3)   | Indoors  |   |
|---|-------|--------|---|----------|---|
| Day   | Start | Finish |   | Outdoors | X |
| Mon   |       |        |   | Both     |   |
| Mon   |       |        | <b>Please give further details here</b> (please read guidance note 4)   |          |   |
| Tue   |       |        |   |          |   |
| Wed   |       |        | <b>State any seasonal variations for the playing of recorded music</b> (please read guidance note 5)  |          |   |
| Thur  |       |        |   |          |   |
| Fri   | 13:00 | 23:00  | <b>Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |          |   |
| Sat   | 13:00 | 23:00  |   |          |   |
| Sun   |       |        |   |          |   |

**G**

| <b>Performances of dance</b><br>Standard days and timings (please read guidance note 7) |       |        | <b>Will the performance of dance take place indoors or outdoors or both – please tick</b> (please read guidance note 3)  | Indoors   |      |
|---|-------|--------|--|---|------|
| Day   | Start | Finish |  | Outdoors  |      |
| Mon   |       |        |  | <b>Please give further details here</b> (please read guidance note 4) | Both |
| Tue   |       |        |  |   |      |
| Wed   |       |        | <b>State any seasonal variations for the performance of dance</b> (please read guidance note 5)  |   |      |
| Thur  |       |        |  |   |      |
| Fri   |       |        | <b>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |   |      |
| Sat   |       |        |  |   |      |
| Sun   |       |        |  |   |      |

# H

|  |       |        |  |          |  |
|--|-------|--------|--|----------|--|
| <b>Anything of a similar description to that falling within (e), (f) or (g)</b><br>Standard days and timings (please read guidance note 7) |       |        | Please give a description of the type of entertainment you will be providing   |          |  |
| Day  | Start | Finish | <b><u>Will this entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)   | Indoors  |  |
| Mon  |       |        |  | Outdoors |  |
|  |       |        |  | Both     |  |
| Tue  |       |        | <b><u>Please give further details here</u></b> (please read guidance note 4)   |          |  |
| Wed  |       |        |  |          |  |
| Thur   |       |        | <b><u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u></b> (please read guidance note 5)  |          |  |
| Fri  |       |        |  |          |  |
| Sat  |       |        | <b><u>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list</u></b> (please read guidance note 6) |          |  |
| Sun  |       |        |  |          |  |

I

| <b>Late night refreshment</b><br>Standard days and timings (please read guidance note 7) |       |        | <b>Will the provision of late night refreshment take place indoors or outdoors or both – please tick</b> (please read guidance note 3)  | Indoors  |  |
|--|-------|--------|---|----------|--|
|  |       |        |   | Outdoors |  |
| Day  | Start | Finish |   | Both     |  |
| Mon  |       |        | <b><u>Please give further details here</u></b> (please read guidance note 4)  |          |  |
| Tue  |       |        |   |          |  |
| Wed  |       |        | <b><u>State any seasonal variations for the provision of late night refreshment</u></b> (please read guidance note 5)   |          |  |
| Thur   |       |        |   |          |  |
| Fri  |       |        | <b><u>Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</u></b> (please read guidance note 6) |          |  |
| Sat  |       |        |   |          |  |
| Sun  |       |        |   |          |  |

**J**

|   |              |              |   |                  |          |
|---|--------------|--------------|---|------------------|----------|
| <b>Supply of alcohol</b><br>Standard days and timings (please read guidance note 7) |              |              | <b>Will the supply of alcohol be for consumption – please tick</b> (please read guidance note 8)  | On the premises  | <b>X</b> |
|   |              |              |   | Off the premises |          |
|   |              |              |   | Both             |          |
| Day   | Start        | Finish       | <b>State any seasonal variations for the supply of alcohol</b> (please read guidance note 5)  |                  |          |
| Mon   |              |              |   |                  |          |
| Tue   |              |              |   |                  |          |
| Wed   |              |              |   |                  |          |
| Thur  |              |              |   |                  |          |
| Fri   | <b>13:00</b> | <b>23:00</b> |   |                  |          |
| Sat   | <b>13:00</b> | <b>23:00</b> |   |                  |          |
| Sun   |              |              |   |                  |          |
|   |              |              | <b>Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list</b> (please read guidance note 6) |                  |          |

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):

|   |  |
|---|--|
| <b>Name</b>                                   | [REDACTED]                             |
| <b>Date of birth</b>                          | [REDACTED]                             |
| <b>Address</b>                                | [REDACTED]<br>[REDACTED]<br>[REDACTED] |
| <b>Postcode</b>                               | [REDACTED]                             |
| <b>Personal licence number (if known)</b>     | [REDACTED]                             |
| <b>Issuing licensing authority (if known)</b> | [REDACTED]                             |



## **M**

Describe the steps you intend to take to promote the four licensing objectives:

**a) General – all four licensing objectives (b, c, d and e)** (please read guidance note 10)

As per the Event Management Plan (EMP) and as per the Event Safety Advisory Group recommendations.

