

4th February 2025 Planning Agenda _____	3
AGENDA ITEM 01b - Gypsy Traveller Plan update _____	8
AGENDA ITEM 06a - Gompels Warehouse Design and Access Statement ____	9
AGENDA ITEM 06a - Core Policy 51 Landscape _____	42
AGENDA ITEM 06a - Local Plan Policy 61 Landscape _____	45
AGENDA ITEM 06a - NHP1 Landscape Policy 17 _____	48
AGENDA ITEM 06a - NHP2 Landscape Policy 18 _____	52
AGENDA ITEM 06a - Core Strategy Policy 24 Additional Employment Land _	55
AGENDA ITEM 06a - Local Plan Policy 64 Additional Employment Land ____	63
AGENDA ITEM 06a - Should Ec Dev been a consultee _____	68
AGENDA ITEM 06f - h Hedgerow removal work for Balfour Beatty _____	70
AGENDA ITEM 06i - TOP decision land off Beanacre Road _____	73
AGENDA ITEM 07a - MWPC previous comments _____	75
AGENDA ITEM 08a - PROPOSED COMMUNITY CENTRE_ PL_2024_07- 907 Snarlton Farm and s106 discussions _____	76
AGENDA ITEM 08a - Snarlton Farm - Applicant's Highway Response - Dec24 _____	79
AGENDA ITEM 08a - Snarlton Farm - Highways Comment 29 Jan 2025 ____	83
AGENDA ITEM 08b Woodrow application - new document - summary only _	85
AGENDA ITEM 08c - Drainage Response holding objection New Road Farm _____	90
AGENDA ITEM 08c - EA objection New Road Farm _____	93
AGENDA ITEM 08c - New report - Energy - for New Road Farm application _	95
AGENDA ITEM 08c Community Facilities and s106 request for New Road Farm PL_2024_10345 _____	112
AGENDA ITEM 08c Highways objections New Road Farm _____	116
AGENDA ITEM 08d - Neighbour comments - Middle Farm _____	122
AGENDA ITEM 08e - Drainage objection Chapel Lane _____	126
AGENDA ITEM 09 - CAWS Initial Findings - Lime Down _____	128
AGENDA ITEM 09 - Meeting date for Lime Down _____	132

AGENDA ITEM 09 - Project update_ launch of statutory consultation on proposals for Lime Down Solar Park _____	140
AGENDA ITEM 10a CEMP v7 for 20_07334_OUT Land West of Semington Road x _____	152
AGENDA ITEM 10b - No access signage to Buckley Gardens, Semington Road, Melksham _____	155
AGENDA ITEM 10b _ ENF_2023_00877 Buckley Gardens_Redacted _____	157
AGENDA ITEM 10c E_ New enforcement complaint - Melksham East Storage Ltd & Melksham West Storage Ltd _____	163
AGENDA ITEM 11a - Neighbourhood Plan cost tally- 2024-25 _____	170
AGENDA ITEM 11a) ii) Examination Arrangements _____	172
AGENDA ITEM 11b) i) Response to query raised on Submission of the Wiltshire Local Plan Review _____	174
AGENDA ITEM 11b)ii) Response to query on Lack of Employment Land in the Melksham area _____	181
AGENDA ITEM 11c - SLCC & NALC review of NPPF changes _____	187
AGENDA ITEM 12a) i) Officer Report on PL202311188 - Land at Blackmore Farm _____	190



MELKSHAM WITHOUT PARISH COUNCIL

Clerk: Mrs Teresa Strange

First Floor
Melksham Community Campus,
Market Place, Melksham,
Wiltshire, SN12 6ES
Tel: 01225 705700

Email: clerk@melkshamwithout-pc.gov.uk
Web: www.melkshamwithout-pc.gov.uk

Thursday 30th January 2025

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

You are summoned to attend the Planning Committee Meeting which will be held on **Tuesday 4th February 2025 at 7.00pm** at **Bowerhill Village Hall, Halifax Road, Bowerhill, Melksham SN12 6SN** (Please note a change to the usual venue and day of meeting) 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. This meeting is being held at a different venue without the council's camera and microphone equipment, we will endeavour to provide a zoom link and recording for YouTube but please be aware that we cannot guarantee either remote access or good quality images and sound.

<https://us02web.zoom.us/j/2791815985?pwd=Y2x5T25DRlVWVU54UW1YWWE4NkNrZz09&omn=81544140332>

Or go to 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. 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**
 - a) To note receipt of planning application for **68 dwellings** and formation of new access and associated works **Land north of Berryfield Lane**, SN12 6DT [PL/2025/00626](#) and to consider holding the next Planning Committee meeting when this is considered at a bigger venue
2. **To receive Apologies and approval of reasons given**
3. **Declarations of Interest**
 - a) To receive Declarations of Interest.
 - b) To consider for approval any Dispensation Requests received by the Clerk and not previously considered.
 - c) To note standing Dispensations relating to planning applications.
4. **To consider holding items in Closed Session due to confidential nature**

Under the Public Bodies (Admission to Meetings) Act 1960, the public and representatives of the press and broadcast media be excluded from the meeting during consideration of agenda items where publicity would be prejudicial to the public interest because of the confidential nature of the business to be transacted.
5. **Public Participation**
6. **To consider the following new Planning Applications:**
 - a) [PL/2024/11426](#): **Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wiltshire**: Construction of warehouse with office space, parking and associated landscaping including site access. Applicant: Gompels Healthcare Ltd. **(Comments by 31/01/2025 - Note extension arranged)**.
 - b) [PL/2024/11665](#): **Land at Semington Road, Melksham, SN12 6DP**: (Rear of Townsend Farm Phase 2) Application for reserved matters pursuant to application ref: PL/2022/08155 for appearance, scale, layout and landscaping. Applicant: Living Space Housing. **(Comments by 14/02/2025)**
 - c) [PL/2025/00086](#): **14 Wellington Drive, Bowerhill, Melksham, SN12 6QW**: First floor extension above existing garage and replacement pitched roof porch canopy. Applicant: Mr & Mrs Brand. **(Comments by 07/02/2025)**
 - d) [PL/2025/00348](#): **289, Sandridge Common, Melksham, SN12 7QS**: Proposed Replacement Rear Single Storey Extension. Applicant: Mr Christopher John. **(Comments by 18/02/2025)**
 - e) [PL/2025/00390](#): **Hedgerow located on each side of existing gate at Bath Road, Melksham, Wiltshire, SN12 8EG**: Section of temporary hedgerow removal is required 1m either side of an existing gate access, therefore 2m total, to facilitate a sewer replacement scheme being undertaken by Wessex Water. The temporary removal is

required to facilitate access for construction machinery to the working area, within the neighbouring fields. Upon completion of the scheme, the hedgerow will be replanted following STD836 standards; a copy of this has been submitted with the hedgerow removal application. Applicant: Wessex Water **(Comments by 18/02/2025)**

- f) [PL/2025/00876](#): **Removal of 4m of hedgerow off A3102, Sandridge Common, Melksham, SN12 7GT**: Partial removal of hedgerow required for widening tower access Applicant: Balfour Beatty **(Comments by 19/02/2025)**
- g) [PL/2025/00936](#): **Removal of 6m of hedgerow Land east of 207 Woodrow Road, Melksham, SN12 7RD** Partial hedgerow removal required to install a 16ft gate Applicant: Balfour Beatty **(Comments by 20/02/25)**
- h) [PL/2025/00873](#): **Removal of 40m of hedgerow Land off A350 Beanacre, Melksham, SN12 7PY** Partial removal of hedgewrow required for tower access and culvert installation for EPZ location Applicant: Balfour Beatty **(Comments: 19/02/25)**
- i) **PL/2025/00624**: To note decision made on TPO (Tree Preservation Order) To fell T1 (storm damaged beech) of TPO 2024/00015 Land off Beanacre Road Melksham, SN12 7PU – To allow the removal of any protected tree, which is dead or imminently dangerous, without the need to make a formal Tree Work Application.

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/2024/05921](#): **Land to the north west and south of West Hill Road, Melksham, SN12 8RB** Change of use of land relating to one field north of West Hill Road and one field South of West Hill Road, from agricultural to equestrian, permission for existing stables and horse box and provision of barn for the storage of equestrian equipment. Applicant: Mrs J Almond **(Comments by 18/02/2025)** **To consider amended plans and change to proposal description**

8. Current planning applications: Standing item for issues/queries arising during period of applications awaiting decision.

- a) **Land south of Snarlton Farm, Snarlton Lane, Melksham, SN12 7QP (Planning Application [PL/2024/07097](#))** Erection of up to 300 dwellings; land for community use or building, open space and dedicated play space and service infrastructure and associated works. **To note updated request for community facility funding and request for s106 discussions to be held with the parish council.**
- a) [PL/2024/10674](#): **Land off Woodrow Road, Woodrow Road, Melksham, SN12 7AY** Outline application with all matters reserved except for access for the development of up to 70 dwellings, open space, ecological enhancements, play space, associated infrastructure (including drainage structures and works to the public highway), access, parking, servicing and landscaping. Applicant: Waddeton Park Ltd **(Comments by: 17/01/2025)**

- b) **PL/2024/10345: 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 correspondence received and consider any response if received**
 - b) **Land off Corsham Road, Whitley, Melksham (Planning application PL/2024/09725)** 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 update on request for conditions by parish council**
 - c) **52e Chapel Lane, Beanacre (Planning Application PL/2023/05883)** Erection of three dwellings, with access, parking and associated works including landscaping. **To note latest Drainage team comments.**
9. To note update **from Lime Down Solar** project and its connection to the national grid at Melksham (Beanacre) substation and the commencement of the latest round of public consultation commencing Weds 29th January <https://www.limedownsolar.co.uk/>
10. **Planning Enforcement:** To note any new planning enforcement queries raised and updates on previous enforcement queries.
- a) **Land West of Semington Road (Rear of Townsend Farm Phase 1)** (PL/2023/00808) – CEMP v7 now approved (Construction & Environmental Management Plan)
 - b) **Land East of Semington Road (Buckley Gardens)** – complaints of work starting on site before permitted hours and request for signage for Shails Lane due to misdirected deliveries to new occupants
 - c) **Westlands Lane** – lorries using weight restricted bridge – correspondence from statutory bodies
11. **Planning Policy:**
- a) **Joint Melksham Neighbourhood Plan:**
 - i) To approve response to the Examiner, as a qualifying body, agreed by the Melksham Neighbourhood Plan Steering group on Wednesday 29th January to comments raised during the Regulation 16 consultation, which closed on 22nd January .
 - ii) To note Examination commenced on Monday 27th January, and information received from the Examiner related to the programme of Examination.

b) Wiltshire Council Local Plan:

To consider responses received following queries raised with Wiltshire Council on:

- i) how comments submitted to the Wiltshire Local Plan consultation were considered and whether there was any public documentation available detailing any changes to the plan as a result.
- ii) the lack of Employment Land allocated in the Melksham area compared to the anecdotal evidence of local need

c) NPPF (National Planning Policy Framework): To note the Society of Local Council Clerks (SLCC) and the National Association of Local Councils (NALC) review on the National Planning Policy Framework (NPPF) changes made in December 2024

12. S106 Agreements and Developer meetings: (*Standing Item*)

a) Updates on ongoing and new S106 Agreements

- i) **Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS**
[PL/2023/11188](#): Demolition of agricultural buildings and development of up to 500 dwellings, up to 5,000 square metres of employment, land for a primary school, land for mixed use hub, open space. Applicant: Tor & Co for Gleesons
 - **To note officer report for the Strategic Planning Committee held on Thurs 23rd January and verbal report from attendees**
 - **To note Decision made to approve the application pending negotiations and agreement of the s106 agreement**
 - **To consider feedback from meeting with Gleesons 28th January and with Gleesons & Wiltshire Council on 29th January re s106 negotiations and approve way forward**
- ii) **Pathfinder Place:**
 - To note any update on outstanding issues and consider way forward.
 - To note update regarding transfer of Play Area
- iii) **Buckley Gardens, Semington Road (PL/2022/02749: 144 dwellings)**
 - To note any updates and consider a way forward.
- iv) **Land South of Western Way for 210 dwellings and 70 bed care home (PL/2022/08504)** To note any updates and consider a way forward.
- v) **To note any S106 decisions made under delegated powers**

b) Contact with developers:

Copy to all Councillors

27th January 2025

Mrs Teresa Strange
Melksham Without Parish Council
Melksham Community Campus, Market Place
Melksham
SN12 6ES

Strategic Planning
Planning Directorate
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Sir / Madam

Gypsies and Travellers Development Plan Document Update

Thank you for taking part in our recent Gypsies and Travellers Development Plan Document consultation.

The next stage of the process will see the draft Plan considered by Wiltshire Council's Cabinet on 4 February.

If the Plan is approved by Cabinet, it will then be considered by Full Council on 25 February. Subject to approval, it will be submitted to the Secretary of State shortly after for examination by an Independent Inspector. All representations received through the consultation will be passed onto the Inspector for their consideration.

You are welcome to attend both the Cabinet and Full Council meetings, and you can also speak at them should you wish to do so.

To find out more about attending these council meetings, including locations, times and agendas and how to participate please visit <https://www.wiltshire.gov.uk/council-democracy>.

Yours faithfully



Georgina Clampitt-dix
Head of Strategic Planning
Wiltshire Council

Gompels Healthcare Ltd

Construction of warehouse with office space, parking and associated landscaping

04 December 2024

Planning, Design and Access Statement



Overview

Gompels Healthcare Ltd is a family run wholesaler primarily supplying Care Homes and Nurseries with everyday consumables, medical and early years products. We have been based in Melksham for over 50 years, starting from a small pharmacy on the High Street and growing to occupy over 120,000 sqft of space on the Bowerhill Industrial Estate, turning over £150 million and employing over 130 people in the local area.

We are bursting at the seams! Covid accelerated our growth and our team is doing fantastic work building our customer base so we desperately need more space so we don't let our customers down.

This statement has been prepared in support of the application for Outline Planning Permission for the change of use from Agricultural to B8 Industrial and the Construction of a warehouse with office space, parking, associated landscaping and access. The application follows extensive pre application consultations with Wiltshire Council and the proposal has been designed to take into account comments and concerns raised throughout this process.

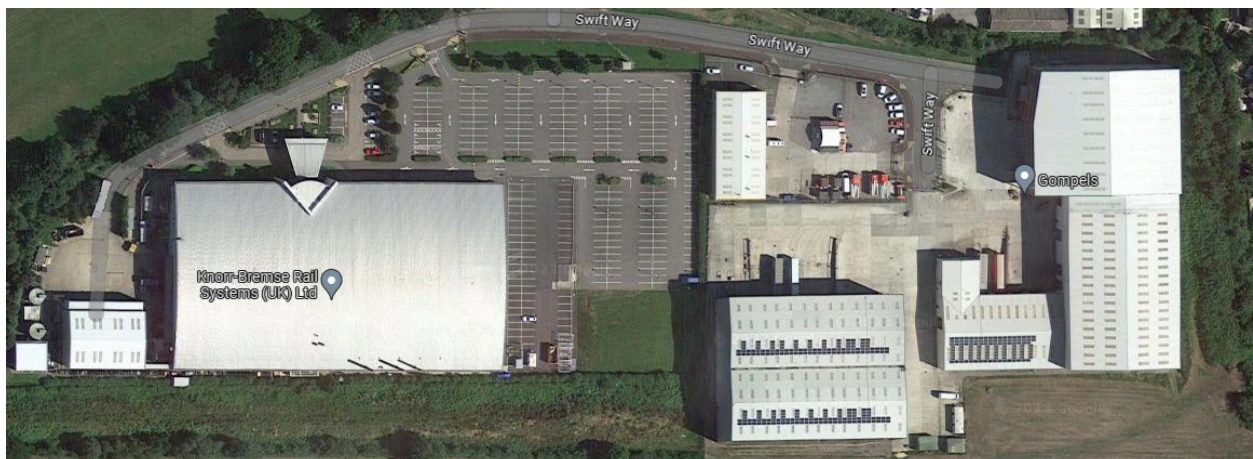
The proposals align seamlessly with Wiltshire Core Strategy Core Policy 34 for Additional Employment Land and are unequivocally supported by the NPPF (December 2024) which demands flexibility in the provision for storage and distribution operations at a variety of scales.

The Site

Existing Site

Gompels Healthcare Ltd currently occupy approximately 120,000sqf of space at Swift Way on the Bowerhill Industrial Estate. The current site has been built out over 3 phases, 2007, 2011, 2017 and 2024, but is now at capacity and cannot accommodate the additional space now required. Owing to the site being built in 4 phases, the site is disjointed with 3 buildings separated by yard space, this is far from ideal for efficient distribution with stock having to travel across the yard for picking and shipping.

The existing Gompels site has been earmarked as the expansion space required by Knorr Bremse who currently occupy cramped production, warehousing and office space adjacent to the Swift Way site.



Aerial view of the existing Gompels site adjacent to Knorr Bremse- the 2024/5 extension is not shown

Application Site

The proposed site is located to the south of the A365 and to the west of Turnpike Garage and Carnation Lane. It provides the space Gompels require for storage and more efficient distribution, as well as the capacity to accommodate the long term growth of the business. With sufficient space available to accommodate the full business, it will free up the existing Gompels site on Swift Way. This will allow other local businesses in much need of expansion space the room to relocate and grow, allowing for the growth of businesses across the Industrial Estate.

The site is currently a largely flat arable field; it is bounded and intersected by mature hedgerows which will be retained and enhanced where possible. Lost hedgerows will be replaced elsewhere on the site and overall landscape planting will provide a Biodiversity Net Gain across the site. The site lies adjacent to the built form of Bowerhill and Bowerhill Lane, albeit outside of the settlement boundary. It is well located and sits in the wider backdrop of the Bowerhill Industrial Estate and within a close proximity to residential areas, thus enabling employees to access the site via sustainable transport methods.



Aerial view of the proposed site (twin brown, triangular fields South of the A365) Turnpike garage is to the East, Melksham to the West

Alternative Options

This site to the South of the A365 has been chosen following an extensive search over the last 5 years. The site is immediately available and deliverable within a short timescale. A number of other sites have been considered, locally and further afield, with this site being the only viable, deliverable option for the business when assessed against set criteria.

1. Within a childcare friendly, commutable distance of the existing Swift Way site. Important to ensure the retention of loyal and key staff members, many of whom have been with us for 10+ years
2. Large enough to accommodate current space requirements and future 5-10 year growth
3. Viable given site restrictions
4. Deliverable within a 2-3 year timescale
5. Good access links to main trunk roads

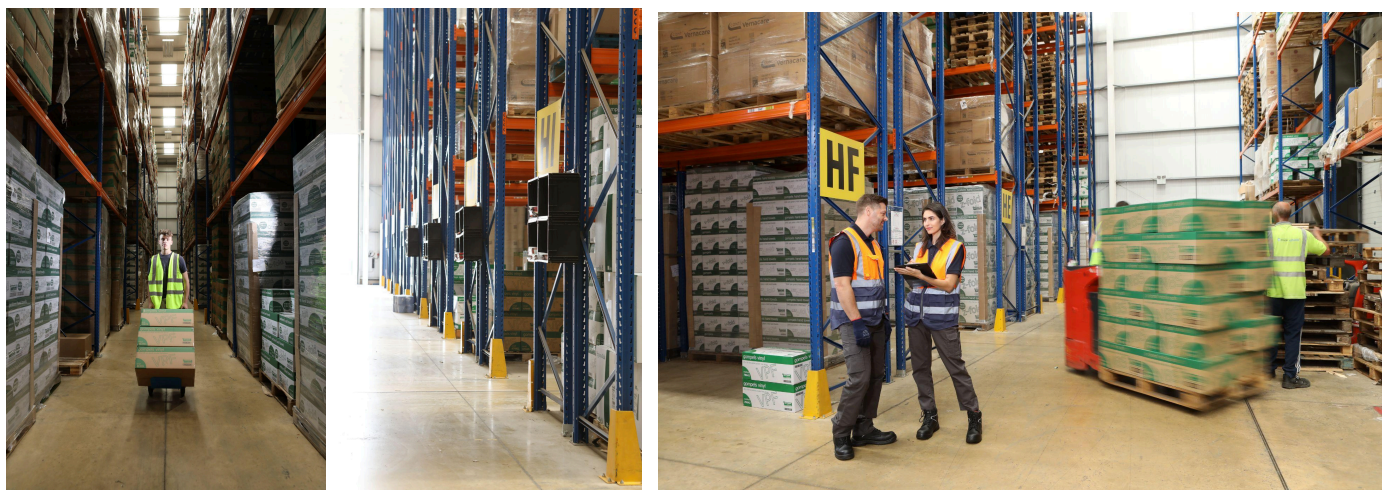
Site	Distance	Size	Viable	Deliverable	Road Access	Comments and further assessment
Land South of A365 - the proposed site for this planning application						Immediately available and deliverable. Within easy commutable distance for existing staff, large enough to accommodate current requirements with potential for future growth and with good road links for transport.
Swift Way Expansion						Not sufficient space for short term need or long term growth. Land to the South is unavailable as within an option agreement with a developer who is not willing to negotiate its release
Christie Miller Site						WC retained for own use after bidding on it 3 times
Other Melksham Greenfield sites						Viability and deliverability concerns / land unavailable as tied up in promotion agreements
South of Hampton						Land is not available. Constraints make viability

Park						borderline.
Trowbridge / Chippenham Industrial Sites						30% of staff commute on foot / bike - estimated none of these would commute and at least half of the others would have severe difficulties because of childcare commitments.
Coventry / Midlands						The best transport links. Estimated that 100% of staff would not commute

Following a number of conversations with the Wiltshire Council Economic development team regarding the shortage of available expansion space for all Melksham businesses, it is understood that the team have assessed no less than 14 sites in and around Melksham, and concur with our conclusion that there are no other available options for expansion for the larger businesses of the Bowerhill Industrial Estate.

Use

Gompels are a wholesale distribution business of medical, janitorial and early years supplies. The warehousing space is used for storage of stock and the picking, packing and shipping of orders. The office space is used for the associated admin functions of the business, consisting of a customer service and sales team, finance, procurement, marketing and IT personnel.



A clean, quiet business, Gompels do not pollute, attract pests, or generate noise

Gompels are a clean and quiet business. Stock consists of everything to care for the elderly and the very young. From medical gloves to poster paint, Incontinence pants to babies nappies. We do not pollute, attract pests or cause noise pollution. Quiet electric forklifts are used and nearly all deliveries are during the daytime. Noise produced at the proposed site will be less than at the existing site as everything will be located in one building, removing the need for stock to be transported outside between buildings.

Planning Policy

Wiltshire Core Strategy

The application site lies within the Melksham Community Area as defined by the Wiltshire Core Strategy 2015 - Core Policy 15. It lies outside of the Melksham settlement boundary as defined by the WCS and as reviewed in the Wiltshire Housing Site Allocation Plan. Therefore such a development can only be considered via an allocation or exception policy.



The proposed development site in relation to the Melksham and Bowerhill Settlement

Core Policy 34 of the Wiltshire Core Strategy is an exception policy for Additional Employment Land and applies to this application. CP34 supports development outside of Market Towns where they are considered essential to the wider strategic interest of the economic development of Wiltshire.

“Outside the Principle Settlements, Market Towns and Local Service Centres, developments will be supported that:

i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or

- ☒ The proposed site is located adjacent to the settlement of Melksham and seeks to retain and expand Gompels Healthcare Ltd who are currently situated within the Melksham settlement

iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.

- ☒ The proposed development will retain Gompels within Wiltshire and allow for their expansion. In addition it will free up the existing Gompels site on Swift Way allowing for the relocation and expansion of other large Bowerhill based employers. This will safeguard an estimated 580 jobs across the Bowerhill based employers and their expansion is expected to create an additional 275 jobs

Where they:

a. meet sustainable development objectives as set out in the policies of this Core Strategy and

- ☒ The warehouse development has been specified against the BREEAM criteria and is expected to achieve at least an Excellent rating as well as meeting Biodiversity Net Gain requirements. The retention of the business in Melksham supports the economic development of the town and growth of jobs within Melksham, reducing outcommuting and in turn pressure on the road networks and pollution issues. The site layout also safeguards the route of any future Melksham Bypass which is a priority to Wiltshire Council.

b. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and

- ☒ The site is located adjacent to the existing development of the Bowerhill and within the wider backdrop of the Bowerhill Industrial Estate and other commercial premises along the A365. The site is currently agricultural land, located over 150m from the main residential development on Bowerhill and a similar distance from the properties located on Carnation Lane. It is anticipated that landscape screening will significantly enhance the setting of the properties on Carnation Lane and the development will not detract from residential amenity. Landscape assessments indicate that its 15 year impact is “not significant” on the landscape.

c. are supported by evidence that they are required to benefit the local economic and social needs and

- ☒ The proposed development will retain Gompels, and a number of other local businesses within Melksham and allow for their expansion. This will safeguard 580 jobs and their expansion is expected to create an additional 275 jobs.

d. would not undermine the delivery of strategic employment allocations and

- ☒ The development of this site will not undermine the delivery of strategic employment sites. Existing strategic employment sites are not in the right location, or of the right size or scale to accommodate this development.

e. are supported by adequate infrastructure.”

- ☒ The site is adjacent to the A355 leading directly to the A350 and in turn the M4 providing good road connectivity. Infrastructure provision, including drainage solutions will be provided as part of the development.

Wiltshire Local Plan Review

The Wiltshire Local Plan Review was submitted to the Planning Inspectorate for examination in November 2024.

The Draft Local Plan identifies Melksham as having an important strategic employment role that has been affected by considerable recent job losses through the closure of Cooper Tire. It acknowledges that the strategic employment sites have been built out and that there is significant demand for expansion space. It seeks to allocate additional employment land, however this is not of the scale required for this development. Policy 18 allocates approximately 5 hectares of employment land on Land East of Melksham, not only is the size grossly inadequate for the needs of the business, the area is also intersected by a watercourse, further reducing its developable area and making the site totally unsuitable for this type building.

“Businesses and agents report significant demand for expansion space in the area against a shortage of available sites”

SD/09 Wiltshire Local Plan - Planning for Melksham September 2023

Policy 64 of the Local Plan Review continues the support for additional employment land adjacent to Market Towns such as Melksham, as set out in WCS CP34.

The Joint Melksham Neighbourhood Plan

The Joint Melksham Neighbourhood Plan (Made July 2021) acknowledges the need for additional employment land to retain jobs, stating “Proposals should seek to generate the same number, or more, permanent full time equivalent jobs”. The Joint Melksham Neighbourhood Plan 2, submitted to Wiltshire Council in November 2024 continues support for the retention and generation of jobs from the existing employers within Melksham. **It acknowledges the current level of outcommuting and considers the expansion of employment opportunities within the plan area as desirable to reduce outcommuting and support sustainable travel movements.**

National Planning Policy Framework December 2024

The National Planning Policy Framework was revised in response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation on 12 December 2024 and sets out the government’s planning policies for England and how these are expected to be applied.

“Building a Strong, Competitive Economy”

The NPPF states that:

“86. Planning policies should:

*b) set criteria, and identify strategic sites, for local and inward investment to match the strategy and to **meet anticipated needs over the plan period**;*

- ☒ This warehouse proposal **addresses a critical gap** in strategic planning for employment land in Melksham.
- ☒ The Wiltshire Core Strategy and Local Plan Review have failed to identify strategic employment sites at the scale required to meet local needs. Additionally, the Wiltshire Employment Land Review Update (Sept 2023) grossly underestimates the immediate and long term demand for commercial land in Melksham leading to a significant shortfall of allocated employment land.
- ☒ This development directly addresses this shortfall by **providing essential commercial space** to meet the pressing needs of Gompels, and in turn freeing up much needed additional space for other local businesses **fostering local economic growth and resilience**.

*c) pay particular regard to **facilitating development** to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, **freight and logistics**;*

- ☑ The proposed warehouse development facilitates the needs of a modern economy by **supporting logistics and freight operations**, critical components of contemporary economic infrastructure.
- ☑ In addition, the Gompels business supplies **essential medical supplies to laboratories** and healthcare facilities across the country and is at the **forefront of research and development** into cost effective **logistics robotics and AI**.
- ☑ The warehouse development and the business itself **align seamlessly with the NPPF's emphasis on sectors such as freight and logistics**, laboratories and digital infrastructure contributing to a resilient supply chain.

*e) be flexible enough to **accommodate needs not anticipated in the plan**, and allow for new and flexible working practices and spaces to **enable a rapid response to changes** in economic circumstances.”*

- ☑ The application seeks the **flexibilities demanded in the NPPF** on allocated employment land, and aligns with the flexibilities afforded in Core Policy 34 to address the critical requirements not planned for in the Wiltshire Core Strategy or Local Plan Review.
- ☑ By providing sufficient space to relocate the entire Gompels business, the vacated site will also provide the **flexible additional space** for a number of other local businesses.

And

*“87. Planning policies and decisions should recognise and address the **specific locational requirements** of different sectors. This includes making provision for:*

*b) **storage and distribution operations at a variety of scales** and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to **support the supply chain**, transport innovation and decarbonisation; and*

- ☑ The Wiltshire Core Strategy and Local Plan Review makes no provision for much needed storage and distribution space within Melksham. The commercial land allocated in the Local Plan Review is on a scale, and distributed in a way, only suitable for small scale businesses shipping smaller goods. It is also not in an easily accessible location to local trunk roads.
- ☑ The proposed site, and the current Gompels site would **address the commercial needs** of a number of businesses, and their **locations are easily accessible** to local trunk roads. This supports **efficient transport** and reduces pressure on the local road networks.

*c) the expansion or modernisation of other industries of local, regional or national importance to **support economic growth and resilience**.”*

-
- ☑ By enabling the **modernisation and expansion of storage and distribution businesses**, the development contributes to **economic growth and resilience** at local, regional, and national levels. This aligns with the NPPF's focus on **supporting industries vital to the economy**.

The Economic Case

The Gompels family has been trading in Melksham since 1967. The businesses now have a turnover of £160m and employ 155 people in Melksham as well as another 25 at a remote site in Redditch. Gompels Healthcare Ltd is the wholesale arm which supplies Care Homes and Children's nurseries with medical supplies, PPE and infection control products. It employs 80 people at its 100,000 Sq ft warehouse on the Bowerhill Industrial Estate in Melksham.

One of the reasons Gompels Healthcare Ltd has grown successfully is that it has always planned for the long term and invested heavily for growth. The existing site of 5 acres was purchased with expansion in mind and was developed in stages over 10 years as the business grew.

Five years ago, a search for a new site was launched because the existing facilities were beginning to be too small. Post Covid, the business is substantially larger and in urgent need of a single site logistics hub that will enable growth opportunities to be realised for the next 5 to 10 years.

Many potential sites have been pursued in the Melksham area over the five-year period and unfortunately none of them have come to fruition and there are no other alternatives available. The proposed site near Turnpike garage is available and has been owned by the Gompels Family since 1983. It provides an ideal home for a new single site logistics hub.

The existing site accommodates 100,000 Sq Ft of warehouse and 10,000 Sq Ft of offices. The business needs more warehouse capacity urgently and is ready to invest in a facility that will wholly replace the existing site. The new site would provide over 200,000 sq ft. In addition, the existing site would then become available for Knorr Bremse Rail Systems, who are also seeking space for expansion. The expansion of Knorr Bremse onto the existing Gompels site would see them adding at least an additional 125 jobs to the local area.

The following business case provides some useful history, identifies key challenges to finding enough space and outlines the advantages of a Gompels relocation which will allow multiple other local businesses to substantially enhance the local job market at a time when Melksham is building more and more houses. In total, the proposal protects 575 jobs and creates a further 275 jobs.

History

The Gompels family has been in Melksham for 58 years. From a busy pharmacy in the centre of the town, David and Mary Gompels served the community at large. The third generation of Gompels are now running the business with the same pharmacy in the middle of Melksham and a wholesaling

business (Gompels HealthCare Ltd) on the Bowerhill Industrial Estate. The wholesale side provides medical and hygiene products to around 15,000 care homes and children's nurseries across the UK as well as other businesses in the local area, including the Wiltshire Air Ambulance, Wiltshire Council, Schools, Hospitals including the RUH - Bath and Doctors surgeries.

As a family business, based in Melksham, we are inextricably linked to the local employment scene and economy. Today we employ a number of staff whose parents and even grandparents have worked for us in the past.



Gompels Pharmacy located on the High Street in the 1960's, and still there today, in addition to the distribution business on Bowerhill today

The Market Challenge

Gompels Healthcare competes in two fiercely competitive segments at the pan UK level.

In the Care sector, we come head-to-head with Bunzl, a £12 billion turnover European super slayer, and a number of other companies that are located in development zones with the benefit of vast amounts of brownfield sites and government funding.

The Nursery sector is no less fierce than the Care sector. Our two major competitors are Venture capital backed and located where land, buildings and wages are cheaper. (See addendum for a sorely missed opportunity!)

Investment for Growth and Productivity

For a Wiltshire based family business to be able to compete and show healthy growth in these two segments of the market is no mean feat. It is achieved by:

- Recruiting and training an excellent team to a level that far exceeds our competitors
- Investing heavily in IT systems and equipment that enables great people to work really efficiently
- Reinvesting and planning ahead so that there is the space and resources to thrive and grow
- Operating from a highly efficient single site with optimised logistics

This is why in 2006, the bold decision was taken to purchase 5 acres of industrial land on the Hampton Park East site (Bowerhill Ind Est.). Over the following 10 years, this site has housed a series of 4

buildings/extensions which have enabled timely expansion of the business in response to steady growth.

Owing to the bulky nature of the products supplied, (Infection control wipes, toilet rolls, nappies, etc.), moving stock between two sites spoils any competitive advantage. Quite simply, split sites are not feasible for the business, as orders are picked within minutes and hours of being placed by the customer and there is no time or margin to shuffle products around and amalgamate orders. In the Healthcare sector, customers rely on same day dispatch, so that their essential healthcare products are delivered on a next day basis.

Skills and People

“Warehousing” jobs are often considered to be low skilled, low paid employment. We would counter that by the bare facts of our employees - 60% of them are skilled office roles, dedicated software and IT in-house specialists including robotics and AI engineers, a skilled marketing/graphics team, finance personnel, effective sales and customer service teams and key accounting functions. These are exactly the type of jobs that Wiltshire has tried to encourage.



Jobs at Gompels span the whole range of salaries and skills mix. There are as many office jobs created in the expansion as there are warehouse jobs, and work in the warehouse is far from just unskilled manual labour. The robots, the forklifts, IT systems and the team, need plenty of skilled people to make sure that the customers get the products that they want at the right time.

The wages paid by Gompels are in the top 25% for the sector. Everyone is paid well above the living wage and more than Amazon

pays for comparable work in Bristol. This well above average pay policy is so that we can attract and retain the best talent in the area, combined with training programs that help new recruits to really grow and contribute to the business.

A breakdown of existing roles and employment growth is summarised below for Gompels HealthCare:

Role	Current numbers	With new development
Directors and management team	6	12
Procurement and accounting	14	25
Sales, Marketing, Customer services	24	48
Programmers and IT	4	10
Regulatory (H&S, Compliance)	2	7
Warehouse – pickers, supervisors	18	38
Forklift Drivers and other drivers	10	22
Maintenance and cleaning	2	6
New roles	-	12
Total	80	180

Over 85% of our staff are residents of Melksham or West Wiltshire. On some days, over 30% of our staff either walk or cycle to work.

Room to grow

It is the lack of physical space that has been a major challenge for the last 4 years. Covid accelerated the growth of the business to such an extent that the current site at Swift Way is operating beyond its capacity and constraining the ability of the business to grow. Customers are seeking new products, buffer stocks and greater volumes, but the warehousing space is just not there to turn these opportunities into jobs. The recently added extension has added 20,000 square feet which is already accounted for in the growth that has occurred prior to this application.

Looking to the future

The business has its skilled staff local to Melksham and considers it essential to remain in Melksham and retain that wonderful team. Local growth suits the business and the local community. Whilst Melksham is not normally associated with logistics, it has some advantages. A significant portion of our freight comes in through Southampton port and moves North or East to the conurbations. Generally there is a deficit of freight moving from Wiltshire to these areas, so we gain some cost advantages and help the environment by eliminating empty transport legs.

The business currently uses the following physical space:

Space	Current Site	With new development
Storage sq ft	110,000	200,000
Storage pallet spaces	12,000	25,000
Offices and ancillary Sq ft	10,000	20,000
Total Sq ft	120,000	220,000*

*figures approx depending on final plans

For practical purposes the new site is 2 times larger than the existing site and gives the business the space that it needs to overcome the current space shortfall and room for future growth.

Alternative sites – Melksham

Just over 5 years ago, the search began for a new site for the business when it could be seen that space was getting short at the current premises.

- 5 Sites were presented North of Melksham, all of which were rejected by the Council
- Much of the “obvious” industrial land is blocked by promotion agreements for houses, this includes the 5 hectares allocated in the Local Plan Review at East Melksham, but is also far too small.

- Land behind Christie Miller has many complications and ultimately was retained by Wiltshire Council.
- Extending the current site with offers made for adjoining land. Again, this has come to nothing, partly because of the uncertainty created by the bypass and the desire on behalf of the landowner and promoter to have houses rather than industrial buildings.
- At least 2 sites adjacent to the existing Industrial areas have now been declared unavailable by the landowner.

The only remaining option is the application site to the West side of Melksham just before Turnpike Garage. It is adjacent to the settlement and built form of Melksham and is increasingly adjacent to other industrial style buildings (Melksham Oak, Turnpike garage, Little Bowerhill Farm and Redstock Industrial units).

Alternative Sites – UK

- Relocating to Chippenham or another local town – If we ask staff to commute to Chippenham, then many of them will sadly decide that an extra 1-2 hours per day in the car is not only a huge expense, but also an extra hour or more of childcare and time away from their family. It just does not add up for them and as much as we would like to cover the cost, that would put the business at a competitive disadvantage versus our competitors.
- Relocating to a development zone – Being able to benefit from regional development subsidies and help a poor area of the UK develop remains an option if it gives the space that we so badly now need at a preferential price. It is estimated that all of the employees would end up opting to remain in Melksham and seek local employment.
- Relocating to a port – As around 50% of our products come in by sea, a port (particularly the newly announced Free Ports) presents some advantages.
- Relocating to the Coventry/Corby area in the centre of the UK and near the national carrier distribution hubs. The scope for finding ready made warehouses in this area is huge and is part of what makes it attractive to distribution businesses. It would probably be our preferred option if we cannot secure the space we need in Melksham. There is a skilled local workforce that is familiar with our type of business and lots of scope to save on freight costs which is a huge proportion of our total outgoings. This is the most likely alternative option.

Staying Local

The team, it is all about the team

Our workforce is a huge part of what makes the Gompels Family businesses special and able to compete with larger players in the market. Our dedicated teams have been instrumental in building and growing the business over the past decade and their expertise and deep understanding of our operations are critical to sustaining our growth and ensuring our ongoing success.

Our roots in the local community run deep and we are frequently employing the grandchildren of people who worked for us in the early years. This builds a unique and vibrant workforce with a huge level of knowledge and commitment.

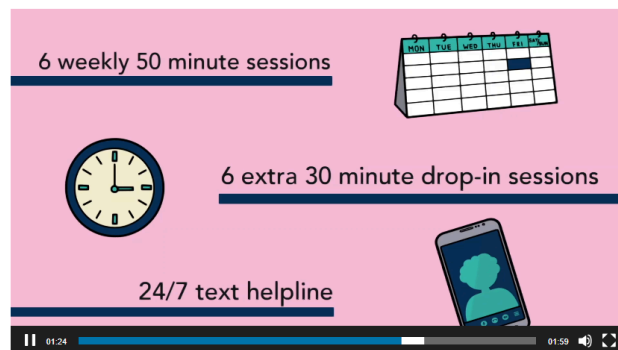
Community

Over the last few years, we have been pleased to be able to support local initiatives with enabling finance and support. These have included:

- £13,000 for the Melksham skate park
- Providing meeting facilities for Melksham Without and Melksham Town Council's
- Funds for Bowerhill Residents Action Group (BRAG) to enable footpaths and community enhancement schemes
- Funds for Town and Parish Councils, local community groups and local charity events including the Dog show in aid of Wiltshire Air Ambulance and local football teams
- £250 per employee per year to match funding for local community initiatives and charitable activities



Mental health support



In addition:

- Over £2million has been donated to charitable causes in the last 7 years
- Switch 180 provides free mental health support to 1000's of young people in Wiltshire and across the UK (£250,000+ per year)
- Building Schools for Africa has built over 30 classrooms in Cameroon and helped 100's of internationally displaced people find a safe place to stay (£400,000)
- £5,000 of support has been provided to finance the homeless kitchen facilities and van that travels around Wiltshire and BANES
- Each year, 2 high level leaders are funded to attend the Windsor Leadership Course
- Mentoring services have been provided to the Help 2 Grow program in Wiltshire

Proudly sponsored by...



Supply Chain

It is estimated that the business relies on over 35 local businesses to provide essential support services and supplies. To name just a few in a range of sectors; Bristol Soap based in Atworth is a major supplier of infection control products, Broughton Transport provides pallet services to customers across the country whilst Protect Fire Equipment from Devizes services our equipment. Numerous trades and specialists (legal, accounting, technical) are employed to keep the business in good health.

The Economic Case

Wiltshire is experiencing record growth in housing stock, but as the local plan identifies, there is an urgent need to create local employment so that out-commuting and hence peak time traffic and pollution is minimised. This expansion presents a wonderful opportunity for stable long-term local

businesses to protect 575 jobs and create 275 sustainable direct jobs which are largely in line with SWLEP priority sectors. In addition, there will be a substantial number of additional indirect jobs created, particularly as a result of the additional high tech direct jobs created.

The existing site occupied by Gompels HealthCare Ltd will become vacant should the new site be approved. Knorr Bremse Rail Systems, a neighbouring business, has already surveyed the buildings and is in urgent need of local (preferably connected to the existing site) additional facilities for expansion. The current Gompels site is in an ideal location for them and there will still be space for another local business to occupy one of the other buildings. A letter from Knorr Bremse follows.

Jobs for Wiltshire	Currently	With new development	Total jobs
Gompels	80	100	180
Knorr Bremse on vacated Gompels site	500	125	625
A N Other business on vacated Gompels site (assumed jobs)	0	50	50
Total Direct Jobs	580	275	855

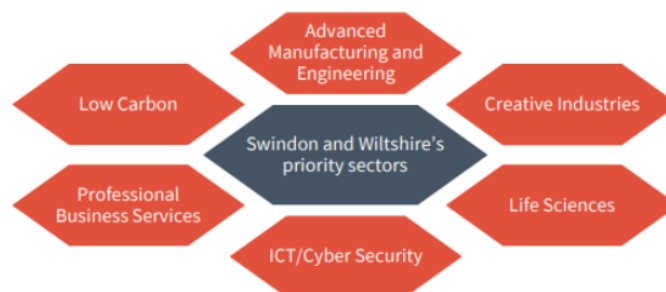
3000 Indirect Jobs are supported by the two companies

Using the UK Blue book 2020 Supply and Use tables from the Office of National Statistics, the number of indirect jobs supported by the two companies is 3000. Many of these will be based in Wiltshire.

Fulfilling policy objectives

Aligning with the Swindon and Wiltshire LEP key sectors

The proposed development aligns closely with the priority sectors of the Swindon and Wiltshire LEP.



Knorr Bremse typifies advanced manufacturing and engineering and is exactly the type of business that Wiltshire says it wants to support and attract. Gompels Healthcare Ltd supports the Life Sciences

sector with infection control and hygiene products. Gompels Healthcare is also making significant investments in the ICT sector as it is developing software, robotics and AI with a view to selling systems to help SME businesses become more efficient. Innovate UK is looking to assist with further development of this innovative software because it helps close the productivity gap.

A number of BioPharma businesses based on the Porton Down Science Park are supplied by Gompels, including Fluorogenics Ltd and across the UK, we supply companies like Bard, Fisher Scientific and Cambridge Life Sciences. It is vital that as the life sciences sector grows in Wiltshire there are the support services available.

A reduction in out-commuting

Reducing out-commuting is a key objective for Wiltshire and this development is able to assist with actually delivering on this policy. It creates local, long term jobs near to residential areas with a diversity of sectors and employees so that the area does not become dependent on one major employer.

Sustainable transport

The proposed site is close, but not too close to the major areas of housing in Melksham. That gives staff the realistic opportunity to walk, cycle and lift share to get to work. We are proud of our up to 35% of staff not coming to work by car and would aim to increase this with additional measures such as showers, flexible hours, part home working and general awareness exercises.

The site is adjacent to two bus stops that are well served and will enable us to draw more strongly from nearby towns like Devizes, as well as from the wider Melksham area. The sustainable transport links for the site are superb, with the A365 running alongside, as well as within close proximity to the canal which offers great walking and cycling opportunities.

Local jobs for local people

The Gompels Family would desperately like to retain and grow its very local team. The skills have been built up over decades and enable the business to be ultra efficient and competitive. In a survey of competitors accounts, the business has double the productivity per employee compared to others in our sector. Gompels and Knorr Bremse are beacons for Wiltshire and serve to seed the local area with expertise, services and jobs.

Additional funds for Wiltshire Council

The rates alone on the new building would be around £1m per year. A healthy proportion would come to the Wiltshire Council. If all the businesses in Bowerhill could have the expansion room that they require then there would be over £3m added to the rates payable in Wiltshire.

Facilitating future growth for Gompels Healthcare

The proposed site will provide for the next phase of growth and employment. Standing still is not a sustainable option.

The proposed logistics hub will of course create some environmental impact. The business believes these impacts can be managed, mitigated and in the planning balance judged to be acceptable. As

owner occupiers, we can achieve so much more compared to a developer from miles away who is purely interested in getting the building up and moving on to the next site.

Addendum

The 20,000 sq foot extension currently being built on the existing site is an expensive, too little, too late sticky plaster for the business. Since the new site search started 5 years ago, the business has doubled in turnover, whilst the space available has only increased by 20%.

There was an opportunity to bring the now very defunct Consortium back to Wiltshire following its disastrous move to Nottingham. Sadly, lack of space prevented this from happening. It was a once in a lifetime opportunity that we had to pass on. Major contracts have been lost due to a lack of storage space. In January 2024 a huge contract with a national nursery group was lost because we did not have the stock holding capacity to support their business needs.



The Knorr Bremse letter that follows is dated April 2022. Their search and that of 6 other growing companies on the Bowerhill Industrial estate continues today as there is no land for development in the Melksham area.

In November 2024 we contacted some local businesses to find out what their requirements were for land to support their growth plans:

Immediate Commercial land requirements for well known Melksham based businesses

Knorre Bremse - 6 acres +

Herman Miller - 4 acres

Broughton transport - 5 acres

Westbury packaging - 5 acres

Gompels - 15 acres



WESTBURY PACKAGING

Total 35 acres required immediately and generating up to 700 jobs

Boomerang - leisure 10-25 acres

This highlights the inadequacy of the Wiltshire Employment Land Review Update (Sept 2023) and provision of employment land in the Local Plan Review. This list is not exhaustive and does not include other large employers on the Industrial Estates such as Avon, G-Plan, Checkmate and Great Bear Distribution who we have been unable to contact.

Economic Conclusion

The proposed development aligns seamlessly with Wiltshire Council Core Policy 34, addressing the urgent need for additional employment land to support local economic growth and create sustainable jobs. By relocating to the new site, Gompels Healthcare Ltd will expand its capacity, while also enabling neighbouring businesses like Knorr Bremse to expand, safeguarding at least 580 existing jobs and creating 275 new roles. This collaborative approach not only enhances employment opportunities, but also reinforces Melksham's position as a hub for business and innovation.

The site's proximity to residential areas and sustainable transport links supports local employment and reduces the need for out-commuting, aligning with Wiltshire's sustainability objectives. The location allows employees to walk, cycle, or use public transport, which minimises traffic congestion and pollution.

Gompels Healthcare Ltd plays a pivotal role in key regional economic sectors, including life sciences, ICT, and logistics. The business has consistently demonstrated innovation, particularly in robotics and AI, to improve efficiency and productivity. This project will further enhance Wiltshire's reputation for supporting advanced manufacturing and technology-driven businesses, while also meeting the growing demands of the care and nursery sectors.

As a long-established family business with deep ties to the Melksham community, Gompels Healthcare Ltd embodies the principles of sustainable growth and social responsibility. Its operations are supported by a robust local supply chain involving over 35 businesses, creating a ripple effect of economic benefits throughout the area. The relocation will ensure the business continues to thrive, supporting not only its own workforce but also the wider community.

In conclusion, the proposed development directly addresses the objectives of Wiltshire Council Core Policy 34. It delivers much-needed employment land, supports sustainable local growth, and ensures long-term economic resilience for Melksham. This project represents a forward-thinking investment that will benefit the community and region for years to come.

25 April 2022

TO WHOM IT MAY CONCERN

Knorr-Bremse Rail Systems (UK) Ltd

Knorr-Bremse relocated to the Melksham site in 2005 and is one of the largest employers in Wiltshire. The company has enjoyed significant growth over recent years with numbers employed rising from 300 to over 500. The core business of the company is the sale of train braking systems. The following activities occur in the Melksham site:

- Original Equipment Manufacturer.
- Aftermarket overhaul and repair.
- Engineering including R&D.
- Centre for the UK Sales team.
- Centre for UK Administration.

A braking system assembled on the site is exported to China for train vehicles operating on the Chinese metro railway lines. An upgraded version of this product is to be assembled in Melksham, and this product is anticipated to be suitable for a global market. It is one of the KB Group's significant products.

The company has outgrown its current facility and for several years has been seeking local sites to accommodate its growth. Currently, facilities are occupied in other areas of the country, or warehousing space rented. However, this footprint is inefficient and costly. Additionally, KB is an acquisitive company and requires a local unit to accommodate entities which are expected to be acquired.

KB considers that a 60,000 square foot facility is needed to accommodate current and future requirements. This would result in 75 employees being required. Other expansion plans are likely to see at least a further 50 employees located in this facility.

Searching the local area has revealed no suitable premises are vacant, and no land available for a developer to build a unit. Unless a solution is identified shortly, KB will have to consider relocating all its operations to a single new build unit. Sites are being investigated.

KB has been made aware of the potential to lease part of the current Gompels Healthcare site. This is an ideal facility for a satellite facility and can be easily adapted for its needs. The efficiencies and cost savings envisaged from all operations running close together would be realized. However, this site is dependent upon Gompels relocating. It is understood that Gompels urgently need to relocate to an expanded facility. KB also needs to find a solution imminently. Therefore, KB is urging the council to progress Gompels plans promptly to enable their relocation, which will then enable KB to progress its solution. From KB's perspective, the timeline is becoming critical.

Westinghouse Way, Hampton Park East, Melksham, Wiltshire, SN12 6TL, UK.
Tel: +44 (0)1225 898 700. Fax: +44 (0)1225 898 705.
Firm of assessed capability ISO9001 and ISO14001.
Registered in England No. 3974921. VAT Registered No. GB752952412.



Knorr-Bremse Group

Layout & Appearance

The proposed design for the site and its associated extensive landscaping reflects a thoughtful approach to functionality, aesthetics, and community integration. The layout has been carefully planned to ensure operational efficiency while minimising the development's impact on the surrounding area, particularly nearby residential properties. The lorry yard, car parking and offices have been strategically positioned along the road frontage, away from residential boundaries, to reduce any potential noise and lighting disturbance, with the building itself providing a screen to any operational noise, in addition to screening properties from existing noise from the A365. This arrangement ensures a clear separation between the site's industrial activities and the quieter neighbouring areas.

The placement of the building within the site allows for the creation of large landscaped boundaries, incorporating extensive tree and hedgerow planting, hedgerow enhancement and soil bunds. These features serve to help maintain separation from the boundaries and visually soften the development. Upon vegetation maturity at year 15, the effects of the building on the landscape will have declined to a non-significant level. This approach reflects a commitment to maintaining a harmonious relationship with the neighbouring properties and the wider landscape.



The placement of the building within the site allows for the creation of large landscaped boundaries with extensive tree and hedgerow planting, increasing biodiversity and leading to a non significant effect on the landscape after maturity at year 15

The scale of the building has been dictated by the operational needs of a modern warehouse facility. The height is essential to accommodate the storage, logistics, and distribution activities of Gompels. At the same time, the height has been carefully considered in relation to the building's position within the area and surrounding landscape. It has been intentionally kept lower than many modern distribution buildings, ensuring the development maintains a less intrusive profile and blends more harmoniously with its environment. The overall size and layout of the development have been carefully considered to provide the necessary functionality while avoiding unnecessary bulk. This

balance between operational requirements and visual sensitivity demonstrates a commitment to thoughtful and context-aware design.

To further reduce the visual impact of the building, its appearance has been designed with sensitivity to the local context. A neutral colour palette—featuring soft greys, blues, or greens—is under consideration, with the final selection to be made following consultation with stakeholders. These colours have been chosen to harmonise with the natural surroundings, reduce glint and glare and ensure the building integrates visually into the immediate and wider landscape.



Overall, the design, scale, layout, and appearance of the development have been carefully tailored to meet the operational needs of the business while respecting and enhancing its context. This approach balances functionality with aesthetic and environmental considerations, ensuring the site is both efficient and visually sympathetic to its surroundings.

Landscaping

The proposed development involves the construction of a warehouse facility on land south of Bath Road, Melksham. A comprehensive Outline Landscape and Visual Appraisal (LVA) has been conducted to assess the potential impacts of the project on the local landscape and visual environment. The appraisal concludes that while there will be an initial impact, these effects will diminish over time with the implementation of robust mitigation measures.

The site, currently arable farmland, will transition to industrial use with the introduction of the proposed warehouse. Upon completion, this change will result in an impact on the local landscape character. However,



the development incorporates a range of landscape mitigation measures, including extensive tree planting and hedgerow enhancements. These measures, along with the building position, have been carefully optimised to soften the building's appearance, improve biodiversity, and integrate the development into the surrounding environment.

By Year 15, when the planting has matured, these interventions will reduce the landscape impact to a non-significant level.

From a visual perspective, the warehouse will initially be visible from nearby residential areas and public footpaths, particularly those to the north and south of the site. Elevated views from locations such as Seend will include the proposed building within a wider panorama that already features residential and industrial elements. Over time, the proposed tree planting around the site will screen much of the structure, significantly reducing its visibility. By Year 15, these visual effects are anticipated to diminish to a non-significant level.

Additionally, the proposed Melksham Eastern Bypass, if approved, will further alter the site's landscape and visual context. The bypass would introduce a substantial source of visual and auditory disturbance, thereby reducing the sensitivity of the surrounding landscape and visual receptors. Under these circumstances, the proposed development would integrate into the modified environment, resulting in no significant effects at any stage of the project.

A second, full Landscape and Visual Impact Assessment (LVIA), which includes a Zone of Theoretical Visibility (ZTV) analysis, is currently being prepared and will be submitted in January. Preliminary findings from this assessment, by a second independent landscape expert, align with the initial appraisal, reaffirming that with the implementation of landscape mitigation measures, the development's impacts on both the landscape and visual environment will be non-significant at Year 15.



The existing view towards the site from Seend Cleeve, dominated by Bodmans Industrial Buildings (left) glare from Melksham Oak (central) and Turnpike Garage (right)

In conclusion, while the proposed development is expected to have an initial impact, the implementation of a comprehensive suite of landscape mitigation measures will ensure that these effects diminish over time. By Year 15, the landscape and visual impacts are anticipated to be non-significant. The findings of the forthcoming LVIA, along with the potential influence of the Melksham Eastern Bypass, further support the conclusion that the development will harmonise effectively within its setting.

Flood Risk & Drainage

In accordance with Environment Agency Flood Map data, the site is located within Flood Zone 1, classified as land having less than a 1 in 1,000 year annual probability of fluvial flooding. The maps also indicate the site to be at low risk of surface water flooding. As the site is over 1 hectare in area a Flood Risk Assessment has been prepared in support of the outline planning application.

A full drainage strategy will be submitted as part of a later reserved matters application. This will set out the proposed approach to managing surface water and foul drainage, ensuring compliance with local planning policies and best practice guidelines. The strategy will detail additional measures to mitigate flood risk, maintain water quality, and manage run-off sustainably through attenuation basins, permeable surfaces, and controlled discharge rates.



Water Supply

As highlighted in Wessex Water's pre-application response, the site is currently intersected by 2 x 300mm diameter strategic trunk mains, and houses a 8" distribution main to the North West corner. It is anticipated that these mains will be redirected around the perimeter of the proposed building (costs borne by the developer), taking into account the 5m and 10m easements that are required. The indicative new route is shown on the plan.

Transport & Access

The proposed development on Bath Road, Melksham, incorporates a range of measures to ensure sustainable transport options and operational efficiency. The site has been designed to encourage walking and cycling, with dedicated pedestrian and cycle routes, secure cycle parking facilities, and staff amenities. These features aim to reduce dependency on private vehicles while promoting healthier and more sustainable travel habits.

Public transport accessibility is a key feature of the site. Located within 200 metres of bus stops served by frequent services connecting Melksham to neighbouring towns, the development ensures viable alternatives to car travel are readily available. These measures align with local and national objectives to reduce congestion and emissions.

In addition to promoting sustainable transport, the expanded site will enable significant operational efficiencies. The additional space will optimise logistics operations by allowing goods to be consolidated into fuller loads. This efficiency will directly contribute to a reduction in traffic and transport emissions, aligning with broader sustainability objectives.

A comprehensive Travel Plan has been prepared to support these initiatives. This includes the appointment of a Travel Plan Coordinator to manage ongoing measures, regular travel surveys to inform updates, and the provision of travel information packs for all staff. By fostering a shift towards active and sustainable travel while optimising operational processes, the development will minimise its environmental impact and contribute positively to the local community.

In response to pre-application advice and to address potential impacts on the local highway network, the proposed development has been carefully designed to ensure no significant adverse effects. A key improvement includes the introduction of a ghost right-hand turn lane on the Melksham to Devizes A365, Bath Road, which will facilitate safer and smoother access to the site, reducing the likelihood of congestion or conflicts between vehicles. Additional measures are being considered to enhance highway safety, such as relocating the 40mph and 60mph speed limit signage to better reflect the site's context and traffic conditions. This adjustment will help to calm traffic and improve the overall safety of the stretch of Bath Road serving the development.

A ghost right hand turn lane will ensure no adverse effects on the road network

To further enhance pedestrian safety and support sustainable travel, a new pedestrian crossing will be introduced, providing a safe route for those walking or cycling to the site. This crossing will be

strategically located to integrate with existing footway and cycleway networks, ensuring connectivity for staff and visitors accessing the site from nearby residential and industrial areas.

These measures, alongside the provision of on-site infrastructure for sustainable transport modes, will ensure that the development integrates seamlessly with the local highway network without causing significant disruption. By improving access, reducing vehicle speeds, and prioritising safety, the scheme will not only mitigate potential impacts, but also enhance the overall functionality and safety of Bath Road for all users.

Sustainability

The proposed development integrates a comprehensive sustainability strategy to address environmental, social, and economic objectives. A Sustainable Procurement Plan ensures responsible sourcing, waste reduction, and embodied carbon minimisation, with key materials such as steel, cladding, concrete, and timber meeting strict sustainability standards, including certifications like BES 6001 and FSC. Efforts to reuse and recycle materials will further reduce construction waste.

Energy efficiency is a central focus, with the design leveraging on-site renewable energy, such as solar panels, which generate surplus electricity to be fed into the grid for other Wiltshire businesses. Additional measures include air-source heat pumps, LED lighting, and optimised natural daylighting to minimise energy consumption.



Solar panels on our existing site at Swift Way generate more electricity than we use and make us a net contributor to the grid

Sustainable transport initiatives reduce car dependency through active travel options, electric vehicle charging infrastructure, and optimised logistics, minimising transport-related emissions. Bulk procurement and the use of national carriers further reduce the environmental impact of freight operations.

The project incorporates resilience to climate change through measures like Sustainable Drainage Systems (SuDS), permeable surfaces, and natural landscaping to manage flooding and enhance biodiversity. Passive cooling, robust materials, and water-saving systems ensure adaptability to future climate conditions.

Achieving a BREEAM Excellent rating in the pre-assessment, the development demonstrates leadership in environmental performance. It incorporates energy efficiency, water conservation, sustainable materials, and biodiversity enhancements while prioritising occupant wellbeing with improved air quality, low-VOC materials, and access to natural light.

Sustainability performance will be tracked and improved through regular audits, certifications, and lifecycle assessments. Continuous monitoring and stakeholder engagement ensure the project not only meets current sustainability goals, but also adapts to evolving environmental challenges, contributing to long-term benefits for the environment, community, and economy.

Ecology

Preliminary ecological surveys have been undertaken to assess the site's potential to support protected species and to inform the planning process. These surveys have revealed several key findings, alongside recommendations for ongoing monitoring and management.

The site was determined to have low suitability for foraging and commuting bats based on its size, habitat quality, and connectivity to the wider landscape. A summer bat activity survey conducted in July 2022 confirmed low levels of bat activity, predominantly in the southern areas of the site, away from the road. Static monitoring over a five-day period recorded bat calls from typical species in low numbers. To comply with ecological guidelines, further surveys will be undertaken in 2025, including additional bat activity transects and static monitoring. These measures aim to ensure a comprehensive understanding of bat activity within and around the site.

Potential for dormice was identified in the site's hedgerows due to their structure and connectivity. Sixty nesting tubes were deployed across suitable sections of hedgerow in August 2022, and initial checks in September revealed wood mouse nests and bird nests, but no evidence of dormice. Monitoring will continue in 2025, with the nesting tubes left in situ over the winter to allow for further inspections in spring.

Although the site does not contain waterbodies suitable for great crested newts (GCN), three ponds within 500 metres of the boundary were surveyed using eDNA sampling. One pond, located approximately 90 metres west of the site, tested positive for GCN DNA, while the other two ponds were confirmed as negative.

These findings underscore the importance of incorporating ecological sensitivity into the development process. The project will proceed with ongoing monitoring and habitat management to ensure compliance with ecological guidelines and to minimise impacts on biodiversity. This approach demonstrates a commitment to sustainable development that aligns with both planning policy and ecological best practices.

It is not believed that an Environmental Impact Assessment (EIA) is required for this proposal, as the development falls below the thresholds outlined in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The site is not located within a sensitive area as defined by the regulations, and the nature, scale, and potential impacts of the proposed development are not anticipated to result in significant environmental effects.

Biodiversity Net Gain

A preliminary assessment of biodiversity net gain (BNG) has been conducted using the Biodiversity Metric tool to evaluate the potential ecological benefits of the proposed development. This initial analysis provides an indicative overview of the anticipated gains, with detailed plans to be finalised at later stages.

The baseline condition of the site comprises 13.6 habitat units and 8.0 hedgerow units, with no river units present. Following the proposed habitat creation and enhancement measures, the post-intervention condition is projected to deliver 16.73 habitat units and 9.55 hedgerow units. These figures correspond to an estimated 23.01% net gain in habitat units and 19.38% net gain in hedgerow units, reflecting the development's commitment to enhancing local biodiversity.



This preliminary work highlights the project's commitment to delivering biodiversity net gain from its inception. By integrating BNG principles into the planning and design process at an early stage, the development sets a strong foundation for achieving sustainable outcomes. While these figures are indicative and subject to refinement as detailed plans are developed, they underscore the proactive approach taken to ensure compliance with national biodiversity policies and to contribute positively to the local environment. Further assessments and detailed design work will confirm these projections and guide implementation to maximise ecological benefits.

Consultation

Consultation has been a key part of the process for the proposed warehouse development, ensuring that the scheme is informed by local needs, policy considerations, and stakeholder perspectives. Over the past five years, we have engaged in extensive discussions with various stakeholders, including Wiltshire Council, Melksham Without Parish Council, and Seend Parish Council, to address the critical shortage of available land for business expansion in the area and secure the future of the Gompels business, as well as other businesses within Melksham.

Discussions with Wiltshire Council

Regular engagement with Wiltshire Council Planners and the Economic Development team has taken place over the last five years to explore potential solutions to the lack of suitable land for business expansion in Melksham. These discussions highlighted the pressing need for relocation to sustain the business and protect local employment opportunities. A formal pre-application enquiry (ENQ/2022/00548) was undertaken in Summer 2022, during which Wiltshire Council provided guidance on the suitability of the proposed site and advice on addressing planning concerns and considerations, including access, design and landscaping, and environmental impacts. These points have been subject to much consideration and the plans have been developed to address the points raised.

The logo for Wiltshire Council, featuring the text "Wiltshire Council" in white on a green rectangular background with a white swoosh underneath.

Engagement with Parish Councils



We have prioritised collaboration with local parish councils, recognising their pivotal role in representing the interests of the local community. Regular discussions with Melksham Without Parish Council have taken place, with councillors demonstrating a clear understanding of the challenges faced by the business and offering their support for the proposed relocation to the application site. A formal meeting was held with councillors in January 2024, further solidifying their backing.



Similarly, Seend Parish Council has been engaged in the consultation process. A meeting in October 2024 allowed for a detailed discussion of the land availability issues around Melksham, the proposed project's implications and benefits. Councillors expressed reserved support for the proposal, acknowledging its importance in retaining jobs within the town and ensuring the continued operation of valued local businesses.

Engagement with Wiltshire Councillors

In addition to consultations with planners and parish councils, we have actively engaged with local Wiltshire Councillors representing Melksham and the surrounding areas. Discussions have focused on the significant challenges faced by businesses due to the limited availability of land for expansion. Councillors have been highly supportive of the proposal, recognising the importance of retaining the business within Melksham to preserve local jobs and contribute to the town's economic stability.

Their input has been invaluable in shaping the application and ensuring it aligns with the strategic priorities for the area including reducing out-commuting, alleviating congestion and improving air quality. By facilitating the business's relocation within the local area, the scheme helps to retain employment opportunities close to where people live, reducing the need for employees to commute longer distances. This in turn supports efforts to minimise traffic congestion and associated air pollution, contributing to a more sustainable local economy and healthy environment. This ongoing dialogue with Wiltshire Councillors has reinforced the strong local and political support for the proposed relocation to the application site.

Feedback has been overwhelmingly positive, with stakeholders recognising the critical importance of the relocation for the Melksham economy

The feedback from these consultations has been overwhelmingly positive, with stakeholders recognising the critical importance of this relocation for the economic vitality of Melksham. The support from both Parish Councils and Wiltshire Councillors reflects a shared commitment to addressing the shortage of employment land and fostering sustainable local economic growth. This collaborative approach has informed the design and access strategy of the proposed development, ensuring that it meets the needs of both the business and the wider community.

Summary

The proposed development by Gompels Healthcare Ltd represents an essential step forward. It addresses the company's urgent need for space while contributing significantly to the economic and

social fabric of Melksham. Over its 50-year history in Melksham, the Gompels family businesses have evolved from a small pharmacy on the high street, into a major distributor of medical and early years supplies. **All together we employ over 130 people and turn over £150 million annually.** However, the limitations of the current site at Swift Way have become a critical barrier to growth. The proposed relocation to a new site South of the A365 not only addresses these constraints, but also creates an opportunity to streamline operations, expand capacity, and **secure the company's future in the region.**

The economic implications of this development extend far beyond Gompels itself. The relocation will **safeguard 580 existing Melksham jobs, create an additional 275 new roles and create over 3000 indirect jobs**, precisely in the sectors and towns that Wiltshire is seeking to boost. The jobs encompass a diverse range of skilled and unskilled positions. The project also unlocks opportunities for neighbouring businesses like Knorr Bremse, which plans to utilise the vacated site to expand its operations and **generate further local employment.** With Melksham experiencing significant housing growth, the **creation of sustainable, local jobs** is essential to **reducing out-commuting, alleviating traffic congestion, and mitigating pollution.** By anchoring its expansion within the local community, the Gompels businesses reinforce **Melksham's role as a hub for employment and innovation.**

The revised **National Planning Policy Framework (NPPF)**, updated on 12 December 2024, **emphasises strategic planning, economic growth**, and modern infrastructure to **address critical gaps in employment land provision.** The proposed warehouse development **resolves a significant shortfall** of allocated employment land, providing **essential commercial space** for Gompels and **enabling growth** for other local businesses too. It supports the modern economy by **aligning with the NPPF's focus on logistics, freight, and digital infrastructure**, crucial to **supply chain resilience.** This development also promotes the modernisation and expansion of critical industries, contributing to local, regional, and national **economic resilience and growth.**

The proposal is deeply aligned with **local and national sustainability and planning objectives.** Designed to achieve a **BREEAM Excellent rating**, the development incorporates renewable energy solutions, biodiversity net gains, and sustainable transport options. The inclusion of green buffers, tree planting, and enhanced hedgerows, not only mitigates the visual and environmental impact of the new facility but also integrates it harmoniously into the surrounding landscape. **Consultations and collaboration with stakeholders**, including Wiltshire Council and local parish councils, have been integral to the project's development, ensuring it meets community needs and adheres to planning policies. This inclusive approach has garnered **widespread support** and highlights the project's commitment to sustainable and socially responsible growth.

In conclusion, this development is far more than a logistical improvement for Gompels Healthcare, but a transformational **investment in Melksham's economic resilience and environmental sustainability.** It enables a critical expansion for a longstanding local business, supports the growth of other critical employers within Melksham, and **creates a foundation for continued job creation.** It is compliant with Core Policy 34 and unequivocally constitutes **sustainable development.** By

prioritising sustainability, economic growth and social responsibility, the project aligns with Wiltshire's strategic goals, delivering benefits that extend well beyond the immediate stakeholders. This proposal exemplifies the balance of **growth, innovation, and responsibility**, in harmony with sustainability and the local context, **ensuring Melksham's prosperity for decades to come.**



Wiltshire Core Strategy

Adopted January 2015

Core Policy 51

Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.
- ii. The locally distinctive character of settlements and their landscape settings.
- iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- iv. Visually sensitive skylines, soils, geological and topographical features.
- v. Landscape features of cultural, historic and heritage value.
- vi. Important views and visual amenity.
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.
- viii. Landscape functions including places to live, work, relax and recreate.
- ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the

objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

Core Policy 52: Green infrastructure

6.88 Green infrastructure is a descriptive term used to characterise spaces such as parks and gardens (urban and country parks, formal gardens); amenity green space (informal and formal recreation and sports spaces,



domestic gardens, village greens, green roofs); urban green spaces (urban commons, waste land and disturbed ground); woodland, downland and meadows, wetlands, open and running water, quarries; green corridors (rivers and canals including their banks, road and rail corridors, cycling routes, pedestrian paths, and rights of way); allotments, cemeteries, and churchyards. It provides socio-economic and cultural benefits which underpin individual and community health and wellbeing. These include: conserving and enhancing the natural environment; providing wildlife corridors; reducing noise and air pollution; and helping communities adapt to climate change through water and carbon management. In urban areas, functions include providing routes (e.g. footpaths and cycleways) which link areas of open space within settlements; providing sustainable drainage, flood storage and urban cooling; and providing a wide range of opportunities for engagement and active citizenship, relaxation and quiet contemplation, sport, recreation and children's play.

6.89 The maintenance and enhancement of Wiltshire's green infrastructure network will be crucial in helping to ensure that the growth set out in this Core Strategy can be delivered in a sustainable manner. In particular, the development proposed in

An aerial photograph of a town in Wiltshire, showing a mix of residential and commercial buildings, a central street with parked cars, and surrounding green fields under a clear blue sky.

Wiltshire Local Plan

Pre-Submission Draft 2020-2038 (Regulation 19)

September 2023

Wiltshire Council

Policy 91

Conserving and enhancing Wiltshire's landscapes

Development will conserve and where possible enhance Wiltshire's landscapes by:

1. being located and designed to respect landscape character and maintain an area's distinctive sense of place and reinforce local distinctiveness as set out in the Wiltshire Landscape Character Assessment⁶³ and landscape strategy;
2. conserving, enhancing, and restoring the characteristics and views of landscapes along with valued attributes and existing site features such as trees, hedgerows, dry stone walls and waterbodies that contribute to the character and quality of the area;
3. conserving and enhancing the locally distinctive character of settlements and their landscape settings;
4. conserving and enhancing the transition between man-made and natural landscapes at the urban fringe;
5. being of high-quality design appropriate to its townscape and landscape context in accordance with the National Design Guidance and Wiltshire Design Guide, that incorporates green and blue infrastructure, supports climate resilience, biodiversity enhancement, and health and wellbeing of the local community;
6. be located and designed to prevent erosion of relative tranquillity (light pollution and noise) and intrinsically dark landscapes, and use opportunities to enhance areas in which tranquillity have been eroded;
7. where necessary, being supported by a proportionate Landscape and Visual Impact Assessment, Landscape and Visual Appraisal, or Townscape Appraisal that shows how, through an iterative process that has considered the site context, this has helped integrate and enhance the proposed development;
8. protecting geology and soils that underpin the landscape character of Wiltshire enhancing healthy 'living' soils as the foundation for successful plant growth, natural carbon sequestration, groundwater storage and filtration, as well as all eco-system services.

Wiltshire's designated landscapes

Great weight will be given to conserving and enhancing the landscape and scenic beauty of Wiltshire's designated landscapes, Areas of Outstanding Natural Beauty and the New Forest National Park. Development within, and influencing the setting of, these designated areas should be limited in scale and extent and are expected to contribute towards conserving and enhancing their natural beauty.

Proposals for development within or affecting designated landscapes must demonstrate that they have taken account of the objectives, policies and actions set out in the relevant management plans for these areas. Proposals for development outside of an Area

⁶³ The Wiltshire Landscape Character Assessment, alongside any subsequent revisions and other relevant assessments and studies, provides an up-to-date and consistent understanding of the key landscape characteristics and features that contribute to local distinctiveness and sense of place in Wiltshire.

of Outstanding Natural Beauty that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities, as set out in the relevant management plan, must also demonstrate that it would not adversely affect its setting.

Development will not be supported if it cannot demonstrate conservation or enhancement to the landscape character and special qualities of an Area of Outstanding Natural Beauty or National Park.

Conserving and enhancing dark skies

Wiltshire's dark skies

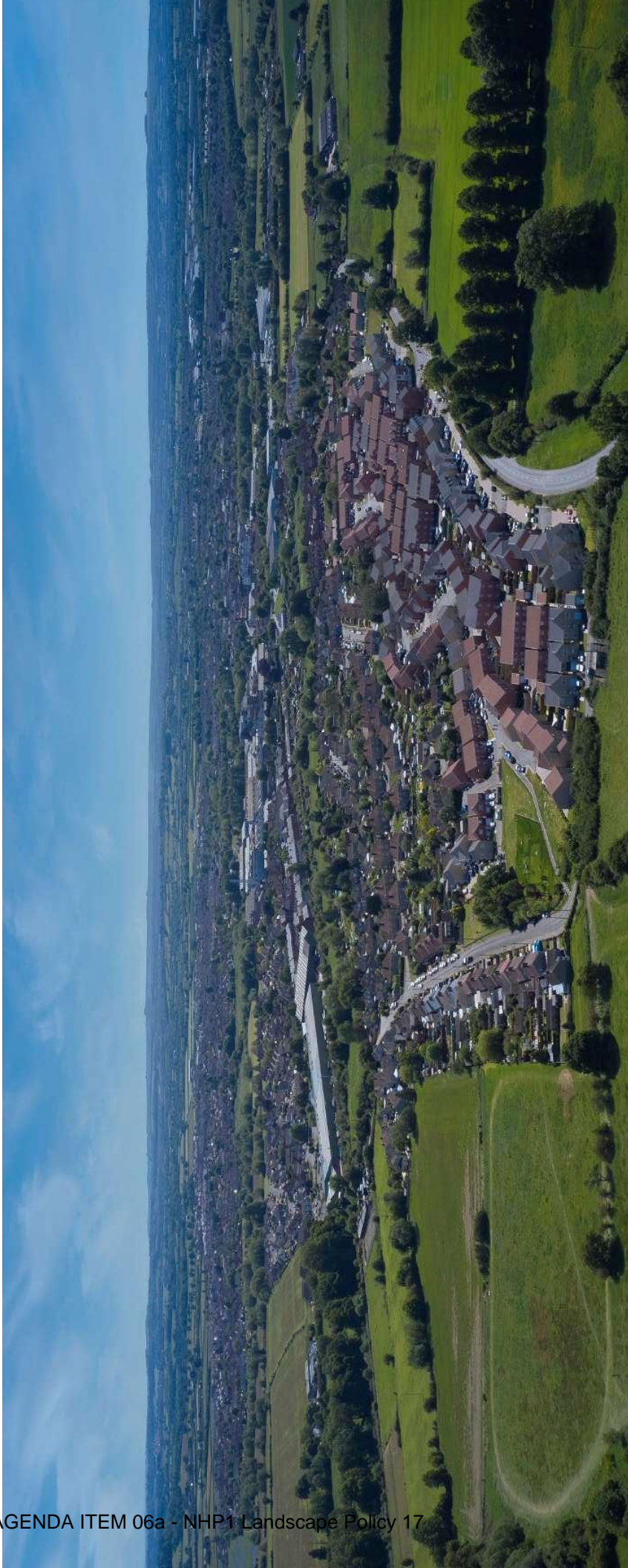
- 5.171** Dark night skies serve a multitude of benefits including those related to human health, landscape character and views of the night sky alongside being critical to many species, supporting heathy ecosystems. Modern lighting practices have introduced light as a form of pollution to our night skies, causing a glow in the countryside that can harm local biodiversity whilst detrimentally impacting on an area's character. Where relevant, planning applications should be supported by lighting schemes setting out the necessity for, and suitability of, the planned lighting including, as appropriate, details of how the lighting will be directed/shielded, will produce minimum levels of brightness, and will be used only when required.
- 5.172** The impact of artificial light has left much of England without the presence of truly dark night skies. National policy⁶⁴ makes it clear how planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.
- 5.173** Within Wiltshire there are large areas of open countryside that host dark night skies⁶⁵, much of which falls within the boundaries of Wiltshire's Areas of Outstanding Natural Beauty⁶⁶, notably those areas outside of the defined limits of development. This is reflected in the respective management plans for each of these Areas of Outstanding Natural Beauty whereby the conservation and enhancement of dark skies is a consistent priority.
- 5.174** In 2019 the dark skies within the Cranborne Chase Area of Outstanding Natural Beauty were designated as an International Dark-Sky Reserve (IDSR), having been found to host the darkest night skies in central southern England⁶⁷. The IDSR designation covers the whole of the Cranborne Chase designated landscape with the area's management plan, providing further detail regarding the importance of conserving and enhancing the Dark-Sky.
- 5.175** Given the demand for various types of lighting associated with development, it is important that the impact on the surrounding area is considered when determining such applications. Although some lighting is permitted development, the council will ensure applications that involve the

⁶⁴ *National Planning Policy Framework*, GOV.UK (2023, para. 185)

⁶⁵ CPRE Night Blight interactive map underpinned by Open Street Map and World Imagery satellite maps.

⁶⁶ Cotswold national landscape, Cranborne Chase Area of Outstanding Natural Beauty and the North Wessex Downs Area of Outstanding Natural Beauty.

⁶⁷ *Campaign to Protect Rural England* (June, 2016) Night Blight: Mapping England's light pollution and dark skies showed that 52% of Cranborne Chase Area of Outstanding Natural Beauty is in Band 1, which is the darkest category and 40% of the Area of Outstanding Natural Beauty is in the next category.



Joint Melksham Neighbourhood Plan

2020 - 2026

Referendum Version



Natural and Built Environment



Landscape Character

This policy helps meet objective 14: Conserving and enhancing the quality of the natural landscape.

Policy 17: Landscape Character

Development proposals will be expected to:

- i. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;
- ii. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments, and
- iii. respond sensitively to the transition between settlement edge and countryside and maintain the separate identity of settlements.

The reason for the policy

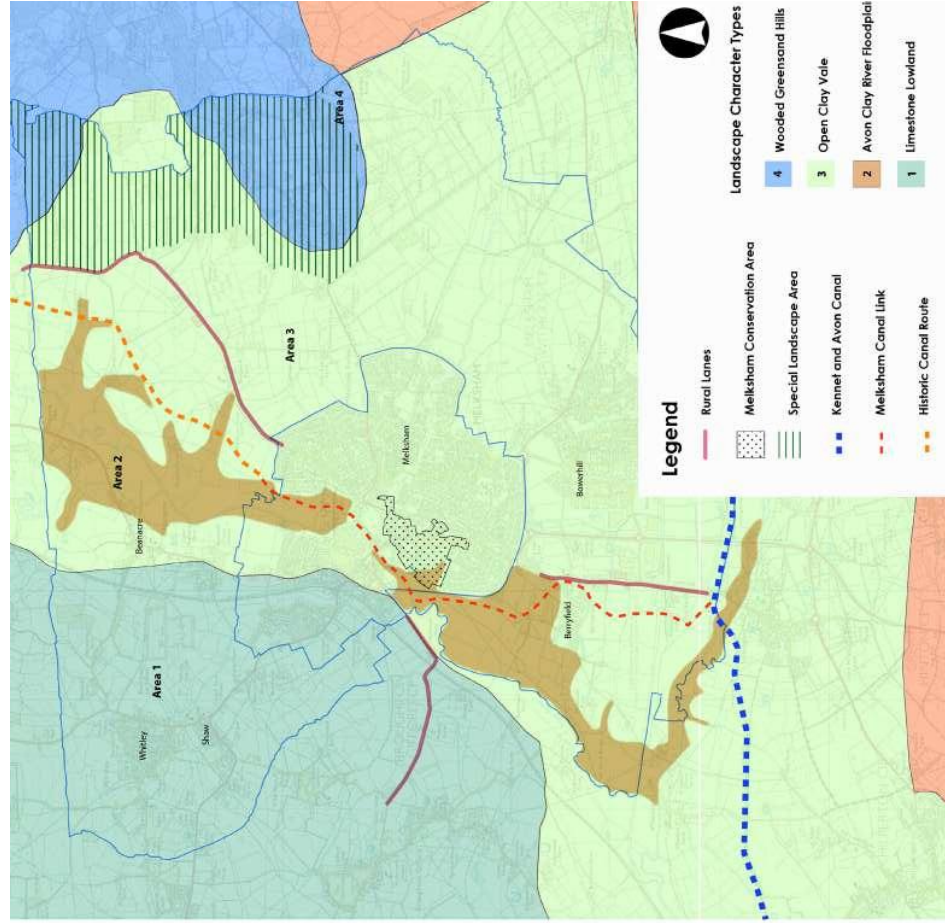
4.18.1 The local landscape is the backdrop to our daily life, and reflects the relationship between people and place. Retaining and enhancing the character and appearance of the landscape in Melksham is recognised as hugely important as the town continues to grow and develop – in particular at the edges between the built and natural environment.

4.18.2 The landscape within the Plan area is diverse in character ranging from areas of flat and low lying land with a general sense



Bridge across the River Avon

Figure 14: Landscape Character (source: Neighbourhood Plan Local Landscape Report V2)



© Crown copyright and database rights 2019 Ordnance Survey 100049050

of openness, to areas that are much more enclosed with lines of trees along the river Avon. As the land rises to the north east there is a designated 'Special Landscape Area' which is protected through core policy. This area, which has special characteristics worthy of a local level designation, is shown on Figure 14, as are other identified areas of distinct character.

4.18.3 Key characteristics of the landscape of the Plan area are detailed in the Green Infrastructure Report¹⁶ and the Local Landscape Character Evidence Base Report²³ which supplements Landscape Character Assessment work done by Wiltshire Council with local detail. Some key points are:

- The landscape around the river Avon forms a wedge of landscape into Melksham town running in between areas of housing (Riverside Drive to the west and Forest to the east) and from the south as far as the town bridge taking in the Conigre Mead nature reserve from where it spreads out again into the Melksham Without Parish towards the edges of Berryfield.
- Houses from Methuen Avenue, in the Forest area, on the east of this character area, and houses from Riverside Drive on the west, front out onto accessible greenspace (allotments from Methuen Avenue), providing an active frontage and connection to the landscape of the river Avon.
- Brooks and stream corridors are scattered across the landscape,

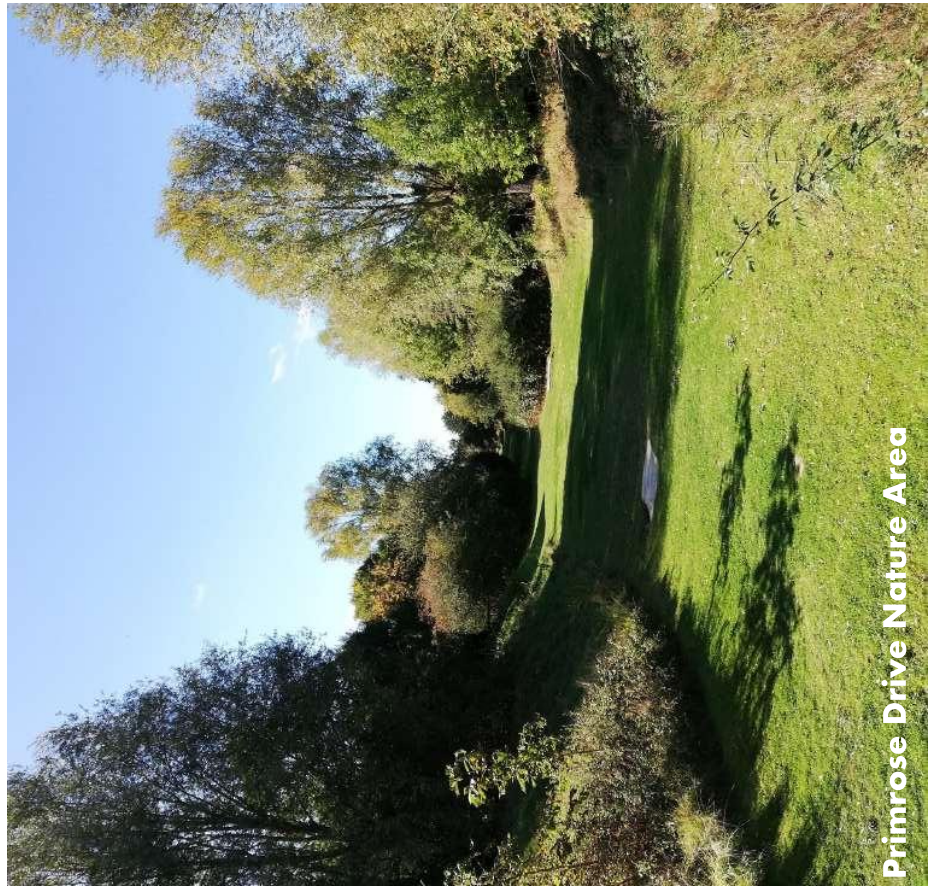
Natural and Built Environment



for example Clackers Brook which, like the river Avon, forms a key area of natural green space and landscape, also making a link and connection with the built environment of the town. South Brook to the north west, meanders through agricultural fields between the two villages of Shaw and Whitley, contributing to the separate identity and character of the two villages and to local amenity, with a number of footpaths crisscrossing the area.

4.18.4 Elements of Historic Landscape Character (tangible elements of past land-use that influence the present-day landscape) have also influenced the sense of place and identity of the present-day town and surrounding rural areas and should be drawn on within major planning proposals.

4.18.5 A number of views across the landscape have been included in the Landscape Character Report²³ to illustrate the different characteristics and features across the Plan area. From many places expansive views of the wide open landscape can be appreciated.



Primrose Drive Nature Area



Joint Melksham Neighbourhood Plan 2

2020 – 2038

Submission Plan September 2024



MELKSHAM
NEIGHBOURHOOD
PLAN

Natural, Built and Historic Environment

Landscape Character

This policy helps meet objective 14: Protecting settlements' rural setting and countryside gaps across the plan area
and objective 15: Conserving and enhancing the quality of the natural landscape.



Policy 18: Landscape Character

Development proposals will be expected to:

- integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;
- demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessment; and,
- respond sensitively to the settlement setting and transition between their edges and countryside and maintain the separate identity of settlements; and,
- conserve or enhance the character, openness, tranquillity and amenity of the open countryside.

The reason for the policy

4.18.1 The local landscape is the backdrop to our daily life, and reflects the relationship between people and place. Retaining and enhancing the character and appearance of the landscape in Melksham is recognised as hugely important as the town continues to grow and develop – in particular at the edges between the built and natural environment.

4.18.2 The landscape within the Plan area is diverse in character



Bridge across the River Avon

Natural, Built and Historic Environment



ranging from areas of flat and low lying land with a general sense of openness, to areas that are much more enclosed with lines of trees along the River Avon. As the land rises to the north east there is an area that was once designated in the West Wiltshire Local Plan as a 'Special Landscape Area'. This designation is currently saved by the Core Strategy, but is not proposed to be retained in the emerging Local Plan.

4.18.3 Key characteristics of the landscape of the Plan area are detailed in the Green Infrastructure Report³⁴ and the Local Landscape Character Evidence Base Report³⁵ which supplements Landscape Character Assessment work done by Wiltshire Council with local detail. Some key points are:

- The landscape around the River Avon forms a wedge of landscape into Melksham town running in between areas of housing (Riverside Drive to the west and Forest to the east) and from the south as far as the town bridge taking in the Conigre Mead nature reserve from where it spreads out again into the Melksham Without Parish towards the edges of Berryfield.
- Houses from Methuen Avenue, in the Forest area, on the east of this character area, and houses from Riverside Drive on the west, front out onto accessible greenspace (allotments from Methuen Avenue), providing an active frontage and connection to the landscape of the River Avon.
- Brooks and stream corridors are scattered across the landscape,

for example Clackers Brook which, like the River Avon, forms a key area of natural green space and landscape, also making a link and connection with the built environment of the town. South Brook to the north west, meanders through agricultural fields between the two villages of Shaw and Whitley, contributing to the separate identity and character of the two villages and to local amenity, with a number of footpaths criss-crossing the area.

4.18.4 Elements of Historic Landscape Character (tangible elements of past land-use that influence the present-day landscape) have also influenced the sense of place and identity of the present-day town and surrounding rural areas and should be drawn on within major planning proposals.

4.18.5 A number of views across the landscape have been included in the Landscape Character Report²⁴ to illustrate the different characteristics and features across the Plan area. From many places expansive views of the wide open landscape can be appreciated.

34. [Available on the JMNP2 evidence webpages.](#)

35. [Available on the JMNP2 evidence webpages.](#)



Wiltshire Core Strategy

Adopted January 2015



6 Delivering the Spatial Objectives: Core Policies

6.1 In addition to the three Core Policies set out in Chapter 4 of this document and those place specific policies as contained in the area strategies, the evidence upon which this strategy is based indicates the need for a number of policies which will be required to ensure delivery of the spatial objectives. These policies will apply across Wiltshire and are presented under each of the six strategic objectives, as follows:

Strategic objective 1: delivering a thriving economy

Strategic objective 2: addressing climate change

Strategic objective 3: providing everyone with access to a decent, affordable home

Strategic objective 4: helping to build resilient communities

Strategic objective 5: protecting and enhancing the natural, historic and built environment

Strategic objective 6: ensuring that adequate infrastructure is in place to support our communities.

- 6.2 The objective of delivering a resilient, sustainable and competitive economy characterised by a greater proportion of higher value, higher skilled jobs aligns with the emerging Swindon and Wiltshire Local Enterprise Partnership⁶⁹ which identifies the following priorities to deliver this goal:
- 10,000 new private sector jobs created (6,000 within Wiltshire)
 - Safeguarding of 8,000 jobs within existing business base
 - Achieving 91% coverage of superfast broadband
 - Using planning powers to build a supportive economic environment
 - Delivering regeneration in our primary population centres of Chippenham, Trowbridge and Salisbury
 - Allocation of strategic employment sites
 - Reduction on CO² emissions
 - Delivering resilient rural communities
 - Targeting growth in the tourism sector.
- 6.3 The Core Strategy aims to deliver ‘an economy that is fit for the future’⁷⁰ that brings about the objectives of the Swindon and Wiltshire Local Enterprise Partnership partly through providing new strategic employment sites to support new business creation and attract inward investment. In addition, facilitating the relocation, modernisation and expansion of existing businesses will be important, as will assisting the delivery of regeneration sites in the Principal Settlements of Chippenham, Salisbury and Trowbridge. This will ensure that appropriate employment opportunities are available for Wiltshire’s residents providing the opportunity for people to live and work locally, helping to reduce levels of out-commuting and increase the self-containment of settlements. Overall it will provide choice and flexibility for businesses. Support for rural based businesses is as important for Wiltshire as new investment in the main settlements.
- 6.4 This section includes policies which seek to:
- support the delivery of additional opportunities for employment provision, over and above those identified at allocated sites, in the Principal Settlements, Market Towns and Local Service Centres and for rural based businesses

- protect existing employment sites where appropriate, particularly where these are considered critical to the economic role of the Principal Settlements and Market Towns
- support opportunities for the regeneration of brownfield sites in the Principal Settlements, Market Towns and Local Service Centres
- support the appropriate reuse of redundant MoD facilities
- protect the vitality and viability of town centres and support appropriate proposals for tourism development and accommodation.

6.5 This Core Strategy plans for the provision of around 178 hectares (ha) of new strategic employment land over the plan period to 2026, to supplement that already built or granted planning permission between 2006 and 2011. The overall strategy for employment growth is set out in Core Policy 2, and specific sites are identified in the Area Strategies. The strategic sites allow for a range of employment choices in sustainable locations around Wiltshire's Principal Settlements and Market Towns. However they do not provide for all employment land that may be needed over the plan period and the Core Strategy also provides for additional employment opportunities to come forward. There may be proposals that arise during the plan period that are of exceptional strategic importance to the Wiltshire economy and do not strictly accord with the Strategy, which may merit consideration. In such circumstances, potential will be explored in conjunction with the Swindon and Wiltshire Local Enterprise Partnership, with consideration being given to the sub-regional context and impacts on the overall development strategy, in particular not undermining the delivery of the strategic employment sites already planned at settlements.

6.6 Whether the new allocated employment sites will be delivered alongside allocated housing sites or on their own, these sites will be master-planned to deliver a range of job types and unit sizes. The masterplans will take into account the most recent Employment Land Review evidence and the needs of displaced businesses as a result of regeneration projects. Wiltshire's economy outside the Principal Settlements is based on a large number of small businesses and, as such, business units should predominantly be planned to meet this more local demand⁷¹.

6.7 Sites will contribute to the delivery of flexible and affordable workspace across all the B uses, particularly small and start-up units with some 'follow on' space, to provide continuing opportunities for small business, business start-ups and continuation.



Start-up or incubator units should be supported by shared business infrastructure relevant to the use class. Design and build options should also be considered and all businesses should prepare green travel plans.

- 6.8 Research undertaken on behalf of the Wiltshire Military/Civilian Integration Programme⁷² has identified the value that Wiltshire's significant military presence brings to the local economy. However, changing requirements mean that a number of MoD sites in Wiltshire could become surplus or due for release during the plan period. The Core Strategy's approach to the re-use of military establishments is set out in Core Policy 37.

Core Policy 34: Additional employment land



- 6.9 The evidence⁷³ indicates that Wiltshire does not have land available in the right location at the right time to meet business needs and this could result in Wiltshire losing business to other locations where a more favourable business and regulatory environment exists. Core Policy 34 therefore supports the delivery of opportunities for the provision of employment land that may come forward in the Principal

Settlements, Market Towns and Local Service Centres of Wiltshire, in addition to the employment land which is allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (settlement strategy) and in any community-led plans, including neighbourhood plans.

6.10 A number of target sectors⁷⁴ have been identified for Wiltshire in order to promote the move towards a higher-value economy. These include:

- advanced engineering and manufacturing
- business services
- Bioscience
- environmental technologies
- food and drink
- ICT and creative industries
- agriculture and land-based industries
- tourism.

6.11 Proposals which support these target sectors will be supported providing they meet the requirements of Core Policy 34.

6.12 Core Policy 34 aims to support the rural way of life through the promotion of modern agricultural practices, appropriate diversification of the rural economy and provision of broadband. The policy includes criteria to be met for proposals relating to the retention or expansion of existing businesses within or adjacent to the Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages.

6.13 Core Policy 34 also includes an element of flexibility to allow new employment opportunities to come forward outside but adjacent to the Principal Settlements, Market Towns and Local Service Centres, and in addition to the employment land allocated by this Core Strategy, where such proposals are considered to be essential to the economic development of Wiltshire. It also allows for the possibility of development essential to the wider strategic interest of the economic development of Wiltshire. In considering criterion viii of Core Policy 34 any such proposals should be supported by evidence to justify that they would not have a significant adverse impact upon existing, committed and planned public and private investment at sites



identified in the Plan for employment development at Principal Settlements or Market Towns. Support for such proposals will be an exception to the general approach, and any applications of this nature will need to be determined by the relevant planning committee (and not by officers using delegated powers).

Core Policy 34

Additional employment land

Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. These opportunities will need to be in the right location and support the strategy, role and function of the town, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, where applicable.

Proposals for office development outside town centres, in excess of 2,500sq metres, must be accompanied by an impact assessment which meets the requirement of national guidance and established best practice, and demonstrate that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.

Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that:

- i. are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or
- ii. support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or
- iii. are for new and existing rural based businesses within or adjacent to Large and Small Villages; or
- iv. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.

Where they:

- a. meet sustainable development objectives as set out in the policies of this Core Strategy and
- b. are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and
- c. are supported by evidence that they are required to benefit the local economic and social needs and
- d. would not undermine the delivery of strategic employment allocations and
- e. are supported by adequate infrastructure.

Core Policy 35: Existing employment sites

6.14 Achieving the strategic objective to deliver a thriving economy which provides a range of job opportunities in Wiltshire depends on retaining the availability of and enhancing existing employment sites, as well as creating new opportunities in appropriate locations. The Core Strategy seeks to protect Wiltshire's most sustainable and



valued employment areas by applying policies to favour employment uses on these sites. On some of these employment areas there are strong redevelopment pressures for other uses, notably residential and retail.

An aerial photograph of a town in Wiltshire, showing a mix of residential houses, a central street with parked cars, and surrounding green fields under a clear blue sky. The bottom half of the image is overlaid with a green gradient.

Wiltshire Local Plan

Pre-Submission Draft 2020-2038 (Regulation 19)

September 2023

Wiltshire Council

5. Delivering the spatial objectives

Introduction

- 5.1** The following section of the Plan presents a suite of policies that cover a range of specific themes. They are arranged in three categories - Economic, Social and Environmental that reflect the structure of national planning policy. The policies do not seek to repeat those established at a national level. However, they do reflect local circumstances and are based on evidence. The Plan should be read as a whole. Therefore the proponents of development schemes and decision makers will need to follow the policy advice, and associated guidance, throughout the Plan where relevant to development proposals.

Economic

Additional employment land



- 5.2** The Plan supports growth, retention and investment in employment provision. In addition to sites allocated in the Plan and the retention of Principal Employment Areas, Policy 64 (Additional employment land) allows additional land to come forward at sustainable locations and also in the countryside supporting rural businesses. The evidence²¹ suggests that Wiltshire does not always have a sufficient choice of available land which can be delivered at the right time to meet business needs. Policy 64 (Additional employment land) therefore supports the delivery of opportunities for the provision of employment land that may come forward within and adjacent to defined settlements or the built-up area of Small Villages, in addition to the employment land which is allocated in the Plan.
- 5.3** Opportunities will need to be in the right location and support the role, and function of the settlement to which they relate, as identified in Policy 1 (Settlement Strategy) and in any neighbourhood plans. As well as meeting criteria to ensure they do not undermine delivery of allocated sites or result in harmful impacts. Policy 2 (Delivery Strategy) sets out requirements to help ensure that employment proposals where permitted are brought forward in a timely way, and for the use intended.
- 5.4** Several specialist sectors²² are particularly relevant to Wiltshire and of importance to the economy in both employment and business terms for the county. These include:
- advanced engineering, defence and manufacturing
 - professional business services
 - life sciences
 - low carbon and sustainable construction
 - ICT and cyber security
 - creative industries
- 5.5** Proposals which support these specialist sectors will be particularly encouraged in line with the requirements of Policy 64 (Additional employment land). Other policies in the Plan address the potential contribution Ministry of Defence sites may make to Wiltshire's economy over the Plan period.
- 5.6** Policy 64 (Additional employment land) also aims to support Wiltshire's rural economy including agricultural practices, such as agribusiness, intensive and organic farming, precision and sustainable agriculture, as well as diversification of existing rural based businesses.
- 5.7** Policy 64 (Additional employment land) also includes an element of flexibility to allow new employment opportunities where such proposals are considered essential to the wider strategic interest of the economic development of Wiltshire. In considering criterion iii any such proposals should be supported by evidence to justify that they would not have a significant adverse impact upon existing, committed and planned public and private investment at sites identified in the Plan for employment development.

²¹ *Wiltshire Employment Land Review Update*, Hardisty Jones Associates (September, 2023)

²² *Swindon and Wiltshire Local Economic Assessment*, Hatch (March 2022, page vi.)

Policy 64

Additional employment land

Proposals for employment development (within use classes B2, B8 or E(g)(i-iii)) will be supported on unallocated sites within or adjacent to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where they are appropriate to the role and function of the settlement.

Employment development proposals elsewhere will be supported that:

- i. are for farming; or
- ii. diversify and support an existing rural based business; or
- iii. are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council.

Proposals will only be supported where they:

- a. are appropriate in scale with their location, do not adversely affect the operation of nearby uses or unacceptably harm residential amenity;
- b. do not lead to unacceptable impacts on the historic environment;
- c. do not represent unacceptable harm to landscape character or visual intrusion;
- d. would not undermine the delivery of strategic employment allocations;
- e. lead to no unacceptable impacts on the local transport network; and
- f. are supported by adequate infrastructure, including broadband.