**b) The prevention of crime and disorder**

As per the Event Management Plan (EMP) and as per the Event Safety Advisory Group recommendations.

**c) Public safety**

As per the Event Management Plan (EMP) and as per the Event Safety Advisory Group recommendations.

**d) The prevention of public nuisance**

As per the Event Management Plan (EMP) and as per the Event Safety Advisory Group recommendations.

**e) The protection of children from harm**

As per the Event Management Plan (EMP) and as per the Event Safety Advisory Group recommendations.

**Checklist:**

**Please tick to indicate agreement**

|   |  |   |
|---|--|---|
| • | I have made or enclosed payment of the fee.  | X |
| • | I have enclosed the plan of the premises.  | X |
| • | I have sent copies of this application and the plan to responsible authorities and others where applicable.  | X |
| • | I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable.   | X |
| • | I understand that I must now advertise my application.   | X |
| • | I understand that if I do not comply with the above requirements my application will be rejected.  | X |
| • | [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom or my share code issued by the Home Office online right to work checking service (please read note 15). |   |

It is an offence, under Section 158 of the Licensing Act 2003, to make a false statement in or in connection with this application. Those who make a false statement may be liable on summary conviction to a fine of any amount.

It is an offence under Section 24b of the Immigration Act 1971 for a person to work when they know, or have reasonable cause to believe, that they are disqualified from doing so by reason of their immigration status. Those who employ an adult without leave or who is subject to conditions as to employment will be liable to a civil penalty under section 15 of the Immigration, Asylum and Nationality Act 2006 and pursuant to Section 21 of the same act, will be committing an offence where they do so in the knowledge, or with reasonable cause to believe, that the employee is disqualified.

**Part 4 – Signatures** (please read guidance note 11)

**Signature of applicant or applicant’s solicitor or other duly authorised agent** (see guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

|                    |   |
|--------------------|---|
| <b>Declaration</b> | <ul style="list-style-type: none"> <li>[Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).</li> <li>The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, or have conducted an online right to work check using the Home Office online right to work checking service which confirmed their right to work (please see note 15)</li> </ul> |
| Signature          | ██████████  |
| Date               | 20/02/2026  |
| Capacity           | Director, Jarboom Ltd   |

**For joint applications, signature of 2<sup>nd</sup> applicant or 2<sup>nd</sup> applicant’s solicitor or other authorised agent** (please read guidance note 13). **If signing on behalf of the applicant, please state in what capacity.**

|           |  |
|-----------|--|
| Signature |  |
| Date      |  |
| Capacity  |  |

|   |            |          |            |
|---|------------|----------|------------|
|   |            |          |            |
| Post town   | ██████████ | Postcode | ██████████ |
| Telephone number (if any)   | ██████████ |          |            |
| If you would prefer us to correspond with you by e-mail, your e-mail address (optional) |            |          |            |
| ██████████  |            |          |            |

## Notes for Guidance

1. Describe the premises, for example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.
2. In terms of specific regulated entertainments please note that:
  - Plays: no licence is required for performances between 08:00 and 23.00 on any day, provided that the audience does not exceed 500.
  - Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
  - Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
  - Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
  - Live music: no licence permission is required for:
    - a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
    - a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.

- Recorded Music: no licence permission is required for:
    - any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.
  - Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
  - Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
    - any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
    - any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
    - any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
    - any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.
3. Where taking place in a building or other structure please tick as appropriate (indoors may include a tent).
  4. For example the type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.
  5. For example (but not exclusively), where the activity will occur on additional days during the summer months.
  6. For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.
  7. Please give timings in 24 hour clock (e.g. 16.00) and only give details for the days of the week when you intend the premises to be used for the activity.
  8. If you wish people to be able to consume alcohol on the premises, please tick 'on the premises'. If you wish people to be able to purchase alcohol to

consume away from the premises, please tick 'off the premises'. If you wish people to be able to do both, please tick 'both'.

9. Please give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups or the presence of gaming machines.
10. Please list here steps you will take to promote all four licensing objectives together.
11. The application form must be signed.
12. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
13. Where there is more than one applicant, each of the applicants or their respective agent must sign the application form.
14. This is the address which we shall use to correspond with you about this application.
15. Entitlement to work/immigration status for individual applicants and applications from partnerships which are not limited liability partnerships:

A licence may not be issued to an individual or an individual in a partnership which is not a limited liability partnership who is resident in the UK who:

- does not have the right to live and work in the UK; or
- is subject to a condition preventing him or her from doing work relating to the carrying on of a licensable activity.

Any licence issued in respect of an application made on or after 6 April 2017 will become invalid if the holder ceases to be entitled to work in the UK.

Applicants must demonstrate that they have the right to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity.

They do this in one of two ways:

- 1) by providing with this application, copies or scanned copies of the documents which an applicant has provided, to demonstrate their entitlement to work in the UK (which do not need to be certified) as per information published on gov.uk and in guidance.
- 2) by providing their 'share code' to enable the licensing authority to carry out a check using the Home Office online right to work checking service (see below).

### **Home Office online right to work checking service.**

As an alternative to providing a copy of original documents, applicants may demonstrate their right to work by allowing the licensing authority to carry out a check with the Home Office online right to work checking service.

To demonstrate their right to work via the Home Office online right to work checking service, applicants should include in this application their share code (provided to them upon accessing the service at <https://www.gov.uk/prove-right-to-work>) which, along with the applicant's date of birth, will allow the licensing authority to carry out the check.

In order to establish the applicant's right to work, the check will need to indicate that the applicant is allowed to work in the United Kingdom and is not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity.

An online check will not be possible in all circumstances because not all applicants will have an immigration status that can be shared digitally. The Home Office online right to work checking service sets out what information and/or documentation applicants will need in order to access the service. Applicants who are unable to obtain a share code from the service should submit copies of documents as set out above.

Your right to work will be checked as part of your licensing application and this could involve us checking your immigration status with the Home Office. We may otherwise share information with the Home Office. Your licence application will not be determined until you have complied with this guidance.

**Data Protection:** *Wiltshire Council will use this information for the purposes of The Licensing Act 2003 and related purposes. Any member of the public may examine the application form on request. Further information can be found at <http://www.wiltshire.gov.uk/community-safety-privacy-notice>*

*You are providing your information to Wiltshire Council, contact details [publicprotectionnorth@wiltshire.gov.uk](mailto:publicprotectionnorth@wiltshire.gov.uk). The Council's Data Protection Officer can be contacted via [InformationGovernance@wiltshire.gov.uk](mailto:InformationGovernance@wiltshire.gov.uk)  
Your information is collected for the purpose of processing your licence application as required to fulfil the council's duties under the legislation, statutory or contractual requirement or obligation.*

**Legislation Context**

*Licensing Act 2003 for the processing of licensing applications and the prevention of fraud. The information may be shared with police, fire service and teams within Wiltshire Council, as statutory consultees, the Home Office to ascertain the right to work and HM Revenue and Customs, at their request, to identify potential fraud.*



## Fiona Dey

---

**From:** David Pafford  
**Sent:** 06 March 2026 12:32  
**To:** Saffi Rabey; John Glover; Teresa Strange; Fiona Dey; Vaughan Thompson (vaughan@placestudio.com); Katie Lea (katie@placestudio.com)  
**Subject:** Appeal AP-37487

Dear All,

I attach the final version of the letter sent to Steve Reed and Matthew Pennycook at the Department of Housing, Communities and Local Government about the Snarlton Farm appeal. I copied Brian Mathew MP in on this.

I also sent a copy to Ian Thorn, Adrian Foster and Nic Thomas at Wiltshire Council, (cc Nick Holder) urging them to make a strong representation to the Secretary of State.

Thanks to those who contributed.

Best wishes,

David

 [Planning Appeal AP-37487.docx](#)

Dear Secretary of State,

PLANNING APPEAL AP-37487

We write to you as representatives of the Joint Melksham Neighbourhood Plan, where Melksham Town Council (MTC) and Melksham Without Parish Council (MWPC) were the two Qualifying Bodies and the Steering Group led the process which ended in the Plan being made on 4 August 2025.

Firstly, we wholeheartedly endorse the letter to you from our MP, Brian Mathew. Secondly, we wish to make further comments which will give more substance to the strength of feeling in the Melksham community.

We were surprised to learn that the Appellant's lawyers had referred this matter to your department even before the Appeal had begun. We believe that this attempt to circumvent due process indicated a lack of confidence in their own case.