Proposals for additional national and regional logistics development adjacent to M4 Junction 17 will be supported subject to:

- the impacts being assessed in accordance with Department for Transport advice;²³
- development proposals not prejudicing the delivery of other planned growth; and
- the funding and delivery mechanism of any required improvements/alterations to M4 Junction 17 and the surrounding transport network having been agreed and secured.

Existing employment land

- 5.8** Achieving the strategic objective to deliver a thriving economy that provides a range of job opportunities in Wiltshire depends on retaining the availability of and enhancing existing employment sites, as well as creating new opportunities in appropriate locations. The Plan seeks to protect Wiltshire's employment areas by applying policies to favour employment uses on these sites. On some of these employment areas there have been redevelopment pressures for other uses, notably residential and retail.

²³ Policy Paper - Strategic road network and the delivery of sustainable development, Department of Transport (updated December 2022)

- 5.9** Principal Employment Areas have been identified in the Principal Settlements and Market Towns, and some of the Local Service Centres and Large Villages, as set out in the relevant Area Strategies. They also include two Principal Employment Areas in the rural area near to Amesbury and Salisbury. These Principal Employment Areas are critical to the economic role of these settlements and Wiltshire as a whole. To maintain a reasonable balance between jobs and homes to encourage self-containment, these Principal Employment Areas should be protected from alternative uses with their continued use and intensification for employment purposes encouraged, as set out in Policy 65 (Existing employment land).
- 5.10** It will also be important to retain existing employment uses outside the Principal Employment Areas to maintain diversity and choice of sites for employers and allow for local business expansion. However, it is important to acknowledge that some older employment areas may no longer be fit for purpose or that their role has changed, for example, from a primarily employment site to a trade centre site. Changes of use within sites can invigorate an area and act as a positive catalyst for change. The overall employment land target includes an allowance for the replacement of some sites. Therefore, in some circumstances it may be appropriate to allow for the redevelopment (in whole or part) of existing employment sites for an alternative use, particularly where the site is not required to remain in its current use to support the local economy in the area.
- 5.11** In demonstrating that a site has no requirement to remain in employment use, the ability of the site to meet modern business needs must be considered, as well as its value and contribution to the local and wider economy both currently and in the longer term. An objective assessment must be made of the site's potential contribution to the economy, in line with other sites in the area; it must be shown that the site is no longer viable for its present, or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least five years), for which there is evidence of genuine and sustained attempts to sell or let it on reasonable terms for employment use. Existing employment sites identified within this Plan for alternative uses as part of ongoing regeneration schemes will not be expected to meet the criteria of Policy 65 (Existing employment land).

Policy 65

Existing employment land

Proposals for renewal and intensification of employment uses, particularly in Principal Employment Areas, will be supported.

All land in employment use should be retained for employment purposes to safeguard their contribution to the Wiltshire economy and the role and function of individual settlements.

Proposals involving the loss of employment land (B2, B8, E(g)(i-iii)) must demonstrate that:

- i. where the proposal would lead to a material loss of employment land, provision will be made for its replacement with employment land of similar size and quality nearby, unless it can be demonstrated that there is no longer a requirement for employment land in that location;

From: [Teresa Strange](#)
To: [Russell Brown - Wiltshire Council \(russell.brown@wiltshire.gov.uk\)](mailto:russell.brown@wiltshire.gov.uk)
Cc: ["Developmentmanagement"](#)
Subject: PL/2024/11426 Gompels warehouse, Melksham
Date: 30 January 2025 19:58:00

Hi Russell

I am just reading more into this planning application for the Gompels warehouse before the parish council consider on Tuesday evening.

I have looked at the one the other side of the parish, considered recently, and note that Economic Development were consulted, and wondered if this was something considered for this application, it doesn't look like they have been from the consultee list.

PL/2024/03104

Site Address

OCTAVIAN BONDED WAREHOUSE, GOODES HILL, GASTARD, CORSHAM, SN13 9PP

Proposal

Proposed Construction of 2-Storey Extension to the Side of the Existing Offices and Single Storey Storage Building

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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to

whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: [Tate, Kate](#)
To: [Teresa Strange](#)
Subject: RE: Hedgerow removal work for Balfour Beatty
Date: 31 January 2025 09:06:35
Attachments: [image001.png](#)
[image002.png](#)

Hi Teresa,

You're correct in that the Balfour Beatty applications are for access to the high voltage utility towers for maintenance to be carried out.

I have ensured that reinstatement plans have also been submitted to allow for the hedgerows to be replanted following completion of the maintenance.

I hope that this provides you with enough reassurance for your meeting, but please let me know if you have any further questions.

Kind regards,
Kate

Kate Tate
Arboricultural Officer
Planning Technical Services

Wiltshire Council

Email: kate.tate@wiltshire.gov.uk

Tel: 01249 706641

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 30 January 2025 13:12
To: Tate, Kate <Kate.Tate@wiltshire.gov.uk>
Subject: Hedgerow removal work for Balfour Beatty

Hi Kate

We have received several hedgerow removal applications in the parish, and 3 for Balfour Beatty for "YYM OHL Refurbishment Scheme" – is there a description of the project so I can let the councillors know what it is for when they are considering it – I can see its for access to towers – my assumption is that they are refurbishing a run of electricity pylons or installing something new? Just wondered as you had done the pre app work if you were

able to confirm?

The Wessex water one is self explanatory, just trying to see what the bigger picture was on the Balfour ones so we can let the community know when any works start.

- a. **PL/2025/00390: Hedgerow located on each side of existing gate at Bath Road, Melksham, Wiltshire, SN12 8EG**: Section of temporary hedgerow removal is required 1m either side of an existing gate access, therefore 2m total, to facilitate a sewer replacement scheme being undertaken by Wessex Water. The temporary removal is required to facilitate access for construction machinery to the working area, within the neighbouring fields. Upon completion of the scheme, the hedgerow will be replanted following STD836 standards; a copy of this has been submitted with the hedgerow removal application. Applicant: Wessex Water **(Comments by 18/02/2025)**
- b. **PL/2025/00876: Removal of 4m of hedgerow off A3102, Sandridge Common, Melksham, SN12 7GT**: Partial removal of hedgerow required for widening tower access Applicant: Balfour Beatty **(Comments by 19/02/2025)**
- c. **PL/2025/00936: Removal of 6m of hedgerow Land east of 207 Woodrow Road, Melksham, SN12 7RD** Partial hedgerow removal required to install a 16ft gate Applicant: Balfour Beatty **(Comments by 20/02/25)**
- d. **PL/2025/00873: Removal of 40m of hedgerow Land off A350 Beanacre, Melksham, SN12 7PY** Partial removal of hedgerow required for tower access and culvert installation for EPZ location Applicant: Balfour Beatty **(Comments: 19/02/25)**

The parish council are considering them on Tuesday evening.

Many thanks, 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

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
On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

Town and Country Planning (Tree Preservation) (England) Regulations 2012

Dead Dying or Dangerous Tree(s)

Application Reference Number: PL/2025/00624

Decision Date: 21 January 2025

Applicant: Mr Nick Cranston
Acer Tree Surgeons, The Old Post Office, 85 High Street,
Chapmanslade, Westbury, Wiltshire BA13 4AN

Particulars of Development: Beech tree (storm damaged) - fell (T1 of TPO 2024/00015)

At: LAND OFF BEANACRE ROAD, MELKSHAM, SN12 7PU

The Council confirms that the above Tree is classified as Dead and Dangerous (DD). The tree can be removed under the Town and Country Planning (Tree Preservation) (England) Regulations 2012. This allows the removal of any protected tree, which is dead or imminently dangerous, without the need to make a formal Tree Work Application to the Council.

Parvis Khansari - Corporate Director, Place

Notes

Section 213 of the Town and Country Planning Act places a duty on landowners to plant another tree of an appropriate size and species, in the same or nearby place.

The new tree should be planted within the first available planting season following the removal of the DD tree. The replacement tree should be a suitable species and of similar stature (at maturity).

The applicant should note that this notice does not affect any private property rights and therefore does not authorise the carrying out of any work on land, or entering land outside his/her control.

If such works are required, it will be necessary for the applicant to obtain the landowners consent before work starts.

If the property is sold, the requirement to plant replacement trees passes to successive owners of the land.

(https://www.wiltshire.gov.uk/)

Comment

Melksham Without Parish Council's Comment

Planning Application

PL/2024/05921 (/p...

Stance

Comment

Details (?tabset-ae70b=...

Files (?tabset-ae70b=2)

Information

Web Comment Name

Melksham Without Parish Council's
Comment

Comment Number

WC-24-07-307293

Text

Whilst Melksham Without Parish Council
have no objection to the above planning
application, they suggest the shipping
containers be of a colour to blend in with
their surroundings.

From: [Teresa Strange](#)
To: [Giles-Franklin, Verity](#)
Cc: [Green, Kenny](#); [Sims, Steven](#); Nick.Holder@wiltshire.gov.uk
Subject: FW: PROPOSED COMMUNITY CENTRE: PL/2024/07907 Land south of Snarlton Farm and s106 discussions
Date: 31 January 2025 10:02:00

Dear Verity

I write to update you further to the email below in September re potential community facilities for the Snarlton Farm/Catesby application PL/2024/07907.

The decision on the application to the north, for Blackmore Farm, was taken at the Strategic Committee last week.

Since then, the parish council have been party to the s106 negotiations with Gleesons and Steve Sims and are pursuing a s106 contribution of 0.4Ha of land for community use, with a financial contribution towards community facilities.

The parish council are keen that there is just one community facility in the new housing developments to the east, and whilst maintaining their objection to this speculative development in the Snarlton Farm application, wish to discuss any potential s106 contributions from the Snarlton Farm application if Wiltshire Council are minded to approve. They are keen that in the discussions moving forward for this application that a contribution to the community facilities is secured, and that this can be transferred to the parish council to pool with the other funds and land from Blackmore Farm. We are making the same request to the planning application by Bloor in the north of Blackmore Farm at New Road Farm A3102 (Policy 20 in the emerging Local Plan) and will be making it to any forthcoming applications for the remaining parcels of the LP Policy 18 site allocation that is not yet covered by the Blackmore Farm application.

The request for funding from the Snarlton Farm application to reflect that it's a financial contribution only, and not for land as well.

The parish council are very keen to meet and discuss this application with you too, before the production of the Officer Delegated Report, rather than the parish council's first opportunity at a Strategic/Western Area Planning Committee. These potential developments are bigger than some villages in Wiltshire, and the parish council are keen to be involved in the place making aspects of these new developments.

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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: Teresa Strange

Sent: 12 September 2024 17:23

To: Sims, Steven <Steven.Sims@wiltshire.gov.uk>; Verity.Giles-Franklin@wiltshire.gov.uk

Cc: developmentmanagement@wiltshire.gov.uk; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Mike Sankey <mike.sankey@wiltshire.gov.uk>; Locum <locum@melksham-tc.gov.uk>; Committee Clerk <committee.clerk@melksham-tc.gov.uk>

Subject: PROPOSED COMMUNITY CENTRE: PL/2024/07907 Land south of Snarlton Farm AND PL/2023/11188 Land at Blackmore Farm

Dear Steve and Verity

Melksham Without parish council have considered the current situation with the potential for a community centre on the Snarlton Farm application, the same on the application for Blackmore Farm and the s106 funding for a community centre in the application for Hunters Wood/The Acorn 14/10461/OUT which is now in the parish of Melksham Town. We understand the Town Council are yet to submit a planning application for the proposed site in Angelica Avenue to the rear of Spa Medical Centre.

We just want to draw to your attention and understand how best the planning applications with any s106 funding and land agreed for a community centre, if Wiltshire Council are minded to approve, is dealt with.

Could there be some wording that could be reflected depending on which application is decided on first, that it's the offer of land and funding, or just funding if land secured elsewhere?

The parish council do not think three community centres are required, but perhaps two as the one for the initial development of 800 dwellings east of Melksham had theirs omitted as part of the new primary school development; but we also want to ensure we don't miss out on any at all, and the potential for funding for perhaps one big one. The parish council would like to be party to any discussions on this, with the town council as appropriate.

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

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 twitter: [@melkshamwithout](#)

On Instagram: [melkshamwithoutpc](#)

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to

admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.



Planning Note: Snarlton Farm (PL/2024/07097)

This note is intended to support a submission by DTA Transport in response to highways matters raised in a statutory planning consultation response by Wiltshire Council acting as the Local Highways Authority to planning application: **PL/2024/07097** Land at Snarlton Farm, Snarlton Lane, Melksham, SN12 7QP for:

Erection of up to 300 dwellings (Class C3); land for local community use or building (incorporating Classes E(b), E(g) and F2(b) and (c)); open space and dedicated play space and service infrastructure and associated works on land South of Snarlton Farm (Outline planning application with all matters reserved except for two pedestrian and vehicle accesses (excluding internal estates roads) from Eastern Way) - Resubmission of PL/2023/07107)

This note deals with the planning matters regarding:

- The sustainability of the site location in planning terms
- Proposition of a bridge across Land at Snarlton Farm.

- **The sustainability of the site location in planning terms**

Melksham is a 'Market Town' in the, now submitted, Wiltshire Local Plan. It has found to be a sustainable location for new development.

Snarlton Farm was promoted throughout the local plan. Until very shortly before the regulation 19 stage, the site was an allocation in the Local Plan alongside Land at Blackmore Farm and a number of other smaller sites to form an area Land East of Melksham (Site 1, as set out in the Planning for Melksham). The site was not removed on sustainability grounds rather, it was taken out as the Council has significantly lowered their housing delivery requirements and this has resulted, the Council say, in a lesser need.

The Applicant disagrees with the Council on their distribution of housing and disagree that the evidence base supports such a significant reduction in housing in the Chippenham HMA and will present its case to the Inspector at the Examination of the Wiltshire Local Plan.

It is worthy to note that Wiltshire Council as the Local Highway Authority have been statutory consultees to the Wiltshire Local Plan Review at all stages.

The SHELAA, of which an extract is provided below in figure 1, shows that accessibility for both Land at Snarlton Farm and Land at Blackmore Farm have an “amber status” in regard to accessibility. A conclusion of this late-stage assessment was that there would no over-riding significant impact that would justify rejecting the site.

Figure 1. Site Sieving, Stage 2A and 2B, Planning For Melksham, September 2023.

SHELAA Reference	Site Address	Accessibility	Flood Risk	Heritage	Landscape	Traffic	Stage 2A and Stage 2B - Overall judgement	Taken Forward
3525	Land at Snarlton Lane	Amber	Green	Green	Green	Amber	<p>Site is adjacent to the settlement boundary. The site is adjacent to Melksham football and rugby club to the south. There is an area of flood zone 2 and 3 associated with Clackers Brook running through the centre of the site.</p> <p>At this stage, there are no overriding significant impacts that would justify rejecting the site. The site should be taken forward for further assessment.</p> <p>It would be appropriate to combine this site with 3552, 3686 and 3123 to consider one logical extension to the town.</p>	✓
3552	Land at Blackmore Farm	Amber	Amber	Amber	Red	Green	<p>Site is adjacent to the settlement boundary. From a landscape perspective this is a very large site that is exposed to views across from Sandridge Hill along with wider rural views to the east. However, being a large site, there is potentially scope for mitigation.</p> <p>At this stage, there are no overriding significant impacts that would justify rejecting the site. The site should be taken forward for further assessment.</p> <p>It would be appropriate to combine this site with 3686, 3525 and 3123 to consider one logical extension to the town.</p>	✓

- Proposition of a bridge across Land at Snarlton Farm.

The highways note is supported by Planning, Ecology and Landscape commentary on the proposition of Wiltshire Local Planning Authority that the Applicant, Catesby Estates Promotions Limited, should evidence why a single access point from Eastern Way with a bridge over the River Avon is not appropriate.

This is a late-stage request by the Local Highways Authority and was not raised in consultation to the original planning application in 2023.

Clackers Brook is key to the blue and green infrastructure existing and proposed at Snarlton farm. A bridge would dissect this infrastructure. It is not characteristic of the river channel of Clackers Brook to be crossed regularly with highways infrastructure; it is crossed at Eastern Way and Queensway, east of Melksham Town centre but otherwise maintained as open space within the River Corridor and forming a characterful part of Melksham.

Clackers Brook and land to its immediate side is in Flood Zone 2 and 3. Residential development, the most vulnerable development to flooding, should be located in the area at lowest risk of flooding (ie Flood Zone 1) (NPPF, 2023).

Conclusion

In summary the site is located in a sustainable location, adjacent to a high order settlement in the settlement hierarchy. The Local Highways Authority has not previously raised the need for a single access or a bridge crossing valuable blue and green infrastructure during the course of the promotion of the site in the Wiltshire Local Plan review nor was it raised during the planning application in 2023. It is not characteristic of the wider river channel to be crossed by highways infrastructure, with vehicular crossing points in only two locations east of the River Avon.

Mr Mead wrote in regard to the Blackmore Farm application (Consultation response August 2024):

"Whether a site is sustainable in transport terms is more subjective than qualitative. In a sense of location, the proposed site sits outside the reasonable zone of walking distance for a significant number of identified facilities, which all sit to the west. There is likely to be a reliance on private car use where available. When looking at the wider geography consideration is given to the Bowerhill Area and its reliance on wider facilities within Melksham and its distance from them."

It is hoped that a similar rationality is drawn to this application with an appreciation of the future of this site at Snarlton Farm and its close proximity to development at Site 1, Submission Policy 18 Last East of Melksham.

It is unfortunately not possible to connect the site other than by footpath along Eastern Way, and through the rights of way network, due to land outside of the Applicants control intervening the two sites. It is not possible to extend the red line of the application boundary.

NEAME SUTTON LTD, West Suite, Coles Yard Barn, North Lane, Clanfield, Hampshire PO8 0RN

TEL 02392 597139

EMAIL info@neamesutton.co.uk

WEB www.neamesutton.co.uk

COMPANY No. 07164666

COMPANY REGISTERED ADDRESS: 1 and 2 The Barn, West Stoke Road, Chichester, West Sussex PO18 9AA

(<https://www.wiltshire.gov.uk/>)

Comment

Highways Department's Comment

Planning Application	Stance
PL/2024/07097 (/p...	Comment

[Details \(?tabset-ae70b=...](#)

[Files \(?tabset-ae70b=2\)](#)

Information

Web Comment Name

Highways Department's Comment

Comment Number

WC-25-01-323692

Text

Meeting with LPA and applicant on 29 Jan 2025. Further work agreed. No further response from LHA until receipt and reconsultation on further work, including additional work already submitted.

Date Created

29/01/2025

(<https://www.facebook.com/WiltshireCouncil>)

(<https://twitter.com/wiltscouncil>)



(<https://www.youtube.com/user/wiltshirecouncil>)

Contact (<https://www.wiltshire.gov.uk/contact>)

Newsletter (<https://www.wiltshire.gov.uk/newsletter>)

Cookies (<https://www.wiltshire.gov.uk/cookies>)

Copyright (<https://www.wiltshire.gov.uk/copyright>)

Privacy (<https://www.wiltshire.gov.uk/privacy>)

Data protection (<https://www.wiltshire.gov.uk/data-protection-foi-data-protection>)

Accessibility (<https://www.wiltshire.gov.uk/accessibility>)

© 2025 - Wiltshire Council

Landscape & Visual Statement

Land at Woodrow Road, Melksham

On behalf of Waddeton Park Ltd

Job Code: P24-2824 Date: 20/11/2024

Author: Neil Furber BSc (Dual Hons), PGDip, CMLI

7. Summary and Conclusions

Approach

- 7.1. Pegasus Group have been commissioned by Waddeton Park Ltd to prepare a Landscape and Visual Statement (LVS) to accompany an outline planning application for an outline application for up to 70 dwellings, vehicular access, open space, landscaping, and other associated works (the 'Proposed Development') on a 3.82 hectare site on the northern edge of Melksham, Wiltshire.
- 7.2. An initial desk-top study was carried out to review a range of published information relating to the site and its context, landscape designations, published landscape character assessments and the accompanying guidance.
- 7.3. A site visit was carried out in November 2024, and the likely visibility of the proposals during winter when trees are not in leaf has been considered as part of the assessment.
- 7.4. This LVS does not comprise a full Landscape and Visual Appraisal in accordance with the Guidelines for Landscape and Visual Impact Assessment, however it has been prepared by a Chartered Landscape Architect with over 25 years consultancy experience of similar schemes.
- 7.5. This report has been undertaken with regard to published best practice, although for the avoidance of doubt it is not a formal Landscape and Visual Impact Assessment.

Baseline

- 7.6. The Site is in arable agricultural use, as part of a larger field and lies on the northern edge of Melksham, adjoining the post war residential estates along Meadow Road and Lincoln Gren to the south and ribbon development along Woodrow Road to the east.
- 7.7. The River Avon runs 100-150m to the west and a line of high voltage overhead lines on lattice pylons runs along the northern edge of the Site.
- 7.8. The Site is located on relatively level ground ranging from 42m AOD in the northeastern corner to a level of 39.5m along the southern boundary.
- 7.9. The site lies outside of any statutory or local/non-statutory landscape designations and is not located within the Green Belt.

Proposed Development

- 7.10. The evolution of the design and description of the Proposed Development is set out in the Design and Access Statement (DAS). The illustrative masterplan incorporates generous amounts of open space which is integral to the overall layout. Combined, the areas represent 48% of the application area.
- 7.11. Vehicular access is proposed via a single road link that would connect to Woodrow Road to the east, at an existing gap in the residential frontage to the highway. The proposed density is up to 35 dph and building heights would be limited to 2 storeys to reflect local townscape context.

Likely Landscape Effects

- 7.12. The loss of part of a field would be slight in the context of the extent of the wider agricultural landcover with an opportunity to increase the species diversity of permanent grassland, at the periphery of the Site. There would be no loss of trees and the loss of a short section of species poor hedgerow fronting Woodrow Road to accommodate the access would be more than compensated by native hedgerow planting within the Site.
- 7.13. The public footpath along the southern boundary of the Site would be retained and enhanced, and alternative routes provided within the Site.
- 7.14. The Wiltshire Landscape Character Assessment (2005) identifies the site as being located, within the 'Open Clay Vale' Landscape Character Type (LCT 12) and the 'Avon Open Clay Vale' Landscape Character Area (LCA) 12B.
- 7.15. The character of the site and local countryside is not of such value that it has warranted a national or local landscape designation, and the landscape has no features that would indicate a 'valued' landscape in the context of the National Planning Policy Framework (NPPF) Paragraph 180(a).
- 7.16. The relatively flat topographical profile of the site, close relationship to existing settlement to the south and east, and the presence of the pylon line along the northern boundary of the Site indicates that the landscape of the Site and immediate locality has a lower susceptibility to change.
- 7.17. The Site does not contain any landscape features that would be considered rare or unique and does not contain or adjoin any designated heritage or nature conservation assets. There are no known cultural associations with the Site or its immediate context that have been recorded in notable works of literature or art.
- 7.18. The landscape value of the Site is assessed as medium and the susceptibility of the Site to the type of change proposed is assessed as low, taking into account the presence of the existing settlement edge and pylon line to the north. The overall landscape character sensitivity is medium to low.
- 7.19. The immediate landscape context is defined by the housing estate on the edge of Melksham to the south and ribbon development to the east. As part of the Proposed Development, new mitigation planting beyond the easement associated with the overhead lines would present an opportunity for an improved interface between built development and the countryside, with no material indirect harm to wider landscape character.
- 7.20. There would be no change to any of the listed key characteristics of the "Open Clay Vale" LCT and "Avon Open Clay Vale" LCA. Beyond the immediate vicinity of the site, the opportunity to perceive indirect effects upon landscape character from the new development would be very localised. The impact of the proposals upon ordinary countryside, already heavily influenced by a close relationship to existing housing to the south and east, and defined by high voltage powerlines to the north, would not result in any material change to wider landscape character.

Likely Effects upon Visual Amenity

- 7.21. The main opportunities for views of the proposals would occur from the public right of way that follows the southern boundary of the Site connecting Methuen Avenue to the southwest and Woodrow Road to the east. There would be views from the public footpath along the western boundary of the Site, that at the time of the site visit took a narrow route through

the maize crop. There would also be a fleeting view from Woodrow Road to the east at the location of the site access.

7.22. Views towards the Site would also be available from the local public rights of way network to the west and northwest, although at the time of the site visit views were obscured by the maize crop.

7.23. More distant views from the countryside to the north and northwest are restricted by the gently undulating nature of the landform that falls towards the River Avon and tributary water courses. Where limited views may occur, the proposals would be viewed against the existing settlement edge of Melksham.

Landscape Officers Response to the Outline Application

7.24. The response to the Landscape Officers Consultation Response dated 11/08/2022 is set out below. Further details would accompany a Reserved Matters application, should an outline consent be granted.

- The Illustrative layout and Design and Access Statement would respect the historic/future alignment of the Wilts/Berks canal;
- The Public footpath along the southern boundary of the Site would be incorporated into the design within an enhanced landscape setting;
- New native woodland planting along the northern and eastern boundary of the site beyond the pylon easements to reinforce the new settlement edge, subject National Grid easement requirements;
- Detailed landscape design as part of a Reserved Matters application that demonstrates the required biodiversity net gain and delivery of appropriate recreational provision; and
- Investigation as part of a Reserved Matters Section 106 agreement of the feasibility, within landownership constraints, of Green Infrastructure connections to the River Avon Corridor.

Planning Policy Review

7.25. An appraisal of the outline scheme against relevant national and local planning policy has been undertaken with respect to landscape and visual matters. It is concluded that the Illustrative Masterplan with potential modifications detailed above, could, at a Reserved Matters stage, comply with the relevant Core Strategy Policies from the Wiltshire LDF and Joint Melksham Neighbourhood Plan Policies.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sourced from sustainably managed forests.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK

Wiltshire Council Planning Consultation Response

29 January 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: Ruaridh O'Donoghue
Direct Line: 01225 716761

Application No: PL/2024/10345
Full planning permission
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.
Land north of the A3102, Melksham.

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

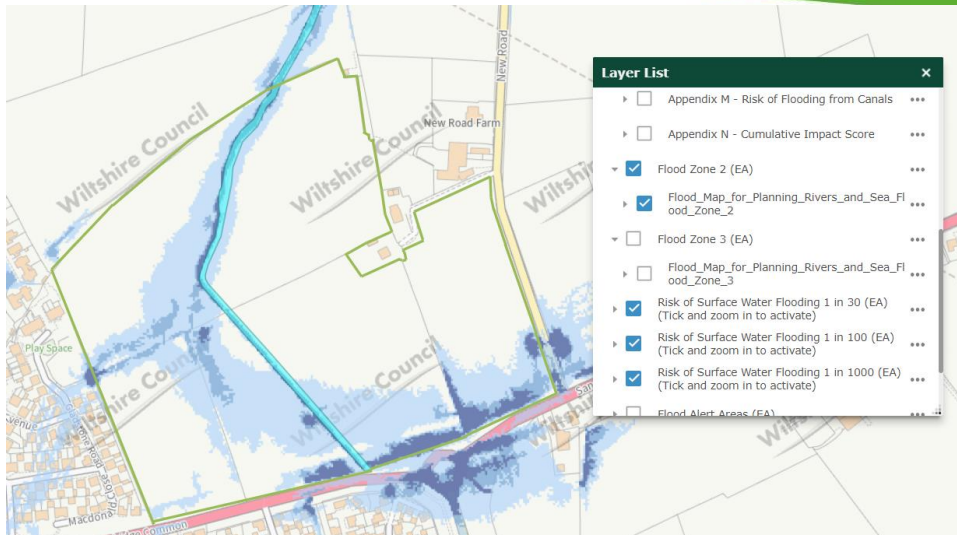
<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input type="checkbox"/>	Support subject to conditions (please set out below)
<input checked="" type="checkbox"/>	Holding objection (for reasons set out below)
<input type="checkbox"/>	No objections

Matters Considered:

Documents Reviewed:

- Application Form
- Design and Assess Statement
- Drainage Strategy
- Drainage Strategy Layouts
- Flood Risk Assessment and Outline Drainage Strategy
- Illustrative Landscape Strategy
- Site Layout
- Ground Investigation

The application has been supported with a Site Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA and we do not take any responsibility for incorrect data or interpretation made by the authors.



Most of the site is located within Flood Zone 1. However, the extent of the watercourse within the site is in Flood Zone 2, but the proposed 295 dwellings have an 8m easement from the main water course. The proposed site does not support infiltration and therefore this will not be a viable means of surface water discharge.

SFRA mapping shows the site to have a low-medium risk of surface water flooding and a low risk of ground water flooding. The FRA for the site references modelling that has been carried out to establish the extent of surface water flooding when considering the various existing drainage features and watercourse within the site. We would expect this modelling report to be submitted as part of the application to properly understand the flood risk implications.

Based on the observed flooding within the redline boundary for the development, the applicant should engage with the LPA to understand as per NPPF (December 2024), whether a sequential test is required to demonstrate that there is no reasonably available alternative sites at lower risk of flooding. The LPA should define the area of the search, to enable the Sequential Test to be completed. Please note that whilst this has technical implications, the Sequential Test is a planning matter and not a technical drainage matter.

The applicant is proposing to attenuate surface water using detention basins but has not proposed any other SuDS as part of the development. We would expect a review of the proposed layout to be undertaken to consider where further SuDS can be utilised in line with NPPF Paragraph 182.

An exceedance plan has been provided but this plan only covers the highways. Given the scale of the development, we would expect the exceedance plan to show exceedance routing around properties (considering driveways and gardens) to demonstrate that properties are protected from these flows. We would also expect the exceedance plan to show the locations and extents of any surface water ponding.

It is also noted that the EA have objected to the proposal to culvert Forest Brook on environmental/biodiversity grounds.

Objections:

The drainage team in their capacity as Lead Local Flood Authority have the below objections to the application; these must be overcome before a drainage objection can be removed:

1. **The applicant should carry out a review of the proposed layout with respect to the four pillars of SuDS design as per the NPPF (para 182) which dictates that SuDS are to provide multifunctional benefits, where possible.**
2. **In conjunction with the LPA, it should be confirmed whether the site is subject to and passes the Sequential Test / Exception Test as relevant.**
3. **The applicant should provide the modelling report referenced in the FRA to ensure proper understanding of the flood risk implications of the development.**
4. **An exceedance plan that shows exceedance routing around individual properties and the location and extent of any surface water ponding should be provided.**

5. Detailed drawings (including cross sections) of any attenuation, conveyance or infiltration drainage features should be provided. These should detail ground and water levels, inlet and outlet structures, and construction details.

Conditions:

The drainage team have the following conditions which would need to be addressed by the applicant prior to gaining LLFA approval:

1. No development hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details.

In order to discharge the above drainage condition the following additional information must be provided:

- Clear arrangements for the ownership and ongoing maintenance of the SuDS over the lifetime of the development. Where it is specified that a homeowner would be responsible for the maintenance of any drainage or SuDS features, this responsibility should be detailed in the property deeds. Where drainage or SuDS features are proposed to be adopted, adoption agreements should be provided.

REASON: To ensure that the SW drainage performs as designed and to avoid flooding due to lack of maintenance.

- A construction management plan, which shall include monitoring of, and measures to retain, the existing vegetation across the site, together with details of drainage arrangements during the construction phase, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

REASON: There's a statutory duty to ensure that surface water quality and quantity is managed throughout construction and as not to increase flood risk, or pollution of watercourses

Informatives:

- The application states that foul drainage will discharge to public sewer. This requires consultation with the sewerage undertaken for the area.
- Wiltshire is a land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

An ordinary watercourse is a watercourse that does not form part of a main river. The term watercourse includes all rivers and streams and all ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) and passages, through which water flows.

Wiltshire Council's land drainage bylaws can be downloaded [here](#). The land drainage consent application form and guidance notes can be found on our website [here](#).

- All new drainage will need to comply with Building Regulations Part H.
- There must be no interruption to the existing surface water and/or land drainage arrangements of the surrounding land because of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively.

Abhishek Nandan (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.

Ruaridh O'Donoghue
Wiltshire Council
Development Control West
County Hall Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our ref: WX/2024/138581/01-L01
Your ref: PL/2024/10345

Date: 24 January 2025

Dear Ruaridh

CONSTRUCT 295 HOMES; PUBLIC OPEN SPACE, INCLUDING FORMAL PLAY SPACE AND ALLOTMENTS; SUDS; AND ASSOCIATED INFRASTRUCTURE; WITH 0.4HA OF LAND SAFEGUARDED FOR A NURSERY. PRINCIPAL POINT OF ACCESS FROM NEW NORTHERN ARM ON THE EXISTING EASTERN WAY/A3102 ROUNDABOUT JUNCTION, WITH SECONDARY ACCESS ONTO THE A3102. ADDITIONAL ACCESS POINTS FOR PEDESTRIANS AND CYCLISTS

LAND NORTH OF THE A3102, SANDRIDGE COMMON, MELKSHAM

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

We **object** to this application due to flood risk and the use of culverts.

Objection 1 – Flood Risk

We **object** to the planning application as currently we have insufficient information to adequately assess the flood risks posed by the development.

Reason

The Flood Risk Assessment (NPPF: Flood Risk Assessment and Outline Drainage Strategy, Ref SHF.102.003.HY.R.002.B, written by Enzygo, dated Oct 2024) references modelling that has been carried out. Due to potential imminent changes in national flood risk mapping, which could potentially significantly change flood risk to this site, we need to see the model report (which should support the modelling) to understand the flood risk implications.

Overcoming our objection

The applicant must submit a modeling report that clarifies the potential flood risk implications.

Objection 2 – Culverting

We **object** to the proposed culverting of the main river (Forest Brook), due to its impacts on Water Framework Directive (WFD) requirements.

Reason

We are opposed to culverting because it damages habitats, interrupts wildlife corridors and disrupts river continuity. Article 10 of the Habitats Directive states that wildlife corridor networks should be protected from development, and, where possible, strengthened by or integrated within it.

Environment Agency, Rivers House (Sunrise Business Park) Higher Shaftesbury Road, Blandford Forum, Dorset, DT11 8ST. Customer services line: 03708 506 506 www.gov.uk/environment-agency

Cont'd

This objection is supported by paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

Overcoming our objection

The applicant must explore the feasibility of using clear-span bridges instead of culverts. We will need to see evidence of this. If clear span bridges are proven not to be feasible the applicant must provide appropriate assessments (WFD/WER assessment) to demonstrate that culverting will not increase flood risk elsewhere and will not result in an unacceptable impact on channel hydromorphology.

Note to Applicant – Clear span bridge design

We require clear span bridges to be designed with soffits set at least 600mm above the 1 in 100 year flood level plus an appropriate allowance for climate change.

Note to Applicant – Biodiversity opportunities

Whilst we are pleased to see the watercourse will have an enhanced corridor (buffer strip), there are sections where the footpath is too close to the channel and risks potential erosion in future, particularly where the path is on the outside of a bend. The path must be moved away from the watercourse at these points.

The Biodiversity Net Gain assessment (Appendix 8.2: Biodiversity Net Gain Statement and Assessment, dated 4th November 2024 written by GE Consulting) states “...there are no opportunities to provide extra units within the red line boundary”. However the straightened section of channel would benefit from increased sinuosity with appropriate in-channel interventions. There may be a good opportunity here to generate some watercourse credits with increased sinuosity.

Note to LPA

If you are minded to approve the application contrary to our objection, we request you notify us immediately to allow further consideration and advice.

If you have any queries regarding our response, please get in touch

Yours sincerely

Ms Lindsay Fello
Sustainable Places - Planning Advisor

Email wx.sp@environment-agency.gov.uk
Phone 020 3025 1229



Energy Strategy Statement

Bloor Homes

Land off Sandridge Common Melksham

1. Executive Summary

Bloor Homes has instructed Briary Energy to prepare this document, which examines the feasibility of suitable Low to Zero Carbon (LZC) sources, high-efficiency alternative systems, and low carbon energy efficiency measures.

The Land off Sandridge Common Melksham development will comprise of 295 dwellings. The developer will first ensure a Building Regulation compliant carbon reduction across all dwellings through fabric measures, before assessing LZC technologies where appropriate.

The energy consumption figures for the development will be based on benchmark figures for each building type from SAP 2021 and include regulated and non-regulated emissions.

1.1. Site Plan

The section below provides an overview of the development which is promoted in this application.



2. National Planning Policy Framework (NPPF)

The latest National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of planning of sustainable development. The NPPF has guidance for developments to ensure they plan for climate change.

Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Planning for climate change

158. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁵⁶. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

159. New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

160. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.

161. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

Paragraph 163 sets out what is expected from local authorities when considering strategies to mitigate and adapt to climate change:

163. When determining planning applications⁵⁷ for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions;
- b) approve the application if its impacts are (or can be made) acceptable⁵⁸. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas; and
- c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site and approve the proposal if its impacts are or can be made acceptable

3. Energy hierarchy through design

The Land off Sandridge Common Melksham development will be developed with the aim of reducing annual energy consumption, whilst providing energy in the most environmentally friendly way to reduce the annual CO₂ footprint.

This strategy has been developed using established methodology (as recommended by CIBSE). It has three stages of priority, seeking to reduce energy use through the cleanest possible solutions.

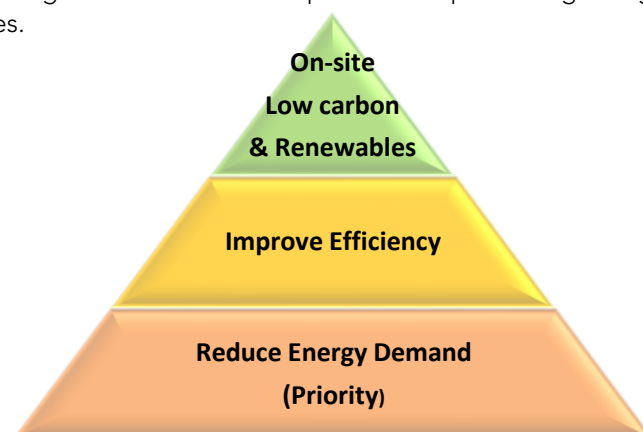
Be Lean - Reducing energy needs through improved design and construction.

Be Clean - Supply energy efficiently through the use of decentralised energy where feasible.

Be Green - Further reduce CO₂ emissions through the use of on-site renewable sources, where practical.

As this hierarchy demonstrates, designing out energy use is weighted more than the generation of low-carbon or renewable energy to offset unnecessary demand. Applied to the development of new housing, this approach is referred to as 'fabric first' and concentrates finance and efforts on improving U-values, reducing thermal bridging, improving airtightness and installing energy efficient ventilation and heating services.

This approach has been widely supported by industry and government for some time, with previous reports from Zero Carbon Hub [1] and Energy Saving Trust [2] having both stressed the importance of prioritising energy demand as a key factor in delivering resilient, low energy homes.



Further to the above methodology, we have also looked at other steps towards achieving a low carbon solution, including:

- The incorporation of passive design solutions by considering the dwellings orientation and layout solutions;
- The incorporation of energy efficiency measures through the design of services and improved fabric performance;
- Calculation of the predicted design energy consumption rates and associated annual CO₂ emissions in comparison with a 'baseline' building (using Part L Regulations compliance standards) to include both regulated and un-regulated energy use;
- Assessment of the viability of incorporating low and zero carbon energy sources.

Benefits of the Fabric First Approach	Fabric Energy Efficiency Measures	Bolt on renewable energy technologies
Energy/CO ₂ /fuel bill savings applied to all dwellings	✓	X
Savings built-in for life of dwelling	✓	X
Highly cost-effective	✓	X
Increases thermal comfort	✓	X
Potential to promote energy conservation	✓	✓
Minimal ongoing maintenance / replacement costs	✓	X
Minimal disruption to retrofit post occupation	✓	X

[1] Zero Carbon Hub, Zero Carbon Strategies for tomorrow's new homes, Feb 2013.

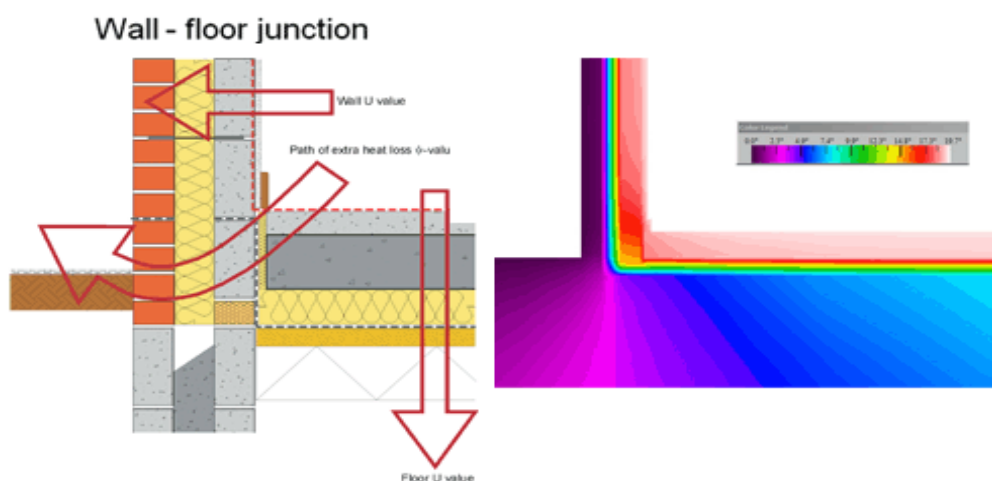
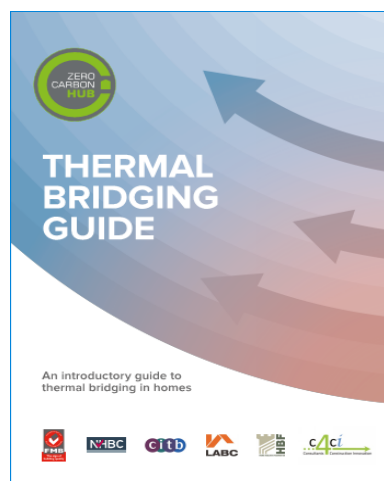
[2] Energy Saving Trust, Fabric first: Focus on fabric and services improvements to increase energy performance in new homes, 2010

4. Be Lean - Energy efficient design measures

Enhancing the thermal performance of the building is usually more cost effective than providing renewable energy, with more reliable CO₂ savings for the long-term life cycle of the building, without the cost of replacing mechanical or electrical components on a continual basis. Adding renewable technology will then maximise these carbon reductions, reducing the quantity required.

Element	Building Regulations 2021	Proposed
Ground Floor	0.18 W/m ² k	0.11 W/m ² k
External Wall	0.26 W/m ² k	0.24 W/m ² k
Ins Joist	0.16 W/m ² k	0.09 W/m ² k
Ins Rafter	0.16 W/m ² k	0.16 W/m ² k
Windows	2.00 W/m ² k	1.30 W/m ² k
Doors	2.00 W/m ² k	1.20 W/m ² k
Air Permeability	8.00 m ³ /hm ² (@50 Pa)	4.00 m ³ /hm ² (@50 Pa)
Thermal Bridges	0.15 ≤ Y	Calculated Constructive Details

Improving the thermal bridge constructive details can have a great impact on the heat loss of the development, in some cases using enhanced details can make as much as a 27% improvement on fabric alone.

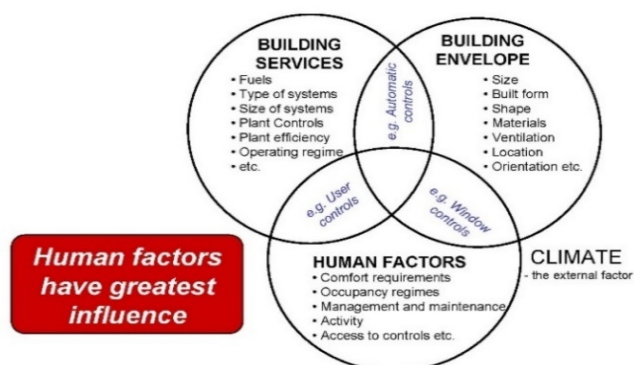


Additional improvements to thermal performance can be achieved by ensuring good practice airtightness targets are achieved. Simple measures like sealing around services (e.g. water, gas and cables), using proprietary seals and collars, ensuring blockwork is sealed and parging layer/plaster finish is applied to external walls before erecting studwork for internal partitions will all improve air tightness results.

5. Be Clean - Energy efficient M & E systems

Having reduced energy demand through the fabric first approach, we now look to specify mechanical and electrical systems with efficiencies that surpass the requirements of the Domestic and Non-domestic Building Services Compliance Guide (2013).

FACTORS THAT INFLUENCE ENERGY CONSUMPTION



The following energy efficient systems are proposed. This covers the clean mechanical and electrical systems, HVAC (heating, ventilation, air conditioning), hot water, lighting and efficient controls. Some renewable factors may be considered and included at this stage, i.e.: heat recovery, air source heat pumps or ground source heat pumps. The suitability of such technologies will be explored further within this report.

Element	Building Regulation Values	Proposed Values
Low energy lighting (efficacy $\geq 45\text{lm/W}$)	75%	100%
Air Source Heat Pump	170%	250% +
Shower Save (WWHRS)	N/A	N/A
Hot Water Cylinder - L	Notinal kWh/day	Calculated kWh/day
Heating controls	Programmer, TRV's & room stats	Time & Temp Zone controls (over 150m ²)
Advanced controls	N/A	delayed start
Ventilation	0.5 l/W/s (SFP)	0.11 l/W/s (SFP)

6. District Heating

As part of planning, any major development proposal should evaluate feasibility of energy systems in accordance with the following hierarchy: -

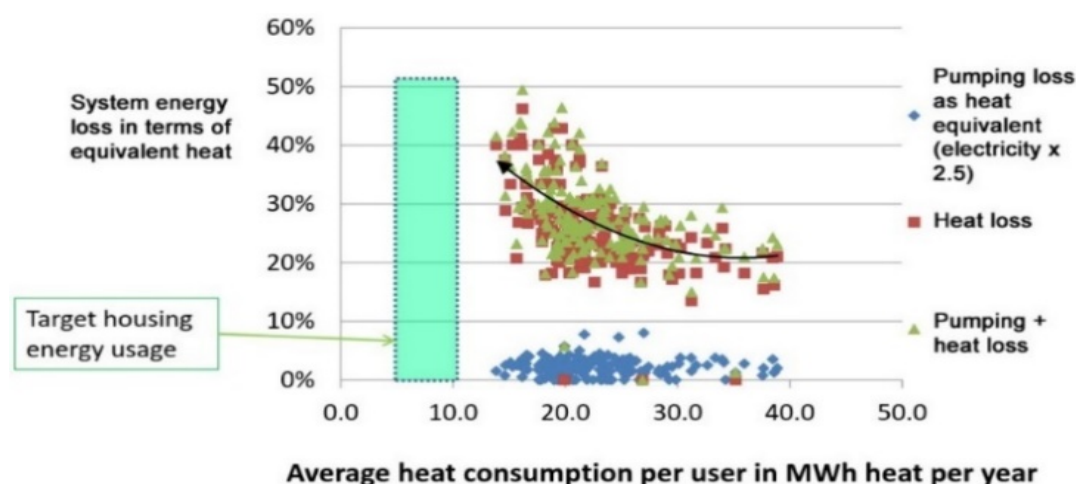
- Connection to existing heating and cooling networks;
- Site wide combined heat and power (CHP) network;
- Communal heating and cooling.

Over several years, building service engineers Max Fordham have studied the benefits and drawbacks of providing heat to buildings via hot water heat networks supplied from community scale heat sources, in particular combined heat and power (CHP). Government scenario planning includes predictions that by 2050 heat networks may supply about 20% of the UK's building heat demand [D. o. E. & C. Change, "National Energy Efficiency Data-Framework (NEED) report: Summary of analysis 2013 Part 1," DECC, 2013.]. It is clear that government policy is vigorously pursuing gas fired CHP with heat networks, but to what effect?

The issues are varied and complex, and include: consideration of the heat sources that may be in use in the future; the future strategy for national electricity generation; the difference between "as predicted" and "as measured"; the relationship to the intensity of heat demand; and the costs to the end users.

The most important aspect that Max Fordham concluded is that the heat network system heat losses are very large. They are much larger than the assumed values used in regulatory and system planning calculation methods (such as SAP). An unfortunate feature of this (district heating) debate is that good quality data from a wide range of UK installations is not available or not publishable due to its commercially sensitive nature. Clearly this situation is not helping the UK develop a low carbon heat strategy.

However, data from the Danish District Heating Association shows that from analysis of about 100 installations the heat losses in the municipal distribution pipes ranged from 15% to 45% of the heat supplied. This is only the loss up to the building site boundaries. There will be additional losses inside the buildings too. The current UK average domestic heat demand is 14MWhr/dwelling/yr. [D. o. E. a. C. Change, "National Energy Efficiency Data-Framework (NEED) Summary consumption statistics," DECC, 2011.]. At this scale the Danish data shows that a heat loss of around 35%. If the heat demand from buildings is reduced to less than 10 MWh/yr. (which is desirable) then the heat losses might represent 50% of the heat supplied.



Danish data of heat and pumping losses in district heating systems. Source: Birger Lauersen, International chef / Manager International Affairs, Dansk Fjernvarme / Danish District Heating Association

District Heating - Continued

High system heat losses (and pumping demands) mean that in many cases, gas fired CHP with heat networks will not reduce, but increase carbon emissions. This is particularly true when compared to using individual gas boilers and electricity from the current national grid. It is clear that heat networks need to be reassessed (by the UK Government) taking into account the true extent of heat losses and/or the mitigation measures required to reduce them. If this is done, we may well see quite a change in national and local policies for heat networks, with or without CHP.

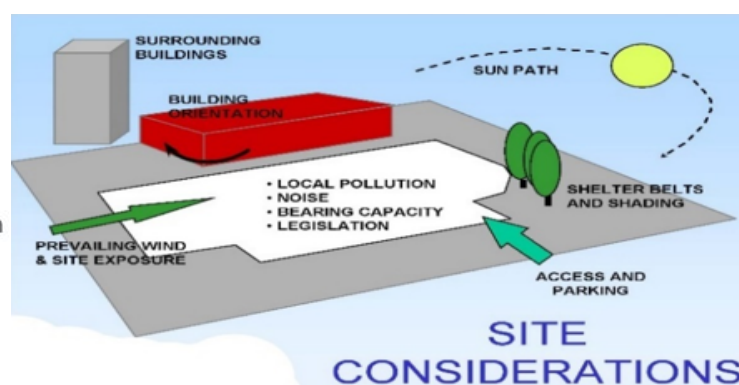
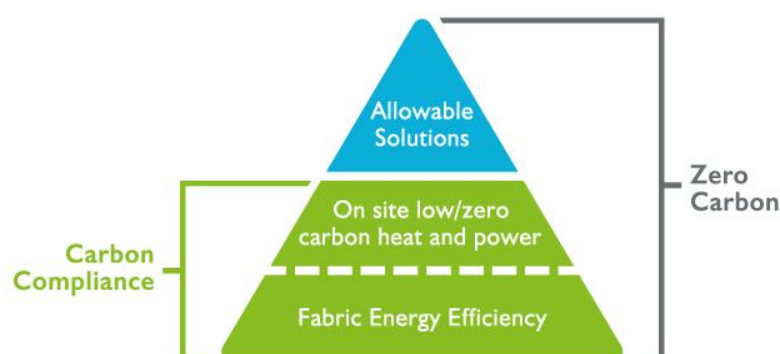
Our preference has always been a much more vigorous pursuit of heat demand reduction, principally by insulating and draught proofing existing buildings. From our observations of district heating systems we believe that the very high losses can be reduced with improved components, improved design and improved care during installation. However, it is highly unlikely that the system losses could be reduced to the levels that have informed current government policy anytime soon.

The development will not connect to any existing district heating system, nor will a new system be considered, for the following reasons:

- the site is mainly residential, with units dispersed over a large area. This will mean that a large distribution network would be required, and it is anticipated that distribution losses would be high.
- the carbon reduction and energy efficiency requirements can be achieved at a lower cost, and at a greater benefit to the homeowner the 'fabric first' approach is proposed.
- the site is too far away from existing District Heat networks.
- the home owners would be tied to the same supplier, removing choice.
- The statement on the previous page outlines why CHP and district heating systems are generally more expensive to run, consume more energy and issue more CO₂ than an equivalent "conventional" systems.

7. Low to Zero Carbon Technology Reductions

In order to satisfy local planning requirements, a detailed assessment of Low to zero carbon technologies will be carried out. Each energy efficiency measure has been considered to give a greater understanding of which solutions could be implemented at the development to provide energy and CO₂ savings beyond current building regulations. Feasibility is based on location, cost, payback for both initial payment and ongoing maintenance and suitability



Technologies Not Considered within following feasibility study -

- **Fuel Cells** : These are not yet fully commercially available
- **Hydro** : Small scale hydro would be inappropriate for integration into the proposed development due to the geographical location of the proposed site
- **CHP, Biomass and Biogas District heating**: These have been discounted under the District Heating Scheme section

Low to Zero Carbon Technology Reductions - cont.

7.1. Solar Hot Water

Solar water heating systems use heat from the sun to work alongside conventional primary water heaters. The technology is well developed with a large choice of equipment to suit many applications. There are three main components.

Solar collectors - fitted to the roof and collect heat from the sun's radiation. There are 2 main types of collector:

- Flat plate systems: comprised of an absorber plate with a transparent cover to collect the sun's heat
- Evacuated tube systems: comprised of a row of glass tubes that each contain an absorber plate feeding into a manifold which transports the heated fluid.

Heat transfer system - uses the collected heat to heat water

Hot water cylinder - stores the hot water that is heated during the day and supplies it for use later.

All savings are approximate and are based on the hot water heating requirements of a 3 bed semi detached home. Solar water heating can be used in the home or for larger applications. A domestic system would typically require 3-4 square metres of southeast to southwest facing roof receiving direct sunlight for the main part of the day and space to locate an additional water cylinder.

installation and maintenance costs - The typical installation cost for a domestic system is £3,000- £5,000. Evacuated tube systems are more advanced in design than flat plate, and so tend to be more expensive. Solar water heating systems generally come with a 5-10 year warranty. A yearly check by the householder and a more detailed check by a professional installer every 3-5 years should provide sufficient maintenance.

Proposed for this development?

No



Solar Thermal Calculation

Number of plots with panels	0
Size of Panel	4.5
Number of Panels per plot	0
Total m ²	0
Average kWh/m ²	294
Energy produced by panels	N/A
Energy% Saved From Panels	N/A
CO ₂ % Saved From Panels	N/A

Not Proposed for this development because...

- Solar Thermal relies on energy from the sun, therefore producing hot water only during daylight hours
- Poor servicing and badly programmed controls can make this technology operate less efficiently than a standard boiler
- Hot water storage has a heat loss linked to it, which can contribute to summer overheating and reduced efficiency
- This is not a 'fit and forget' technology, it requires regular servicing, replacement parts and optimizing of controls
- This is not suitable for poorly orientated dwellings
- Solar thermal is predominantly not feasible for dwellings with combination boilers

7.2. Photovoltaic Collectors (PV)

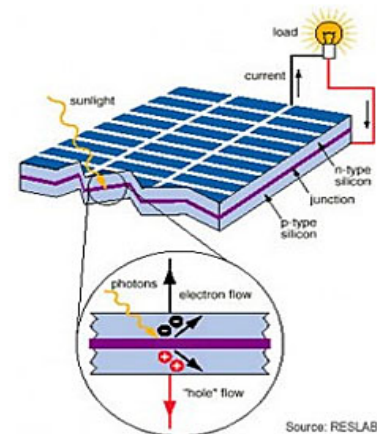
Proposed for this development?

Yes

Solar PV panels create electricity to run appliances and lighting from natural daylight (direct sunlight is not required) to generate electricity.

How it works

Photovoltaic cells convert solar radiation into electricity. The PV cell consists of one or two layers of a semi conducting material, usually silicon. When light shines on the cell it creates an electric field across the layers, causing electricity to flow. The greater the intensity of the light, the greater the flow of electricity. PV systems generate no greenhouse gases, saving approximately 325kg of carbon dioxide emissions per year- adding up to about 8 tonnes over a system's lifetime for each kilowatt peak (kWp). PV cells are referred to in terms of the amount of energy they generate in full sun light.



PV arrays come in a variety of shapes and colours, ranging from grey 'solar tiles' that look like roof tiles, to panels and transparent cells that you can use on conservatories and glass to provide shading as well as generating electricity. As well as enabling you to generate free electricity they can provide an interesting alternative to conventional roof tiles.

PV performs optimally with a roof or wall that faces within 90 degrees of south, as long as no other buildings or large trees overshadow it. If the roof surface is in shadow for parts of the day, the output of the system will decrease. The additional weight of PV will require the roof to be designed accordingly to carry the load. Solar PV installations should always be carried out by a trained and experienced installer. The area of PV required to provide 1kWp is around 6.5m².

Cost and maintenance

Prices for PV systems vary, depending on the size of the system to be installed, type of PV cell used and the nature of the building on which the PV is mounted. The size of the system is dictated by the amount of electricity required. For the average domestic system, costs can be around £1250-£2000 per kWp installed (energy saving trust 2017), with most domestic systems usually between 1.5 and 2 kWp. Solar tiles cost more than conventional panels, and panels that are integrated into a roof are more expensive than those that sit on top. Grid connected systems require very little maintenance, generally limited to ensuring that the panels are kept relatively clean and that shade from trees has not become a problem.

The wiring and components of the system should however be checked regularly by a qualified technician. Stand-alone systems, i.e. those not connected to the grid, need maintenance on other system components such as batteries.



Photovoltaic Collectors (PV) - continued

Proposed for this development?

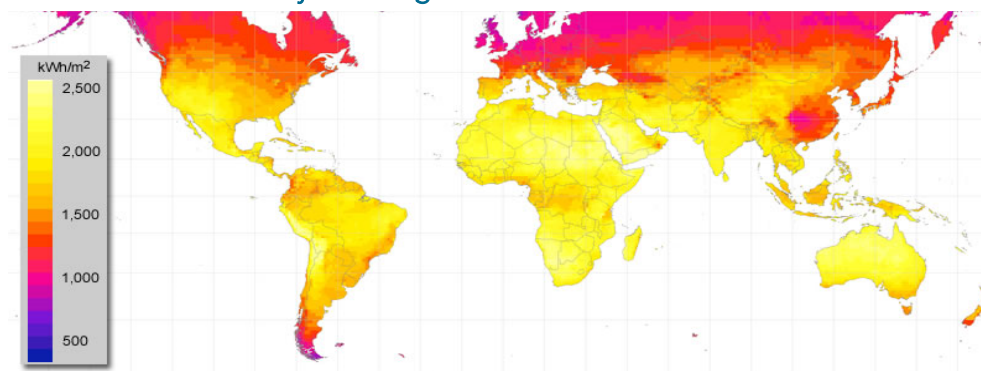
Yes

In determining the feasibility of Solar PV, energy output will be calculated through the equation - $E = A \times r \times H \times PR$, detailed below.

Loss details (dependent on site, technology, and sizing of the system)

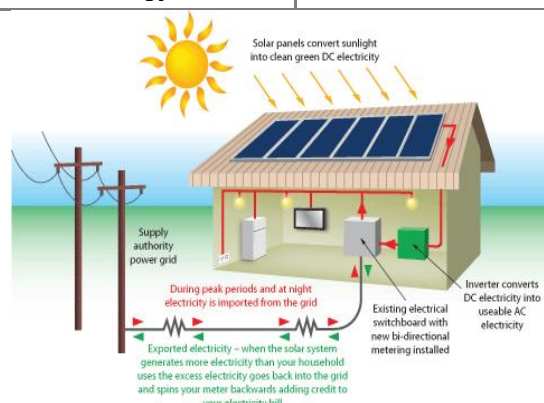
Inverter losses	4%
Temperature losses	3%
DC cables losses	1%
AC cables losses	1%
Shadings	0%
Losses weak irradiation	1%
Losses due to dust, snow	1%
Other Losses	0%

Yearly sum of global irradiance



	Total site kWp	PR = Perf Ratio	H = Annual irradiation	r=panel yield(%)	A=Panel Area(m²)	E=Energy (kWh)
South	185	0.89	1054	20%	925	173,541.10
SE/SW	90	0.89	997	20%	450	79,859.70
East/West	200	0.89	854	20%	1000	152,012.00
NE/NW	0	0.89	686	20%	0	0.00
North	0	0.89	640	20%	0	0.00
	475				Total Energy kWh	405,413

PV Panels required to meet 475kWp output	
240W Panels	1979 Panels Required
250W Panels	1900 Panels Required
270W Panels	1759 Panels Required
300W Panels	1583 Panels Required
330W Panels	1439 Panels Required



Proposed for this development because...

In order to achieve a Building Regulation standards or better improvement (over part L) at Land off Sandridge Common Melksham, 475kWp of Solar PV will be applied, following initial demand reduction through fabric efficiency measures. The below details the viability of PV for this development -

- Clean, green energy. During electricity generation with PV panels there are no harmful greenhouse gas emissions
- PV panels have no mechanically moving parts, with good quality panels lasting up to 25 years and some inverters lasting as long as 10 years;
- There are direct cost savings to the dwelling occupier, less electricity to buy and often tax credits and other incentives.

7.3. Micro wind turbine

Proposed for this development?

No

Wind turbines use the wind's lift forces to rotate aerodynamic blades that turn a rotor which creates electricity. In the UK we have 40% of Europe's total wind energy.

Most small wind turbines generate direct current (DC) electricity. Systems that are not connected to the national grid require battery storage and an inverter to convert DC electricity to AC (alternating current- mains electricity). Wind systems can also be connected to the national grid. An inverter and controller convert DC electricity to AC at a quality and standard acceptable to the grid. No battery storage is required. Any unused or excess electricity may be able to be exported to the grid and sold to the local electricity supply company.

There are two types of wind turbines -

- Mast mounted - free standing and located near the building(s) that will be using the electricity.
- Roof mounted- can be installed on house roofs and other buildings



Potential Benefits

Wind power is a clean, renewable source of energy which produces no carbon dioxide emissions or waste products. Individual turbines vary in size and power output from a few hundred watts to two or three megawatts (as a guide, a typical domestic system would be 1- 6 kilowatts). Uses range from very small turbines supplying energy for battery charging systems (e.g. on boats or in homes), to turbines on wind farms supplying electricity to the grid.

Not Proposed for this development because...

The Government wind speed database predicts local wind speeds at Land off Sandridge Common Melksham to be 4.4 m/s at 10m above ground level, 5.1 m/s at 25m above ground level and 5.7 m/s at 45m above ground level. This is below the level generally required for commercial investment in large wind turbines.

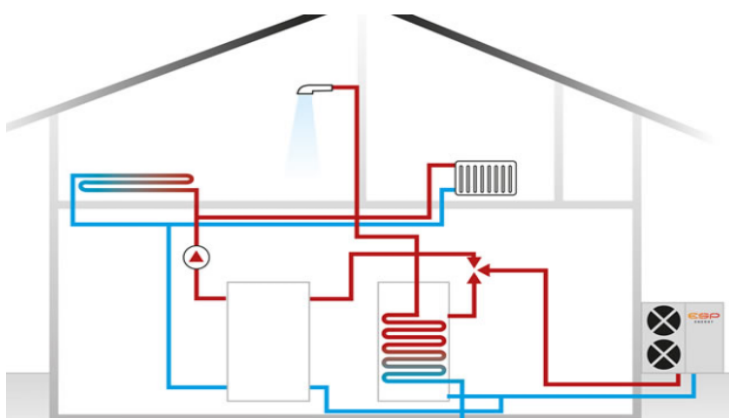
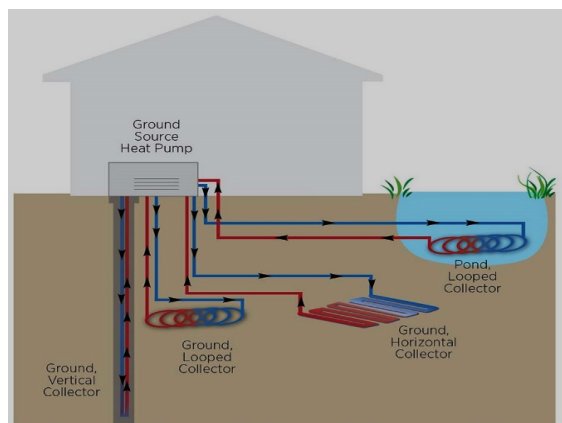
- Large potential land take, noise pollution and signal interference make a large wind turbine unsuitable for this development
- Horizontal axis micro-wind turbines only reduce carbon emissions by a small amount. High winds can cause the turbine to be stationary
- Health and safety is a factor, with high speed moving parts mechanical failure can be catastrophic to human life, birds and wildlife
- The turbine flicker effect means that the turbine needs to be at least 400 metres from the nearest dwelling and computer controlled to take into account the position of the sun

7.4. Heat Pumps (ASHP & GSHP)

Proposed for this development?

Yes

There are two types of heat pumps, ground source and air source. Heat pumps work in a similar way to fridges and air conditioners and absorb heat from the ground or from the air. Ground Source Heat Pumps (GSHP) and Air Source Heat Pumps (ASHP) are mainly designed to work with under floor heating systems because of the lower design temperatures of under floor systems. The Coefficient of Performance (CoP) of ground source heat pumps can range between 3.5-5.5 and air source between 2.5-4.5.



GSHPs require significantly more space to install heating coils, either in trenches or bore holes. This is often not viable within the boundary conditions of a development, nor the space constraints of an urban or suburban dwelling. ASHPs have fewer space constraints, can be more easily installed and offer a shorter payback period.

Commercial buildings and some dwellings can benefit from variable refrigerant flow systems (VRF), which are large-scale ductless HVAC systems that can perform at a high capacity. VRF systems can either be heat pump or heat recovery systems, which provide simultaneous heating and cooling. These systems function in a similar way to an ASHP and when designed correctly they can produce efficiencies in some circumstances outperforming GSHP.

Proposed for this development because...

Heat pump systems reduce carbon emissions and have an efficient conversion rate from energy to heat. Water source heat pumps can reach high efficiencies, with Coefficient of Performance (CoP) as high as 5.5, so for every 100% of electricity used the pump can produce 5.5 times the heat. Being coupled with low temperature radiators or under floor heating improves the heating efficiency.

- Moving away from fossil fuel heating is in line with government policy and the proposed Future Homes Standard
- Increased generation of grid electricity from renewable sources has reduced the associated carbon costs of electric heating
- As heat pumps are electric, they represent a perfect fit for solar applications. This makes for an effective carbon free model. Coupled with Solar PV, heat pumps can lead to a zero net energy
- Heat pumps require less maintenance than a combustion heating system. Depending on the size of the units they only require inspection by a professional every 3-5 years
- Government incentives are available for most types of heat pumps

7.5. Flue Gas Heat Recovery Systems (FGHRS)

Proposed for this development?

No

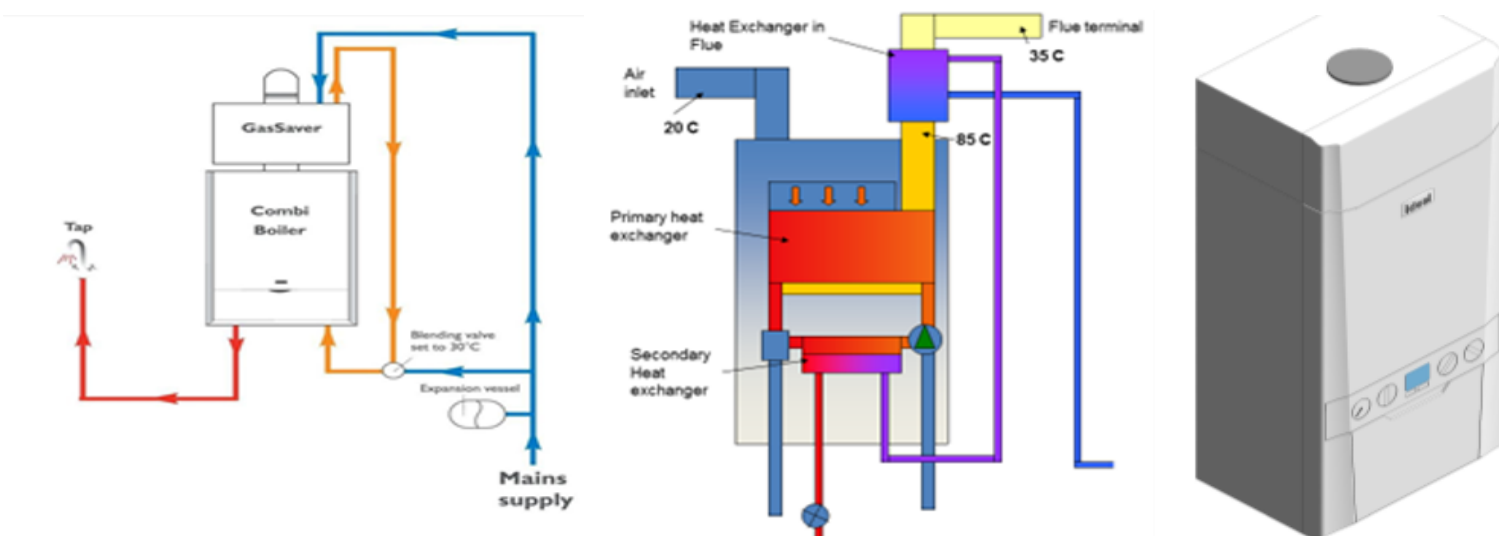
FGHRS can provide a reduction in CO₂ emissions compared to some technologies that are classified and listed as LZC technologies yet produce emissions in excess of a Natural Gas energy model.

FGHRS take advantage of the heat within the waste flue gasses resulting from the combustion of gas in the boiler. This recovered heat is used to preheat the cold water entering the boiler, thereby lowering the amount of energy needed to warm the water up to the required temperature. This principle can be applied to mains gas, LPG or oil condensing boilers.

The system requires very little maintenance, with no need for mains electricity. These systems should be planned in early as there are additional space requirements for the FGHRS. Some boilers have the system built in, and in others it takes the form of a "top box". It is important that the specific boiler and FGHRS are compatible so check this with the manufacturer or seek further advice.

FGHRS has no specific land use requirements or additional planning requirements.

FGRS can be either a "wet" or "dry" configuration



Not Proposed for this development because...

Flue Gas Heat Recovery Systems are not the most effective carbon reducing technology for the Land off Sandridge Common Melksham development. They are better suited to small dwellings with no more than five occupants and two bathrooms, although there are some devices that are capable of providing hot water or central heating to larger dwellings and even non-domestic buildings. These types are less efficient and can often require continual servicing and calibration.

7.6. Waste Water Heat Recovery Systems

Proposed for this development?

N

Following Directive (EU) 2018/2001 of the European Parliament and of the Council, 11 December 2018, Waste Water Heat Recovery (WWHR) is defined as a source of renewable energy, stating -

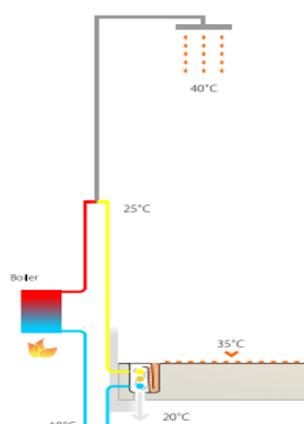
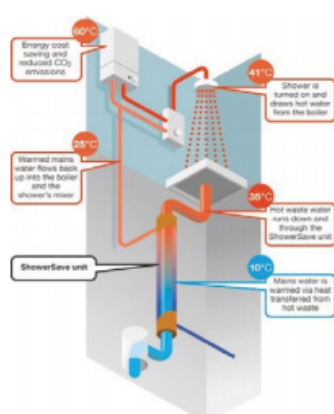
(1) 'energy from renewable sources' or 'renewable energy' means energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;

(2) 'ambient energy' means naturally occurring thermal energy and energy accumulated in the environment with constrained boundaries, which can be stored in the ambient air, excluding in exhaust air, or in surface or sewage water;

Shower Save (Figures 1 & 2) Waste Water Heat Recovery Systems (WWHRS) is a Dutch technology, where in The Netherlands, they are fitted to 20% of new dwellings. Although generically classified as a WWHRS, the Shower-Save device is primarily applicable to heat recovery from warm shower waste water.

The most common configuration known as QB-21, is applicable to upstairs showers, whilst the Linear Drain can be used in apartments, bungalows or other single storey properties. The principle of heat recovery is the same in both cases -

- Warm shower water passes through the 'grey' water side of a copper counter-flow heat exchanger
- Mains pressure water simultaneously passes through the fresh water side of the heat exchanger, where it is pre-heated before passing into both the 'cold' inlet of the mixer shower and the 'cold' inlet to the hot water cylinder, combi boiler or other water heater.
- The use of pre-heated water (orange line below) reduces the total volume of hot water required per shower, whilst also pre-heating the cold feed to the hot water heater which increases potential flow rates for combi or shortens the re-heat time of cylinders. The energy saving applies to whichever fuel is used for water heating, which is therefore not limited solely to gas boilers. Whilst technically applicable to instantaneous electric showers, these ARE NOT currently modelled by SAP, so it is not possible to apply in Appendix Q either. WWHRS does not save energy from baths, in which hot water use is in advance of grey water disposal, but it is applicable to the shower over a bath.



Not Proposed for this development because...

It is not viable due to construction constraints to install WWHRS to this development, for the following reasons: -

- Although WWHR can be installed on ground floor and single story dwellings, the devices are less efficient, providing reduced carbon and energy savings
- Multiple shower and SVP locations require multiple WWHRS devices, in each instance reducing system efficiency

8. Renewable energy technology summary

The below table summarises the proposed Low/Zero carbon technologies that will be applied to the site, following the assessment of viability of each technology.

Potentially viable energy strategies considered	Number of Dwellings Applied to	Energy Saved %	Carbon Saved %	Proposed?
Solar hot water	0	0	0	No
Solar Photovoltaic (Approx.)	295	21.6	14.2	Yes
Wind Turbines	0	0	0	No
ASHP	295	63.9	74.2	Yes
GSHP	0	0	0	No
Flue Gas Heat Recovery ¹	0	0	0	No
Waste Water Heat Recovery	0	0	0	No
Fabric Approach	295	10.2	10.5	Yes

1. Passive FGHR included in overall fabric results and does not therefore demonstrate additional savings

9. Baseline Energy Calculations

A baseline total energy demand has been established for the development. Reductions in demand due to energy conservation measures are considered and form the basis of the renewable energy strategy which follows.

Total floor areas for the development have been used in conjunction with the building specification to determine total energy demand and associated carbon emissions using the methodology as set out in Part L1 2021, calculated using approved SAP software.

What is DER and TER?

DER stands for Dwelling Emission Rate and is the calculated Carbon emissions of the dwelling as per the dwellings design.

TER stands for Target emission Rate and is the Notional Target carbon emission rate given to a dwelling based on its physical dimensions and the notional fabric and heating figures.

Savings are measured in terms of a reduction in CO₂ emissions and kWh, which are calculated from their association with a particular fuel source. CO₂ conversion factors have been taken from the approved SAP 10.2 tables.

Activity	Fuel	Unit	Energy - Gross CV	
Electricity Generated	Electricity	kWh	0.136	kg CO ₂ e
Gaseous Fuels	Natural Gas	kWh	0.210	kg CO ₂ e
Biomass	Wood Pellets	kWh	0.028	kg CO ₂ e

9. Baseline Energy Calculations - continued

Predicted Carbon Emissions: Part L1 2021 TER (Baseline Compliant figures)						
	Space Heating Demand	Hot Water Demand	Energy From Pumps and Fans	Energy from Lighting	Notional LZC's	Totals
Part L1 Plots (kWh/a)	961,996	829,373	25,370	61,556	-640,437	1,237,858
CO ₂ Associated with total Energy Demand (kg/a)	202,019	174,168	3,450	8,372	-82,861	305,149

Predicted Carbon Emissions: Part L1 2021 DER (Predicted Development figures)						
	Space Heating Demand	Hot Water Demand	Energy From Pumps and Fans	Energy from Lighting	Proposed LZCs	Totals
Part L1 Plots (kWh/a)	868,260	723,317	37,527	57,066	-1,482,203	203,968
CO ₂ Associated with total Energy Demand (kg/a)	182,334	151,897	5,104	7,761	-312,846	34,250

Baseline Emissions - Reduction through fabric and building efficiency

The carbon emissions for the development at is calculated to be 34,250.22 kgCO₂ per annum. This represents a carbon reduction of 88.78% over the Part L1 compliant figure of 305,148.52 kg per annum

The total energy demand for the development at is calculated to be 203,967.68 kWh per annum. This represents an energy reduction of 83.52% over the Part L1 2021 compliant figure of 1,237,858.15 kWh per annum.

10. Energy and Carbon Reduction Summary

This energy statement has been prepared in support of the development at Land off Sandridge Common Melksham. Local Planning Policy for the development requires that demand reduction measures are implemented to achieve an improvement of Building Regulation standards or better, over Part L1 2021 standards.

Provisional SAP assessment of the house types proposed demonstrates that baseline Part L compliant emissions for the development will be 305,148.52 kgCO₂ per annum, with an energy demand of 1,237,858.15 kWh per annum.

Energy demand reduction has been prioritised as part of the widely supported 'fabric first' approach. The benefits to the resident of this approach have been discussed in detail, which include an improvement in thermal comfort, lower energy bills, reducing the risk of fuel poverty and minimal maintenance requirements. These benefits are realised alongside the crucial aspect of the long-term reduction in energy demand that is built into the lifetime of the dwellings.

Applying this approach through a combination of the fabric specification proposed, detailing to avoid thermal bridging, reducing air leakage and employing passive and active design measures, the dwellings will secure a saving in CO₂ emissions of 40,913.00 kgCO₂/year, equating to an energy demand reduction of 192,125.00 kWh/year.

	TER	DER	Reduction	Reduction %
Part L1 Plots (kWh/a)	1,237,858	203,968	1,033,890	83.52%
CO ₂ Associated with total Energy Demand (kg/a)	305,149	203,968	101,181	88.78%

The development has been designed with the intention of maximising the carbon and energy reductions through the use of energy efficient design and by maximising the use of renewables. This represents a carbon reduction of 88.78% over the Part L1 compliance.

From: [Teresa Strange](#)
To: Ruaridh.O'Donoghue@wiltshire.gov.uk
Cc: [Sims, Steven](#); kenny.green@wiltshire.gov.uk; Nick.Holder@wiltshire.gov.uk
Subject: FW: Melksham Without Parish Council comments on the Land north of the A3102 (New Road Farm) application PL/2024/10345
Date: 31 January 2025 15:41:00
Attachments: [MWPC comments on New Road Farm application.docx](#)

Hi Ruaridh

I write to update you further to Melksham Without PC's comments on the A3102/New Road Farm planning application PL/2024/10345 further to the decision on the application to the east, for Blackmore Farm (LP policy 18), made at the Strategic Committee last week.

Since then, the parish council have been party to the s106 negotiations with Gleesons and Steve Sims and are pursuing a s106 contribution of 0.4Ha of land for community use, with a financial contribution towards community facilities.

The parish council are keen that there is just one community facility in the new housing developments to the east, and wish to discuss any potential s106 contributions from the New Road Farm application. They are keen that in the discussions moving forward for this application that a contribution to community facilities is secured, and that this can be transferred to the parish council to pool with the other funds and land from Blackmore Farm. We are making the same request to the planning application by Catesby in the south of Blackmore Farm at Snarlton Farm if Wiltshire Council are minded to approve this speculative development; and will be making it to any forthcoming applications for the remaining parcels of the LP Policy 18 site allocation that is not yet covered by the Blackmore Farm application.

The request for funding from the New Road Farm application to reflect that it's a financial contribution only, and not for land as well.

The parish council are very keen to meet and discuss this application with you too, before the production of the Officer Delegated Report, rather than the parish council's first opportunity at a Strategic/Western Area Planning Committee. These potential developments are bigger than some villages in Wiltshire, and the parish council are keen to be involved in the place making aspects of these new developments and to arrange first refusal of the transfer of the equipped play areas for example, that would be in any draft s106 Heads of Terms.

With many thanks, 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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: Teresa Strange

Sent: 17 January 2025 21:01

To: Ruaridh.O'Donoghue@wiltshire.gov.uk; Jonathan Dodd <Jonathan.Dodd@bloorhomes.com>; 'Developmentmanagement' <developmentmanagement@wiltshire.gov.uk>

Cc: Nick.Holder@wiltshire.gov.uk; Marianne Rossi <admin@melkshamwithout-pc.gov.uk>; saffi.rabey@melksham-tc.gov.uk; Graham Ellis (graham.ellis@melksham-tc.gov.uk) <graham.ellis@melksham-tc.gov.uk>; Committee Clerk <committee.clerk@melksham-tc.gov.uk>

Subject: Melksham Without Parish Council comments on the Land north of the A3102 (New Road Farm) application PL/2024/10345

Dear Ruaridh and Jonathan

Melksham Without Parish Council considered the following application on Monday evening.

PL/2024/10345: Land north of the A3102, Melksham: 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.

Melksham Without Parish Council recognises that this site has been allocated in the Wiltshire Local Plan and is not against the application in principle but requires clarification on the following issues prior to any approval being given, particularly as this is for a full planning application, and not outline. They therefore resolved that the parish council ask Wiltshire Councillor Holder to call in this application for the reasons detailed attached.

But that the parish council contact the developers in the meantime to try and resolve the issues, and if they are resolved satisfactorily, the council to withdraw the call in.

I am therefore sending to both Bloor and the Planning Officer at this stage to seek that clarification moving forward. Cllr Holder was in attendance at the council's Planning meeting on Monday night to hear the discussion regarding this application, and the approach agreed.

Please see attached.

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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

MEMORANDUM

To: Development Management

From: Sustainable Transport

Ref: PL/24/10345

Ref: C/24/10345

Date: 8th January 2025

PL/24/10345 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. - Land north of A3102 Melksham

Submissions Reviewed

Planning Statement
Transport Assessment
Travel Plan
WCHAR Assessment
Illustrative Layout
Parking Plan
S38 Adoption Plan

Relevant Planning & Guidance (Sustainable in Transport Terms)

National Planning Policy Framework – December 2024
Wiltshire Core Strategy
National Design Code
LTN1/20 – Cycle Infrastructure Design
Wiltshire Active Travel Design Standards
Wiltshire Active Travel Parking Standards
Manual for Streets
Wiltshire Design Guide
Wiltshire Highways Asset Management Plan – August 2019

Relevant Planning Policy & Guidance

NPPF

The NPPF, as updated and published in December 2024, makes the position in relation to highways and transport as matters to be considered in the determination of planning applications.

Wiltshire Core Strategy – Adopted January 2015

The application site has no allocation in the WCS. In transport terms policies CP60 and CP61 have significance.

Core Policy 60 – Sustainable Transport

'The council will use its planning and transport powers to help reduce the need to travel particularly by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. This will be achieved by:

- i. planning developments in accessible locations*
- ii. promoting sustainable transport alternatives to the use of the private car*
- iii. maintaining and selectively improving the local transport network in accordance with its functional importance and in partnership with other transport planning bodies, service providers and the business community*
- iv. promoting appropriate demand management measures*
- v. influencing the routing of freight within and through the county*
- vi. assessing and, where necessary, mitigating the impact of developments on transport users, local communities and the environment.'*

Core Policy 61 – Transport and New Development

'New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. As part of a required transport assessment, the following must be demonstrated:

- i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:*
 - a. Visually impaired and other disabled people*
 - b. Pedestrians*
 - c. Cyclists*
 - d. Public transport*
 - e. Goods vehicles*
 - f. Powered two-wheelers*
 - g. Private cars.*
- ii. That the proposal is capable of being served by safe access to the highway network.*
- iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.*

Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.'

Access

The overall premise for access in relation to this application is poor. The draft policy in the emerging local plan is noted as stating 'vehicular access from the existing access on the A3102 adjacent to the southern boundary'. However, the development proposal appears to have made little effort to establish a proper 4-arm roundabout form of access. The proposal visually towards a 3-arm compact roundabout with reverse curvature having a fourth arm added.

In terms of highways design and the land available if a four-arm roundabout access is pursued in this location, it should take the form of a newly designed roundabout from first principles in accordance with CD116 – Geometric Design of Roundabouts.

It would have to be noted, in terms of the local highway network and the movement of vehicles through the Wiltshire Council network that providing direct access onto a roundabout for 295 dwellings would create a principle of car use and direct access onto the A3102 and Eastern Way. Given the vehicular movement principles of a roundabout private vehicle movements in and out and out of the development, particularly at peak times are incentivised due to the very low RFC values for the new arm which are 0.09 in the AM and 0.04 in the PM. Notably, there are queues on the existing arms, highlighting how the fourth arm would afford residents of this development the opportunity to get ahead of other movements.

This leads to questioning the need for a second access for the development proposal. The Fire and Emergency statutory consultee comments have been reviewed and there does not appear to be, at this time, an emergency justification for a secondary access. Looking at the almost unfettered private vehicle access the 4th arm roundabout proposal provides the overall meaningful benefit, except for further ease of private vehicle access and egress from the site is not understood.

The secondary access modelling outputs act as evidence for the position outlined above. Due to the T-junction nature of this access and traffic flows on the A3102 the junction operates well within capacity with RFC of 0.17 in the AM and 0.06 in the PM. However, there is vehicle delay due to the need to wait at a give way for adequate turning opportunity, However, this does not exceed 15 seconds which is entirely reasonable for exiting from a residential setting immediately onto a local A Road.

There would appear to be no clear capacity justification for two accesses to support this application. Therefore, the suitability of access proposals must be questioned.

The more significant issue is the approach to design of the roundabout additional arm. It would be more appropriate to establish a new 4-arm roundabout in this location derived from the principles of geometric design, which would essentially require the roundabout to be pulled up northwards and create a 90-degree pattern of approach arms. This appears to entirely feasible given the available highway and land opportunities.

It cannot be understated that the site does not justify a roundabout form of access on its own merits and even giving some weight to the emerging policy wording, the proposals still need to prioritise sustainable modes over private vehicle use. The Blackmore Farm development, if approved, essentially begins to redefine the relationship with this site to buses and proposes stops that would sit between Eastern Way and the Blackmore Farm site access, notably intended to be a T-junction. Therefore, in terms of access to buses there would be a need for pedestrian movements east of the site and this does not appear to be well engaged within the proposals.

Unsustainable Location

The site location currently demonstrates trips with an 85% reliance on private vehicle trips, including sharing. Walking provides for 7% of all trips and cycling 3% of all trips.

The comparator that is usually drawn from is the National Travel Survey data. In 2022, 80% of all trips less than 1 mile were on foot. A significant proportion of these

trips are associated with children aged 5-16 walking to school whether escorted or unescorted.

The site has a limited number of facilities within a walking distance of less than 800m. Excluding the proposed nursery the list of sites is five comprising two convenience shops, a public house, ATM and a primary school.

There are limited facilities within a 15-minute walking distance. Melksham Town Centre which provides the highest quality of local offer, although not substantiated within the submissions, is 24 minutes walking distance. Given the scale of the site it is anticipated that Active Travel England will be a statutory consultee to this application and whilst there are concerns relating to the sustainability of the site in transport terms and walking routes, including time and distance we would wish to see their response in relation to Active Travel.

Parking

The application is a departure from local parking standards. There is little to no justification for this departure. There is an over-provision of parking for 2-3 bed properties. There is an under provision of parking by one space for 4-bed properties which seems to be completely unnecessary.

It is accepted that Wiltshire residential parking standards as defined as minimums, with no upper threshold for maximums. However, the proposal does not sufficiently demonstrate the need for additional parking.

Wiltshire has a minimum internal size requirement for garages to count towards parking of 6m x 3m and this is reflected in the application materials. However, many of the garages are placed behind tandem parking meaning that for larger properties only one third of the parking is inter-accessible. Tandem parking appears throughout the proposed layout and where this is combined with garages there is a very low chance of use. RAC data establishes that only 4 in 10 garages are regularly used for overnight storage of vehicles. I see nothing within the proposed layout that would infer garage use would be higher, and I am relying on my experience of parking issues prevalent on newer developments with garages that with no other measures there will be more parking within the layout i.e. on the carriageway than presented by this proposal.

The proposed visitor parking is also below the minimum. This is worsened by visitor parking including the allotments offer for parking and will need to be addressed. Visitor parking on areas that are not intended for adoption can also not be supported as they will not be available as public parking in the long term.

There are 20No. M4(3) parking spaces shown on the parking plan and these relate to the associated standard of dwelling. It is not entirely clear in all instances which dwelling the bays relate to, and some parking is more difficult to access or use and needs to be addressed. It is also stated that dwellings have been included that accord with M4(2) in which case the matters for parking including widening need to be understood.

Layout

A Section 38 adoption plan has been submitted with the proposals. It would appear that there are three tiers of streets within the proposed layout, although I have not been able to find a clear plan with proposed cross sections of streets.

The main boulevard appears to be too linear and there are overall concerns that the internal layout does not reflect a 20mph design speed. This is highlighted by the traffic calming proposals which appear to be present throughout the layout and are otherwise avoidable with design geometries that make a 20mph environment.

It would appear that internal footpaths are not intended for adoption. It is not easy based on the plans to establish the sustainable patterns of movement other than those routes that are adjacent to carriageway. There does appear to be a lack of permeability for walking and cycling, otherwise requiring adherence to footways for travel. This may be clarified by plans showing sustainable / green routes across the site than improve the experience of walking and cycling away from traffic.

Visibility through bends and proximity to private walls and boundaries needs to be reviewed and addressed to ensure that areas over which visibility is required will be within maintainable areas.

A nursery is shown as safeguarded land but sits next to the proposed main boulevard. There would have to be concern as to whether the nursery and associated parking are suitable in this location. Indiscriminate parking in close proximity to the primary access is a foreseeable issue that can be addressed.

Frontage

A site of this scale, immediately adjacent to an 'A' Road would benefit from a more engaged active travel frontage and strategy. Noting the 40mph aspect of the A3102 there will need to be a clear and legible walking and cycling relationship with the southern side.

The proposals will benefit from motorists being able to interpret and anticipate walking and cycling trips exiting the site and travelling along the identified walking and cycling routes.

Looking at the development to the west and the speed limit changeover location the character of the highway in this location needs to be understood further along with the suitability of pedestrian experience of walking adjacent to higher speeds. Additional information to construe the changes to the A3102 along this section would be useful.

There appears to be no clear set of plans for off-site works and notably no walking relationship established between the site and Gladstone Road on the northern side.

Highways Position

Object – Insufficient information relating to need and suitability of access.

Object – Lack of information and does not adhere to parking standards.

Object – The development is in an unsustainable location on transport terms and does not provide a genuine choice of transport modes based on its distance from local areas and lack of safe and suitable connecting infrastructure for sustainable modes.

The site has not adequately demonstrated its sustainable travel relationship with the wider area and community including how it will engage as a community point of interest for play and leisure and education facilities.

The provision of pedestrian crossing points on a 40mph roundabout with no other alternative offer, which could be provided and would offer greater safety and confidence for active travel is a concern.

Chris Mead

Sustainable Transport

Email: christopher.mead@wiltshire.gov.uk

(<https://www.wiltshire.gov.uk/>)

Comment

Clive and Pat Bollen's Comments

Planning Application	Stance
PL/2024/09725 (/p...	Object

Details (?tabset-ae70b=...

Files (?tabset-ae70b=2)

Information

Web Comment Name

Clive and Pat Bollen's Comments

Comment Number

WC-25-01-323460

Text

Further to our objection to the above Planning Application (sent 12 Jan 25) we wish to draw your attention to the fact that today we have been pumping water since 1500 and are likely to have to do so most of the night based on the current weather forecast. The significance of this is that it

emphasises the gravity of our flooding situation which we have been experiencing for many years. It has never been resolved despite engagement with Wiltshire Council's Drainage Team who installed a diversion ditch 12 years ago which has proven to be insufficient in protecting our home.

Today's situation occurred after heavy persistent rainfall but not to the extremes previously experienced in the village that trigger routine surface water problems. This leads us to believe that more frequent flooding occurrences are to be expected, and have the potential to be compounded by an inadequately thought through water attenuation plan for the proposed Middle Farm housing development. It is difficult to envisage what route the excess surface water will take to drain away from the land earmarked in the plan other than through current routes which sees it rapidly drain onto our, and our bordering neighbour's, property where the ditches already struggle to cope as they quickly fill to capacity and overflow.

We urge you to explore further why the existing drainage systems around this area of Corsham Road do not function adequately. The risk of flooding, and need to take mitigating action through pumping, is a constant and ever-present worry and source of anxiety to us. Both of us are in our 80s and we have to cope with positioning a heavy pump and 30m of associated hose

and electric cable, over difficult terrain, at any hour of the day or night to protect both our property and neighbour's from flooding. (This pumping equipment has been temporarily loaned to us by the Shaw and Whitley flooding group CAWS since January 2024 – they too are aware of our ongoing issues). This is really not sustainable and hopefully you can understand why we are so concerned about an even great threat of escalation.

Additionally we were disappointed to hear that this housing development application had not been brought to the attention of the Conservation Officer, which we feel is particularly pertinent as the flooding risk has the potential to impact on our grade II listed (circa 1837) home if the proposed plan is approved.

We would welcome an informed response explaining how the detailed drainage plan, or intended attenuation system, will be effective. If you wish, we would be more than happy for you to visit our property to view in person how the contours of the land, and adjoining fields, result in a high flooding risk that must be alleviated. We look forward to understanding your view on how the proposed housing development plans to address surface water as we find the whole situation deeply concerning.

Regards

Clive and Pat Bollen

Date Created

27/01/2025

(<https://www.facebook.com/WiltshireCouncil>)

(<https://twitter.com/wiltscouncil>)



(<https://www.youtube.com/user/wiltshirecouncil>)

Contact (<https://www.wiltshire.gov.uk/contact>)

Newsletter (<https://www.wiltshire.gov.uk/newsletter>)

Cookies (<https://www.wiltshire.gov.uk/cookies>)

Copyright (<https://www.wiltshire.gov.uk/copyright>)

Privacy (<https://www.wiltshire.gov.uk/privacy>)

Data protection (<https://www.wiltshire.gov.uk/data-protection-foi-data-protection>)

Accessibility (<https://www.wiltshire.gov.uk/accessibility>)

© 2025 - Wiltshire Council

Wiltshire Council Planning Consultation Response

10th January 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: David Cox
Direct Line: 01225 716774

Application No: PL/2023/05883
Outline planning permission: All matters reserved
Erection of three dwellings, with access, parking, and associated works including landscaping (Outline application with all matters reserved - Resubmission of PL/2022/06389)
Land to the rear of 52e, Chapel Lane, Beanacre, Melksham, Wilts, SN12 7PX

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Recommendations:

<input type="checkbox"/>	Comment
<input type="checkbox"/>	Support
<input type="checkbox"/>	Support subject to conditions (please set out below)
<input checked="" type="checkbox"/>	Object (for reasons set out below)
<input type="checkbox"/>	No objections

Matters Considered:

The application has been supported with a Site Specific Flood Risk Assessment (FRA). It should be noted that our comments below are reliant on the accuracy and completeness of the FRA, and we do not take any responsibility for incorrect data or interpretation made by the authors.

Following a review of all submitted information, including parish consultations, local resident concerns, the submitted FRA (including GI), and considering both the feasibility of delivering previously proposed conditions and compliance of the development with the updated NPPF (published December 2024). This response supersedes all previous responses from the Council's drainage team.

Whilst we acknowledge that our previous response was for additional information to be obtained via planning, we do not believe additional information based on the currently proposed strategy could be provided to address our concerns without fundamentally changing the strategy. We appreciate that this is an Outline Application, however there is a need to still provide a credible drainage strategy, and demonstrate that the development will be safe with regards to flooding from all sources.

We note that the Council's SFRA shows the site to be in a location where groundwater is between 0.025 – 0.5mbgl; within this zone there is a risk of groundwater flooding to both surface and subsurface assets. There is the possibility of groundwater emerging at the surface locally. The submitted FRA including GI completed by Listers GEO showed Groundwater Levels at 0.2mbgl in Winter 2024, therefore ratifying the SFRA. On the basis of the groundwater flood risk (both within the submitted GI and the Council's SFRA) we would recommend to the LPA that a Sequential Test should be undertaken to identify a site at lower risk of flooding (from all sources) as per Paragraph 175 of NPPF. If this site is shown to be the only reasonable available site, we would suggest that the Exception Test as per Paragraph 178 of the NPPF is completed.

Due to the shallow groundwater across the site this will limit the feasibility of soakaway / infiltration based drainage features being used; both the Council's Soakaway Guidance¹ and The SuDS Manual (CIRIA C753) clearly state that the peak groundwater level should be greater than 1m below the invert of an infiltration feature.

This is supported by the submitted Ground Investigation for the site which states "*The testing carried out in the River Terrace Deposits indicates an infiltration rate of less than 5.0×10^{-6} m/s and considering that infiltration rates reduce as the soil becomes saturated a much lower infiltration rate, in the region of less than 1.0×10^{-6} m/s, is likely. This indicates soils with a very low permeability.*

Taking the above into account and the fairly shallow groundwater, it is considered soakaway drainage is unlikely to be suitable for this site."

It is noted that infiltration testing was completed on site in May 2023 using the BRE365 methodology; out of three locations, one failed to yield a result and successive tests at each borehole (as required by the Council's Soakaway Guidance, CIRIA C753 and the BRE 365 methodology) failed to yield a result. Successive tests are required in soakaway testing, so as to represent a design scenario of saturated ground. The fact that successive tests could not be completed would normally represent that infiltration-based drainage would not be viable.

Given the high groundwater levels across the site, and failed infiltration testing, an infiltration based drainage strategy is not suitable for this site. No alternative drainage surface water strategy for the site has been presented, and therefore there is a risk that this development would increase flood risk elsewhere.

Concerns have been raised by the parish council, and local residents with regards to the existing flooding situation in the local area; the applicant has not currently provided a response to these concerns or included them within their Flood Risk Assessment.

With regards the proposed drainage mound, Paragraph 1.31 of Building Regulations Part H states that percolation characteristics of the soil should be obtained in both summer and winter; percolation tests were completed only in May 2023 and therefore this point has not been satisfied. This gives us concern that the drainage mound will be a suitable means of secondary treatment during winter conditions.

Paragraph 1.33 of Building Regulations Part H states that "*the groundwater table should not rise to within 1m of the invert level of the proposed effluent distribution pipes*". The submitted Drainage Mound Sections show that the invert level of the proposed distribution pipes would be 50mm above existing ground level. When considering the depth of groundwater shown from the Winter 2024 monitoring period, it demonstrates that the 1m clearance stated within Building Regulations is not achieved.

Consequently, based on the evidence submitted, we do not believe that a Drainage Mound is suitable for this site.

Overall, the drainage team (in capacity as LLFA) have to **object** to the current proposal on the following grounds:

Objections

1. Compliance with NPPF Paragraph 175 with regards to Groundwater Flood Risk.
2. Failure to provide a drainage strategy which demonstrates how surface water will be managed to prevent an increase in flood risk elsewhere.
3. Failure to provide a drainage strategy which demonstrates how foul water will be safely managed to prevent an increase in flood / pollution risk elsewhere.

--

Ben Wilding on behalf of Wiltshire Council Drainage

¹ [Developers-guidance-note-surface-water-soakaways-2.pdf \(wiltshire.gov.uk\)](#),



LDS Statutory Consultation - Initial Findings

Introduction

Stage 2 Statutory Consultation was launched today, 29 January 2025, with a news update on the Lime Down Solar Website <https://www.limedownsolar.co.uk/news/latest-update>

Consultation documents were published on the Lime Down Solar Website and hard copies can be viewed in local libraries including Corsham and Melksham. <https://www.limedownsolar.co.uk/documents>

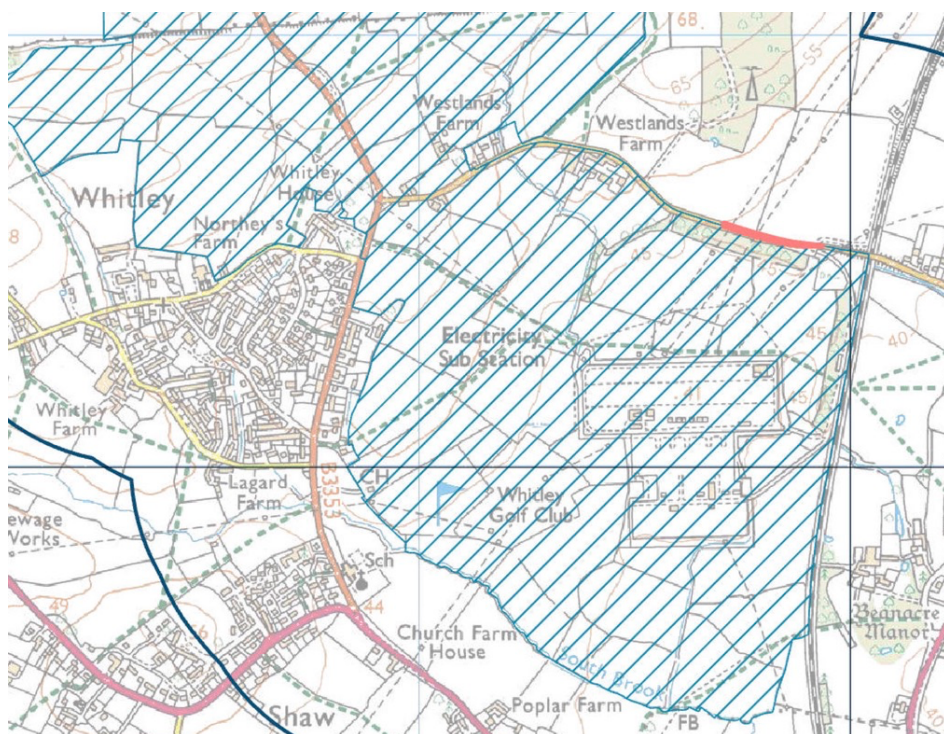
These documents run to circa 13,500 pages.