Counsel for the Appellant clearly recognised that the Joint Melksham Neighbourhood Plan 2 (JMNP2) was a crucial obstacle to his case because he spent most of the first day of the hearing trying to illegitimise it. All those who spoke in favour of JMNP2 as interested parties were subjected to sharp questioning in an obvious attempt to expose inconsistencies. This was a failure: JMNP2 was conceived, developed, endlessly consulted upon, examined and made according to the regulations. It gained 88.8% approval at referendum and is now part of Wiltshire Council's (WC) planning policies.

It is unfortunate that WC's Local Plan (WCLP) has been delayed, but this does not invalidate JMNP2. The Examiner requires that, within six months of the WCLP being made, JMNP2 must consider holding a review to determine whether an update is necessary. We have committed to doing that.

Despite this Appeal putting something of a brake on development, the three Melksham strategic sites in WCLP are making their way through the planning process, with the number of houses increasing in comparison with the original allocations. The two JMNP2 sites in Melksham Town have started preparatory work, The site south of Western Way has applied for Reserved Matters and the two sites in Whitley will soon be under way with one a live planning application for over a year.

Decisions about where to allocate sites for housing development in JMNP2 were made after a Housing Needs Assessment in the Melksham area. This showed the kind of dwellings required, where they were needed, who they were for and how many were sustainable. JMNP2 is not against building houses: we have planned positively for the

growth the community needs and have allocated 68% more dwellings than required by WC.

In recent years, our community has been bombarded with speculative applications, as developers have sought to take advantage of WC's difficult situation with housing land supply. Some of those applications have had to be permitted because WC felt unable to risk the potential costs of appeals. In our view, this has led to unsustainable development. There are currently five speculative applications as developers prepare their next move for if AP-37487 is allowed. If JMNP2 is undermined, these five sites (including this appeal site) would see an additional 763 houses built on unsustainable sites and with a severe lack of infrastructure; this view has been formed following the independent assessment of over 100+ sites by Aecom as part of the JMNP2 call for sites.

Finally, we welcome the strong endorsement in the latest draft NPPF of the importance of plan-led development and the key role of neighbourhood plans within that.

This Appeal is truly a test case of both local democracy and commitment to Neighbourhood Planning. Local communities will be waiting to hear your decision: are we to have plan-led development or a developer-led free-for-all?

We respectfully ask you to refuse AP-37487.

Yours sincerely,

Cllr Saffi Rabey, Mayor of Melksham

Cllr John Glover, Chair, Melksham Without Parish Council

Cllr David Pafford, Chair, JMNP2 Steering Group

[www.melkshamneighbourhoodplan.org](http://www.melkshamneighbourhoodplan.org)

## Fiona Dey

---

**From:** Teresa Strange  
**Sent:** 03 March 2026 14:33  
**To:** Rose, Martin  
**Cc:** Fiona Dey  
**Subject:** RE: Semington Road Bus stop

Thanks Martin

I will put back on the agenda, we are having this Sustrans holistic review of the road, perhaps we add it to the list of things they look at?

All the best, 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)

**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.

Want to keep in touch?

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

On X: [@melkshamwithout](#)

On Instagram: [melkshamwithoutpc](#)

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**From:** Rose, Martin <[martin.rose@wiltshire.gov.uk](mailto:martin.rose@wiltshire.gov.uk)>  
**Sent:** 19 February 2026 13:04  
**To:** Teresa Strange <[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk)>  
**Subject:** RE: Semington Road Bus stop

Hi Teresa,

I've had some feedback from the Townsend Farm developer, through my colleague in DC, Amanda Hall re. our proposal for a bus stop south of the mobile home park.

To be honest the comments were to be expected as we always knew there wasn't a perfect solution, given the proximity of the Roundabout and traffic calming island. In short, they feel a bus stop in the location shown (see attached PDF) would cause safety issues for road users which they couldn't support and as such they will not agree to a change in the planning condition.

We will need to have a rethink.

Regards

Martin Rose IEng, FIHE, MCIHT, CMgr MCMi  
Principal Engineer – Traffic Engineering  
Highway Asset Management and Commissioning  
Wiltshire Council ,  
County Hall, Bythesea Road  
Trowbridge BA14 8JN

## Wiltshire Council

Email: [martin.rose@wiltshire.gov.uk](mailto:martin.rose@wiltshire.gov.uk)

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

Highways Fault? Report it here:

<http://www.wiltshire.gov.uk/mywiltshire-online-reporting>

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Trowbridge

BA14 8JN

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Visitor parking is at the front of the main building for 2 hours. Please input your car registration details on arrival. There are several pay and display car parks within a 5-minute walk of County Hall.

#### Travelling by Rail

Trowbridge railway station is, approximately, a 10-minute walk from County Hall.