A very quick review of the documents has been conducted today against the objectives set out at Annex A and initial findings are set out below. Please note that this information is high level and preliminary at this stage and therefore may be subject to change following a detailed review which will take place over the next few weeks.

Cable Route

The cable route search areas are identified by maps. The search areas around Whitley are described as the "Southeast Corridor" and the "Southwest Corridor". The actual cable route within these broad search areas is not shown – the assumption must therefore be that a preferred route has not yet been *formally* selected.

The search area map for Whitley can be found in Volume 2, Landscape and Visual, Fig 8.1.8. A screenshot of the area immediately next to Whitley is shown in the screenshot below.



Whitley Cable Search Area

Information about ground conditions and contamination in the Whitley cable search areas areas can be found at Volume 1, Chapter 19, pages 29 to 31. Other ancillary information gathered from desk studies can be found at Volume 3 Appendix 19.6 (Southeast Corridor) and Appendix 19.7 (Southwest Corridor).

The Cable Route Construction Method Statement can be found in Volume 3, Appendix 3.2. This is a relatively short document (circa 10 pages) and is recommended reading.

The Electromagnetic Field Assessment can be found at Volume 3 Appendix 20.5. It will be important to review the actual cable route against this document in due course.

Volume 1 Chapter 16 states that the cable works could have an impact on Whitley Golf Club and Cricket Club. Screen shot below.

Formal recreation facilities (Whitley Golf Club and Cricket Club)	Low	Cable burying works requiring potential temporary partial or full closure of facilities during works	Short-term temporary	Moderate adverse
---	-----	--	----------------------	------------------

Extract identifying potential impact on the Golf Club

Summary. Without any information on the actual cable run routes, the information in the consultation documentation is of limited value at this time. If the scheme is approved, the cable route will inevitably come close to Whitley given its proximity to the substation. The Golf Club is likely to be impacted. The Cable Route Construction Method Statement is recommended reading.

Deselection of the Whitley BESS Site

There are multiple references throughout the document suite regarding the deselection of Whitley as a BESS site.

The high-level rationale for deselection can be found at Vol 1, Chapter 4, Paras 4.7.2 to 4.7.5 on pages 23 and 24. It is worth noting that our non-statutory feedback in April 2024 is cited. Screenshots are below.

4.7 Alternative Sites for the BESS Area

4.7.1 The Scheme would include either one or two BESS Areas, both of which are located within Lime Down D (see **Volume 2, Figure 3-1**). The following section sets out the alternatives considered.

EIA Scoping

4.7.2 At Scoping stage, the options for locating the BESS Area comprised either land at the Existing National Grid Melksham Substation, or within land at Lime Down D, as shown in Figure 3.4 accompanying the Scoping Report. The land within Lime Down D and the land at Melksham Substation were identified because:

- The land at Melksham Substation provides an option closer to the PoC at the Existing National Grid Melksham Substation which has benefits of minimising transmission losses, maximising storage efficiency, providing effective grid balancing and supporting a faster and more reliable reaction to power outages and disruptions; and
- The land at Lime Down D provides an option that is in close proximity to the solar PV sites and customer substation. This too has the same benefits in terms of minimising transmission losses, maximising storage efficiency, providing effective grid balancing and supporting a faster and more reliable reaction to power outages and disruptions. Of the options for co-locating the BESS Area with the Solar PV Sites, the land at Lime Down D represents the option with the least overall effects because it is centrally located, well screened, is not close to many residential receptors and is in close proximity to built infrastructure being the existing railway line. Overall, the location of the BESS Area within Lime Down D has lower potential for significant effects.

Planning Inspectorate Reference: EN010168 Page 23

PEIR Stage

4.7.3 At PEIR Stage, the location for the BESS Area has been further refined to one or two sites within Lime Down D, as shown in **Volume 2, Figure 3-1**. The land at the Existing National Grid Melksham Substation has now been discounted following feedback from non-statutory consultation and further analysis of potential environmental effects. In particular:

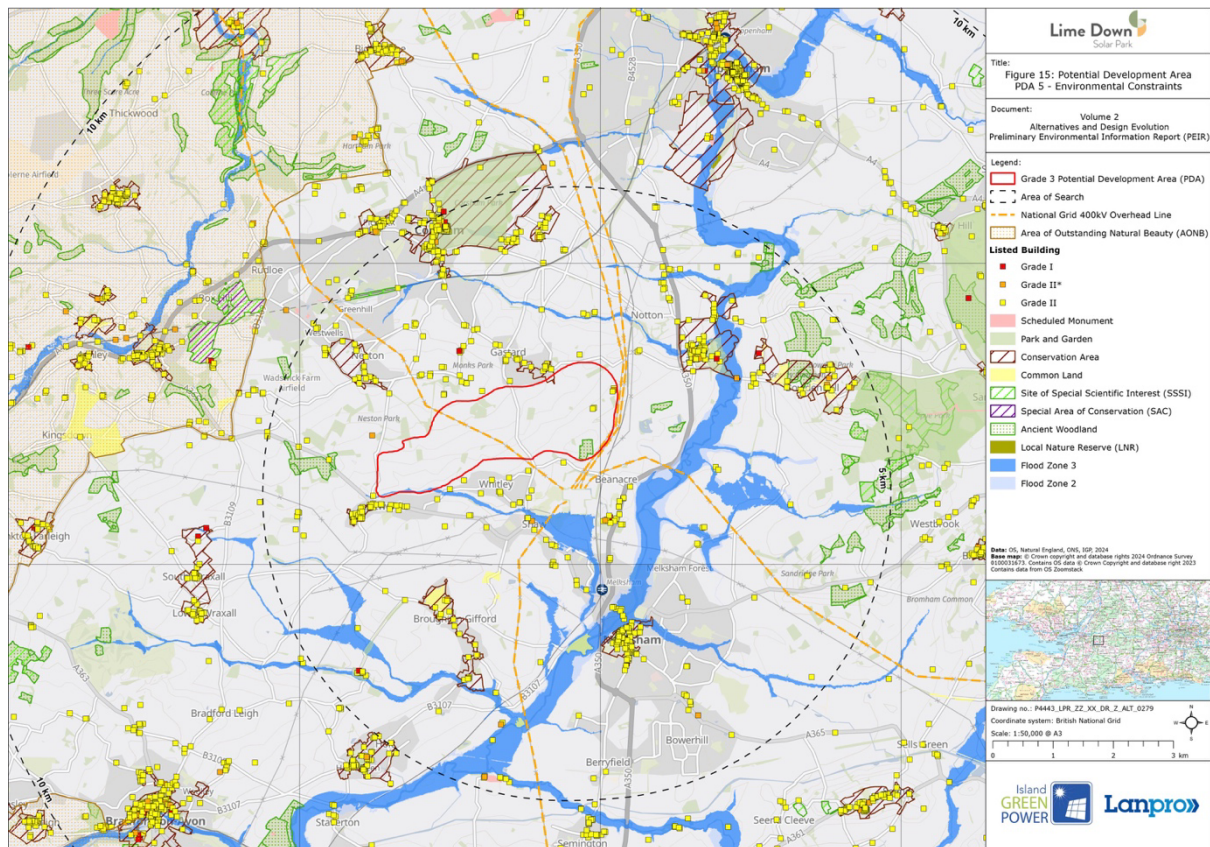
- The rising topography of the proposed site may lead to more likely significant environmental effects;
- Mitigation measures to screen the BESS Area would cause adverse effects on the intact character of the rural agricultural landscape which forms the setting of Whitley and would lead to a loss of views to the Roman Road and arable farmland that forms the hinterland to Whitley;
- There are numerous footpaths in the vicinity from which the BESS Area is visible. Due to the rising landform and the lack of vegetation along the southern edge of BESS Area, there is potential for the Scheme to be visible across the countryside to the south, especially from the adjacent northern edge of Whitley; and
- Discounting this proposed site for the BESS Area avoids impacts to nearby designated heritage assets that may have arisen from the BESS Area.

4.7.4 Whilst it was anticipated that potential impacts on flood risk, ecology and biodiversity arising from the BESS Area installation could be mitigated, the removal of the BESS Area from the land at the Existing National Grid Melksham Substation removes these impacts for that site.

4.7.5 The location of the BESS Area will be further refined following the PEIR stage and the final proposed location will be presented in the ES and DCO Application.

It is also worth noting that Whitley was also included in the Site Assessment for the entirety of the scheme (solar panels and BESS). The site was known as Potential Development Area No 5 (PDA 5). The Site Selection report at Volume 3, Appendix 4.2, Page 27 paras 3.3.6 to 3.3.8 identifies why Whitley was not selected; it obviously would have had a massive impact on this area if it had been selected!

A map of PDA 5 is shown at Fig 15. Screenshot below.



Other Works and Equipment that might have an impact on Shaw and Whitley

Based on a cursory examination of the documents only, there are no other works or equipment that might have an impact other than the cable route.

Next Steps

CAWS will review the documents in more detail over the next few weeks. If you see any key information not covered above, please let us know. Please also let us have any questions you might want to put to the developer as we are keen to put together a consolidated list in advance of the consultation event at Shaw School on 26 February 2025.

Annex A

Document Review Approach

Primary Objectives

No	Objective	Approach	Intended Outcome
1	Understand the proposed cable route and connection to the substation (in our area only) and the impact on access, drainage, proximity to heritage assets, residents and businesses etc.	Review design parameters and proposed routes and timescales.	Minimise the impact on residents, businesses and visitors etc.
2	Ascertain whether the developer has introduced (somewhere in the 13,500 pages) works/equipment not previously identified that might have an impact on Shaw and/or Whitley.	Document search by key word.	If new works/equipment introduced, the consultation process should re-start.
3	Review the evidence relating to the Whitley Site assessment/deselection in order to be better prepared to deal with any future applications on this site or elsewhere.	Document review.	A report that demonstrates why the Whitley site is unsuitable for any non-agricultural development.
4	Understand the BESS design parameters and emerging design so that we might be better equipped to deal with any other future BESS schemes in our area.	Document review.	Table of technical information and key design parameters.

We will not consider at this time:

- solar design, equipment, configuration etc;
- solar site assessment/selection;
- BESS site selection other than that which might inform Objective 3;
- cable runs north of Gastard;
- whether or not the LDS scheme should go ahead.

From: info@limedownsolar.co.uk
To: [Teresa Strange](#)
Cc: [Marianne Rossi](#)
Subject: Re: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals
Date: 29 January 2025 17:21:34
Attachments: [image002.png](#)
[image003.png](#)
[Outlook-kad3zbx.f.png](#)
[Outlook-bt5lrflm.png](#)

Dear Teresa,

I hope you're doing well.

You will have received an email from us earlier today announcing the launch of our consultation, do let us know if you have any questions on any of the information provided.

Thank you for your patience as we confirmed our availability for a briefing. Following your conversation with Will, please could I confirm that the 26 February is convenient for the Council, and if an hour late morning, or early afternoon would be suitable?

Kind regards,

Kate

Community Relations Team

Lime Down Solar Park

T: 0808 175 6656

E: info@limedownsolar.co.uk

FREEPOST Lime Down Solar



From: info@limedownsolar.co.uk <info@limedownsolar.co.uk>
Sent: Friday, January 17, 2025 10:18 AM
To: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Cc: Marianne Rossi <admin@melkshamwithout-pc.gov.uk>
Subject: Re: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals

Hi Teresa,

Thank you for your reply.

As you will have seen, we've arranged a separate meeting with CAWS on the 22 January. We're looking at our availability to meet with the Parish Council and will get back to you shortly.

Kind regards,

Kate

Community Relations Team

Lime Down Solar Park

T: 0808 175 6656

E: info@limedownsolar.co.uk

FREEPOST Lime Down Solar



From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

Sent: Thursday, January 16, 2025 2:05 PM

To: info@limedownsolar.co.uk <info@limedownsolar.co.uk>

Cc: Marianne Rossi <admin@melkshamwithout-pc.gov.uk>

Subject: RE: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals

Hi Kate

Thanks for your message.

I have had a chat with CAWS, and they would like to keep it separate please, they feel their issues/questions may be different and would like to keep it quite small.

I think the parish council might have some wider issues than CAWS (which is just Whitley and Shaw) about future impacts on the village of Beanacre that is also in the parish, and the home to the connections to the substation.

There is some consistency across the two groups as Peter Richardson is Chair of CAWS and a parish councillor, but they are two different organisations with different aims and objectives.

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

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](#)

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

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: info@limesdownsolar.co.uk <info@limesdownsolar.co.uk>

Sent: 15 January 2025 10:44

To: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

Cc: Marianne Rossi <admin@melkshamwithout-pc.gov.uk>

Subject: Re: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals

Dear Teresa,

I hope you had a nice Christmas break.

Thank you for confirming that the Council would like to meet.

As you will have seen, we have also been contacted by CAWS for a briefing and have asked if they would be interested in a combined meeting, in the first instance, with the Parish Council. Of course, please do let us know if this would be suitable for the Parish Council too.

We contacted you yesterday as we published our Statement of Community Consultation (available [here](#)) which contains further details of our stage two consultation. To confirm, we will be holding an event on Wed 26 Feb (17:30–20:30) at Shaw CofE Primary School, SN12 8EQ.

Please do let us know if you have any questions or queries regarding our upcoming consultation or more generally. We look forward to hearing from you.

Kind regards,

Kate

Community Relations Team

Lime Down Solar Park

- T: 0808 175 6656
- E: info@limedownsolar.co.uk
- FREEPOST Lime Down Solar



From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

Sent: Monday, December 23, 2024 7:25 PM

To: info@limedownsolar.co.uk <info@limedownsolar.co.uk>

Subject: RE: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals

Dear Will

Thank you for this notification.

I confirm that Melksham Without Parish Council would like to meet with you in the New Year, we look forward to hearing more about making arrangements after the Christmas break.

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

ADVANCE NOTICE OF LEAVE:

The parish council office will close for the Christmas break on Friday 20th December and re-open on Monday 6th January.

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: info@limesdownsolar.co.uk <info@limesdownsolar.co.uk>

Sent: 17 December 2024 14:04

To: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

Cc: Lorraine McRandle <office@melkshamwithout-pc.gov.uk>; John Doel <john.doel@melkshamwithout-pc.gov.uk>

Subject: Lime Down Solar Park Update – Advance notice of dates for next stage of consultation on detailed proposals

Dear Teresa Strange,

I am writing to you as Clerk for Melksham Without Parish Council to update you on our emerging plans to carry out the next stage of public consultation on our proposals for Lime Down Solar Park – a solar and energy storage project we are developing in Wiltshire, along with associated infrastructure to connect the project to the national grid at Melksham substation.

Since holding an initial stage of consultation earlier this year, we have continued to shape and refine our proposals for the project in light of feedback we received during that consultation, along with the findings from our ongoing survey and environmental work.

The aim of this second (statutory) stage of consultation is to give local communities and people with an interest in the project the opportunity to find out more and provide feedback on our more detailed proposals.

This statutory consultation will run over seven weeks from **Wednesday 29 January to Wednesday 19 March 2025**, with in-person and online information events anticipated as running throughout February.

We will consider all the views and comments submitted to this second consultation, together with the findings from our ongoing environmental and technical assessments, to help shape the project ahead of submitting an application for development consent to the Planning Inspectorate in Autumn 2025.

How we're consulting

Ahead of consultation launching on 29 January 2025, in accordance with the Planning Act 2008, we will publish a Statement of Community Consultation (SoCC).

The SoCC explains how we intend to carry out statutory consultation with local communities, share information about and invite feedback on the project. The final

SoCC we publish will also confirm the full programme of in-person and on-line information events we are holding over the course of the consultation.

We anticipate publishing the SoCC on 14 January 2025, two weeks before consultation starts. From this date it will be made available to view and download from the project website www.limedownsolar.co.uk and printed reference copies will be lodged at a selection of local community venues as follows:

- **Corsham Library**

Springfield Community Campus, Beechfield Road, Corsham, Wiltshire, SN13 9DN

- **Melksham Library**

Melksham Community Campus, Market Place , Melksham, Wiltshire, SN12 6ES

- **Malmesbury Library**

24 Cross Hayes, Malmesbury, Wiltshire, SN16 9BG

- **Chippenham Library**

Timber Street, Chippenham, Wiltshire, SN15 3HJ

Copies of the community consultation documents providing information about what we're consulting on, along with reference copies of technical reports, will be available to view at these same venues from 29 January 2025.

These documents and reports will also be available to view at in-person information events we hold, and the project website will be updated with electronic copies you can view and download.

Requests for copies of community consultation materials in print and digital format can also be made from 29 January 2025 by contacting the community relations team (contact details included below).

Next steps

We would welcome the opportunity to brief you in more detail about what we're consulting on and how people can take part further to the SoCC being published on 14 January 2025.

If this would be of interest to you, please do contact us to discuss the possibility of coordinating an online or in-person briefing, otherwise we will continue to keep you updated as more information about the consultation becomes available.

In the meantime, if you have any questions or would like to discuss anything further, please contact us on the Project freephone **0808 175 6656** or email us at info@limedownsolar.co.uk.

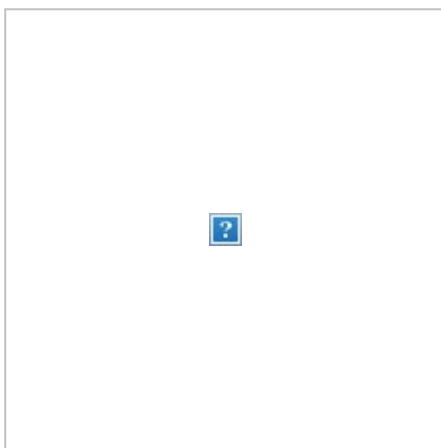
Yours sincerely

A handwritten signature in black ink that reads "W Threlfall". The signature is written in a cursive, slightly slanted style.

Will Threlfall
Senior Project Development Manager
Island Green Power

From: [Lime Down Solar Park](#)
To: [Lorraine McRandle](#)
Subject: Project update: launch of statutory consultation on proposals for Lime Down Solar Park
Date: 29 January 2025 15:34:21

No images? [Click here](#)



Lime Down Solar Park Project Update

Launch of statutory consultation on proposals for Lime Down Solar Park

Dear Teresa Strange,

I am writing to you in your capacity for Melksham Without Parish Council to confirm the launch of statutory consultation on our detailed proposals for Lime Down Solar Park – the solar and energy storage project we are developing in Wiltshire, along with associated infrastructure to connect the Project to the national grid at Melksham substation.

With an anticipated generation capacity of

up to 500 megawatts (MW) Lime Down Solar Park could deliver enough affordable, clean electricity to power around 115,000 homes and help achieve Net Zero targets, while providing energy security of supply and value to us all. As we work to deliver this vision, we want to ensure people living and working in the area have the opportunity to inform and influence the development of our proposals.

Consultation is open from 29 January to 19 March 2025.

The proposals we're sharing as part of this statutory consultation have been informed by comments submitted to the first stage of consultation we held in 2024, together with findings from ongoing environmental and technical surveys. This has enabled us to refine and shape a more detailed design for the Project and incorporate measures that would reduce its impact on neighbouring communities and residents, while being sensitive to the local landscape, preserving wildlife and habitat, and also providing environmental and ecological enhancements.

Over the course of this consultation, we would particularly like to invite your views on areas including the indicative masterplan, visual impact considerations, and the underground electrical connection between the solar development areas, Project substation and Melksham Substation so we can finalise our proposals ahead of submitting our application for

development consent to the Planning Inspectorate in 2025.

Publicising the consultation

We want to raise awareness of this consultation with as many people as possible and encourage them to provide us with their views. Please consider sharing the materials and information listed below through your own channels (for example websites, community forums, social media).

Advertising

We have posted a **Consultation Leaflet** to over 14,000 homes and businesses in vicinity of the Project to let people know that the consultation is taking place; signposting them to where they can find more information about the Project, what we're consulting on and how they can take part. These leaflets started to arrive with people from the beginning of this week.

We have issued a press release to regional print, broadcast and online media outlets to build awareness, and placed advertisements for the consultation in local media outlets (print and online).

Posters have also been distributed to local community venues and we have written to all those who have registered their details to directly receive information and updates about the Project.

Documents

The **Preliminary Environmental Information Report (PEIR)** and associated **Non-technical Summary (NTS)** have been published on the Project website. This is a technical report that sets out the environmental considerations of the proposals and further information about how our proposals seek to mitigate and reduce potential impacts associated with the development.

A **Document Navigation Booklet** and **Project Information Booklet** have been produced to provide further details about the consultation on and our proposals for the Project.

In addition, printed and online versions of a Project Feedback Form are available so people can share their views on our proposals with comments being specifically invited on areas including:

- the strategic masterplan for the solar sites;
- the cable route search corridor for the underground grid connection; and,
- measures we are proposing to reduce the environmental effects of the Project.

We also continue to invite suggestions for projects and initiatives we could support to benefit communities for deliver community benefits.

All the documents listed above are

available to view and download from Documents section of the Project website [HERE](#). They will be available to view at in-person information events taking place (see below) and can also be found at community access points (included at the bottom of this correspondence) in hard copy format.

Public information events

We are inviting individuals to come along to in-person and online information events we are holding over the course of the consultation period and speak with members of the Project team to find out more about the Project, what we're consulting on and how they can take part. The schedule of events is set out below.

- **Wednesday 05 February 2025**

18:30 – 20:00

Online (Zoom) - register to attend via [Project website](#) or by [clicking here](#).

- **Friday 07 February 2025 14:30 – 19:30**

Sherston Village Hall, High Street,
Sherston, Malmesbury, SN16 0LQ

- **Saturday 08 February 2025 11:00 – 15:00**

Hullavington Village Hall, Hill Hayes
Lane, Hullavington, Chippenham,
SN14 6EB

- **Wednesday 12 February 2025**

14:30 – 19:30

Grittleton Village Hall, The Street,

Grittleton, Chippenham, SN14 6AW

- **Thursday 13 February 2025 14:30 – 19:30**
Corsham Town Council Hall, Town Hall, 65 High Street, Corsham, SN13 0EZ
- **Friday 14 February 2025 14:30 – 19:30**
Malmesbury Town Hall, Cross Hayes, Malmesbury, SN16 9BZ
- **Saturday 15 February 2025 11:00 – 15:00**
Luckington Village Hall, Bristol Road, Luckington, Chippenham, SN14 6NP
- **Tuesday 25 February 2025 14:30 – 19:30**
Goss Croft Hall, Startley Road, Upper Seagry, Chippenham, SN15 5HD
- **Wednesday 26 February 2025 17:30 – 20:30**
Shaw CofE Primary School, Corsham Road, Shaw, Melksham, SN12 8EQ
- **Thursday 27 February 2025 18:30 – 20:30**
Online (Zoom) - register to attend via [Project website](#) or by [clicking here](#).

In-person information events will take the form of a drop-in session at which interested parties will be able to view copies of the consultation documents,

maps and plans and speak with members of the Project team. Anyone wishing to do so will be able to join one of the online events, which will take the form of a webinar, via telephone or the internet. These will take the form of a presentation followed by a moderated question and answer session.

Those wishing to attend an online event are requested to register in advance via the Project webpage.

Finding out more

The Project website has been updated with information about what we are consulting on and includes the option for people to submit feedback online. People are also encouraged to register their details with us so we can contact them directly when new information about the Project and future engagement and consultation becomes available.

Anyone with questions about the Project or requiring further information can contact the Community Relations team directly using any of the following methods:

- Freephone: 0808 175 6656 (open 09.00 –17.00, Mon-Fri)
- Email: info@limedownsolar.co.uk
- Mail: FREEPOST Lime Down Solar (no stamp required)

Please scroll to the bottom of this update to see the list of Community Access Points where you can view hard copies of the consultation

materials, along with more information to facilitate access.

Providing feedback to the consultation

People can submit their feedback to the consultation online via the Project website.

Views and comments can also be submitted in writing by completing a printed feedback form, copies of which will be available at in-person events or can be requested by contacting the Community Relations Team. All people need to do is complete as many sections of the form as they wish and then hand it in at one of the in-person events or post it to us at FREEPOST Lime Down Solar.

Any emails received via the Project email, or letters sent to the Project Freepost address during the consultation period will also be considered as feedback.

The deadline for receipt of feedback to the consultation is 23:59 on Wednesday 19 March 2025.

Next steps

Further to consultation closing, we will review all the feedback submitted and then review our proposals in light of the views and comments received so we can finalise and submit an application for development consent to the Planning Inspectorate. We anticipate this happening in Autumn 2025.

If you have any questions about consultation now underway, please do contact us by calling the Project freephone 0808 175 6656 or emailing info@limedownsolar.co.uk. In the meantime, we welcome any comments you have on our proposals and look forward to the possibility of meeting you at one of our information events.

Yours sincerely,



Will Threlfall
Senior Project Development Manager
Island Green Power

Lime Down Solar Park - Community access points

- **Corsham Library** - Springfield Community Campus, Beechfield Road, Corsham, Wiltshire, SN13 9DN

Mon (staffed): 09:00 – 19:00

Tues (staffed): 09:00 – 17:00

Weds (staffed): 09:00 – 17:00

Thurs (staffed): 09:00 – 17:00

Fri (staffed): 09:00 – 19:00

Sat (staffed): 09:00 – 17:00

Sun (not staffed)

- **Melksham Library** - Melksham
Community Campus, Market Place,
Melksham, Wiltshire, SN12 6ES

Mon (staffed): 09.30 – 19:00
Tues (staffed): 09.30 – 17:00
Weds (not staffed).
Thurs (staffed): 09.30 – 19:00
Fri (staffed): 09.30 – 17:00
Sat (staffed): 09.30 – 17:00
Sun (not staffed)

- **Malmesbury Library** - 24 Cross
Hayes, Malmesbury, Wiltshire,
SN16 9BG

Mon: 14:00 – 19:00
Tues: 09:30 – 17:00
Weds: 09:30 – 17:00
Thurs: closed
Fri: 09:30 – 19:00
Sat: 09.30– 13:00
Sun: closed

- **Chippenham Library** - Timber
Street, Chippenham, Wiltshire,
SN15 3EJ

Mon: 10:00 – 19:00
Tues: 09:00 – 17:00
Weds: 09:00 – 13:00
Thurs: 09:00 – 19:00
Fri: 09:00 – 19:00
Sat: 09:00 – 17:00
Sun: closed

Hard copies of the Consultation
Leaflet, Project Information Booklet
and the Consultation Feedback Form

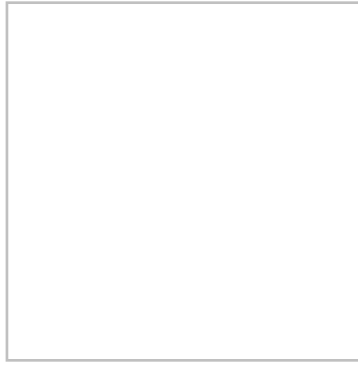
will be available to take away free of charge. Please note that due to limited space at **Corsham Library** and **Melksham Library** hard copies of the consultation materials will only be available to view during staffed hours when it is possible to request assistance from a member of staff to provide access to the documents.

Electronic copies of all the consultation documents may be viewed on a computer at the above community access points from **29 January and 19 March 2025**. While access to computers at these information points is free, the venues require visitors to show proof of identity to use an on-site computer.

More information is available at www.wiltshire.gov.uk/libraries-accessing-computers. We recommend contacting the venues to check the opening times prior to visiting.

Communication Lines

- info@limedownsolar.co.uk
- Freephone - 0808 175 6656 (open 09.00-17.00 Monday to Friday excluding bank holidays)
- FREEPOST Lime Down Solar Park
- www.limedownsolar.co.uk



You are receiving this newsletter because you registered your contact details with us to send you project updates straight to your inbox.

If you would like to stop receiving these emails, please click unsubscribe below.

[Unsubscribe](#)

From: [Teresa Strange](#)
To: [Luke Webb](#)
Cc: [Horan, Chris](#); [Cleave, Julie](#); [Marianne Rossi](#); [Jonathon. Seed \(jonathon.seed@wiltshire.gov.uk\)](#); [Nick.Holder@wiltshire.gov.uk](#); [O'Donoghue, Ruaridh](#)
Subject: RE: CEMP v7 for 20/07334/OUT Land West of Semington Road
Date: 31 January 2025 17:43:00
Attachments: [WhatsApp Image 2025-01-31 at 14.23.00_9f89c3a3.jpg](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[WhatsApp Image 2025-01-31 at 14.22.40_ad4469e7.jpg](#)
[WhatsApp Image 2025-01-31 at 14.24.33_c5b985cb.jpg](#)
[WhatsApp Image 2025-01-31 at 14.24.23_1b94f34a.jpg](#)
[WhatsApp Image 2025-01-31 at 14.24.12_68f00d37.jpg](#)

Hi Luke

Could we please have some wheel washing/road sweeping as promised?

None has been seen in Berryfield Park or Berryfield Lane. The A350 roundabout looks like this too.

Photos taken today, early afternoon.

Thanks, 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

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](#)

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

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: Luke Webb <lwebb@livingspacehousing.co.uk>
Sent: 29 January 2025 09:14
To: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Cc: Horan, Chris <Chris.Horan@wiltshire.gov.uk>; Cleave, Julie <Julie.Cleave@wiltshire.gov.uk>; Marianne Rossi <admin@melkshamwithout-pc.gov.uk>; Jonathon. Seed (jonathon.seed@wiltshire.gov.uk) <jonathon.seed@wiltshire.gov.uk>; Nick.Holder@wiltshire.gov.uk; O'Donoghue, Ruaridh <Ruaridh.O'Donoghue@wiltshire.gov.uk>
Subject: RE: CEMP v7 for 20/07334/OUT Land West of Semington Road

Hi Teresa,

Apologies for the delay in coming back to you.

The CEMP is now approved.

I also understand communication has been made with neighbouring properties. Please let me know if this is not the case.

Kind regards,

Luke Webb MRTPI
Planning Director

T: 0121 752 3726

M: 07399250872

livingspacehousing.co.uk

Hayfield House, Arlestone Way, Shirley, B90 4LH



The company accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

We will always treat your personal data with respect. For information on how we use your personal data please visit our updated [Privacy Notice](#)

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 16 January 2025 16:54
To: Luke Webb <lwebb@livingspacehousing.co.uk>
Cc: Horan, Chris <Chris.Horan@wiltshire.gov.uk>; Cleave, Julie <Julie.Cleave@wiltshire.gov.uk>; Marianne Rossi <admin@melkshamwithout-pc.gov.uk>; Jonathon. Seed (jonathon.seed@wiltshire.gov.uk) <jonathon.seed@wiltshire.gov.uk>; Nick.Holder@wiltshire.gov.uk; O'Donoghue, Ruaridh <Ruaridh.O'Donoghue@wiltshire.gov.uk>
Subject: CEMP v7 for 20/07334/OUT Land West of Semington Road

Hi Luke

Just wondered what the current situation is with this CEMP please?

The parish council met on Monday evening and welcome this latest version and hope that this will be the subject of detailed monitoring and, if necessary, enforcement action.

The parish council highlight that no road sweeping has been undertaken despite this commitment from yourself when we met before Christmas.

We understand from residents of Townsend Farm that visited the parish council office earlier today that gravel is being used to fill holes that have formed already in the access road through Townsend Farm, and this is being spread across the highway surfaces, including Semington Road, and stuck with the mud that is not being cleaned – despite their direct requests to the site manager for a roadsweeper.

There is still no communication with the site management and the residents of Townsend Farm, as detailed in the CEMP. They have raised issues such as cracked soil pipes in the road etc – the only time they have had communication is when they turn up with the vibration monitoring device and the residents take the opportunity to enter into dialogue then.

Those in North, South and no. 5 Townsend Farm are now being asked to give up their land and right of access to the rear of their houses for maintenance, to Sovereign Housing – it's a civil issue presumably, and the residents have had to get legal representation to deal with things like obtaining a soakaway etc on the development site that was promised to be addressed in August, and the first, what they feel is litigious communication has come now in January. They are still not clear how the current sewage overflow that they have, as they have septic tanks, to these fields (as detailed as a right in their deeds) is going to be addressed.

In the meantime, the parish council have the reserved matters application to consider for the phase 2 site.

Luke, can you please see if you can get some commitment from site management to engage with the residents of Townsend Farm – it's only 7 dwellings – and some road sweeping. And pursue the outstanding issues regarding their current sewage connections which seems to now be the remit of Sovereign?

With many thanks, 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

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.

From: [Teresa Strange](#)
To: [Rose, Martin](#); [Cleave, Julie](#)
Subject: No access signage to Buckley Gardens, Semington Road, Melksham
Date: 28 January 2025 13:12:00

Hi Julie and Martin

I wonder if you can help me please.

The development at Buckley Gardens, on Semington Road PL/2022/02749 has started to be occupied.

I had to ask the Street Naming department to chase the developers as there were no road signs, but these are now in place – well, I can see the first one off Semington Road is as I pass.

I have had a call from a resident of Shails Lane this morning to say that we could do with a sign at the end of Shails Lane to say no access to Buckley Gardens/Housing Development/David Wilson – something that points that out as sat navs are directing vans and lorries down there, and the road is now blocked off and there is no turning space. This morning there was a fuel lorry, and yesterday 2 x Evri drivers and a Argos van. There is no physical access to the housing development from Shails Lane.

Can we just ask the developers to put up a sign? Wessex Water have done so to say their access has changed, and there is one that was put up to say no construction traffic.

I am happy to ask the developers just conscious it would be on the highway..... not sure if needed permanently or just until everyone gets used to it.

Any advice would be gratefully received.

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

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
On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: [Rivans, Natalie](#)
To: [Teresa Strange](#)
Subject: RE: ENF/2023/00877 Buckley Gardens
Date: 29 January 2025 07:59:19
Attachments: [image001.png](#)
[image002.png](#)

Hi Teresa

██████ did contact us late last year but did not get back to us with any completed forms. She was also happy the file was closed at the start of January.

I will open the file and put you as the complainant for this new case.

Thanks

Natalie Rivans
Planning Enforcement Officer
Planning Enforcement Team

Wiltshire Council

External Tel: 01225 770502
E-mail: natalie.rivans@wiltshire.gov.uk
Website: www.wiltshire.gov.uk
Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

The views expressed in this e-mail represent an officer's opinion only and are not binding on any future decisions made by elected members of the Council or under powers delegated to officers.

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 28 January 2025 14:16
To: Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk> ██████████
██████████
Subject: RE: ENF/2023/00877 Buckley Gardens

Hi Natalie (cc: ██████████), Semington Road resident – for info)

I have another complaint from a resident, this time of Shails Lane, regarding the starting on site before 8am.

Their working theory is that it's the cement production machinery at 7.40am every morning, so that there is muck ready for the bricklayers to commence at 8am.

Whilst resigned to the building noise during the day, this does wake and disturb them daily.

I have sent them your monitoring forms and asked them to fill in.

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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk
Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).
We do not guarantee that any email is free of viruses or other malware.

From: [REDACTED]
Date: 3 December 2024 at 07:50:39 GMT
To: Natalie Rivans <Natalie.Rivans@wiltshire.gov.uk>
Subject: Re: ENF/2023/00877

I was walking along Shails Lane this morning at 7.30 and can report that heavy machinery was in operation. Work is starting early on site each morning as the lights from the diggers can be seen quite clearly from the back of my property.

[REDACTED]

On 14 Nov 2023, at 13:45, Rivans, Natalie
<Natalie.Rivans@wiltshire.gov.uk> wrote:

Deliveries should be between 0800-1600hrs.

As stated below, work can begin at 730am but no machinery before 0800hrs. I hope this clarifies matters, however all documentation can be found and read online if you have any further concerns or queries relating to any of the works taking place on site.

Although this file will be closed, there is another open on it and work times will be monitored.

Regards

Natalie Rivans

Planning Enforcement Officer

Planning Enforcement Team

Wiltshire Council

Internal Tel: 15502

External Tel: 01225 770502

E-mail: natalie.rivans@wiltshire.gov.uk

Website: www.wiltshire.gov.uk

The views expressed in this e-mail represent an officer's opinion only and are not binding on any future decisions made by elected members of the Council or under powers delegated to officers.

From: [REDACTED]

Sent: Tuesday, November 14, 2023 1:27 PM

To: Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>

Subject: Re: ENF/2023/00877

Thanks for your prompt reply.

Just a query re start times. Can you clarify whether deliveries such as concrete etc and even machinery are permitted before 8.00 am and the start of actual work on the site.

Helen Romaine [REDACTED]

On 14 Nov 2023, at 12:00, Rivans, Natalie
<Natalie.Rivans@wiltshire.gov.uk> wrote:

Dear [REDACTED]

The CMP states works on site are -

Monday to Friday inclusive: 07.30am – 18.00pm (No plant or machinery operations are to commence prior to 8.00am)

Saturday: 07.30am – 13.00pm (No plant or machinery operations are to commence prior to 8.00am) All details of the plans and documents can be found online under the relevant planning application to view.

You may be aware that I have spoken with the developer who has liaised with the site manager and they claim to be adhering to this. I should add there are no time limits for workers to arrive on site, so they may be coming early to prepare and there is no breach of planning control here.

However, no machinery is to start until 0800hrs.

As I have addressed this matter with the developer, I will close this file for now. If, however, machinery starts before 0800hrs please let me know. I will send you monitoring sheets as these will need to be completed. The reason for this is that - should this matter be formally progressed in court you will need to provide this as evidence that these breaches have occurred.

Regards

Natalie Rivans

Planning Enforcement Officer

Planning Enforcement Team

Wiltshire Council

Internal Tel: 15502

External Tel: 01225 770502

E-mail: natalie.rivans@wiltshire.gov.uk

Website: www.wiltshire.gov.uk

The views expressed in this e-mail represent an officer's opinion only and are not binding on any future decisions made by elected members of the Council or under powers delegated to officers.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

From: [Flower, Kerry](#)
To: [Teresa Strange](#)
Cc: [Rivans, Natalie](#)
Subject: RE: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd
Date: 20 January 2025 14:11:51
Attachments: [image001.png](#)
[image002.png](#)

Hi Both

Natalie you seem to have this all in hand, however shout if you need me to make contact with developer etc.

Teresa, yes I am one of the Highway Officers. If any comments to a specific application are stated within the application file, all comments are looked at, and considered by Officers.

Kind regards

Kerry

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 20 January 2025 12:58
To: Flower, Kerry <Kerry.Flower@wiltshire.gov.uk>
Cc: Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>
Subject: RE: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Kerry

For info, the planning application numbers were on the complaint form, but here for your ease – this is for the current enforcement case.

Planning applications numbers a bit hard to follow its actually two sites adjacent to each other, with a different Ltd company name for each.

West: 17/04116 with discharge of conditions on 2022/02615 and variation on PL/2024/01377 for additional units

East: 17/04110 with discharge of condition on 2022/02614 and variation on PL/2024/01378 for additional units

Kerry, Are you someone that comments on planning applications at all from a highways point of view? We have another planning application for a new shunt reactor going in to the National Grid substation site at the same place and have asked for some specific CEMP clauses to prevent this, and it would be good to make contact with the highways officer who will be commenting on that application – I can forward that email of requests.

With many thanks,
Teresa

From: Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>
Sent: 20 January 2025 12:26
To: Flower, Kerry <Kerry.Flower@wiltshire.gov.uk>
Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Subject: RE: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Kerry

The complaint is the HGVs vehicles using the bridge. I have gone to the owner of the site who has confirmed neither of the HGVs are ones attached to his site and suggests It's worth noting that National Grid had transformer deliveries to the Melksham substation towards the end of last year, so these could potentially be theirs.

In any case, I have asked that evidence is collated via photos and monitoring sheets so we can ascertain more. Once I have this, I will let you know. For now, as the incidents do not appear to be happening regularly.

I have also asked the police are made aware as potentially this is a criminal offence. If this does continue perhaps a TTO can be explored, but appreciate substantial evidence is likely needed in the first instance.

Thanks

Natalie Rivans
Planning Enforcement Officer
Planning Enforcement Team

Wiltshire Council

External Tel: 01225 770502
E-mail: natalie.rivans@wiltshire.gov.uk
Website: www.wiltshire.gov.uk
Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

The views expressed in this e-mail represent an officer's opinion only and are not binding on any future decisions made by elected members of the Council or under powers delegated to officers.

From: Flower, Kerry <Kerry.Flower@wiltshire.gov.uk>
Sent: 20 January 2025 12:01
To: Rivans, Natalie <Natalie.Rivans@wiltshire.gov.uk>
Cc: clerk@melkshamwithout-pc.gov.uk
Subject: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Good afternoon Natalie

I acknowledge receipt of the above, is there anything you would like me to do?

Kind regards

Kerry

From: Cleave, Julie <Julie.Cleave@wiltshire.gov.uk>
Sent: 20 January 2025 11:30
To: Flower, Kerry <Kerry.Flower@wiltshire.gov.uk>
Subject: FW: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Kerry,

Do you know anything about the site being mentioned below. I have searched the planning portal and I think it could relate to PL/2024/01378.

Thank you,

Julie Cleave MCIHT
Highways Development Control Engineer (Level 3)
Sustainable Transport
(Part time: Mon – Thurs)

Wiltshire Council

Tel: 01225 713463
Email: Julie.Cleave@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 17 January 2025 17:53
To: Cleave, Julie <Julie.Cleave@wiltshire.gov.uk>
Subject: FW: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Julie

Sorry, meant to give you the Enforcement reference its ENF/2025/00014

Kind regards, Teresa

From: Teresa Strange
Sent: 17 January 2025 16:36
To: Cleave, Julie <Julie.Cleave@wiltshire.gov.uk>

Subject: FW: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Julie

Hope you are well.

I have raised the following enforcement issue, which has been registered as

Natalie Rivans has said that its worth following up with Highways, is that you?

Please see below:

"I am just about catching up after Christmas and have this morning emailed the application for Westlands Farm and the CMP.

The photographic evidence is good, and I have attached some monitoring sheets to be completed, especially as you said this is happening regularly. This is also traffic offence under the Road Traffic Regulation Act 1984 for which drivers and employers can be fined, so it is certainly a matter that the local police can enforce, in severe circumstances they can also prosecute as well as fine.

Highways can also look at a Temporary Traffic Order and stopping the bridge being used by HGV's so it is worth emailing them to see if they are aware of this too.

I will update you once I have heard back from the owner, and please could residents complete the forms and provide us with an photo/video with dates as possible which will help should this continue to be persistent and breach the CMP."

With many thanks, 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

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

On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: Teresa Strange

Sent: 09 January 2025 17:55

To: enforcement@wiltshire.gov.uk

Cc: Marianne Rossi <admin@melkshamwithout-pc.gov.uk>

Subject: New enforcement complaint - ignoring Construction Traffic Management Plan - Melksham East Storage Ltd & Melksham West Storage Ltd

Hi Natalie

Happy New Year to you!

Please find new enforcement complaint.

Lorries delivering BESS Battery Storage kit to near the large substation off Westlands Lane, Beanacre, over the weight limit bridge, and impacting residents, in complete contradiction of the Construction Traffic Management Plan (attached for your ease of reference) its identical on both planning applications, this is the latest one for the 2024 applications.

All detailed on the enforcement complaint form attached.

Plus photographic evidence. The ones dated 27th November, stuck on the bridge.

The one dated 7th Jan, was 3 vehicles all together, residents weren't quick enough to get a photo but they did when they returned as just cabs having dropped off their delivery.

I can't find any contacts to raise directly ourselves, all details on the planning application forms are redacted. But we have had noise complaints several times last year, with the first part installed (this bit of installation is a variation for more units) and Peter Nobes was dealing with from that side, and I know went to site several times so would have contacts?

Planning applications numbers a bit hard to follow so please see below, actually two sites adjacent to each other, with a different Ltd company name for each. All on the form, but easier to read here

West: 17/04116 with discharge of conditions on 2022/02615 and variation on PL/2024/01377 for additional units

East: 17/04110 with discharge of condition on 2022/02614 and variation on PL/2024/01378

for additional units

I know that if you look up weight restriction bridge issues on the WC website it's the Police to report to, but as its in direct contravention of the Construction Traffic Plan thought I would come to you at Enforcement first. Please let me know if you think I should report to the local police.

Many thanks,

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

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](#)

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

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It

is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

Costs for Melksham Neighbourhood Plan 2024/25					
Date	Voucher Number	Description	Amount NET	30% Share MWPC	70% Share MTC
June payroll-TS		Stamps for Neighbourhood Plan consultation letters x132 first class	£178.20	£53.46	£124.74
Stamp control sheet		Stamps for Neighbourhood Plan consultation letters x 30 second class	£25.50	£7.65	£17.85
June payment run		Shaw Village Hall venue hire for NHP drop in event 20th July 2024	£60.00	£18.00	£42.00
July Payment run- July payroll TS	V3973	Neighbourhood Plan consultation printing at Nettl Inv.10987614	£428.40	£128.52	£299.88
July Payment run	V3980	Bowerhill Village Hall room hire for NHP drop in event	£42.50	£12.75	£29.75
September payment run	V4059	Campus room hire for NHP drop in event	£106.40	£31.92	£74.48
July Payment run- July payroll TS	V3973	Neighbourhood Plan consultation printing at Nettl Inv.11000997- A2 Foamex boards	£457.50	£137.25	£320.25
July Payment run	V3967	Neighbourhood Plan full page consultation advert in the Melksham News (issue 860)- Inv.0076137	£530.00	£159.00	£371.00
July Payment run	V3985	Melksham Neighbourhood Plan archive website domain annual cost	£90.00	£27.00	£63.00
July Payment run- July payroll LM	V3974	Land registry search for NHP	£6.00	£1.80	£4.20
August Payment run	V4004	Melksham Neighbourhood Plan domain fee- 2 years- Archive website for NHP 1 and current NHP 2 domain	£40.26	£12.08	£28.18
August Payment run	V4019	Inv.0076476- NHP consultation adverts in the MIN editions 861 & 862	£1,060.00	£318.00	£742.00
August Payment run LM Payroll	V4023	Land registry search for NHP	£6.00	£1.80	£4.20
August Payment run	V4006	Printing for NHP consultation event	£75.00	£22.50	£52.50
September payment run	V4056	Inv.009- Work on NPPF consultation response-	£570.00	£171.00	£399.00
September payment run	V4060	Inv.815-NHP Adverts	£1,060.00	£318.00	£742.00
		Working lunch	£6.66	£2.00	£4.66
October Payment run	V4141	Inv.010- Additional work to support and enable the Parish and Town Council to respond to the NPPF consultation-	£76.00	£22.80	£53.20
October Payment run	V4150	NHP email address renewal	£111.04	£33.31	£77.73
November payment run	Miriam Zaccarelli	Inv. 2405- Additional resource on the Neighbourhood Plan- August, September, October & November 2024- (73.25 hours) MTC to pay full amount for this as previously agreed	£1,465.00	£0.00	£1,465.00
November payment run	HM Land registry	Land registry search for NHP	£3.00	£0.90	£2.10
December payment run	AK Urbanism- V4263	Inv.052023-CT-01- Planning and master planning services support- Cooper Tires	£1,725.00	£517.50	£1,207.50
December payment run	AK Urbanism-V4263	Inv.052023-CT-02- Two stages of work on the development concept and site capacity assessment- Cooper Tires	£6,225.00	£1,867.50	£4,357.50
December payment run	Wiltshire Publications-	Full Page advert in Melksham News- 21st November issue	£530.00	£159.00	£371.00
		Total	£14,877.46	£4,023.74	£10,853.72

Place invoices paid by MTC

Date	Voucher Number	Description	Amount NET	30% Share MWPC	70% Share MTC
26/04/2024	V3834	NHP consultation materials	£2,403.50	£721.05	£1,682.45
26/04/2024	V3843	NHP Additional support to be paid fully by MTC	£105.00	£0.00	£105.00
		Place invoice 6105	£3,025.00	£907.50	£2,117.50
		Place invoice 002	£1,512.50	£453.75	£1,058.75
		Place invoice 007	£1,140.00	£342.00	£798.00

		Place invoice 011	£3,277.50	£983.25	£2,294.25
		Place invoice 015	£2,565.00	£769.50	£1,795.50
		NHP Additional support to be paid fully by MTC	£165.00	£0.00	£165.00
				£0.00	£0.00
		Total	£14,193.50	£4,177.05	£10,016.45

Total Neighbourhood Plan for 2024/25

£29,070.96

Joint Melksham Neighbourhood Plan 2

Examination Arrangements

Purpose of this Note

This Note sets out the basis on which the examination of the Joint Melksham Neighbourhood Plan 2 will be undertaken. Its ambitions are two-fold:

- to comply with the NPIERS Guidance for service users and examiners (April 2018); and
- to provide guidance for the Town Council and the Parish Council ('the qualifying bodies') on the key stages of the examination.

The examination route map

Different examinations raise their own issues. Nevertheless, the examination of the Plan will have the following the key stages:

Stage 1: Background Reading

This involves reading the submitted Plan, its supporting documents, and the various representations (and the qualifying bodies' responses to those comments). I will take all this information into account when preparing my report.

This stage of the examination has now started.

Stage 2: Visit to the neighbourhood area

The visit will provide me with an opportunity to look at specific issues and locations in the neighbourhood area. Plainly not every component of the Plan needs to be viewed on the visit. Nevertheless, it will be focused on the issues that have arisen either from the background reading and/or which are fundamental to the Plan.

The visit will be unaccompanied. I will not meet with representatives of the qualifying bodies, Wiltshire Council or any of the parties who have commented on the Plan.

I will visit the neighbourhood area in the week beginning 10 February.

Stage 3: Clarification Note

I will send a clarification note shortly after the visit. It will raise a series of questions for the qualifying bodies on the submitted Plan. The answers to the questions will help me to understand the Plan better and, where necessary, to recommend modifications to ensure it meets the basic conditions.

The clarification note will suggest a timescale for responses. However, this is a matter which I am happy should proceed at whatever pace is determined locally. This acknowledges that work on neighbourhood plans is carried out by local councils and individuals on a voluntary basis.

Stage 4: Decision about the need for a hearing

The combination of the background reading, the unaccompanied visit and the responses to the clarification note will allow me to come to a view about the need or otherwise for a hearing

as part of the examination process. The legislation anticipates that most examinations can proceed by way of written representations and without a hearing.

If a hearing is required, I will ask Wiltshire Council will make the necessary arrangements.

Stage 5: The Examination Report

The report will be prepared throughout the examination period. Its general parts can be written early in the process. The elements of the report that overlap with the clarification note will not be prepared until the responses to the note are received. These arrangements would also apply if a hearing was required.

I will prepare a fact check report before the final report. This will give an opportunity for the qualifying bodies and Wiltshire Council to comment on any factual inaccuracies and/or omissions within the report. It will not present an opportunity for the examination to enter another phase.

Other related matters

The timing of the examination

Plainly different plans cover different issues. Neighbourhood plan examinations are inevitably linear and are directly affected by the number of policies and the number and complexity of the representations received.

In the case of the Joint Melksham Plan 2, I anticipate being able to send the fact check report in late-March 2025. The exact timing will be influenced by the responses to the clarification note and/or the organisation of any required hearing.

Documents and Contact Arrangements

I have asked Wiltshire Council to display all examination-related documents on its website.

I will ask Wiltshire Council to send examination-related documents to the qualifying bodies on my behalf.

Andrew Ashcroft

Independent Examiner

Joint Melksham Neighbourhood Plan 2

29 January 2025

From: [Strategic Planning](#)
To: [Teresa Strange](#)
Cc: [Strategic Planning](#)
Subject: RE: Submission of the Wiltshire Local Plan Review
Date: 24 January 2025 13:51:04
Attachments: [image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)

Dear Teresa,

I'm sorry to hear you have found it difficult to access the information in relation to the Regulation 19 consultation and the consultation statement that followed.

Firstly, you mention the availability of the comments submitted. All the comments submitted as part of the Regulation 19 consultation are available [here](#). Here you can browse comments by the part of the plan against which they were submitted or by submission. When searching by submission, you can search by representor / organisation name using the search function to find individual responses.

In terms of a summary of the main issues raised through the Regulation 19 consultation, and indeed an explanation of all the consultation that has informed the preparation of the Local Plan, one of the best resources explaining this process is the 'Regulation 22(1)(c) Consultation Statement'. This statement, the title referring to the legislation that guides its preparation, summarises the stages of consultation that have taken place, explaining who and how the public and stakeholders were invited to participate and make representations alongside outlining how the main issues raised from the Regulation 18 stages of consultation were taken into account in preparing the Local Plan. This document can be found by following [this link](#). Section 3 of this document also outlines the main issues that were raised through the more recent Regulation 19 consultation alongside providing Council responses in some circumstances, often against thematic headings, where this was considered helpful to provide context and response to overarching strategic matters of challenge to assist the examination process. Appendix 2 Schedule 2 to this document also lists a slightly more detailed list of Key Issues against each part of the plan for those wishing to gain an overview of this, without reading all the responses.

When reading the 'Regulation 22 Statement' and the main / key issues reported within, please bear in mind that these do not represent all issues raised through the consultation, rather those the Council have identified as main challenges to the soundness of the draft Plan.

In terms of the consideration given to representations made at Regulation 19 and how these result in change, it is firstly worth reiterating the content within the 'Regulation 22' statement will help you in this regard in terms of understanding the main issues raised and initial Council responses to these. Whilst you are correct in pointing out that an initial schedule of changes ([available here](#)) has been prepared following the consultation, it is not unusual for such schedules to be added to, at the request of the Inspector, as the examination progresses following the discussion of main matters with participants through the examination process. These discussions, organised by the Inspector, will be informed by all of the responses received through the Regulation 19 consultation ensuring that all comments made are duly considered by an independent body (the Planning Inspector).

I trust this has helped in explaining matters.

Kind regards,
James

James Conibere
Planning Officer – Level One
Strategic Planning



Email: james.conibere@wiltshire.gov.uk

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 17 January 2025 13:19
To: Strategic Planning <StrategicPlanning@wiltshire.gov.uk>
Subject: RE: Submission of the Wiltshire Local Plan Review

Dear Strategic Planning

Thank you for this notification that the draft Local Plan as been submitted for examination.

Melksham Without Parish Council have been searching the vast amount of information online to see if there is a document/matrix that records the comments submitted, the consideration of the points raised, and any changes made to the draft Local Plan as a result. They have just produced their own documentation on the same lines as part of the statutory guidance for their review of the Melksham Neighbourhood Plan.

In your statement below it says: "Representations that were made during the Regulation 19 pre-submission consultation, along with a schedule of proposed changes have been submitted alongside the prescribed submission documents."

We can see a list of comments made, but not a record of their review and therefore subsequent changes. T

The parish council, and community groups like CAWS (Community Action: Whitley & Shaw) have spent of lot of time, effort and resources reading the Local Plan review documentation and responding to the consultation questions and are keen to see how their comments have been considered. Especially in the light of the new NPPF which

means that applications for developments that are Local Plan allocations could be automatically approved, without going to Committee for decision, as the presumption is made that they have been properly consulted on as part of the Plan making process. At present, there are two such large residential planning applications that are Local Plan allocations in the parish.

The new NPPF (16cs) says that “Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”
The parish council is keen to see how the draft Local Plan has been shaped by the “Empowering local communities” consultation 2 years ago, and the Local Plan consultation over a year ago.

Can you please clarify if the comments submitted to the Local Plan consultation were considered, and if so, to point the parish council to the evidence of that consideration and the changes made to the Plan as a result; as we have been unable to find out, or have confirmation from our local Wiltshire Council members that it happened. If that approach was not applied, can you please explain why.

With many thanks,
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

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
On LinkedIn: Melksham Without Parish Council

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

From: Strategic Planning <StrategicPlanning@wiltshire.gov.uk>

Sent: 02 December 2024 13:09

Subject: Submission of the Wiltshire Local Plan Review

Dear Sir/Madam,

Submission of the Wiltshire Local Plan Review

Notification under Regulation 22(3) of the Town and Country Planning (Local Planning, England) Regulations 2012 (as amended) ('the Regulations')

We are writing to you because on 28th November 2024 Wiltshire Council submitted the draft Wiltshire Local Plan review (WLPr) to the Secretary of State for independent examination.

The Wiltshire Local Plan is a review of the adopted Wiltshire Core Strategy 2015. It sets out an updated vision and framework for delivering housing and employment land to meet Wiltshire's needs over the period 2020 to 2038. In addition, it sets out a schedule of policies to manage planning applications for development, as well as a full review of extant strategic policies set out in the adopted Wiltshire Core Strategy.

The WLPr has been through the Regulation 19 pre-submission consultation which took place 27th September to 22nd November 2023 and is now ready for independent examination. Representations that were made during the Regulation 19 pre-submission consultation, along with a schedule of proposed changes have been submitted alongside the prescribed submission documents.

Now the WLPr has been submitted to the Secretary of State it will be subject to an examination conducted by the Planning Inspectorate. This is a continuous process running from the date of submission through to the receipt of the appointed Planning Inspector's Report and is likely to take a number of months. It is anticipated that part of this process will involve hearing sessions where those invited to attend will have the opportunity to

respond to matters raised by the Inspector. These hearing sessions could potentially take place during Quarter 2 of 2025. Once confirmed, all details relating to the examination process will be advertised, made available online and sent to those who have indicated they wish to be kept informed of the progress of the WLPr.

The Local Plan and relevant accompanying documents will be available to view on the [Wiltshire Council Website](#). All updates relating to the examination will be published on a [dedicated examination webpage](#) for the WLPr examination, along with contact details for the independently appointed Programme Officer for the WLPr examination, Ian Kemp:

Paper copies of all of the submission documents will be available to view at the three main Wiltshire Council hubs during normal opening hours:

- Monkton Park, Chippenham, Wiltshire, SN15 1ER
- The Council House, Bourne Hill, Salisbury, Wiltshire SP1 3UZ
- County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

In addition, paper copies/web links to the core submission documents will also be made available to view at the following libraries across Wiltshire during normal opening hours:

- Amesbury Library, Smithfield Street, Amesbury, SP4 7AL
- Bradford on Avon Library, Bridge Street, Bradford on Avon, BA15 1BY
- Calne Library, The Strand, Calne, SN11 0JU
- Chippenham Library, Timber Street, Chippenham, SN15 3EJ
- Springfield Community Campus, Beechfield Road, Corsham, SN13 9DN
- Devizes Library, Sheep Street, Devizes, SN10 1DL
- Malmesbury Library, 24 Cross Hayes, Malmesbury, SN16 9BG
- Marlborough Library, 91 High Street, Marlborough, SN8 1HD
- Melksham Community Campus, Market Place, Melksham, SN12 6ES
- Pewsey Library, Aston Close, Pewsey, SN9 5EQ
- Royal Wootton Bassett Library, Borough Fields, Royal Wootton Bassett, SN4 7AX
- Salisbury Library, Market Walk, Salisbury, SP1 1BL
- Tidworth Library, Tidworth Leisure Centre, Nadder Road, Tidworth, SP9 7QA
- Tisbury Library, Nadder Community Campus, Tisbury, SP3 6HJ
- Trowbridge Library, County Hall, Bythesea Road, Trowbridge, BA14 8JN
- Warminster Library, Three Horseshoes Walk, Warminster, BA12 9BT
- Westbury Library, Westbury House, 15 Edward Street, Westbury, BA13 3BD

For general planning policy information, please contact Wiltshire Council's Strategic Planning team by email at strategicplanning@wiltshire.gov.uk or by telephone on 01225 713223. If you would like to learn more about the process and background to the production of the WLPr, please refer to Wiltshire Council's webpages: <https://www.wiltshire.gov.uk/planning-policy>

We have written to you today because you have previously commented on a planning policy document or asked to be kept informed about planning policy matters. If you no longer want to be involved or notified about the WLPr or planning policy matters please let

us know using the email address above and we will remove you from our mailing list.

Strategic Planning

Economic Development and Planning

Wiltshire Council

Tel: 01225 713223

Email: strategicplanning@wiltshire.gov.uk

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or

attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

From: [Way, David](#)
To: [Teresa Strange](#)
Subject: RE: Lack of Employment Land in the Melksham area
Date: 31 January 2025 16:01:59
Attachments: [image001.png](#)
[image002.png](#)

Hi Teresa.

Thanks for this information.

Kind regards, David.

David Way
Senior Planning Officer
Strategic Planning

Wiltshire Council

Tel: 01225 718458
Email: david.way@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 30 January 2025 11:15
To: Way, David <David.Way@wiltshire.gov.uk>
Cc: Planning Feedback <PlanningFeedback@wiltshire.gov.uk>; Winslow, Geoff <Geoffrey.Winslow@wiltshire.gov.uk>; Francis, Luke <Luke.Francis@wiltshire.gov.uk>; Clampitt-Dix, Georgina <georgina.clampitt-dix@wiltshire.gov.uk>; Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>; Clewer, Richard <Richard.Clewer@wiltshire.gov.uk>; Bowen, Rory <Rory.Bowen@wiltshire.gov.uk>; Botterill, Nick <Nick.Botterill@wiltshire.gov.uk>; Seed, Jonathon <Jonathon.Seed@wiltshire.gov.uk>; Moloney, Victoria <Victoria.Moloney@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Subject: RE: Lack of Employment Land in the Melksham area

Dear David

Thank you for your response, which I will take back to the parish council.

I note that although the emerging Local Plan policy 18 allocates 5Ha of employment land, that the planning application approved at last Thursday's Strategic Committee for Blackmore Farm determined that 2.07Ha of that 5Ha will be for offices and Research & Development and that cannot be changed under the delegated s106 negotiations currently

taking place. Therefore, that site allocation policy is already only providing 3Ha for future applications for industrial use set against the emerging Local Plan identified need of 6.9Ha and the parish council identified need of c40Ha.

Identified immediate commercial land requirements for businesses based at Bowerhill Industrial Estate who have contacted the parish council

Employer A 6 acres + (2.4Ha)
Employer B 4 acres (1.61 Ha)
Employer C 5 acres (2.02 Ha)
Employer D 5 acres (2.02 Ha)
Employer E 15 acres (6.07Ha)
TOTAL of commercial space requirement 35 acres (14Ha)

Employer F 10-25 acres leisure space (4.04 – 10.11 Ha)
TOTAL 45 – 60 acres (18 – 24 Ha)

Anecdotal evidence for a further 15 acres and space required for future needs, gives an estimate figure of c100c acres (40 Hectares).

Kind regards,
Teresa

From: Way, David <David.Way@wiltshire.gov.uk>
Sent: 29 January 2025 11:22
To: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Cc: Planning Feedback <PlanningFeedback@wiltshire.gov.uk>; Winslow, Geoff <Geoffrey.Winslow@wiltshire.gov.uk>; Francis, Luke <Luke.Francis@wiltshire.gov.uk>; Clampitt-Dix, Georgina <georgina.clampitt-dix@wiltshire.gov.uk>; Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>; Bowen, Rory <Rory.Bowen@wiltshire.gov.uk>; Clewer, Richard <Richard.Clewer@wiltshire.gov.uk>; Botterill, Nick <Nick.Botterill@wiltshire.gov.uk>; Seed, Jonathon <Jonathon.Seed@wiltshire.gov.uk>; Moloney, Victoria <Victoria.Moloney@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Subject: RE: Lack of Employment Land in the Melksham area

Dear Teresa,

Thank you for your email of 20th January concerning the availability of employment land at Melksham and the enquiries the parish council have had from local businesses. We are aware of the challenges businesses are currently facing in the Melksham area and Wiltshire Council officers have been working with several local businesses and have spent considerable time trying to find solutions to this, particularly in the Bowerhill area.

Current planning policy (Wiltshire Core Strategy Core Policy 34 – additional employment land) does support proposals for new employment development within and adjacent to Market Towns such as Melksham, in addition to supporting sites already allocated in the Local Plan and Principal Employment Areas, in order to allow

businesses to be retained or to expand. This policy of supporting business growth on unallocated sites within or adjacent to Market Towns is proposed to be carried forward into the emerging Wiltshire Local Plan Review (Policy 64).

In terms of the emerging Wiltshire Local Plan, Policy 18 (Land east of Melksham) proposes 5ha of new employment uses on this site in addition to other uses. These employment uses include B2, B8 and E(g)(i-iii) uses and does not restrict employment development to just office uses on this site. This follows the findings of an Employment Land Review (Hardisty Jones Associates, 2023) which found that businesses and agents report significant demand for expansion space in the Melksham area against a shortage of available sites and premises. This review recommended that new employment land is allocated at Melksham to ensure there is a sufficient supply of employment land to meet forecast demand over the Local Plan period.

You asked about how the Employment Land Review (ELR) was undertaken and how it came up with its findings. The ELR analysed historical data on employment site completions and losses in Wiltshire, then extrapolated this to project future demand. Economic and employment growth projections from Cambridge Econometrics and Oxford Economics, considering COVID-19 and Brexit impacts, were also used. Employment changes were converted into property and land requirements using industry densities and a Wiltshire-specific conversion matrix. The ELR recognises that Melksham acts as a cluster with Chippenham and Corsham and that some of the demand could be met within those settlements. It forecasts a demand for up to 24.6 hectares of employment land in the Chippenham, Corsham, and Melksham cluster, with Melksham needing up to 1.2 hectares for offices and 6.9 hectares for industrial use. This demand supports local businesses, new investments, and addresses closures such as Cooper Tires.

It is also possible for neighbourhood plans to allocate new employment sites. We note that the emerging draft Joint Melksham Neighbourhood Plan, that was submitted to Wiltshire Council in November 2024, includes a significant mixed-use allocation of the former Cooper Tires site that could include future employment uses, although the neighbourhood plan recognises that, given the complexities of the site, regeneration is likely to commence later in the plan period and could extend beyond 2038.

If you have any further questions or comments, please do not hesitate to contact me.

Kind regards, David.

David Way
Senior Planning Officer
Strategic Planning

Wiltshire Council

Tel: 01225 718458

Email: david.way@wiltshire.gov.uk

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>

Sent: Monday, January 20, 2025 17:44

To: Strategic Planning <StrategicPlanning@wiltshire.gov.uk>; Moloney, Victoria <Victoria.Moloney@wiltshire.gov.uk>

Cc: Locum <locum@melksham-tc.gov.uk>; Hayley Bell <hayley.bell@melksham-tc.gov.uk>; saffi.rabey@melksham-tc.gov.uk <saffi.rabey@melksham-tc.gov.uk>; Graham Ellis (graham.ellis@melksham-tc.gov.uk) <graham.ellis@melksham-tc.gov.uk>; brian.mathew.mp@parliament.uk <brian.mathew.mp@parliament.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Alford, Phil <Phil.Alford@wiltshire.gov.uk>; Seed, Jonathon <Jonathon.Seed@wiltshire.gov.uk>

Subject: Lack of Employment Land in the Melksham area

Dear Strategic Planning & Economic Regeneration

Over the last couple of months Melksham Without Parish Council have been contacted by several local businesses on the Bowerhill Industrial Estate enquiring whether there was any additional land as they need more space. One of the local businesses had contacted some of the businesses on the industrial estate to obtain information on how much extra space they required, and the combined total with some future supply is around 100 acres (40.46 hectares). Happy to share the contact details of the businesses to the Economic Development team if useful?

In the current draft of the Local Plan there was only a small piece of land at the east of Melksham designated for new employment land, which is for 5 hectares (12.35 acres) in land east of Melksham (Blackmore Farm) Policy 18. This has been a live planning application for several months and is due for decision at Strategic Committee on Thursday. It is for office use, and not industrial; therefore, giving no allocation for new industrial land at all in the Melksham area.

Members queried how Wiltshire Council obtained their information for the Employment Land review to inform the draft Local Plan as it only identified a forecast demand for Melksham of 0.5-1.2 hectares (1.2-2.96 acres) of office space and 6.9 hectares (17 acres) of industrial space (Figure 4.17 of the Wiltshire Employment Land Review Update Sept 2023) as this does not reflect the requirement the parish council are aware of from just some of the existing businesses at Bowerhill Industrial Estate.

In its response to the Local Plan review in 2023 the parish council raised several issues about the Employment Land review but have not been able to find any response to comments made to the consultation (we have raised that separately).

Are there any plans for additional employment land in the Melksham area? The parish council are keen that with all the current housing allocations in the Local Plan, most of which are planning applications to be decided on shortly, that there are also places for

residents to work in the Melksham area and it not become a dormitory town with residents out commuting.

We look forward to hearing from you.

With kind regards, Teresa

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

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](#)

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

This email and any attachments to it are intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient of this email, please forward it to admin@melkshamwithout-pc.gov.uk

Please be aware that information contained in this email may be confidential and that any use you make of it which breaches the common law protection may leave you personally liable. Our privacy notice can be found [HERE](#).

We do not guarantee that any email is free of viruses or other malware.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire

Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

SLCC (Society of Local Council Clerks)

Key Points of the New National Planning Policy Framework (NPPF)

17 December 2024

Twenty-six things clerks and local councils should know about the new National Planning Policy Framework (NPPF):

1. It is the key planning document in England as it sets out the government's planning policies for the country and how these are expected to be applied.
2. The vast majority of the measures it contains apply straight away.
3. The changes are some of the most significant (and potentially controversial) in recent years and form a key part of the promised 'blitz' of English planning rules, including reversing many introduced by the previous government in 2023.
4. It is strategic in nature and much of the detail and its practical implications for local councils will come later.
5. It is pro development, not only in terms of housing but also forms of development such as employment (especially hi-tec), renewable and infrastructure.
6. While there have been some changes made from the draft published for consultation in July 2024, these are limited.
7. It requires local planning authorities (LPAs) to meet their identified housing need, 'including with an appropriate mix of housing types for the local community'.
8. Makes some further changes to the formula 'standard methodology' to identify local authority housing needs published in July. This has generally resulted in higher requirements in London, South East and East of England but falls in other regions compared to the July proposals. [The results of the new method can be found here.](#)

Wiltshire figure extracted here:

Indicative Local Housing Need under the previous standard method	1,917
Indicative Local Housing Need under the new standard method	3,525
Average Annual Net additions (2021/22-2023/24)	2,018

9. LPAs should also identify five years of housing supply land, with an additional 20% buffer for areas where there has been significant under-delivery of housing over the last three years.
10. LPAs should undertake a green belt review where they are unable to meet their identified needs for housing, commercial or other development.
11. Establishes the concept of 'grey belt' land within the green belt, which is land that does not 'strongly' contribute to green belt purposes. Neighbourhood plans are not explicitly affected by the changes.
12. Introduces a few new forms of development that would be appropriate in the Green Belt such as on previously development land in certain circumstances.

13. Neighbourhood plans are not explicitly affected by the changes.
14. Removes the preference in the previous NPPF that local design codes are the primary means for assessing and improving design of development, though still promotes their use.
15. Promotes community-led development including for affordable and self-build housing, as well as renewable energy and low carbon projects.
16. Removes references to beauty and beautiful in relation to high development.
17. Reinforces that brownfield development should be viewed positively.
18. Includes measures aimed at strengthening cross-border strategic working between local authorities.
19. Contains several measures aimed at supporting the provision of affordable housing, especially for social rent.
20. Gives 'significant weight' to the benefits associated with renewable and low carbon energy generation and suggests that LPAs should consider identifying suitable areas for such development when producing plans.
21. Emphasises that the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications.
22. Requires 'significant weight' to be placed on the importance of facilitating new, expanded or upgraded public service infrastructure, such as roads, health, prisons, digital, and electricity pylons.
23. Development proposals and allocation of sites should ensure that sustainable transport modes are prioritised.
24. Needs to be seen in the context of other recent planning announcements made by the government, including that they will play a bigger role in the planning system, the commitment to build 1.5 million homes over the lifetime of the parliament, and the development of 32 new towns.
25. The government received about 10,000 responses, including from SLCC and many local councils to the consultation of the draft NPPF. [A report outlining the government's response to these can be found here.](#)
26. [More information, including a copy of the NPPF, can be found here.](#)

NALC [News](#)

16 Dec 2024

The government publishes the revised National Planning Policy Framework

The government published the revised [National Planning Policy Framework](#) (NPPF) on 12 December 2024. The framework sets out the government's planning policies for England and how these are expected to be applied.

The key changes set out in the framework, effective immediately, include:

- Mandatory housing targets for principal authorities to drive housebuilding, with increased targets in areas facing the highest levels of unaffordability.
- Measures to ensure that principal authorities develop or update local plans that cater to the needs of their communities.
- Principal authorities must identify and prioritise lower-quality grey belt land to meet housing targets.
- New Golden Rules for greenbelt development require developers to provide essential infrastructure for local communities, such as nurseries, GP surgeries, transportation, and a higher proportion of affordable housing.
- Increased emphasis on affordable housing, particularly social rent.

The updates to the NPPF follow a government consultation conducted over the summer, to which [we and many parish and town councils responded](#). The government has also published its [response](#).

REPORT FOR THE STRATEGIC PLANNING COMMITTEE

Date of Meeting	23 January 2025
Application Number	PL/2023/11188
Site Address	Land at Blackmore Farm, Sandridge Common, Melksham, SN12 7QS
Proposal	Demolition of agricultural buildings and development of up to 500 dwellings; up to 5,000 square metres of employment (class E(g)(i)) & class E(g)(ii)); land for primary school (class F1); land for mixed-use hub (class E / class F); open space; provision of access infrastructure from Sandridge Common (A3102); and provision of all associated infrastructure necessary to facilitate the development of the site (Outline application relating to access)
Applicant	Gleeson Land Ltd
Town / Parish Council	Melksham Without Parish Council
Electoral Division	Bowerhill; Cllr Nick Holder
Type of Application	Outline Planning Permission
Case Officer	Steven Sims

Reason for the application being considered by Committee

The application is brought before the Strategic Planning Committee because the proposal involves a departure to the policies of the statutory development plan and the recommendation is to approve subject to completion of a S106 agreement. Notwithstanding this, the application has been called in for committee consideration by Cllr Nick Holder citing the following concerns:

- The Scale of development
- The Visual impact upon surrounding area
- The Relationship to adjoining properties
- The proposal conflicts with the emerging Local Plan and Design Guide.

1. Recommendation: For the reasons set out within this report, officers recommend that the committee endorse the officer recommendation to approve the abovementioned application, subject to a s106 legal agreement and planning conditions.

2. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations having regard to the Council's substantial housing supply deficit (being 2.03 years) as well as the social, environmental and economic material considerations.

3. Report Summary

The key issues for consideration are:

- The principle of development
- The proposed layout, density, design and visual impacts
- The Highway Implications
- The impact on the setting of the adjacent listed building

- The impacts on the living conditions of neighbouring residents
- Drainage issues
- Ecology issues
- Open space/ sports provision
- Loss of agricultural land
- Other issues

4. Site Description

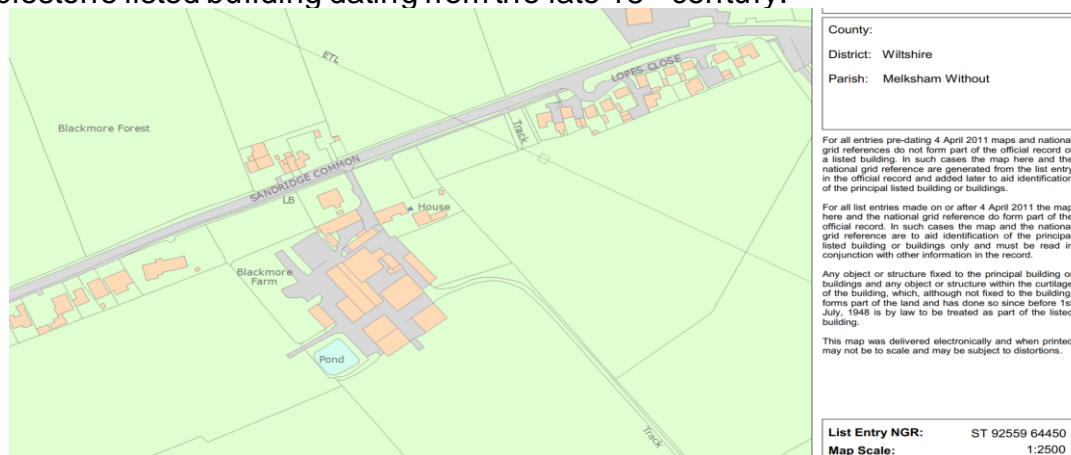


Site Location Plan (Drg no. 220 rev B) with aerial inset showing Blackmore Farm

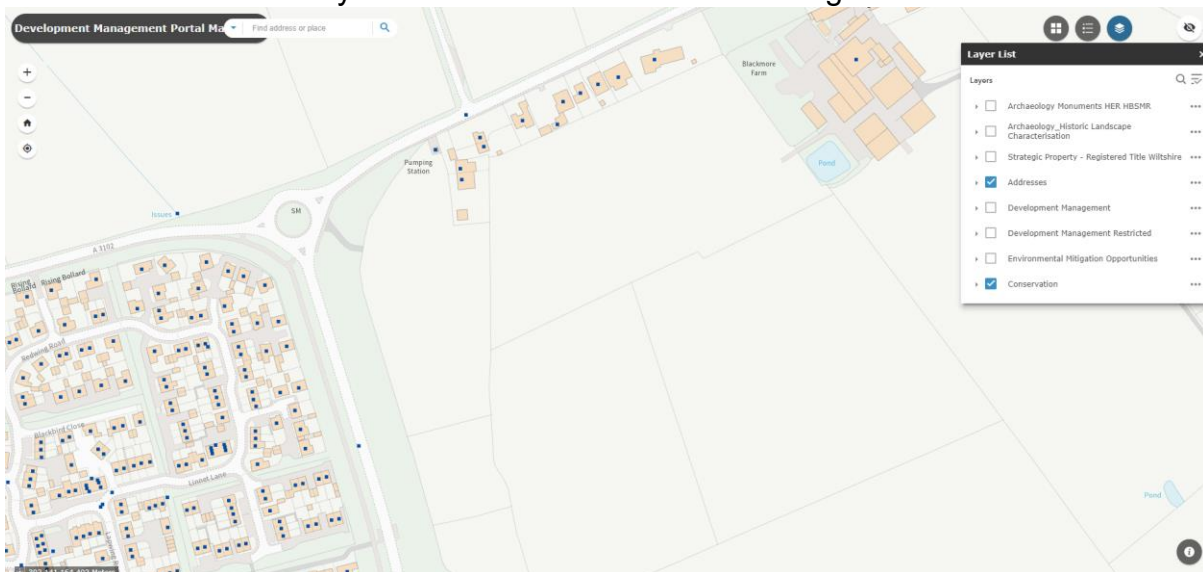
The application site extends to over 37 hectares and is shown above in red outline with other land owned by the applicant shown in blue. The site is located immediately south of Sandridge Common Road (the A3102) and to the east of Eastern Way.

As shown in the aerial insert above right, Blackmore Farm has a range of agricultural buildings that abut the site's northern boundary.

The blue pin marker (on the aerial insert and located near the top right) indicates the location of Blackmore Farmhouse which is a grade II two-storey rendered brick and rubblestone listed building dating from the late 18th century.



The previous inserts also reveal there being a dozen domestic properties abutting the site's northern boundary – which is clearer on the following insert.



To the west, the significant modern town expansion on land to the northeast of Snowberry Lane and south of Sandridge Road is clearly evident – which formed part of a 2004 outline permission for 670 dwellings, which was subject to numerous applications through the years. The site is located just over 2km east of Melksham's town centre.

The application site is comprised of several agricultural fields, bounded by well-established hedgerows (except around Blackmore Farm where the boundary is formed by the outer-walls of agricultural barns and post / wire fencing), and is of predominately Grade 3 (good to moderate quality land) around Blackmore Farm and Grade 4 (poor quality) further to the south (when referencing the Natural England Agricultural Land Classification (ALC) maps) and measuring just over 32 hectares.

The topography of the site is fairly flat and low lying, gently sloping from the north boundary.

Trees are found throughout the site nestling amongst the hedgerows while a small copse of broadleaved trees is located in the southern section of the site.

The site falls within the Avon Open Clay Vale character area while the Wooded Greensand Hill Special Character Area is located approximately 600 metres to the northeast. The site is located within flood zone 1. Some minor areas of the site are subject to surface water flooding associated with Clackers Brook.

A tributary of Clacker's Brook dissects the southern area of the site and public footpath MELW26 runs north south through the site while bridleway MELW41 is located adjacent to the southern boundary. Public footpath MELW27 passes through the centre of the site - as illustrated on the following page.



Site constraints – detailing public footpaths/bridleways and the listed building (Blackmore House)



Photo – looking west from site towards Eastern Way



Photo – looking south from site towards Snarlton Farm



Photo – looking west from site



Photo – looking north from the site and towards the rear of the properties fronting Sandridge Common Road

5. Relevant Planning History

PL/2023/01949 – Outline permission with some matters reserved for demolition of agricultural outbuildings and development of up to 650 dwellings; land for primary school; land for mixed-use hub (class E / class F); open space; provision of access infrastructure from Sandridge Common (A3102); and provision of all associated infrastructure necessary to facilitate development of the site (access only). – Refused, in accordance with following reasons –

1. *Core Policy 1 of the Wiltshire Core Strategy sets out the 'Settlement Strategy' for the County, and in doing so identifies four tiers of settlement - Principal Settlement, Market Town, Local Service Centre, and Large and Small Village. Within the Settlement Strategy Warminster is defined as a Large Village. The Principal Settlements, Market Towns, Local Service Centres and Large Villages have defined boundaries, or 'limits of development'. Beyond the limits of development is countryside. The application site lies beyond / outside the limits of development of Melksham and so is in the countryside.*

Core Policy 2 of the Wiltshire Core Strategy sets out the 'Delivery Strategy'. It identifies the scale of growth appropriate within each settlement tier. The policy states that within the limits of development of those settlements with defined limits there is a presumption in favour of sustainable development; but outside the defined limits – that is, in the countryside – other in circumstances as permitted by other policies of the Plan, development will not be permitted, and that the limits of development may only be altered through identification of sites for development through subsequent Site Allocations Development Plan Documents and Neighbourhood Plans.

Core Policy 15 of the Wiltshire Core Strategy sets out the 'Spatial Strategy' for the Melksham Community Area in which the site lies. It states that development

in the Melksham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.

Policy 6 of the Joint Melksham Neighbourhood Plan (made in July 2021) states that in accordance with Wiltshire Core Strategy Core Policy 2, development will not be permitted outside the Settlement Boundary other than in circumstances as permitted by other policies within the Core Strategy.

The proposal is for outline planning permission to erect up to 650 dwellings, etc in the countryside. Under Core Policies 1, 2 and 15, this does not comply with the Settlement and Delivery Strategies as a matter of principle. The Strategies are designed to ensure new developments satisfy the fundamental principles of sustainability, and so it follows that where a proposal such as this fails to comply with them then it will be unsustainable in this overarching context. The application site is not identified for development in a Site Allocations Development Plan Document, and it is not allocated in a Neighbourhood Plan document.

Furthermore, there are no material considerations or exceptional circumstances set out in other policies of the Plan, which override the core policy's position. The proposal is, therefore, contrary to Core Policies 1, 2 and 15 of the Wiltshire Core Strategy, Policy 6 of the made Joint Melksham Neighbourhood Plan and paragraphs 2, 7-15, 47 and 180(b) of the National Planning Policy Framework (NPPF), comprising unsustainable development.

- 2. The applicant has not demonstrated that the proposal can satisfactorily accommodate the quantum of development proposed. The Parameter Plan – Composite (Drg no. 509 rev H) and Parameter Plan – Density (drg no, 516 rev A) fail to satisfactorily illustrate that 650 dwellings could both fit on the site, and fully accord with the delivery of a high quality development and standard of urban design (including, in particular, an appropriate mix of dwelling types that would adequately respond to local need as expressed in the most up to date Strategic Housing Market Assessment, provide tree-lined streets, quality landscaping and sensitively integrated parking).*

The Council is not satisfied that the proposal would deliver a well-designed, beautiful new place as directed by the Framework and the applicant has not provided adequate clarity about the design expectations. The Council is also not convinced the application has been sufficiently supported in terms of analysing and recognising the intrinsic character of the open countryside. The site forms part of the Open Clay Vale character area which includes a Special Landscape Area (SLA) immediately to the North-East of the site and the site benefits from views to and from Sandridge Park Hill as well as forming a rural buffer to the SLA that would be lost by this development.

The adopted Wiltshire Core Strategy seeks to protect and conserve landscape character, and the Framework sets out within paragraph 180 the need to contribute to and enhance the natural environment, and the Council is not satisfied that this proposal would deliver this policy requirement.

Therefore, the proposal fails on the fundamental tenet of delivering high quality design and place shaping and is found contrary to Core Policies 45, 51 and 57 of the Wiltshire Core Strategy, policies 6 and 18 of the Joint Melksham Neighbourhood Plan and paragraphs 8b, 96, 128, 129, 131, 135, 136, 139, 180 of the Framework.

- 3. The proposed development would cause harm to the setting of the grade II listed farmhouse at Blackmore House, at Sandridge Common. The proposals would introduce a significant suburban form of development which is out of character with the existing agricultural landscape, over a very large area, and would result in the almost complete loss of the wider rural setting within which the listed farmhouse is experienced with a consequent diminution of its significance as the farmhouse becomes completely divorced from the surrounding agricultural landscape. This harm is considered as “less than substantial harm” and in accordance with paragraph 208 of the NPPF, on balance, it is not considered the public benefits of the development outweigh the harm caused. The proposed development is therefore contrary to Core Policies 57 and 58 of the Wiltshire Core Strategy and paragraphs 203, 205 and 208 of the Framework.*
- 4. The applicant has failed to provide sufficient information to fully determine the ecological impacts, including the extent to which the proposed development would impact upon priority habitat types, protected / notable species which are reasonably likely to be present and affected by the development, and the extent to which the development would impact local green infrastructure, as a consequence, the application is not considered to be environmentally sustainable. In addition, insufficient information in the form of adequate/complete bat surveys has been submitted as part of the application to determine the impact of the development on potential tree roosts by bats which are sensitive to the anticipated increase noise and artificial light disturbance, and the impact for Bechstein’s bat in particular. The applicant has also failed to submit sufficient information to provide evidence of Biodiversity Net Gain. The development is therefore contrary to Core Policies 50 and 52 of the Wiltshire Core Strategy, Policy 13 of the Joint Melksham Neighbourhood Plan and paragraphs 180 and 186 of the Framework.*
- 5. The proposed development fails to provide and/or secure adequate provision for necessary on-site and, where appropriate, off-site infrastructure to make the application proposal acceptable in planning terms. The application is therefore contrary to policy CP3 of the adopted Wiltshire Core Strategy, and the National Planning Policy Framework, specifically the central social and environment sustainable development objectives enshrined within paragraph 8.*

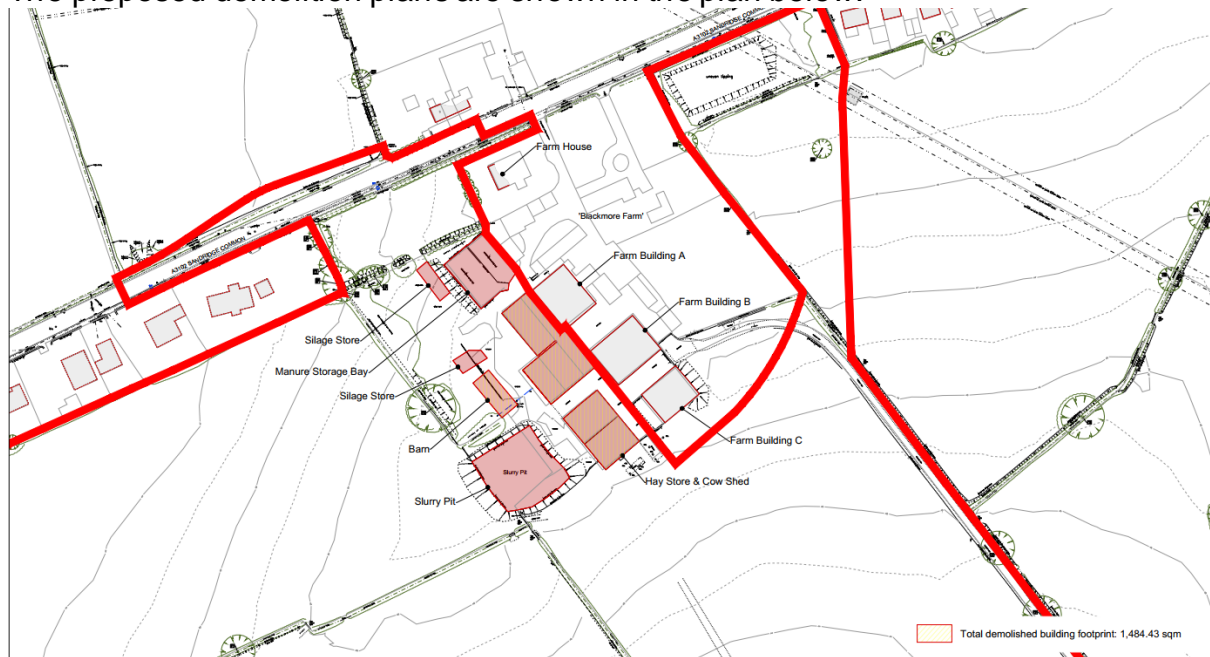
PL/2022/01864 – EIA - Scoping request associated to Land at Blackmore Farm, Melksham – EIA not required

6. The Proposal

This application seeks to obtain outline planning permission, with all matters reserved except for access, for the following development/ works: -

- erection of up to 500 dwellings (with a clear commitment given by the applicants in early April 2024 to deliver 200 dwellings (40% of the scheme) as affordable homes)
- erection up to 5,000 square metres of employment floorspace (class E(g)(i) & E(g)(ii)) (Commercial, Business and Service falling within office use and research and development use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, smells and fumes etc). On the Illustrative Masterplan (see below) this has been shown as comprising circa 2.07ha with space for car parking and a building footprint with a floor area of c.5,000sqm (to be built over two/ three storeys)
- provision of land (2 hectares) for a new a primary school (class F1) and sports pitch provision
- provision of land for a mixed-use hub (class E / class F). On the Illustrative Masterplan this has been shown on a land parcel of circa 0.17ha (1700sqm) with space for car parking and a building footprint with a gross floor area of c.400sqm.
- public open space provision (15 hectares) including 2 equipped play spaces (one for children and one for teenagers) and allotments (amounting to 0.17ha).
- construction of a new ghost island right turn access off Sandridge Common (A3102)
- and associated infrastructure and green infrastructure (additional tree planting, landscape buffers, green corridors and enhancement of existing hedgerows etc)
- demolition of the existing agricultural buildings at Blackmore Farm

The proposed demolition plans are shown in the plan below:



The detailed matters relating to appearance, landscaping, the layout and scale of the proposed development are reserved for a later reserved matters application. However, to assist the Council with its assessment of this outline application, the applicant has submitted an Illustrative Masterplan which is shown on the next page.



Illustrative Masterplan (Drg no. 417 rev C)

7. Local Planning Policy

The adopted Wiltshire Core Strategy (WCS) 2015 – The relevant policies include: Core Policy 1: Settlement Strategy; Core Policy 2: Delivery Strategy; Core Policy 3: Infrastructure Requirements; Core Policy 15: Spatial Strategy - Melksham Community Area; Core Policy 34: Additional employment land; Core Policy 38: Retail and leisure; Core Policy 43: Providing Affordable Housing; Core Policy 45: Meeting Wiltshire's Housing Needs; Core Policy 46: Meeting the Needs of Wiltshire's Vulnerable and Older People; Core Policy 50: Biodiversity and Geodiversity; Core Policy 51: Landscape; Core Policy 52: Green Infrastructure; Core Policy 57: Ensuring High Quality Design and Place Shaping; Core Policy 58: Ensuring the Conservation of the Historic Environment; Core Policy 60: Sustainable transport; Core Policy 61: Transport

and Development; Core Policy 62: Development Impacts on the Transport Network; Core Policy 64: Demand Management; Core Policy 67: Flood Risk

Wiltshire's Emerging Local Plan With regard to - Policy 17 – Melksham Market Town; Policy 18 – Land East of Melksham [Important Note: Following the Full Council meeting on 15 October 2024. The emerging Wiltshire Local Plan was submitted to the Secretary of State on the 28 November 2024 to appoint a planning inspector and to programme an independent examination].

The made Joint Melksham Neighbourhood Plan 2020 – 2026

Emerging Joint Melksham Neighbourhood Plan (Regulation 16 public consultation being held Nov 2024 to Jan 2025)

Wiltshire Council's Housing Land Supply Statement June 2024 (with baseline date of April 2023) – however it is important to note that the June 2024 HLS has been superseded by fresh calculations made following release of the revised NPPF in December 2024 and members should refer to the following:

Wiltshire Council Briefing Note No.24-20 (17 December 2024)

West Wiltshire District Plan 1st Alteration 2004 'saved policies', with regard to: U1a Foul Water Disposal; I2 Arts; and I3 Access for Everyone

Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015

Wiltshire Council's Waste Core Strategy, adopted July 2009

Wiltshire Council's Waste Storage and Collection: Guidance for Developers Supplementary Planning Document, January 2017

West Wiltshire Open Space provision in New Housing Developments – A Guide (Supplementary Planning Guidance August 2024) and Wiltshire Council's Playing Pitch Strategy February 2017

Art and Design in the Public Realm in Wiltshire – 2024 Guidance – adopted May 2024

West Wiltshire Landscape Character Assessment, March 2007

Leisure and Recreation Development Plan Document, January 2009

A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030

Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)

- Active travel infrastructure design standards 2022
- Active travel parking standards and design guide 2022

LTN1/20 – Cycle Infrastructure Design (July 2020)

Air Quality SPD (July 2023)

Wiltshire Council's Wiltshire Design Guide SPD (March 2024)

Wiltshire Housing Site Allocations Plan, adopted 25 February 2020

National Planning Policy Framework (Dec 2024) & Planning Practice Guidance

Open Space provision in New Housing Developments – A Guide (Supplementary Planning Guidance) and Wiltshire Council's Playing Pitch Strategy February 2017

Summary of Consultation Responses

Note following the release of the revised NPPF dated December 2024 some of the following comments from consultees may reference out of date NPPF policy paragraphs.

Melksham Without Parish Council: Following submission and review of revisions, the PC maintained an objection (dated 18 December 2024) due to the health and safety implications of the single access off the A3102. The comments that the parish council have previously submitted over the last year still stand. The parish council supports plan led development but feels strongly that this application does not align with the policy in the Local Plan, with only one access, it also notes it's for 75 more dwellings than the emerging new local plan proposes.

1. Relocation of the Employment Land

Concerning the revised plans, the parish council objects to the revision to move the employment land from the Northeast to the Southwest. The parish council understand from the Planning Officer that this was done to make the plan more aligned with Policy 18 in the draft Local Plan. On looking at the policy Figure 4.12, that made sense when the access was coming from Eastern Way as directly off the distributor road Eastern Way, straight into the employment area. The parish council objects to the increased traffic for the employment land now accessing the employment land via the A3102, travelling the length of the development on an estate road, past the primary school and the residential development – it is felt that it's very unlikely that those accessing the employment land will all be living on the development and walking to work. This will put more traffic pressure on the single access to the site on the A3102 at peak times, with residents out commuting and workers on the employment site and school attendees coming into the development at the same time.

The parish council suggests that this planning application conflicts with the new NPPF paragraph 115 *"(b) safe and suitable access to the site can be achieved by all users"* and *"(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highways safety, can be cost effectively mitigated to an acceptable degree through a vision led approach"*; and feels that paragraph 116 applies *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe..."*

2. Sustainable Transport:

The parish council have previously raised that they wish to see any comments from Active Travel England, as they feel that they put forward constructive comments for the planning application for the adjacent site at Land at Snarlton Farm. These are not available on the online portal for viewing, if they have been received can they be uploaded please, and if not received, can they be chased please to inform this decision-making process.

3. Emergency Access:

The other revision to the plan was to update the emergency access route on the plan, but this is only for emergency vehicles using the pedestrian/cycle way. If there was an accident/incident/road works on the junction of the A3102 and the development, how would the residents of the 500 houses, the school pupils/staff and those working at the employment land be able to exit or come into the development?

4. Community Hub:

The land for the community hub looks to be wholly inadequate to provide a building and car park to serve the community of the new development and needs to be much bigger. We are unable to scale off the drawing, is this something that can be provided to the parish council so that they can compare it to the size of the village hall recently built at Berryfield. The parish council do not feel that community use of the primary school is an acceptable solution, this was done with the relatively recently built Forest & Sandridge School with many issues accessing it for community uses in practical terms, especially as it's not available during the day.

As per the previous comments, the parish council wish to discuss the community hub provision to ensure that a holistic approach is adopted when in consideration with other current planning applications for s106 funding from adjacent sites at Land at Snarlton Farm and Land at New Road Farm. It may be that funding could be secured from the Snarlton Farm application, if Wiltshire Council are minded to approve the application, to fund a larger community hub/centre that could serve both developments. The parish council urge that these options are investigated rather than two community centres being provided on adjacent sites, as well as the one to be built by Melksham Town Council on the Hunters Wood/The Acorns development: leading to an unsustainable proposition.

5. Further discussions:

This is a large development, bigger than some villages in Wiltshire, and the parish council feel that they have an important part to play in the planning process with their local knowledge. The parish council query if their comments that were submitted to the Local Plan review consultation on this policy have been taken into account.

The PC also expressed an interest in seeing conditions and a summary of the s106 obligations in a committee report and the implications of the recent publication of the latest NPPF.

The Melksham Neighbourhood Plan is an important and relevant part of the Development Plan and is still valued as such in the newly published NPPF.

Parish Council comments received 24/9/2024 –

This consultation solely related to the proposed development being accessed via the A3102 and a ghost junction instead of a roundabout.

Melksham Without Parish Council expressed being disappointed that there is still only one access to the development off of the A3102, which is not considered suitable for the reasons expressed previously (in February 2024 and follow up consultation commentary) but the PC maintains its opposition to this application and strongly supports the comments made by the Sustainable Transport Officer in August 24.

In addition, the PC notes some environmental changes to the parameter plans and the parish council requests that the existing mature trees and hedgerows be retained at the site of this development. There are some mature oak trees of significant value on the site.

Also dated 24/9/2024, the PC submitted the following comments–

Further to the recent Planning Appeal hearing for Land west of Semington Road, the parish council requested that any Reserved Matters application should be submitted **WITHIN TWO YEARS**, and not 3 years as per the standard Wiltshire Council condition. This is to try and address the shortfall in the 5-year housing land supply pipeline. Whilst the decision of the Inspector is still pending, he did accept the change in conditions to reflect this request.

Melksham Without Parish Council therefore request if Wiltshire Council are minded to approve the application for Land at Blackmore Farm that any Reserved Matters application should have a condition that they have to submit a Reserved Matters application within 2 years of the decision date.

Parish Council comments received 13/9/2024 –

Melksham Without parish council have considered the current situation with the potential for a community centre on the Snarleton Farm application, the same on the application for Blackmore Farm and the s106 funding for a community centre in the application for Hunters Wood/The Acorn 14/10461/OUT which is now in the parish of Melksham Town, and it is noted that the Town Council are yet to submit a planning application for the proposed site in Angelica Avenue to the rear of Spa Medical Centre.

We just want to draw to your attention to the above and to understand how best the planning applications with any s106 funding and land agreed for a community centre deliver the most appropriate new facility. The parish council do not think three community centres are required, but perhaps two are necessary noting that the one for the initial development of 800 dwellings on land to the east of Melksham had the community facility omitted as part of the new primary school development. We also want to ensure we don't miss out on any at all, and the potential for funding. The parish council would like to be party to any discussions on this, with the town council as appropriate.

Parish Council comments received 11/9/2024 –

Regarding the above planning application, at a Planning Committee meeting on 19 August, Members considered the comments from the Wiltshire Council ecologist on the proposals and supported their objections.

Parish Council Comments received 12/2/2024 –

Melksham Without Parish Council strongly objects to this planning application for the following reasons:

- The proposals do not answer the strategic needs of the Melksham Neighbourhood Plan area and in fact distinctly hinder any future strategic plans for Melksham in terms of master planning via the draft Local Plan policies.
- This is speculative and not plan-led development, its piecemeal and not in line with the allocation in the draft Local Plan (Policy 18); despite the statement in the Preface of the Design & Access Statement that this new application has been prepared in response to this emerging allocation. This gives an uncoordinated, disjointed approach, without the means to properly address the infrastructure needs that the impact this number of houses to the area will bring.
Attention is drawn to the comments of the Urban Design Officer in the Statement of Community Involvement, which the parish council agrees with.
“The site in question is just one piece of a wider area; an area which looks to become a new urban extension (UE) for Melksham, and which will need to be master planned in a holistic way, with input from a range of stakeholders as well as adjacent landowners. The applicant’s seemingly self-serving masterplan references adjacent land promoted by other developers but does not show what is proposed or how those land uses would integrate with the applicant’s masterplan.”
- The application does not adhere with Policy 18 in the draft Local Plan, regarding the housing allocation for Blackmore Farm:
- The local plan allocates 425 dwellings on this site.
- The Local Plan seeks an allocation of 5ha employment land. However, proposals only show 0.93ha of land for employment use, as office space. It is unclear where the requirement for additional office space in Melksham has been evidenced, particularly as there is currently a shortage of warehouse/manufacturing space within Melksham, with businesses and agents reporting significant demand for expansion space in the area against a shortage of available sites and premises, as highlighted in the Wiltshire Employment Land Review Update dated September 2023.
- The Local Plan seeks a much lower density of housing to the east of the site, in order to prevent coalescence with the rural character of the area. However, there is no reference within documentation supporting the application of the level of density proposed in this area, just a general note of “500 dwellings at 36dph average” on the Illustrative Masterplan legend.
- There does not appear to be provision for a mobility hub, including bus and cycle infrastructure provision.
- The development is in the open countryside, outside the Settlement Boundary of Melksham & Bowerhill, isolated and therefore unsustainable and in conflict with Melksham Neighbourhood Plan policy 6: Housing in Defined Settlements. It is stated within the Design & Access Statement the development is adjacent to the settlement boundary, this is not the case, as it is next to a ‘ransom strip’ adjacent to Eastern Way.

- It is noted in the Design and Access Statement it states Core Policy 2 of the Core Strategy is out of date by virtue of a lack of 5-year land supply. However, this is irrelevant given recent changes to the National Planning Policy Framework (NPPF), as Wiltshire Council now have “Paragraph 77” protection.
- The Melksham Neighbourhood Plan was made on 8 July 2021 and therefore meets the National Planning Policy Framework (NPPF) “Paragraph 14” criteria following recent changes to the NPPF. Whilst their documentation states that they have submitted this application to reflect the draft Local Plan, they have made no reference to the Regulation 14 consultation on the reviewed Melksham Neighbourhood Plan that took place in October and November 2023, despite making representations.
- The proposals are not part of any housing allocation in the current Melksham Neighbourhood Plan. The Steering Group are looking to allocate a meaningful number of houses (200-250) as part of the Neighbourhood Plan Review.
- The proposals do not adhere to policies within the adopted Neighbourhood Plan, particularly policies 1, 6, 8, 11 and 18 with regard to sustainable design and construction, housing in defined settlements, infrastructure phasing and priorities, sustainable transport & active travel and local distinctive, high-quality design, respectively.
- There has been no adherence to either the emerging Wiltshire Design Guide or Melksham Design Guide within the development design.
- There is a lack of connectivity with the surrounding area and lack of connection to the distributor road Eastern Way. The only vehicle access proposed is off the A3102; and only one access. It was noted in response to a Scoping Document request, that the Planning Officer had stated ‘despite the large size of potential development it is not proposed to include land to the East of the development at Eastern Way as a means of access, Eastern Way is effectively a by-pass that has been presumably designed to accommodate future growth of the Eastern side of Melksham and included a roundabout with anticipated access to go further east towards your site.’
- It is noted within the Design & Access Statement it refers to Sandridge Common having sufficient capacity to accommodate access points and traffic arising from the proposed development. The parish council would like to see the evidence to support this claim, particularly as they have a concern the only entrance/exit will be at the bottom of a steep hill and on a bend, with several accidents having taken place along this stretch of road over the years.
- Whilst it is noted the only proposed entrance/exit will be served by a roundabout, some of the arrangements for pedestrians around the roundabout are unsatisfactory, particularly as it is noted there is no means of crossing the main road via a central island to access the bus stop on the North-Western side of A3102 outbound or the proposed nursery in the draft Local Plan in Policy 20.
- Concern is raised if there were to be an accident near the only access/egress, this could be completely blocked off, therefore a separate access in a different location is required, as suggested in the draft Local Plan.
- Attention is drawn to Paragraph 114(b) of the National Planning Policy Framework (NPPF) which states: new developments must ensure safe and suitable access to the site can be achieved for all users.
- There is a concern at the impact this development will have on the narrow country roads to the North of the site. A large number of residents will be tempted, as drivers from East of Melksham currently do, to use country lanes such as New Road (single track with passing places), Forest Road and through the National Trust village of

Lacock via a single-track medieval bridge to pick up the A350 to access Chippenham and the M4. The bridge at Lacock is often closed due to flooding.

Concern has recently been raised with the parish council by Wiltshire Council's Highway Officers at the condition of the verges along New Road, given the number of vehicles trying to pass each other on such a narrow road, despite passing places. Therefore, the parish council seek a highway contribution towards increased highway maintenance needed as a result of this development.

- Whilst the parish council have not had sight of the Highway Officers comments relating to this application, they had noted the Highway Officer's previous comments relating to the original planning application (PL/2023/01949) and therefore had requested that any highway requests recommended in those Highway Officer comments should be in place prior to first occupation and not the 400th as indicated in his original report.

- The illustrative map does not show the route of a potential Eastern bypass, as on the original planning (PL/2023/01949). Concern is expressed, there is very limited space between the development and existing woodland near Praters Lane.

The parish council would strongly oppose the destruction of the woodland in order to accommodate a potential eastern bypass. Therefore, concern is expressed at the statement in the Design & Access Statement, that "there is no saved route in the draft Local Plan and therefore no planning policy in place which states they should have regard of the line of Eastern bypass." The parish council note that there is funding for the Eastern Bypass project in the Wiltshire Council budget for 2024/25.

- Within the Local Plan, the indicative plan indicates there will be two accesses to the development, therefore any bus operator would be amenable to running a service to this site, as they would be able to go in one way and out the other and therefore cover the maximum number of passengers and be more efficient from an operational point of view. However, plans only show one access, and no circular route, therefore making the site less accessible for bus operators and less attractive from an operational point of view.

Within the Transport Accessibility and Movement Report it states there is an hourly bus service. However, it does not state when this service starts and finishes. Any service should be available at times to take children from the development to the various schools in the area and visa-versa.

It is also stated a proposed new bus service would go 'down Eastern Way, Western Way, The Spa, through the town centre onward to the Train Station'. Confusion was expressed in the use of Western Way.

Within plans it states bus stops being only 500m away from the site. However, this distance could only be achieved by having to use the existing public right of way network, which is not surfaced and therefore, would need to be sufficiently upgraded.

It is noted the developer does not own the land in question with the landowner objecting to the development for the previous 650 houses.

It is noted the area only has a limited bus service at present. Attention is drawn to the comments of the Planning Inspectorate at a recent Appeal for an application in Southwick (PL/2023/00952), which stated the development was unsustainable due to

an infrequent bus service, therefore, this would suggest this development is unsustainable.

- Whilst it is noted within the Statement of Community Involvement it states the Drainage Team had no objection to the original proposals for planning application PL/2023/01949, this is a bit misleading, as they have asked for several conditions to be addressed.

The parish council have a concern at potential flood risk and note this had also been raised as a concern by several people when commenting on the previous application for 650 dwellings (PL/2023/01949). Although there will be attenuation, once full, the run-off will go into the water courses and unless these are more than adequate, there could be flooding issues including further downstream.

Concern was expressed with the accuracy of the applicants Appendix 9.1 of the Flood Risk Assessment & Drainage Strategy (Part 1) which states that *'the nearest Environment Agency (EA) designated main river to the site is Clackers Brook, a tributary of the River Avon, which passes through Melksham and the neighbouring village of Shurnhold'*. Shurnhold is not a village; it is part of Melksham bordering South Brook about half a mile to the West of the River Avon, whereas Clackers Brook flows into the river from the East. There is therefore concern about the accuracy of other aspects in the report.

- Whilst noting land has been allocated for a 2-form entry school. Any school needs to be in place as soon as residents move in. If not, children will be taken by vehicle to other schools in the Melksham area, causing additional traffic, which does not conform with Wiltshire Council policy. We can only see reference to 2 form entry school in the Transport Accessibility and Movement Report, whereas the other documents and plans only say 2.0ha of land for a school. Wiltshire Council policy is for 2 form entry schools.

Paragraph 99 of the NPPF states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. The Wiltshire Council draft School Place Strategy (page 17) states: *"Wiltshire Council believes that: Parental preference is a key consideration and ability to access a school place close to home within the local community is an important factor."*

The draft School Places Strategy (page 89) states that *"At present, there are clearly insufficient primary school places available in the town to cater for the proposed Local Plan housing"*. It also adds that the closest primary school, Forest & Sandridge, has a capacity of 420 and is full, with a S106 contribution secured to expand the school to 2.5FE. With only 5% of urban primary school capacity at present, it is clear that there are no spaces for the children moving into this proposed development in the current schools; let alone choice of schools.

- Early years: Within the Design & Access Statement it suggests the inclusion of a nursery as set out in Policy 18 of the draft Local Plan is an error. However, it is understood both the Blackmore Farm site and the site allocation in the draft Local Plan opposite at New Road Farm (Policy 20) are required to provide 60 early year places and 110 nursery places respectively. There needs to be a firm plan for the early years

provision and s106 contributions to provide for the new young children that this development will bring to the area. Page 21 of the draft School Places Strategy states:

"Wiltshire Council believes that where additional school places are needed because of new housing development, as far as possible the costs should fall on the landowners and/or developers, by way of contributions falling within the concept of planning obligations". This should apply to Early Years provision too.

- For secondary education, the draft School Places Strategy document states *"The number of pupils attending Melksham Oak is forecast to grow significantly over the next few years as larger cohorts being to feed through from primary schools and as new housing is completed. The recent expansion means that the school now has a PAN of 300 which will be sufficient to meet the needs of current housing. If the proposed Local Plan houses are taken forward, there would be a significant shortfall of secondary places. Whilst the school site is large, expanding the school over 12FE would make it the largest school in the Country and would probably be considered too large to operate from one site".*

- Again, there is evidence that the secondary school places are only sufficient for the current housing in the pipeline, and not for any new school places being generated by speculative development. This is why any future development needs to be planned strategically.

- The Wiltshire Council Education team's comments relate to the prematurity of this application, as there would be insufficient places or room for expansion until the site allocation (Policy 19) in the emerging Local Plan comes to fruition.

- Concern was raised at the safety of children wishing to access Melksham Oak School, as they would need to use Eastern Way and compete with the traffic, particularly as there is still no rear access to the school. There are already many concerns raised at the number of pupils on the A365 pavement, both pedestrians and cyclists, and evidence of regular accidents and near misses as the flow of children at school opening and finishing times is wider than the pavement can cope with. A planning application has recently been submitted for a footpath to the rear of the school (PL/2023/10488) but as yet is no more than a planning application.

[officer note: the above application was approved on 22 April 2024 and a discharge condition submission has been lodged with on-site works being planned for late 2024/early 2025]

- Due to the piecemeal approach of this development, although it shows a primary school on the plans, there is no access to the school from adjoining land, which are in the SHELAA (Strategic Housing & Employment Land Availability Assessment), form part of a wider site in the Local Plan Review in 2021 and have a current public consultation for 300 dwellings with a planning application planned shortly.

- It is noted residents were written to in April 2022 and the public consultation event was also held then. However, since then, there has been more development (some 450 dwellings) in the vicinity i.e. Hunters Wood/the Acorns (18/04644/REM these residents' views would not have been taken into account.

- Whilst there is a proposal to have a pedestrian/cycle access using part of Browns Lane bridleway on Eastern Way, there is still no other means of connecting to existing development and services East of Melksham.

- Only 30% affordable housing is included within proposals and not 40% affordable housing as sought in the draft Wiltshire Local Plan. This is disappointing as the development is envisaged and allocated as part of the Local Plan strategic allocation.

- In order to facilitate access to this development a number of farm building and facilities are due to be demolished and removed. The parish council strongly object to these proposals on heritage grounds. There is concern whether this will allow for the continued viability of the farm holding as 50% of the farm would remain as open land.
- Concern is expressed at the loss of agricultural land used for food production, noting the land and buildings current use is for dairy farming. Following recent changes to the National Planning Policy Framework, a new footnote to paragraph 181 states that when agricultural land must be used, poorer quality land should be preferred over higher quality land. It states: "The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development."
- Concern is expressed at the impact this development will have on the Grade II listed Blackmore House, and its setting, adjacent to the site.
- The Melksham Neighbourhood Plan is currently under review and has a number of emerging evidence documents to underpin revised and new policies. The draft AECOM Site Assessment report 2023 has assessed this site. It excluded it from the initial first sieve of sites, at Stage 1, with the following comments: "The site is removed from the settlement boundary. The site may be appropriate to be developed alongside Site 3678, 3683, 3701 and 3525 as a large urban extension of Melksham which connects to the Melksham Bypass. The site contains deciduous woodland which have priority habitats. The site also includes the designated heritage assets of Blackmore House. The site is exposed to views across from Sandridge Hill."
- It is noted within the Design & Access Statement the presence of 12 no. Category A trees (oak) within the site, with design proposals **seeking** to retain all of the Category A trees. The parish council **insist** all Category A trees are retained.
- It is noted there are a few inaccuracies/errors in the Design and Access Statement as follows:

Local Context

- Melksham Community Hospital. There is no minor injuries unit on site
- There is reference to banks in the town centre, but there are no longer any banks open in Melksham.
- Little Joey's Nursery is now closed.
- The Somerset Arms Pub is now closed.
- Melksham Rugby Club pitches are not available to the general public to use. It is also listed twice.
- Melksham Town Football Club pitches are not available to the general public to use.
- The Beecher Veterinary Centre should be referenced as The Beeches Veterinary Centre.
- Melksham Blue Pool Leisure Centre is now closed.
- Aztec Fitness is now closed.
- The United Church has been missed off the list of churches.
- Melksham Youth Development Centre is now closed.
- There are several references to the local distinctiveness of villages such as Seend, Seend Cleeve, Semington, Bromham, Saint Edith's Marsh and Nether Street which are irrelevant within the context of the site location – for the palette of materials, and areas of local distinctiveness the Melksham Design Guide should be adhered to.
- Some parts of the report seem outdated, for example there is reference to site 1a which was the larger site in the first draft Local Plan consultation report, not the one from Sept 2033 that the document says this application was designed to meet.

Whilst the parish council strongly object to the proposals, the parish council ask that the following be included, if the application is to be approved:

- Adherence to policies of the current Melksham Neighbourhood Plan and those of the reviewed Neighbourhood Plan (JMNP#2), such as the Housing Needs Assessment, Design Guide etc

<https://www.melkshamneighbourhoodplan.org/np2-evidence-base>

- The Parish Council seek the provision of play equipment, above that required by the West Wiltshire District Council saved Policy in the Core Strategy, which is also imaginative to encourage active play.
- It is noted it is proposed to include a destination play area, however, having looked at guidance, the Parish Council are concerned at having everything in one place. They believe that the size of the development would warrant both a LEAP (Local Equipped Area of Play) and a NEAP (Neighbourhood Equipped Area of Play) and a MUGA (Multi Use Games Area) so that there is a range of suitable equipment for all ages; children and teenagers – as per the draft Local Plan policy.
- The Parish Council also wish to enter into discussions to be the nominated party for any proposed LEAPs & NEAPs and seek the following:
 - A maintenance sum in the s106 agreement for continued maintenance of the play areas.
 - Safety Surfacing extended beyond the play area fence line (by at least 30 cm) and for the whole area to be surfaced as such, with no joins to prevent future expansion gaps, and no grass that will require maintenance.
 - Tarmac, not hoggins, paths provided.
 - No wooden equipment provided.
 - Dark Green Metal bow top fencing provided.
 - Clean margins around the edges, no planting.
 - Bins provided outside the play areas.
 - Easy access provided for maintenance vehicles.
 - Public access gates painted red.
 - No inset symbols provided in the safety surfacing, which should be one solid surface.
 - Public Open Space which is regularly mown and not all for wildflower areas, to allow for children to kick a ball around informally.
 - Equipment installed for teenagers.
- Whilst proposals to include allotments are welcomed, the Parish Council ask that these are fenced in, with access to water, as well as a car park provided, and security measures installed. The parish council wish to understand who will run the allotments; if this is to be an Allotment Association then they will require a large, vandal proof shed.
- Circular pedestrian routes around the site.
- The provision of benches and bins where there are circular pedestrian routes and public open space and the regular emptying of bins to be reflected in any future maintenance contribution.
- Connectivity with existing housing development.
- There are practical art contributions, with the Parish Council being involved in public art discussions.
- Speed limit within the site is 20mph and self-enforcing.
- The development is tenant blind. The parish council draw attention to the recent Housing Needs Assessment undertaken as part of the Melksham Neighbourhood Plan

Review, which reflects the current needs of the Melksham area in terms of housing and tenure mix

https://www.melkshamneighbourhoodplan.org/_files/ugd/c4c117_4c8411b64439472fbfcf8e856799e2c9.pdf

- Given the development is adjacent to existing dwellings fronting Sandridge Common, the design layout should result in new gardens backing onto existing garden and that the new housing is no higher than 2 storeys. The design layout should also take account of the impact on any potential new dwellings on the strip of land to the West of this site adjacent to Eastern Way and to the South.
- The road layout within the development is such that there are no dead ends in order that residents and refuse lorries do not need to reverse out of roads.
- Contribution to educational and medical facilities within the Melksham area.
- There is visible delineation between pavement and roads. Shared spaces which are easily identifiable.
- Tree planting is not adjacent to property boundaries; in order they do not cause issues later with growing over the boundary to resident's properties or causing shade on gardens.
- Whilst the parish council welcomes a developer contribution to enhance public transport, the proposals do not go far enough, particularly as reference is made to existing bus services which do not serve Melksham Railway Station, with the nearest bus stop being some distance away from the Railway Station.
- Members welcome the provision of bus shelters with the capabilities for real time information and therefore ask that proposed bus shelters are tall enough with a power supply to enable this. To give good shelter from the weather, shelters are provided with sides, with a bench seat rather than a perch seat.
- Whilst land has been set aside for a 400m² mixed use hub, this will be too small to serve such a large community. Therefore, the parish council ask that significant land to be set aside to enable a functional, 2 storey community building and hub to serve the whole community. The parish council request a community centre large enough to include additional health facilities (with room for GP clinics, as well as complimentary services like physio, chiropodist, osteopath etc.) as well as associated facilities to service and provide a 3G pitch.
- Provision of a Local Centre, similar to nearby Verbena Court, with the provision of electric car charging points (in line with Policy 4 of the Neighbourhood Plan). Contribution towards green initiatives i.e., provision of charging points, local green energy production and battery storage for the community hub.
- The parish council seek improvements to existing Rights of Way in the area which are understood to have been submitted by Wiltshire Council's Rights of Way Team as part of their response to the proposals at public consultation stage and ask that Right of Way MELW30 becomes a bridleway to connect up bridleways at MELW40 & 41, particularly as there are many stables in this area.

As previously requested, the parish council would like to see included in proposals a safer access to Praters Lane from the A3102, as currently people have to go via Lopes Close across private gardens to access the right of way safely.

- Ecological measures such as bird and bat boxes, bee bricks, reptile refugia and hibernacula with all these enhancements (types, numbers, position etc) marked on plans and drawings.

Melksham Town Council: Objects.

Following submission of revised plans received 22/11/24 –

There are no material changes in this application, and it does not address the previous concerns. Issues of access, suitability of existing road and infrastructure have not been addressed. Extra traffic caused by this development would cause problems across the whole of the Melksham area.

MTC reiterates its previously submitted objections, set out below:

Melksham Town Council objects to this application on the grounds that the proposal conflicts with NPPF, Wiltshire Council Core Strategy (Core Policy 2), the allocation in the draft local plan, and the draft Neighbourhood Plan, the existing Neighbourhood Plan and the Wiltshire Design Guide. The proposed Primary School does not comply as it is a one form entry. There is no information on affordable housing or an environmental study. Melksham Town Council also has concerns about infrastructure, archaeological matters and swift bricks.

Lacock Parish Council: Objects. This planning application was considered at a meeting of Lacock Parish Council on 12 February 2024 when the Council resolved to lodge a strong objection to the proposed development for the reasons stated below.

Lacock Parish Council has for many years become increasingly concerned over the increasing number of vehicles travelling through the historic village of Lacock and over the roads leading to Lacock including the single-track medieval bridges over the River Avon. The increase in vehicles undoubtedly arise from the significant major new residential developments to the east of Melksham. As no new road infrastructure has been built to accommodate the increase in traffic from these developments, for those drivers wishing to access the A350, northwards, and potentially the M4 there is no better route than by using New Road, then Forest Road before traversing the bridges and passing through Lacock to reach the A350.

This is a wholly unacceptable situation and is giving Lacock Parish Council a major problem in knowing how to deal with the concerns raised by local residents. The large number of vehicles using Lacock as a “rat run” is causing safety, environmental and damage to the character of the historic village. Traffic calming measures are under consideration, although the cost to the parish of introducing these is significant, but in reality, the only solution is for new road infrastructure to be built to deal with the problem. At the recent consultation Lacock Parish Council supported a new bypass to the east of Melksham terminating at a junction on the A350, to the north of Beanacre (option 10c). Therefore, until the new road infrastructure has been built Lacock Parish Council would argue that no new planning permissions should be granted for new residential development.

Were the Blackmore Farm development to be permitted the new residents who wish to travel northwards would undoubtedly travel along New Road and ultimately through Lacock making the present unacceptable situation even worse. For this reason, the Parish Council argue that the planning application is premature and should be refused.

Wiltshire Council Strategic Planning Team – In terms of the emerging Wiltshire Local Plan Review, limited weight can be given at this stage given that it has not yet been subject to examination.

With regard to NPPF para 49, this development would be unlikely to constitute as being premature because the two limited circumstances do not apply. The application is substantial but *‘not so substantial, or its cumulative effect so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan’*.

Granting permission for this application would be unlikely to undermine the plan-making process or undermine decisions on location or phasing of development as the proposed allocation of this site means that it is considered to be a sustainable location for development. And the emerging Wiltshire Local Plan (WLP) is not at an advanced stage to carry material weight.

With regard to the proposed quantum of housing development (up to 500 dwellings) – given the Council’s HLS shortfall, and the relatively modest increase in housing over and above the emerging WLP Draft Policy 18 (approx. 425 dwellings) the difference is not considered significant

The application is proposing to deliver most of the main infrastructure requirements of Policy 18 i.e. a local centre, a 2ha site for primary school, vehicular access from A3102 and a mobility hub.

It is also noted that the application is proposing to set aside over 2 hectares of land for new employment development, and through negotiated revisions sought by officers, the location of the new employment land provision would respect the emerging WLP concept plan for Policy 18 (Local Plan Figure 4.12). It is also important to appreciate that about half of the land being put forward for new employment purposes through Policy 18 is under the control of other landowners. Therefore, it will be possible for further employment to be delivered within the Policy 18 site allocation on land controlled by other landowners.

Wiltshire Council Economic Development: Objects. In the emerging local plan, it is proposed that 5Ha of land, some of which is on this site, should be allocated for employment use. This proposed employment allocation is adjacent to Snarlton Farm, which already has commercial uses on the site and has planning permission to expand further. The illustrative plan submitted with this application shows housing on this land which we do not feel is desirable or acceptable. Should the remainder of the proposed employment allocation come forward for commercial use then these houses will be virtually surrounded by industrial units.

We note that as part of the application it is proposed to include 4950sqm of space for office, research and development use. Whilst this is welcome, we feel that it would be far better for this indicative employment land to be located adjacent to the existing commercial site at Snarlton Farm. We would also like to see a larger range of class uses – there is still an oversupply of offices following the pandemic and whilst there is

substantial, unmet demand for business units locally it does not tend to be for research and development.

We are also concerned by the proposed upgrade to part of the bridleway MELW41 (PRoW) for use by pedestrians and cyclists. This in our view would have an impact on the existing commercial businesses operating at Snarlton Farm and potentially result in highway safety concerns.

Officer Note on the above: Following the submission of revised plans dated 22/11/2024, the applicant revised their proposal for employment land use – which has been re-located to the southwest of the site adjacent Snarlton Farm to align with the emerging local plan, as such it is considered the above objection has been overcome.

Wiltshire Council Highways Team: No objections subject to conditions.

The following comments were received on 17/12/2024 following the submission of revised details dated 22/11/2024.

Having reviewed the latest submissions and development on the overall application there does not appear to be a specific new drawing or document for review. The following comments are provided in the context of NPPF (Dec 2024), DfT 01/22 and Manual for Streets.

The requirement for an emergency access is not one for consultation with the local highway authority in terms of the principle. This is a matter for the local emergency services to establish the need based on their plans and protocols for the scale of development proposed. In terms of an access that accommodates emergency vehicles, suitable geometry, visibility, construction standards in accordance with Part B will all form part of any technical approval for a highways access onto a public highway should the need be established on human safety grounds by others.

The comments on the officer's report suggest that a s106 is preferred for securing a Travel Plan and this would be acceptable. In terms of the latest version of the NPPF, the need for monitoring would appear to be better covered within a legal agreement than by planning condition.

The need for a School Travel Plan condition or inclusion within the S106 has been rebutted by the applicant. This is due to the fact that the school is intended to form part of a separate application. However, the modelling work and assessment to date for the site has been with the school. In effect there should have been a modelled future scenario without a school included within all submissions, certainly in the context of the latest 'all future scenarios' within the NPPF.

In terms of the order that buildings could come forward and whether trips from outside the site to the school would be greater, has not been fully validated in the work to date. The work and assumptions are based on a complete development operating as per the transport assessment.

If the school development comes forward separately then the respective applicant would need to redo the Transport Assessment work at that time.

The proposals have been subject to a robust transport assessment and the singular access point off the A3102 Sandridge Common Road has been fully modelled and no highway-based objections are raised.

Comments dated 27/8/2024 – these comments concluded -

The proposed access would be safe and suitable, subject to technical approval, but it would have an urbanising impact along a short section of A3102 Sandridge Common Road. The sections of road are all subject to 40mph and the overall change in context and character would not impact significantly on maintenance of local roads due to the hierarchy of roads they hold in the WCC Asset Management Strategy.

The site due to its distance from facilities outside the site is unlikely to result in a better-than-expected level of sustainable mode use but is proposed to be supported by a new hourly bus service.

The proposed walking and cycling improvements and highways works would enable safe and suitable crossing of Eastern Way and routes identified in the draft Local Walking and Cycling Infrastructure Plan, however the distance to local facilities would remain a factor in travel mode choice.

Further development beyond the current settlement boundary, if absent of additional facilities could lead to severe cumulative impacts of the issues outlined above.

In terms of this application, when tested on its own merits, the highway authority considers, having highlighted a number of potential matters, that it has no substantive highway-based objection subject to the required planning conditions, developer contributions and securing a range of highways works which would require separate technical approval from the local highway's authority.

Active Travel England (ATE): In summary, ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue.

Key Issues

Trip generation analysis and travel plan targets

The trip generation and assignment analysis set out in the TA and subsequent Transport Update Notes has a heavy focus on vehicle traffic which, despite helpfully acknowledging a range of trip types and including active travel mode shares, is restricted to a consideration of peak hours of vehicle travel only. ATE requests that a multi-modal trip generation analysis is provided for the entire day, otherwise the application risks setting an artificially low bar for consequent mode shift targets.

These targets lack ambition in their current form, especially considering the fact that the number of proposed dwellings would exceed the quantum outlined in the relevant

emerging Local Plan policy, and they should be increased to better align with the government's target for half of all journeys in towns and cities to be walked, wheeled or cycled by 2030. As it stands, the focus on vehicle traffic and the limited mode shift targets would not be in step with the vision-led approach to transport planning which is currently expected by central government and set out in the most recent revision to the NPPF.

Off-site improvements, public transport strategy and access to the site

The use of the WHCAR (Walking, Cycling and Horse-riding Assessment Review) methodology to identify key routes and identify potential interventions is welcomed, and it is clear that the applicant has taken steps to liaise closely with the LPA and LHA in identifying key issues. Nevertheless, the application would benefit from a more in-depth critical analysis of the quality of existing routes against the principles of the National Design Code and guidance set out in LTN 1/20 and Inclusive Mobility, and useful mapping of key routes and facilities may be further improved with photographs of key deficiencies.

The most up-to-date national guidance on 'walkability' has coalesced around a single common 'walkable' range of 800m (National Design Guide, 2021). It is clear from the distances cited in Table B.1 of the latest Transport Update Note that the vast majority of existing local facilities would fall far outside of this range, and the referenced thresholds of 1.6km and 3.2km, though walkable for some, would serve to exclude a significant proportion of potential users of the walking/wheeling network. This calls into question the capability for the development to be considered sustainable without significant optimisation of local public transport connectivity and cycling infrastructure, as well as the adequate (and early) provision of on-site services which can internalise a sufficient proportion of trips.

It is therefore encouraging that a package of proposed improvements/contributions to be made to off-site infrastructure and public transport services has been set forth at this stage of the application.

ATE has comments to make on the following aspects:

Eastern Way

Eastern Way represents a significant barrier to East/West permeability, and the applicant should look to support/provide interventions which restrain high vehicle speeds and promote safe active travel movements across this route, beyond the proposed toucan crossing at the Snarlton Lane/PRoW MELW41 access. Given the breadth of development scheduled to take place to the east, and the strategic nature of the road, ATE is keen to understand Wiltshire's intentions with respect to traffic-calming interventions along this route.

Outside of the proposed signalised crossing point, the only other ways to cross Eastern Way would be uncontrolled pedestrian crossings at the Sandridge Common Road roundabout and on PRoW MELW27. The latter suffers from a lack of refuge and the protection provided by signal controls yet represents the most direct pedestrian and cycle desire line between the northern half of the site and more central parts of Melksham. Given that the proposed development exhibits a particular deficiency in terms of East/West cycle permeability, with dedicated cycle access only available via

the southern part of the site, ATE considers it particularly important that this crossing and access route be appropriately upgraded to safely accommodate **both** modes.

Public transport strategy

Triggers for the provision of vital internal bus services should be identified and set at this stage of the application. Should the delivery of an internal service be delayed until a later phase of the development, then poorly equipped existing bus stops should be appropriately upgraded in anticipation of any shortfall in public transport provision.

As proposed, future bus services would enter and leave the site via the single northern access point, resulting in a limited and rather inconvenient internal loop. Given the scale of development proposed to the south and east of Melksham, ATE would suggest that a much wider master planning exercise is necessary to understand future public transport needs for the area, and how expanded and newly funded bus services may be made to successfully integrate with nearby development sites; for example, through the provision of a filtered bus connection leading to areas of development south of the site.

New stops to be provided within the development should each include raised kerbs, shelters, seating and real-time passenger information, in continuity with the proposed mobility hub.

Contributions to rail access improvements (Obligation 9) should be tailored/of a sufficient amount to ensure that the expansion and upgrade of cycle parking at Melksham Station is appropriately supported, given the potential increase in rail passengers represented by the proposed development.

Permeability, placemaking and connectivity

Internally, ATE expects all relevant infrastructure to conform to LTN 1/20 and the principles of the National Model Design Code, and requests to be consulted on further details of layout and design. The following should be particularly noted:

- a. Internal crossings should feature raised tables to prioritise pedestrian movements and footways should be continuous and direct, anticipating potential desire lines.
- b. The Illustrative Masterplan shows a lack of dedicated internal cycle infrastructure, particularly in the east of the site, and segregated routes of appropriate width should be provided along key internal corridors.
- c. The internal layout should be specifically designed to provide multiple active travel connections to the south and east, to improve wider permeability and in anticipation of nearby future development.
- d. Appropriate details of lighting and surface treatments for off-street corridors should be agreed at an early stage; footways and cycleways should be bound and level to accommodate users of all mobilities, and residential layouts should be designed to maximise active frontages and passive surveillance to improve feelings of comfort and safety for more vulnerable users.
- e. Cul-de-sacs should be avoided within the residential layout, in favour of instances of filtered permeability.

Cycle storage

Appropriate details of cycle storage, in line with the principles outlined in Section 11 of LTN 1/20 and in accordance with up-to-date local standards, must be considered early

for each aspect of the development. ATE would request to review further details, once submitted, and these should be secured via an appropriate condition. It should be noted that sheds are not the most convenient form of residential cycle storage, and ATE would recommend that cycle parking be located at the front of properties, ensuring convenient access to the highway and sending a clear message that cycling is a viable method of transport from this development.

Conclusion

ATE requests that the local planning authority shares this response with the applicant's agent with a view to providing a further response/appropriate wording for conditions as required.

Wiltshire Council Urban Design Officer: No further comments received following the re-consultation exercise. The Council's urban design officer comments dated 27/2/2024 raised the following concerns: -

- With regards access to the site, the development would fail to provide a key vehicular entrance into the allocation site from the roundabout on Eastern Way
- The proposal fails to provide the allocation of 5ha of Employment Land
- To create a greater sense of security and privacy for new and existing residents, new rear gardens should back onto the existing rear gardens along Sandridge Common.
- There is a major imbalance in the proportion of the size and location of the green open spaces on the site.
- The central POS should be enlarged and not bisected by a road.
- The green spaces dominated by suds basins between the proposed Clackers Way Park and the more formal central POS do not make the most effective use of land.
- The gateway landscape should be concentrated more around the island junction.
- The PRoW should not be preserved on the current alignment as it would cut diagonally across the housing layout grid.

However, since the above consultation comments were received, the applicant agreed to open up the application (at the Council's request) to an independent design review. This was completed by **Design West** - an independent review panel of experts from the built and natural environment sectors, who were invited to review the current application including the illustrative masterplan in August 2024, and in response, the design review panel concluded as follows –

'The applicant has clearly demonstrated, in the view of the panel, the potential of the site to provide a high-quality residential development.'

Police Liaison Officer: No comments

Wiltshire Council Landscape Officer: No objections subject to conditions

Wiltshire Council Ecology Team: No objections subject to conditions

Natural England: No objection

Wiltshire Council Housing Enabling Team: No objections, subject to the housing mix being secured through a s106 legal agreement as summarised below -

The Affordable Housing units should be provided with a tenure mix of 60% of the dwellings being for Affordable Rented housing, 25% of the dwellings being provided as First Homes and the remainder of the dwellings 15% being provided for Shared Ownership homes. The finalised breakdown of the house types/sizes would be confirmed through the s106 legal agreement preparation and based on the most up to date needs data.

Officer Note: The revised December 2024 NPPF (paragraph 66 footnote 31) no longer requires the delivery of First Homes, the delivery of First Homes can still be sought where the local planning authority can evidence that there is a local need and in this case, the Council's affordable housing / new housing team maintain there is a localised need for 38 First Homes to be provided and be subject to a s106 developer obligation.

Wiltshire Council Climate Team: No objections. The applicant was encouraged to take ambitious action as per the existing development plan policy, and it is noted that the developer has made some positive commitments to ensure the scheme would result in more sustainable construction than current building regulations and as such produce carbon savings. Therefore, based on current policy, there are no substantive grounds to sustain an objection overall despite the potential for further improvements.

I would also point out that if the developer is relying on the emerging Local Plan as a substantive material consideration in terms of meeting housing need, the other emerging Plan policies may merit being afforded some weight. Such policies include the requirement for operational net zero and embodied carbon reporting. Neither standard is being currently targeted by the developer. If the emerging Local Plan policies are being applied equally then I would welcome further information from the developer to demonstrate a scheme that is net zero in operation and commits to having an embodied carbon impact no greater than 900kgCO₂/m².

Officer Note: This application is in outline only and the above comments relate more to the detailed scheme which would be material to the future REM submission(s).

Wiltshire Council Rights of Way Team: No objection but commented as follows:

Comments received dated 16/12/2024 following the re-consultation on revised plans submitted by the applicant on 22/11/2024 –

National Planning Policy framework (December 2023) paragraph 104 states that *Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

Comments received/ updated 7/11/2024

Developer contributions are required for the following:

MELW27 requires new surfacing works and removal of access furniture and a developer contribution of £22,500 is justified with the section of MELW27 requiring resurfacing extending to 85m (sum to be index linked).

MELW26 is currently the only Public Right of Way from the development which links to the rural public rights of way network, and three pieces of access furniture would be required to provide access to MELW41 - The Woodstock Medium Mobility kissing gate costs about £580 plus deliver and installation costs, So, £3,500 is justified.

The scheme would require a Cycle Conversion order which is costed at £5,000

Justifying the other contributions.

Of the first 500 responses we have had to the Countryside Access Improvement Plan 2025-2035 survey which is currently open to the public, 384 of the first 500 responses were from people who walked daily or a few times a week.

When asked about the average distance of their journey non-vehicular users of the Public Rights of Way network, the participants responded with the following:

42 users regular journey was under 2 miles
257 users regular journey was 2-5 miles
128 users regular journey was 5-10 miles
36 users regular journey exceeded 10 miles.

These figures clearly demonstrate that all of the requested contributions are justified and one of the selling points of this development will be the ease of access to the Countryside.

Minimum recommended dog walking distance 15-to 30 minutes if taking several walks, a day a distance of 1-2 miles. If walking once a day 45-60 minutes. With a typical average being 30-minutes to 1 hour covering 2-4 miles. More active dogs may need 1-2-hour walks

The figures for dog ownership seems to vary, although I have found websites showing between 28% and 36% of UK homes have a dog. I will work with a figure of 33% for the purpose of this application.

Based on 500 dwellings this development is likely to result in (on average) 165 properties having a dog. Whilst for some the open space and surfaced paths may well provide an adequate distance for short dog walks, those residents with more time available or for owners looking for a longer dog walk or walkers without a dog but who are walking for health and personal enjoyment and wellbeing, are likely to want a longer walk, and the following paths all fall within a four mile return walked distance of this development.

Two addition links to MELW40 (as bridleways or cycleways), the residents of this development should have easy access to the public rights of way network, MELW40 lies 0.15 miles to the East of this development, links to this bridleway would be of huge

benefit to this development giving them easy quick access to the PROW network, MELW40 is a very wide bridleway with part of the bridleway already surfaced and able to withstand an increase in use.

MELW30 Contribution of £3,000 for more accessible access furniture is recommended in the form of gates rather than stiles. MELW30 is only 0.86 miles from the nearest proposed dwelling within the site.

MELW29 is within walking distance of the site being only 0.8 miles to the nearest part of the site. Given that this path is within 15 minutes' walk from the development site, a £4,000 developer contribution can be justified based on the increased pressure this proposed development would place on the existing footpath.

SEEN54 is also within walking distance being just over 1 mile from the development site and easily within range of a short circular walk from this development. The previous request for a developer contribution of £2,000 would allow for the installation of pedestrian gates rather than kissing gates. A figure closer to £8,000 would be needed to complete this work if the landowners insist upon kissing gates.

MELW25 is a path where we have a discrepancy between the definitive map (the legal map) the route that the Parish Council appears to have claimed and the position of the available route. As this path is within 0.7 miles of the development site (and within a walkable distance, a developer contribution is sought for a maximum of £5,000 to enhance the existing available route which is likely to be subject to more use from the proposed 500 dwellings.

MELW23A is within 0.85 miles of the proposed development site, and it too, would likely receive an increase in use should this development proceed, and a developer contribution of £2,500 for improvements to the access furniture to make the path more accessible for all users is justified.

MELW23B is within 0.9 miles of the proposed development site and it is also likely to receive an increase in use should this development proceed, and a developer contribution of £500 for improvements to the access furniture to make the path more accessible for all users is justified.

The following is within a relatively short walk of the proposed development and the PROW request the following developer contributions.

SEEN33 is about 1.7 miles from the development site and the PROW officer requests £5,500 for improvements to the access furniture to make the path more accessible for all users.

ROWD22 is up to 2.1 miles from the proposed development site, is likely to receive an increase in use should this development proceed, and a developer contribution of £5,000 is sought for improvements to the route and access furniture to make the path more accessible for all users.

MELW25A is a walked distance of 1.78 miles from the proposed development site and it is noted that the PROW team have an outstanding request from a user group for

improvements to MELW25A and £5,000 is sought (although this could probably be reduced to £4,000) to cover the legal order.

SEEN21 is 1.2 miles from the proposed development site and provides an important link to the Barge Pub which would be a nice walk from the proposed development site. SEEN21 is likely to receive an increase in use should this proposed development proceed, and £2,500 is sought for improvements to the access furniture to make the path more accessible for all users.

A developer contribution is also sought to go towards the restoration of the Wilts and Berks Canal. This would provide a great safe walking and cycling route from Melksham to Lacock and beyond. The proposed development is located 1.1 miles from the proposed development. We normally seek a contribution of £550 per dwelling (so £275,000) towards the restoration of the canal and its towpath.

Wiltshire Core Strategy Core policy 53 supports the restoration and reconstruction of the Wilts and Berks canal it states that restored canals can bring significant benefits in terms of attracting visitors to Wiltshire, contributing to the local economy, promoting sustainable transport through the provision of walking and cycling routes and providing an important element of the strategic green infrastructure network. The restored canal network will provide opportunities for standing open water and marginal habitat.

Core Policy 52 supports the delivery of green infrastructure projects and initiatives. The planning and delivery of these projects will need to address any potential negative environmental impacts, particularly in relation to disturbance of wildlife, flood risk, water quality, landscape character and tranquillity.

Wiltshire Council Archaeology Officer: No objection.

Wiltshire Council Conservation Officer: Objects (however see comments below).

Comments provided following submission of revised plans dated 22/11/2024

Revised proposals December 2024:

The scheme has been revised with amendments including changes to the indicative layout to relocate the employment area from the immediate south-east of Blackmore Farm to another area of the site. Previously, the location of employment adjacent to the farm to the SE offered an opportunity at least for a form of development (including the scale, form of layout of buildings) which could have been less at odds with the agricultural character of the farmstead. The replacement with residential development in this area close to and wrapping round the SE boundary of the remaining farmstead will exacerbate the harm from the development overall by specifying a suburban form of development which is out of character with the existing agricultural landscape at close proximity, lending further weight to the conclusion that the development would result in harm to the setting of the farmhouse within the medium range of less than substantial harm.

The issues and conclusions overall remain as set out within my comments below (changed NPPF paragraph numbers noted to reflect the recent revision of the NPPF). Please therefore take these into account as reflecting my current position.

Scope of comments: the following comments relate to the built historic environment.

Assessment: Paragraph 200 (207) requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. The current pre-application is accompanied by an Archaeological and Heritage Assessment which identifies the designated assets affected and assesses the impact of the proposals. The requirements of the NPPF are therefore met in this respect.

The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic** or **historic**. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place. In this case I agree with the Heritage Assessment which concludes that the significance of the building lies largely with its historic interest, including its fabric, its form, layout and vernacular design and materials and from the contribution it makes to the understanding and experience of the historic agricultural landscape surrounding Melksham. I also agree with the Assessment that the surrounding land which farms the site has a historic and functional connection with the house that contributes to its significance and its understanding as a farmstead within the rural landscape.

In common with the previous application, the proposals would introduce a suburban form of development which is out of character with the existing agricultural landscape, over a very large area, and would result in the loss of a substantial part of the wider rural setting within which the listed farmhouse is experienced and a consequent diminution of its significance. Given that there would be no direct impact on historic fabric, the harm can be taken as “less than substantial harm” for the purposes of interpreting the NPPF.

On this occasion the omission of built form from the area to the east of the farm does constitute an improvement and allows the farm to retain something of its connection with the surrounding agricultural landscape. Similarly, the introduction of additional landscaping to the south of the boundary to the farm provides some further mitigation.

It is also acknowledged that there has been some erosion of the immediate setting of the house via the loss of much of the historic farmstead and by the construction of the adjacent bungalow, which is out of character in this historic context. However, the area of land covered remains very large and approaching from the north, the farm would become be viewed against a new backdrop of suburban housing development in place of the current agricultural character of the landscape. As a result, there will continue to be a level of harm to the setting of the farmhouse which would result from the proposed development, albeit at the medium/lower end of the spectrum of less than substantial harm.

No heritage benefits are argued or will result from the proposals.

Conclusion: the proposed development would result in harm to the setting and significance of the grade II listed Blackmore Farmhouse. Taking into account the

special regard required by Section 66 of the Act to be given to the desirability of preserving the setting of listed buildings and the **great weight** ascribed to the conservation of designated assets by paragraph 205 (212) of the NPPF it is clear that the proposals should be subject to a high level of scrutiny.

Paragraph 208 (214) of the NPPF requires that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal” (Note: these may include but are not limited to heritage benefits). Paragraph 201 (208) of the NPPF also requires that local authorities take opportunities to avoid or minimise conflict with heritage objectives. The proposals are also at odds with the requirements of Core Policies 57 and 58.

From the viewpoint of the built historic environment alone there are no heritage benefits which will outweigh the harm caused to the historic environment and I must object to the application.

In due course it will fall to the Case Officer to assess the benefits which will accrue and to weigh these against the heritage harm which will be caused and any other planning constraints and to reach a view on the final planning balance. During this process close scrutiny will need to be given to the level and nature of the need and the opportunities for providing the public benefits which would be delivered either in other ways or on other sites which would have a lesser adverse impact.

Following submission of revised details, the conservation officer concluded on 9/5/24 that – ‘...**the harm caused will be within the lower half of the spectrum but there remains an impact which would be required to be offset by the public benefits of the development overall.**’

Wiltshire Council Education Team: No objection subject to s106 contributions as summarised below:

- Early Years Places - $\pounds 17,522 \times 59 = \pounds 1,033,798$
- Primary School Places - $94 \times \pounds 18,758 = \pounds 1,763,252$ (subject to indexation).
- Secondary School Places - Melksham Oak can fully accommodate the pupils that would be generated by the proposed development, without further expansion.

Wiltshire Council Waste and Refuse Team: No objection subject to s106 obligations regarding securing developer contributions for refuse bins

Sport England: Objects. Sport England initially responded to the application consultation with a non-statutory objection on 22 January 2024 on the grounds of lack of sports provision. As a follow up, Sport England note that the applicants state that playing pitches would be brought forward as part of the primary school provision. However, as we pointed out this would have restricted use (none during the school day), therefore, we do not consider this to meet the needs of the new population.

The new population should be able to have unfettered access sports provision during the day. The Wiltshire playing pitch strategy has had annual updates since its adoption, so the applicant’s statement in the technical assessment is incorrect.

Wiltshire Council is currently in the final stages of preparing a replacement playing pitch strategy.

With reference to the covering letter dated 6 September 2024, we note the applicants mention a draft S106. Sport England sought access to the draft to identify the developer's commitments to any offsite provision. In the absence of any proposed on/off-site sport provision being proposed for playing pitches or built facilities, Sport England's position of objection remains in place.

Officer Note: The above objection is not reasonable or sustainable. Members are invited to note the following consultation response based on local needs and knowledge in terms of local sports related infrastructure requirements.

Wiltshire Council Public Open Spaces/ Leisure Strategy Team: No objection subject to a s106 securing the following developer obligations as summarised below:

- 17,464m² of Public Open Space (POS)
- 885m² of Equipped Play in the form of two equipped play spaces
- Sports contribution of £118,000 towards a 3G Artificial Turf Pitch within the Melksham Community Area

Wiltshire Council Drainage Team: Supportive subject to planning conditions

Environment Agency: No objection, subject to conditions

Wessex Water: No objection, subject to a planning condition

NHS Planning Advisor: Have requested a financial contribution of £512,727 to provide additional primary care floorspace at Giffords Surgery and Spa Medical Centre in Melksham.

Wiltshire Council Arboricultural Officer: No objections. The submitted Arboricultural Impact Assessment and Method Statement dated December 2023, and Tree Protection Plans GLEE24436-01-05 dated November 2023, prepared by ACD, demonstrate that the retained trees on and near to the site, have been sufficiently considered, and appropriate protection, methodology and materials are proposed to be used. These documents and plans should form part of approved plans list planning condition.

Wiltshire Council Public Protection Team: No objection subject to conditions

8. Publicity

The application was publicised by individually posted notification letters sent to neighbouring/properties within close proximity of the site and erection of site notices.

As a result of this publicity 198 representations have been received. The representations have been summarised as follows:

- The revised location of the employment land would result in traffic passing through residential areas, causing danger to local residents and school children going to and from the proposed school

- There is an opportunity to negotiate with owners of Snarlton Farm, to provide a separate vehicle access serving the revised employment area via the existing Snarlton Farm access
- Development is not in keeping with the Melksham Neighbourhood Plan/Local Plan/draft Local Plan
- No information is provided relating to affordable housing within the development
- No need for more housing in Melksham/ Melksham has already fulfilled its housing quota
- Setting a precedent for the destruction of “common” land
- Speculative application
- A new primary school and doctors was promised at Bowerhill but still hasn't been built
- Lack of infrastructure (doctors, dentists, schools etc)/ increase pressure on medical services
- No provision for improving recreational facilities
- No provision for secondary schooling
- Adverse impact on local wildlife/protected species/ native flora and fauna
- Harm to biodiversity by destroying habitat
- Loss of open space and hedgerows/ trees will affect local wildlife
- Loss of green open space / adverse impact on the landscape
- Plans do not take into consideration Wiltshire Council's climate policies regarding solar panels or EV charging
- Poor traffic management
- Increased traffic/ congestion/ highway safety issues
- Town is already struggling with traffic due to previous poor planning permissions
- Unsustainable location – will result in greater use of car / car dependent scheme
- Poor bus provision
- Proposed access via Sandridge Road/ A3102 likely lead to congestion on Sandridge Road
- Little thought seems to have been given to the impact on New Road and Forest Road
- Poor parking in area
- Poor state of the roads
- Visibility when exiting Lopes Close is poor
- New Road used as a ‘rat run’/traffic joining the busy commuter road A3102
- Difficult to see how the road could be widened and made safer for all road users
- Increased crime
- Flooding issues
- Increased noise/ air pollution/ vibrations from heavy vehicles/ traffic
- Physical/ mental health issues
- No new reservoirs are being built to ensure water supply
- Need to improve carbon footprint
- Impact on Melksham bypass
- Developments need to be pushed to redeveloping and investing in derelict and brownfield sites
- Reduced / lack of employment opportunities
- Homes should be built in straight lines
- New developments are an eyesore
- High housing densities

- Loss of agricultural land
- Overdevelopment
- Upgrades to part of bridleway MELW41 (PRoW) are proposed for pedestrians and cyclists which potentially adversely affect the operation of business at Snarleton Farm
- Piecemeal development – not including land between application site and Eastern Way
- Employment uses should be located adjacent to those already existing on Snarleton Farm
- Development should provide a second more sustainable vehicular access for buses and cars onto the existing roundabout on Eastern Way
- Lack of a masterplan
- Noise and disturbance on future occupiers of the development due to proximity to proposed employment land
- No need for another primary school

9. Assessment

9.1 Principle of Development

Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

9.1.1 Wiltshire Core Strategy/Housing Land Supply: Case Law & NPPF requirements

Melksham is defined in Core Policy 1 as a Market Town, based on an assessment of its role and function. Market towns are defined as settlements that have the ability to support sustainable patterns of development through their current levels of facilities, services and employment opportunities, and have the potential for significant development that can improve self-containment.

WCS Core Policy 2 sets out the Delivery Strategy for growth for the period to 2026 and aims to distribute development in a sustainable manner. Within the defined limits of development for settlements there is a presumption in favour of permitting sustainable development.

Development proposals outside these defined limits are not supported in principle unless the proposal satisfies the exceptions set out within paragraph 4.25 of the WCS; and none of these exceptions apply in this case.

The policy goes on to emphasise that the limits of development may only be altered through the identification of sites for development through subsequent Site Allocations DPDs and the Neighbourhood Plan making process. This site has not been allocated either through a Site Allocations DPD or neighbourhood plan.

Consequently, the development is contrary to the adopted Wiltshire Core Strategy policies CP1, CP2 and CP15 (Melksham Community Area Policy – which states in its

opening line that *development...should be in accordance with the Settlement Strategy set out in Core Policy 1*).

9.1.2 Housing Land Supply Considerations

On 12 December 2024 the Government issued an update to the National Planning Policy Framework (NPPF). On the same date the Government also issued revisions to the Planning Practice Guidance (PPG) including the standard methodology for assessing and setting Local Housing Need and published the 2023 Housing Delivery Test results.

The revisions that are pertinent to the housing land supply calculation and its implications are summarised as follows:

- a) Local Planning Authorities are now required to demonstrate a deliverable supply of housing sufficient to meet five years against their housing requirement set out in adopted strategic policies (or against their Local Housing Need where the strategic policies are more than five years old) in all circumstances. Under the previous NPPF, Wiltshire was only required to demonstrate a four-year housing land supply because its draft Local Plan had reached an advanced stage.
- b) Local Planning Authorities are now required to add a buffer to the housing requirement in the five-year housing land supply calculation in all circumstances (paragraph 78 of the NPPF). The buffer to apply is driven by the council's latest Housing Delivery Test results, which for Wiltshire indicates a 5% buffer to be added¹. Under the previous NPPF a buffer was only required if the council's Housing Delivery Test results indicate under-delivery of 85% or lower against the housing requirement, which was not the case for Wiltshire.
- c) The revisions to the PPG have set out a revised standard methodology for the Local Housing Need – this is the calculation that establishes the housing figure to be used in the housing land supply calculation. The revision has changed the method from being based on future household projections, to being based on the amount of existing housing stock in the local authority area. The revision has also changed the adjustment factor which is based on the affordability of housing in the local planning authority.
- d) The consequences of not being able to demonstrate a five-year housing land supply are that the presumption in favour of sustainable development (often referred to as the 'tilted balance') applies. This is set out in paragraph 11d of the NPPF. This paragraph has also been amended in two ways. Firstly, where there are exception policies that prevent the 'tilted balance' applying that these provide a 'strong' reason for refusal, rather than a 'clear' reason for refusal. Secondly, to ensure that when the planning balance is being carried out, that particular regard is had to certain key policies in the Framework related to directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

In summary, the changes to the NPPF now require Wiltshire to demonstrate a five-year housing land supply, including a 5% buffer, and must apply the revised Local

Housing Need for decision-taking immediately. This results in a significant increase in the five-year housing requirement to be met from the previous calculation. When this is assessed against the housing land supply which can be delivered within five years, the recalculation shows a significant reduction in the number of years supply. The council cannot demonstrate the requisite five-year housing land supply and can demonstrate a **2.03 years'** supply.

Prior to the publication of the revised NPPF, the Council was already in a position where it was unable to demonstrate the requisite housing land supply, and the 'tilted balance' was for many applications, engaged. The same implications for determining this outline application therefore continue to apply.

However, the changes introduced within the revised NPPF (December 2024) mean that the Council now has a substantial shortfall in its housing land supply position (being 2.03 years when tested against the 5-year requirement), and it is necessary to alter and elevate the weight to be given to housing supply as part of assessing applications for residential development.

This means balancing the strengthened need to boost housing supply against any adverse impacts of the proposal, when considered against the adopted development plan and NPPF as a whole, and any material considerations on a case-by-case basis. When Wiltshire Council was last in deficit in the summer of 2023, a briefing note / action plan was produced (No. 22-09) which outlined how the Council would work towards restoring its 5-year housing land supply requirement (which applied at the time) in the face of the acknowledged shortfall.

There has not yet been an updated action plan and as such, officers maintain that the 2023 version should be given significant material weight in terms of setting out the Council's commitment to addressing the housing supply shortfall until such time that either an updated housing land statement concludes the Council can demonstrate an NPPF compliant HLS or, the relevant policies in the emerging WLP can be afforded significant weight and its site allocations (in addition to pre-existing commitments and windfall calculations) can fulfil the housing supply requirements for the County (which would firstly require a planning inspector to find it sound as part of the examination process).

We have not reached that stage and as such, officers will look to support new housing development on unallocated sites when justified and in accordance with NPPF paragraph 11.

The third bullet point set out within paragraph 6.1 of the 2023 published action plan set out very clearly that:

"The Council will positively consider speculative applications where there are no major policy obstacles material to the decision other than the site being outside the settlement boundaries or unallocated".

Officers strongly advise that this application proposal has the potential to deliver significant housing at a time when the Council has a significant under supply of land for housing.

The remainder of this report will review the technical and material planning considerations which merit being part of the planning balance.

9.1.3 The made Joint Melksham Neighbourhood Plan (JMNP) 2020-2026

The Joint Melksham Neighbourhood Plan (JMNP) 2020-2026 was 'made' in July 2021 and now forms part of the development plan framework for Wiltshire.

JMNP Policy 6 – Housing in Defined Settlements, Policy 7 – Allocation of land at Middle Farm, Whitley and Policy 8 – Infrastructure Phasing and Priorities are all considered material to the assessment of this application.

JMNP Policy 6 of the JMNP supports sustainable development and new housing within the defined settlements of the neighbourhood plan area with new housing proposals outside of the limits of development not being supported unless the proposals comply with Core Policy 2 of the adopted WCS or other policies in the WCS.

JMNP Policy 7 relates specifically to the NP housing allocation site at Middle Farm in Whitley for the development of a 1.6-hectare site for about 18 dwellings, as represents a planned housing growth site allocation which advanced through the neighbourhood plan making process.

The current application proposal does not comply with Policy 6 and is not relevant to Policy 7 of the JMNP. With the JMNP being made in July 2021, it is relevant to record that paragraph 14 of the revised December 2024 iteration of the NPPF states as follows:

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) The neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)*

When tested against paragraph 14 of the NPPF, it is not in dispute that the 'made' joint Melksham neighbourhood plan is less than 5 years old and the Plan contains policies and housing allocations to meet its housing requirement. However, in recognition that the Wiltshire Core Strategy is more than 5 years old, the housing need is defined by the County as a whole and not any one settlement or community area. Furthermore, following the release of the revised NPPF in mid-December 2024 and in recognising the Council's urgent need to address the significant housing supply deficit, supporting this development would not compromise the integrity of the made Neighbourhood Plan and this is further strengthened by the site being identified by the Council as part of a mixed use allocation including housing at Melksham in the emerging Local Plan.

In having regard to these significant factors and having due cognisance of the Council's Action Plan (to address the housing supply deficit), officers consider that supporting this application would deliver significant housing over the next 3-5 years and thus, help address the HLS deficit and the delivery of a significant number of affordable homes which, individually and cumulatively, must be weighed against NPPF paragraph 14.

It is also important to appreciate that the emerging Joint Neighbourhood Plan 2 (covering the period of 2020-2038) has been submitted to Wiltshire Council under Regulation 15 and is currently being consulted on with the Regulation 16 stage ending on 22nd January 2025. However, at this time in the context of this application, the emerging NP holds no weight in the planning balance.

9.1.4 Emerging Draft Wiltshire Local Plan (WLP)

The Council submitted its emerging WLP for independent examination on 28 November 2024. Under the NPPF's transitional arrangements for plan making, the Plan (and the housing requirement) will continue be assessed under the relevant previous version of the NPPF, which in this case is the September 2023 iteration of the NPPF (which is based on the stage the emerging plan had reached).

As part of the many aspects the examining inspector will need to review and be satisfied about, it will be imperative that the Council can demonstrate a five-year housing land supply at the point of the Plan being adopted. This will be assessed against the housing requirement in the emerging WLP which is lower than the revised Local Housing Need.

Within the emerging Plan, draft policy 17 titled 'Melksham Market Town' sets out the following—

'Development at Melksham will:

- 1. ensure town centre regeneration through continued investment in the town centre, maximising use of brownfield land and encouraging employment opportunities;*
- 2. reduce out-commuting through an improved employment offer, including delivery of new employment land to allow existing businesses to expand and to attract inward investment;*
- 3. not undermine the delivery of an A350 bypass to the east of the town;*
- 4. increase levels of train passenger transport and help reduce traffic congestion through improvements to railway station parking facilities, together with improved facilities for public transport, pedestrian and cycle access that have strong links with the town centre;*
- 5. ensure sufficient healthcare facilities, schools and transport infrastructure are delivered;*
- 6. ensure a town-wide approach to future education provision, with sufficient early years, primary and secondary school places provided to meet the needs of all new housing development;*
- 7. continue to safeguard a future route of the Wilts and Berks Canal and enable its delivery to provide significant economic, environmental and social benefits for Melksham;*

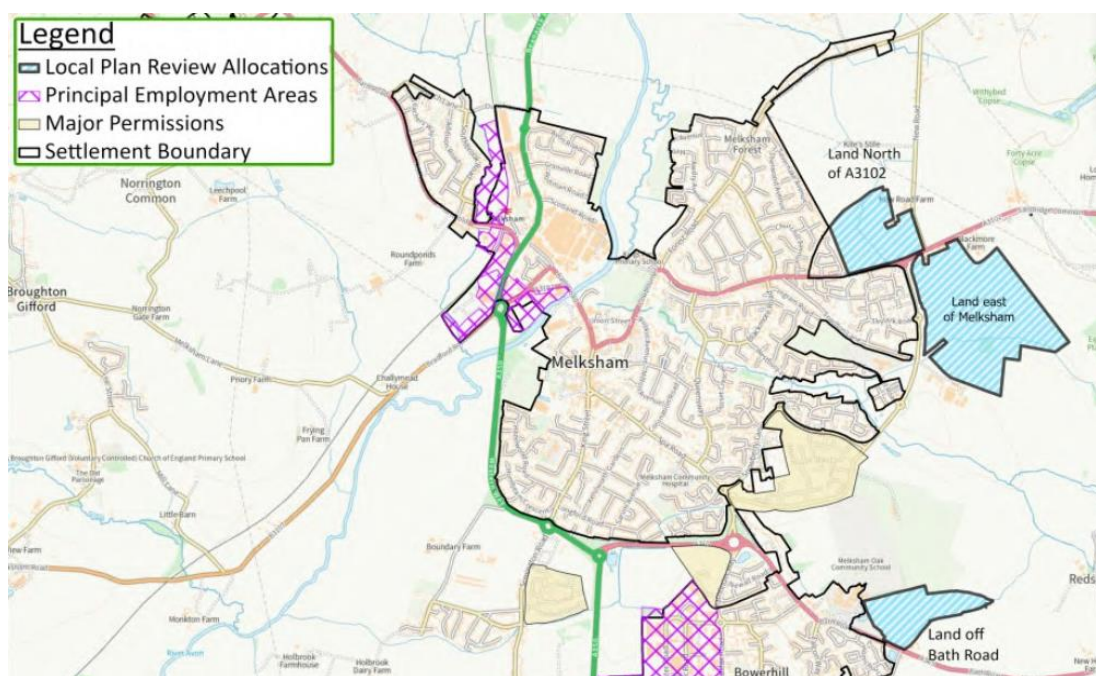
8. deliver improvements to the town's green and blue infrastructure networks, optimising their accessibility and ecological capital, connecting communities and contributing to mitigating and adapting to climate change; and
9. deliver funding contributions towards a Melksham Transport Strategy;

Over the plan period (2020 to 2038) approximately 2,160 homes and 5 ha of employment land will be provided at Melksham, including:

- new allocation for approximately 425 homes and 5ha employment land on Land East of Melksham (**officer note: the site that is the subject of this application**);
- new allocation for approximately 135 homes on Land off Bath Road;
- new allocation for approximately 285 homes on Land North of the A3102; and
- remaining employment land on existing allocation at Hampton Business Park.

The neighbourhood area designation requirement is 270 dwellings. The following Principal Employment Areas will be retained in accordance with Policy 65 (Existing employment land): Bowerhill Industrial Estate, Hampton Business Park, Avonside Enterprise Park, Intercity Industrial Estate, Upside Business Park, Chalkeymead Business Park and Bradford Road Employment Area. Longer term, a broad location for growth will be considered for further housing, employment development and co-ordinated delivery of infrastructure.'

As detailed in the above policy and as highlighted on the map insert below, the current application site does form part of the land which is presently designated as 'Land East of Melksham' (as noted below) which is allocated for approximately 425 dwellings in the emerging WLP.



Melksham Policies Map (Wiltshire Local Plan Fig 4.11 p.83)

Policy 18 'Land East of Melksham' of the Wiltshire Local Plan states –

The Land East of Melksham site is identified on the Policies Map, and is allocated for approximately 425 dwellings, 5ha of employment uses, a local centre, and a 2ha site for a 2-form entry primary school to include 60 early years places. A single comprehensive masterplan, phasing and delivery strategy for the development, must be prepared and approved by the local planning authority in advance of any planning application being submitted for the whole or part of the allocated site.

This must take account of the requirements of this policy and the principles shown within the concept plan and be prepared in consultation with the local community and local planning authority. Subsequent planning applications must be in accordance with the approved masterplan. Infrastructure and mitigation requirements include:

- vehicular accesses from the A3102 and existing roundabouts on Eastern Way; measures to protect and enhance watercourses, as well as ponds, within the site;*
- green and blue infrastructure through the development that incorporates new and existing woodland and protects and enhances existing hedgerows and hedgerow/field trees;*
- lower density development in the east of the site to retain the rural character of the wooded hills towards Sandridge Park;*
- design and layout that safeguards high value archaeological features including the former medieval settlement of Snarilton and heritage assets including the listed Blackmore Farmhouse and its setting;*
- offsite infrastructure improvements to water supply and foul water network;*
- water infrastructure running through the site will need safeguarding through appropriate buffers to allow for access and maintenance;*
- a mobility hub, including bus and cycle infrastructure provision;*
- funding contributions towards early years, primary and secondary education and on, or off-site healthcare capacity to meet the needs created by the development;*
- implementation of ecological buffer zones alongside habitats to be retained and protected within the scheme layout, and wildlife sensitive lighting design in order to minimise adverse effects on light sensitive and intolerant wildlife, particularly bats;*
- appropriate mitigation and compensation for protected species, such as great crested newts; and*
- measures to positively support walking, cycling and public transport use between the site, Melksham town centre and Melksham railway station and linking into existing networks.*

Given that the emerging WLP has not yet been examined, whilst officers fully acknowledge that the landholding at Blackmore Farm has been proposed by the Council for a potential future housing led development, limited weight can be afforded to the WLP at this stage. It does however present a clear commitment by the Council to support the principle of developing this site; although this is part of a wider allocation where it is envisaged that a comprehensive site-wide masterplan would be prepared with all the landowners to ensure that sustainable development can be achieved through securing the mix of uses, phasing of development and infrastructure across the allocated site.

The failure on the part of the respective landowners to come together and agree a site-wide allocation masterplan is very disappointing, which has led officers to secure an illustrative masterplan for this application site that is sufficiently informed by the emerging WLP allocation and to seek a series of commitments from the applicant for the requisite connections to the other site allocation land parcels to the south and west. The applicant's illustrative masterplan and commitments to deliver unfettered highway infrastructure and pedestrian and cycle routes up to their western site boundary to connect with the land parcels to the immediate west of the site would be bound by a s106 legal agreement which would also secure the future delivery of the on-site employment provision, a new primary school, and a mixed-use hub (Classes and E and F) to deliver a sustainable mixed-use scheme.

It should be noted that the emerging WLP draft Policy 18 identifies the need for a vehicular access from both the A3102 and Eastern Way, however the land to the immediate west of this site falls under the control of other landowners, but any grant of permission and the associated s106 agreement for this site shall secure the necessary infrastructure to avoid ransom strips to allow for future linkages to the other parcels of this allocation site.

In terms of recognising there is an emerging plan in progress, the NPPF provides the following direction:

Para 49. Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

Para 50. However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

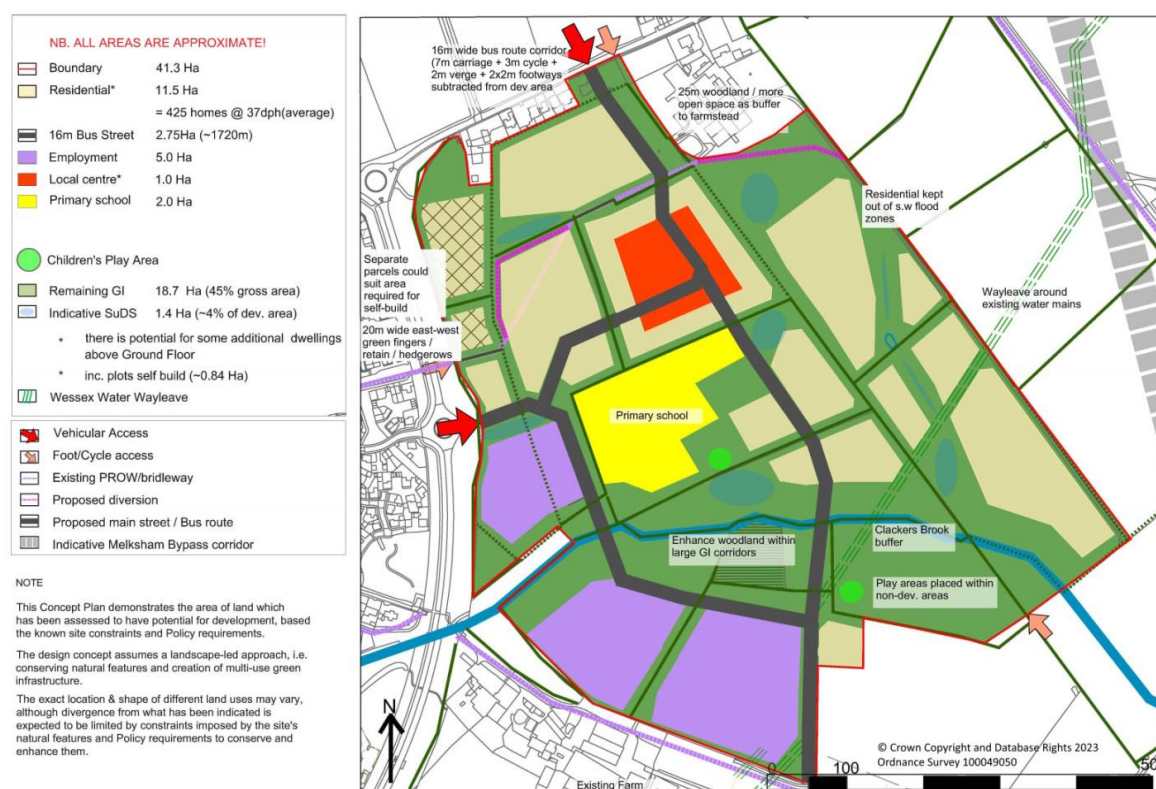
Para 51. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the

local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

The emerging WLP has been submitted for independent examination and hence can be considered to have reached an advanced stage in plan making terms. In this regard, and in the light of NPPF para 49, limited weight can be attributed to draft Policy 18 of the emerging Local Plan. Moreover, the site selection work done by the Council's strategic planning team strengthens the resolve of officers to support the application – which itself, has been subject to fuller, more empirical assessments completed by the applicant.

With regard to the revised NPPF para 50, development management and strategic planning officers have liaised and consider that this development would not constitute as being premature because the two limited circumstances listed above do not apply. The application is substantial but *not so substantial, or its cumulative effect so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan.*

All detailed matters (except for the means of access) will be addressed through subsequent REM applications in accordance with the conditions set out in this report.



Policy 18 Land East of Melksham Concept Plan (Emerging Wiltshire Local Plan)

The following insert reveals the applicants illustrative concept plan based on the emerging WLP allocation site and reveals their commitment to deliver a mixed-used scheme which would be bound by a series of planning conditions and S106 obligations

pursuant to the phased delivery of the site infrastructure, the housing, the employment provision and mixed-use hub.



9.1.5 Commercial Use/ Business Use/ Non-Residential Uses

From reviewing the applicant's masterplan, and being mindful of the emerging Local Plan allocation identifying land for employment purposes (as shown in purple above), the applicants are committed to setting aside and safeguarding a land parcel for employment purposes extending to 2.07ha located in the southwest corner of the application site, and have indicatively identified sufficient space for a building having a footprint of about 5,000sq.m to be built over 2-3 storeys with space for car parking and landscaping and following under class E(g)(i) & E(g)(ii) for commercial, business and service uses office use which could be carried out in any residential area without detriment to the amenity of that area by reason of noise, smells and fumes etc).

It should be noted that through officer negotiation, the applicants agreed to revise the masterplan layout and 're-locate' the employment land (within their scheme) to the southwest corner of the site to bring the scheme more in line with the emerging local plan policy and to avoid hindering the future delivery of the other employment land (purple coloured) which is under separate control and would be subject to separate applications as detailed above.

Officers maintain that the southwest corner of this site and the emerging Local Plan allocation remains the most appropriate location for the future commercial/business land uses, which would be delivered in a phased manner and would need to be subject to an employment land marketing strategy that would need to be agreed with the Council and be secured by a s106 developer obligation. This s106 matter has been highlighted with the applicant and this commitment has been agreed.



Illustrative masterplan with the revised employment site allocation

The phased timeframe for delivering the employment land is unknown at this stage and whilst the concerns expressed by the parish Council are duly noted in terms of commercial and residential traffic potentially using the same road network through the site, it is important to appreciate that the Council will require a phasing and delivery plan to be submitted by the site developers and this would need to carefully consider the potential for mixed traffic. However, in highway safety terms, the Council's highway authority raises no objection to the sole vehicular access onto the A3102. It must also be fully respected that the separate landholding to the west of this application (that also forms part of the emerging site allocation) would be required to deliver the connection onto the Eastern Way bypass and connect with the Skylark Roundabout.

Whilst it would be most preferable from a development management context to have the western roundabout connection secured as part of this application and other pedestrian and cycle access linking to Eastern Way, officers are fully mindful that the land is under separate ownership and having received legal advice, requiring the applicants to enter into an obligation for such matters would conflict with the three legal tests that all planning obligations must satisfy.

The indicative scheme also includes an on-site 'mixed use hub' comprising Use Class E commercial, business and service uses and/or a Class F use for learning and non-residential institution uses. On the Illustrative Masterplan this has been shown in a plot of c. 0.17ha (1700sqm) with space for car parking and a building footprint with a gross floor area of c.400sqm.

Adopted Core Policy 34 'Additional employment land' of the WCS states '*Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy.*' And '*Proposals for office development outside town centres, in excess of 2,500sq metres, must be accompanied by an impact assessment... and demonstrate that the proposal will not harm the vitality or viability of any nearby centres.*'

Core Policy 38 'Retail and Leisure' of the WCS states '*All proposals for retail or leisure uses on sites not within a town centre in excess of 200 sqm gross floorspace, including extension of existing units, must be accompanied by an impact assessment which meets the requirement of national guidance and established best practice and demonstrates that the proposal will not harm the vitality or viability of any nearby centres.*'

In addition to the emerging Local Plan identifying the site under policy 18 for approximately 425 dwellings and 5 ha. of land for employment uses (across the entire allocation and not just this application site), the Plan also seeks to deliver a local centre.

On the future delivery of a community hub, officers are fully aware of the comments / request made by the parish council pursuant to avoiding multiple small community facilities being delivered across multiple sites in relative close proximity, and officers consider it would be prudent to have some flexibility enshrined within the s106 legal agreement to seek either a suitably sized community hub on this site or a developer contribution being secured to go towards delivering one off-site instead, which would require joined up thinking/planning and due cognisance being given to other potentially available sites. This is a matter that could be suitably negotiated as part of the s106 legal agreement preparation stage.

Should the applicant fail to agree to this requirement, a report can be brought back to this committee for a fresh Committee determination.

Through officer negotiations, the applicants revised the application to align with the emerging WLP which seeks to deliver 5 hectares of land for future employment land uses. This application in providing 2.07 hectares broadly aligns with the employment land provision in the emerging WLP with the land in the southwest corner of the site allocation expected to provide the residual employment provision.

This land parcel shall be safeguarded for future employment use (that would itself require its own future follow up reserved matters approval). The applicant is also committed to providing a local centre/community hub however the finalised details would be a matter for a future reserved matters application.

The scheme would safeguard a proportionate allocation of land for future commercial, business and community use; and, in addition, and where appropriate, the s106 mechanism can be used to secure appropriate developer contributions for off-site infrastructure and facilities (not being advanced on the site)

While the expectations set out within draft policy 18 of the emerging Local Plan have not yet been subject to the rigours of a local plan examination, this emerging outline application is supported and would inform a future sustainable detailed application to be delivered through phased REM applications.

9.2 Layout, Density, Design and Visual Impacts

Core Policy 45 of the adopted WCS requires *"new housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities"*. Criterion ii of Policy 6 of the made JMNP also requires *"a suitable mix of house types, sizes and tenures"* to be informed by and to address the current housing needs for Melksham and Bowerhill. In addition to the above policy, Core Policy 57 of the adopted WCS requires a *"high standard of design"* for all new developments. This policy requires developments to *"create a strong sense of place through drawing on the local context and being complementary to the locality"* with applications being accompanied by appropriate information to demonstrate how the proposal would *"make a positive contribution to the character of Wiltshire"* and sets out a list of criteria that proposals for new development must comply with.

Policy 18 of the made JMNP also requires proposals to *"contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of Melksham and Melksham Without"* and requires proposals for major development to *"demonstrate through a masterplan how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic"*.

Paragraph 131 of the Framework states *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve"*.

Paragraph 135 of the Framework sets out a series of criteria which planning policies and decisions should ensure developments create, including being of high quality over the lifetime of the development, being visually attractive and sympathetic to the local character and history, creating a strong sense of place and creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

This application is seeking outline planning permission, with all matters reserved except for access, for the future development of up to 500 dwellings, employment floorspace, primary school and mixed-use hub and associated public open space (POS) infrastructure and green infrastructure. **It should therefore be noted however that appearance, landscaping, layout and the scale of the development are**

matters reserved for a decision at a later date, and therefore the submitted details with this outline submission, are indicative only.

This outline application has been accompanied by an illustrative masterplan (drg no. 417 rev C), composite parameters plan (drg no. 520 rev E), heights plan (drg no. 522 rev C), density plan (drg no. 523 rev D) and illustrative landscape masterplan (ref GLEE24436 10B) to illustrate the indicative layout for the proposed development. A Design and Access Statement (DAS) dated December 2023 has also been submitted with the suite of documents.

Again, it is important to note that a site wide masterplan will not be approved in advance of the determination of this planning application, as anticipated by the wording of draft WLP Policy 18. However, the applicant has produced an illustrative masterplan which nonetheless generally accords with the draft concept plan (Figure 4.12) as it relates to the application site.

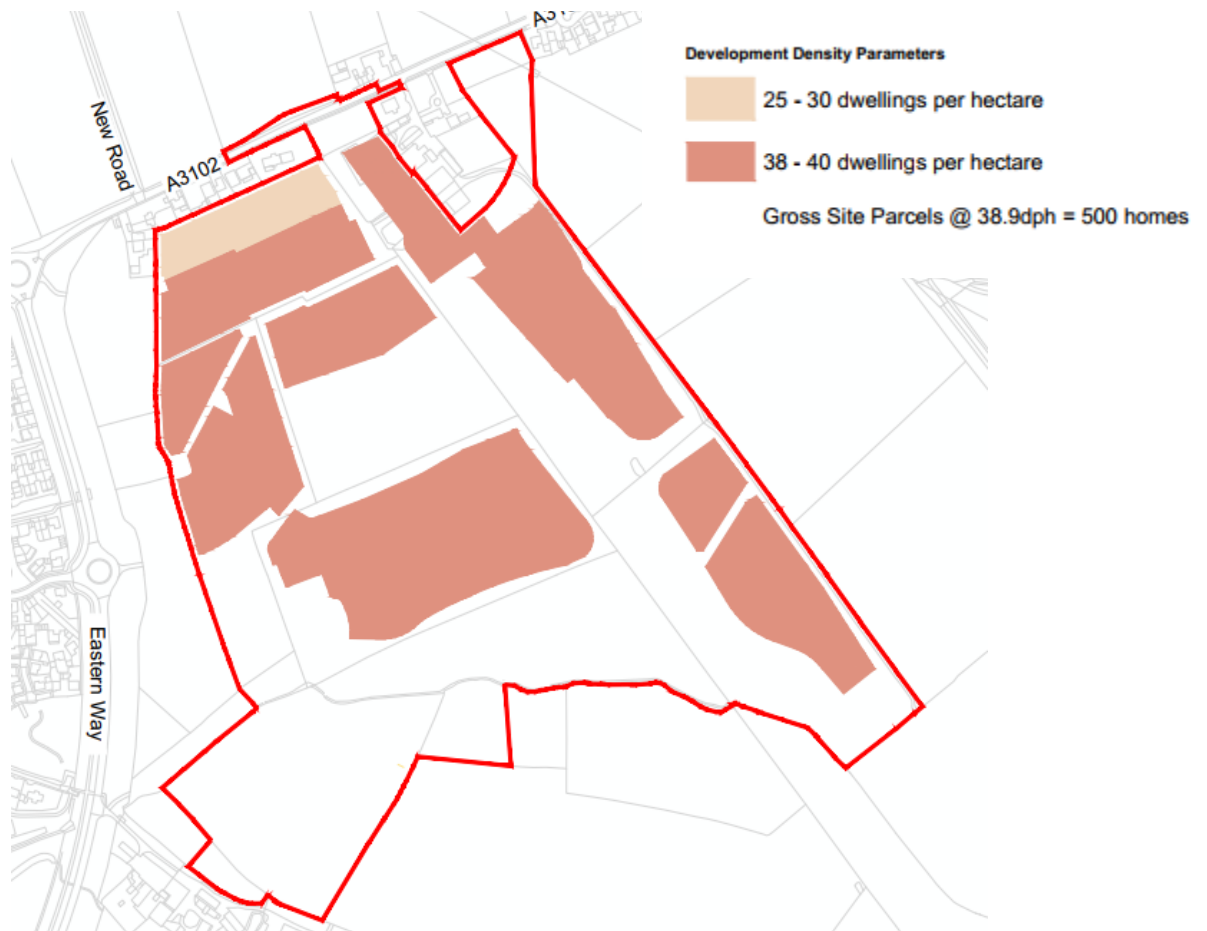
The local plan envisages that a comprehensive masterplan be prepared for the whole site together with a phasing and infrastructure plan. This is to ensure comprehensive sustainable development can be achieved, with the right mix of land uses and infrastructure secured. However, it is also important to note that there are other important factors in this particular case that need to be weighed in the planning balance, including the current HLS position and the site forming the substantive part of the proposed allocation. Such factors are considered to outweigh the need to approve a single comprehensive masterplan, phasing and delivery strategy before this application is determined. Moreover, these matters are covered in a series of proposed planning conditions, as set out in this report that address phasing, detailed design and delivery.

The Design and Access Statement (p71) advises that at this outline stage, the applicant is not committed to a set housing mix. However, there is a commitment and policy appreciation of delivering a sustainable mixed housing scheme including a range of different house types, sizes, and styles. On an indicative basis, the applicants have put forward a suggested mix of about 27% 1 and 2 bed properties, about 53% 3 bed properties and 20% 4 and 5 bed properties. It would be the subsequent REM applications that would need to confirm the exact mix for each proposed phase and the timing of the employment land. This level of detail is not required at outline stage, but the commitment and potential to deliver a sustainable mixed housing scheme are accepted.

The indicative masterplan for the 37-hectare site proposes an average housing density of 38.9dph (as detailed in the submitted Technical Note dated 22/11/2024) which was received following relocation of the employment area to the southwest of the site from the northeast and the subsequent identification of housing in the northeast section of the site.

The gross residential developable area identified in the Parameters Plan equates to a density of c.15dph across the whole site area which officers are comfortable with and recognise that it will be a detailed matter for follow up REM applications to fully assess the merits of any given phased housing scheme. Officers are satisfied the site can accommodate a mixed housing density with higher density in the more central areas

and lower densities closer to the edges of the site parameters, and officers accept that the site can deliver a variety of development across the site in terms of design, scale and layout. The following insert reveals the applicant's indicative density plan.

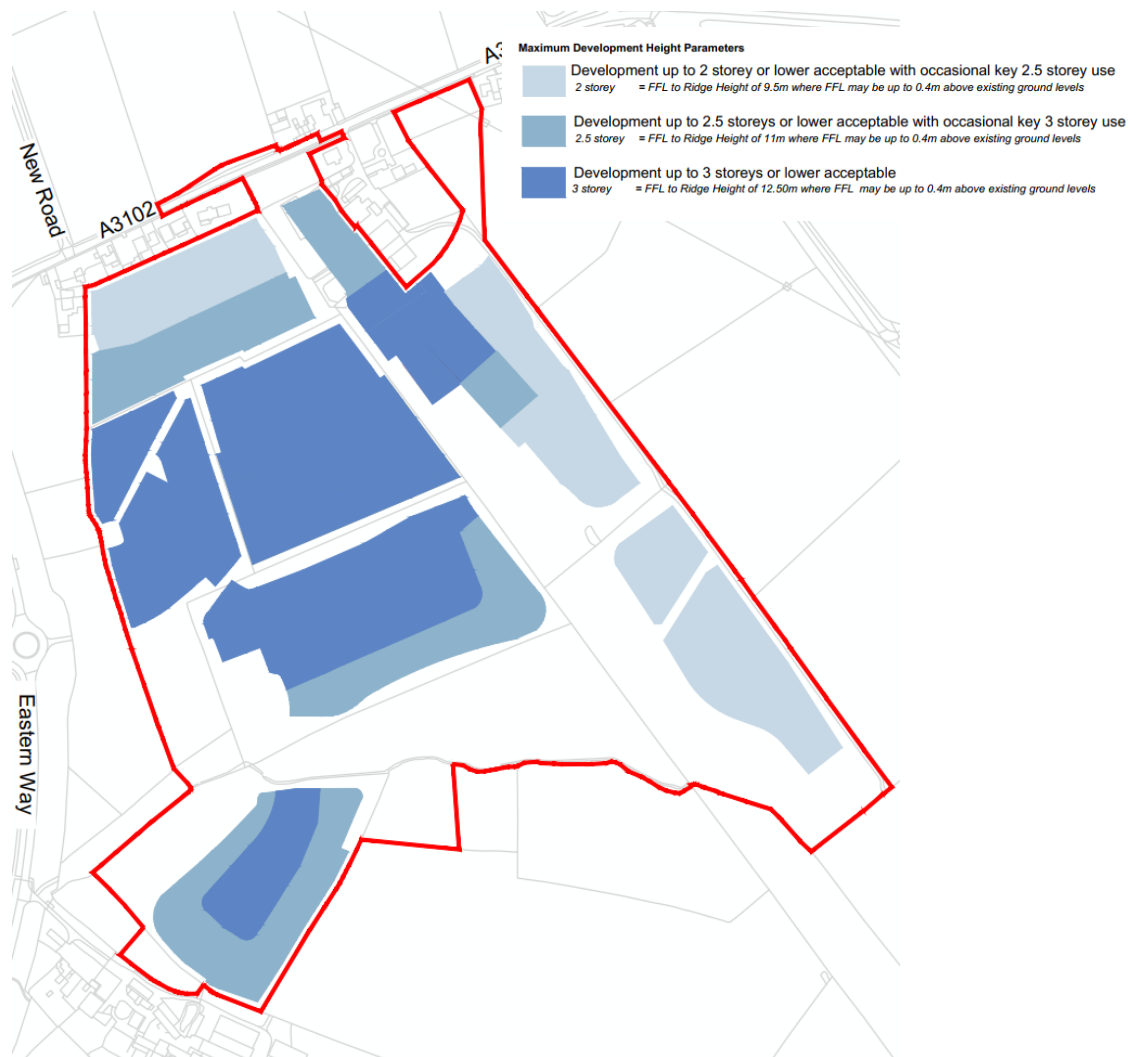


Indicative housing density plan (drg no. 523 rev D)

As detailed in the indicative heights plan (which is reproduced on the next page), the applicants indicate the potential for a mixed range of residential building heights range from 2 to 3 stories.

The plans would allow higher densities and three storey homes (or lower) across the main core of the site. Towards the east, two storey properties with some 2.5 storey units would result in lower density land parcels within the scheme. The lower density area also includes the land to the south of the listed Blackmore House. Having less densely developed domestic properties and their associated gardens backing onto the listed building is considered far more acceptable by development management officers and in addition this lower density area would allow for a better transition with the site edges and the wider countryside beyond.

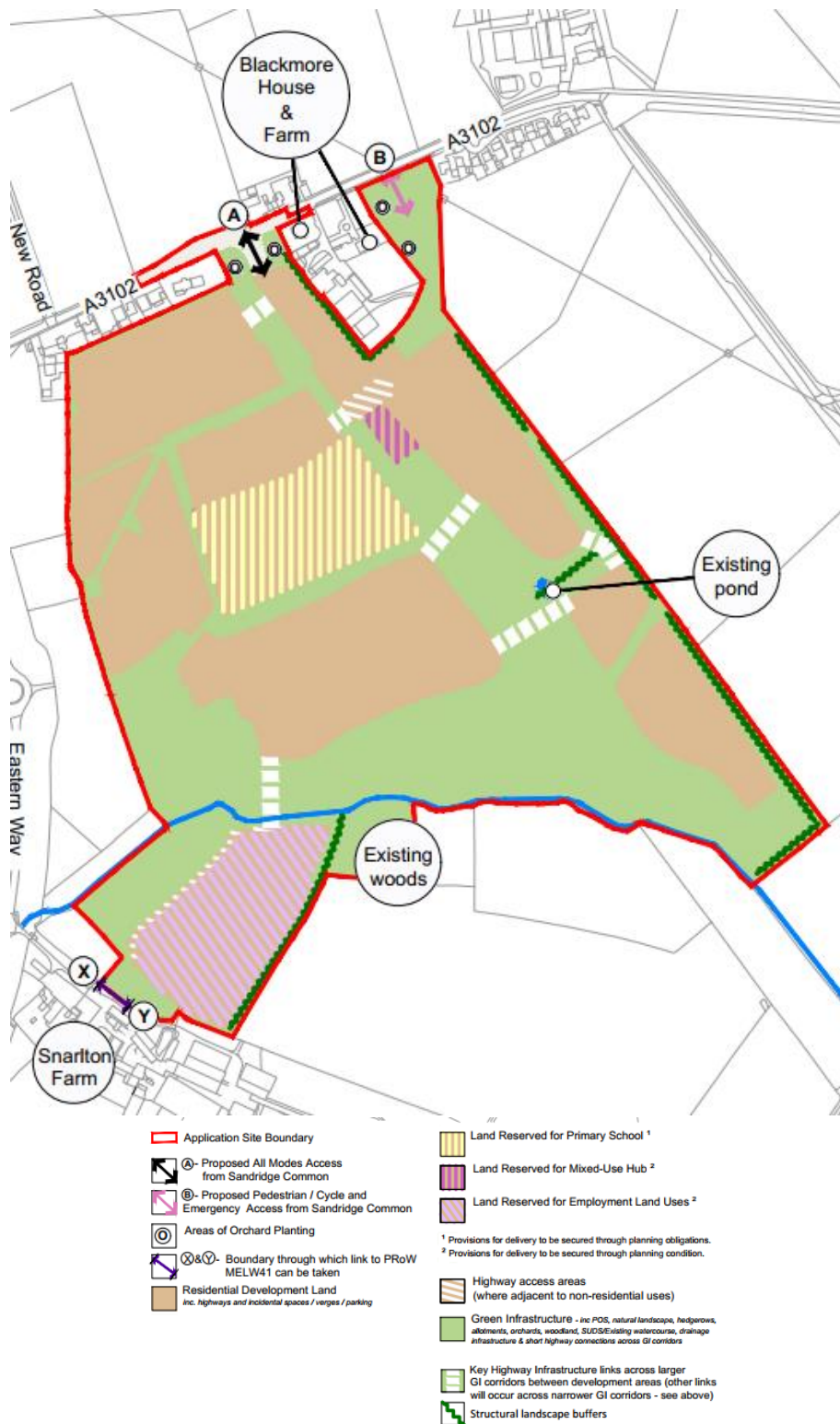
There would nevertheless be opportunities to have some 2.5 storey properties to provide streetscene variety, but the detail and finalised mix would be a matter for the phased REM applications.



Indicative heights plan (Drg no. 522 rev C)

Included within the indicative masterplan, the applicants propose a significant amount of green infrastructure on approximately 15 hectares of land (which equates to about 46% of the site) and would include retained hedgerows enhanced habitats, publicly accessible open space including allotments, equipped play area, teenage play facilities, an urban park and a multi-functional greenspace.

The scheme would also include the creation of attenuation ponds to attenuate surface water discharge that arises from the development. Managed open space areas would comprise amenity grassland for informal recreation, seating and landscape planting is proposed while pockets of community orchards are proposed alongside the new access and Sandridge Common Road. The scheme would also include connections to adjacent public rights of way, and new walking and cycling routes and the introduction of green corridors through the site. The Composite Parameter Plan (see below) makes provision for a connected green infrastructure network which provides opportunities for landscape enhancement, ecological benefit and community recreation.



Indicative composite plan (Drg no. 520 rev E)

The following plans further illustrate the applicants proposed open space provision –



Figure 4.48: POS Quantum 1

Urban Parks, Equipped Play and Teen Activity

- i** An Equipped Play Area / Teen Activity Area (0.05ha + 0.03ha) is set in The Green, accessible within a 300m radii to as many residents as possible.
- ii** 0.01ha of Equipped Play is sited in the Valley Park, south of the stream, to provide doorstep toddler play for homes which lie beyond The Green's 300m radii.



Figure 4.49: POS Quantum 2

Multi-Functional Accessible Greenspace / Urban Parks

- iii** 1.54ha of accessible open space is shown across The Green, North Square and into the Clackers Valley Park, including associated with the doorstep play in the south west.
- iv** The Green can provide 0.15ha of Urban Park POS.
The residual (1.39ha) highlighted can provide multi-functional accessible greenspace (combining both amenity and naturally managed open spaces).

Urban parks/ equipped play areas

Multifunctional green space/ urban parks



Figure 4.50: POS Quantum 3

Allotments (and Community Orchards)

- v** 0.17ha of allotments are sited in a quiet location in the proposal.
- vi** Community Orchards are located at the site entrances and may amount to c.0.35ha in size.

Allotments/ community orchards



Illustrative Landscape Masterplan (Drg no. GLEE24436 10B)

In terms of the landscape impacts of the development the application is accompanied by an illustrative landscape masterplan (ref GLEE24436 10B) and a Landscape and Visual Impact assessment (Environmental Statement chapter 11) by ACD Environmental dated December 2023.

The site is currently a working dairy farm with a number of fields in agricultural use. The site falls close to a Special Landscape Area at the northeastern corner of the site although it lies approximately 200m away. There are several Public Rights of Way (PRoW) which transect the site and the surrounding landscape.

The findings of the Landscape and Visual Impact assessment site appraisal show that there are publicly accessible viewpoints within the site from the PRoW's which run through the site. In addition, there are also views of the site from PRoW's and public bridleways which run directly along, or close to, the site boundaries. To the west, the settlement of Melksham forms a strong visual barrier, whilst the topography to the east varies with a number of wooded hills preventing any distant views of the site. Dwellings along Sandridge Common Road on the northern boundary of the site will also directly overlook the site.

The quality of the site and the immediate surrounding landscape has been assessed as having a medium landscape quality. The site appraisal concludes there are some landscape elements in good repair, many of the field boundaries have good quality

hedgerows, but there are several gappy sections. There are good quality hedgerow oak trees, but these are sporadically distributed throughout the site. The fields are smaller and more irregular than the wider character area and the pylons form a distinctive detracting element. The landscape visual sensitivity has been defined as high as the landscape has a relatively flat topography with few vegetative features forming visual barriers within and adjacent to the site.

In terms of the impact of the development on the landscape the characteristics of the site, the development proposal would significantly change the immediate local character from grassed fields and be replaced by an urban form of development (although about 46% of the site would be retained as green infrastructure and would not be 'built on').

Most of the hedgerows and trees and a large quantity of the existing field boundary hedgerows would be retained and incorporated into the proposals. The watercourse would be retained and protected during all development stages and a wetland wildflower meadow would be provided.

The public rights of way through the site would be retained / enhanced along with dedicated corridors of open space.

The scheme includes several measures to avoid or reduce the potential effects of the development on landscape character. These include the retention of as many field boundary hedgerows and trees as possible, the integration of existing PRoW's through the site into green corridors of public open space, additional tree planting within the retained field boundary hedgerows, provision of a landscape buffer to the south of the residential dwellings along Sandridge Common Road and around the listed Blackmore House and to the eastern, southern and western boundaries. The mitigation measures are focused on retaining the key landscape elements of the site, including the existing hedgerows and hedgerow trees and would reduce the impacts of the development on landscape character.

The proposed low density of the scheme (approx. 15 houses per ha) is considered appropriate for the site and would not be considered as overdevelopment. The detailed layout would still need to be considered at the reserved matters stage should outline planning permission be granted along with the scale, design and appearance of the development. Although there would clearly be a change in the character and appearance of the area, this would be mitigated to some degree by the proposed buffer zones and areas of open space. Officers are satisfied that the illustrative master plan layout would deliver an acceptable development of a maximum of 500 dwellings that could be satisfactorily accommodated on site in terms of landscape, character and visual impact.

It is acknowledged that the loss and redevelopment of the agricultural land would result in some harm to the character and appearance of the area. However, the site is located adjacent to existing urban development to the west forming the eastern fringe of Melksham and there is some limited residential development to the north of the site fronting Sandridge Common Road. In addition, as detailed above there are mitigation measures proposed to offset some of the harm to landscape character. This means that any impacts are localized, and the development does not have significant adverse

impacts on the wider landscape or setting of Melksham. There would be minor adverse visual effects, particularly for nearby residents and people using the public footpaths. However, the negative impacts of the development would be mitigated as far as possible and as required by policy, through the inclusion of landscape features as detailed above. As such the extent of adverse visual impacts would not be widespread and, although it is recognised the development would cause some harm to the landscape setting of the local area.

In addition to all the above, **Design West**, the Council's appointed design review panel of experts from the built and natural environment sectors, were invited to comment on the application relating to the quantum of development, the use and access and proposed illustrative masterplan and concluded as follows

'The principles of the land parcels, comprising 500 homes (including up to 200 affordable homes), and employment position with over 40% of the site proposed for green infrastructure are supported. The applicant has clearly demonstrated, in the view of the panel, the potential of the site to provide high quality residential development.'

As such officers are satisfied that the illustrative masterplan layout would deliver an acceptable development of a maximum of 500 dwellings that could be satisfactorily accommodated on site in terms of landscape, character and visual impact.

9.3 Highway Issues

Criterion xiv of adopted WCS CP57 requires proposals to satisfy the requirements of CP61 (Transport and New Development). CP61 requires new developments to be *"located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives"*. CP61 also requires in criterion ii that proposals would be *"capable of being served by safe access to the highway network"*.

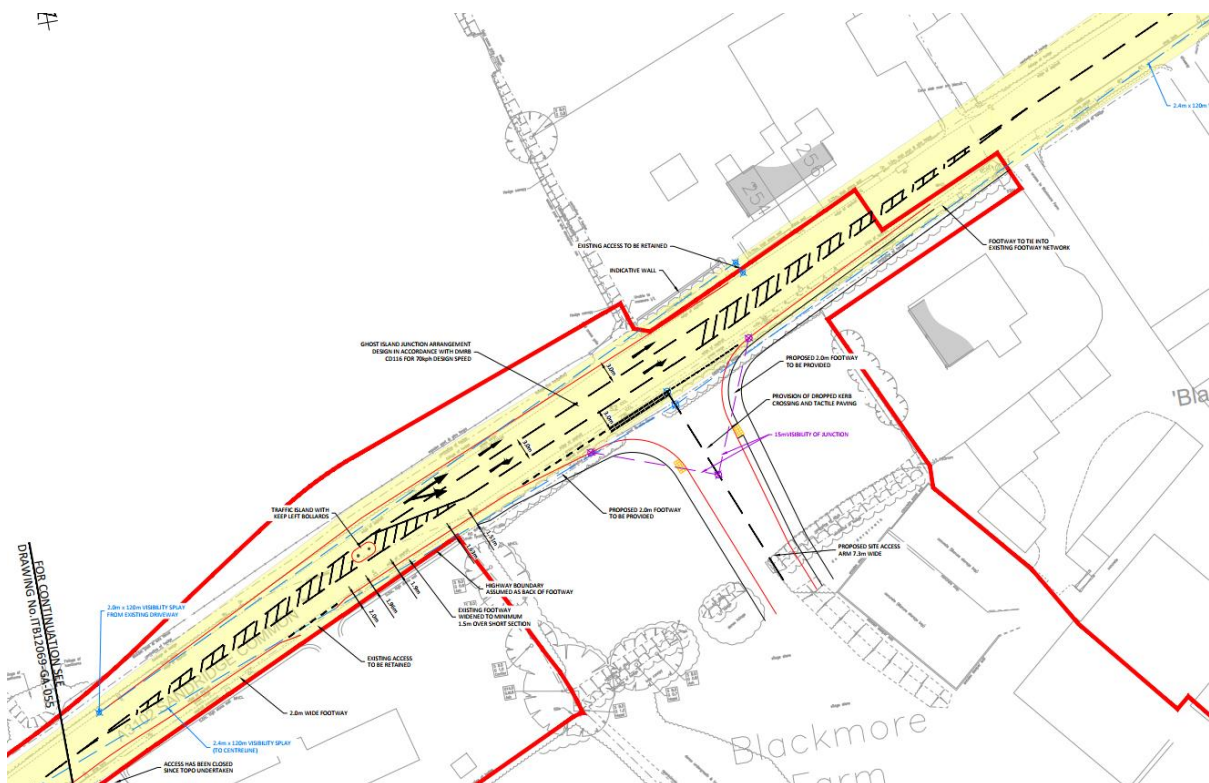
In addition, WCS CP64 requires adherence to residential parking standards. In addition to the abovementioned policies, paragraph 116 of the Framework states that developments *"should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*.

It is important to fully appreciate that this outline application is only seeking detailed consideration on the proposed means of vehicular access, with all the other matters being reserved for a future application.

As part of this supported application, the applicants propose the scheme to be accessed via a new vehicular access being formed off the A3102 with a ghost island right turning facility as detailed in the illustrative masterplan section and access plans which are reproduced on the following page. Sandridge Common Road is subject to a 40mph speed limit in the vicinity of the site frontage.



Illustrative Masterplan section detailing proposed access (A) and emergency access (B) onto Sandridge Common Road

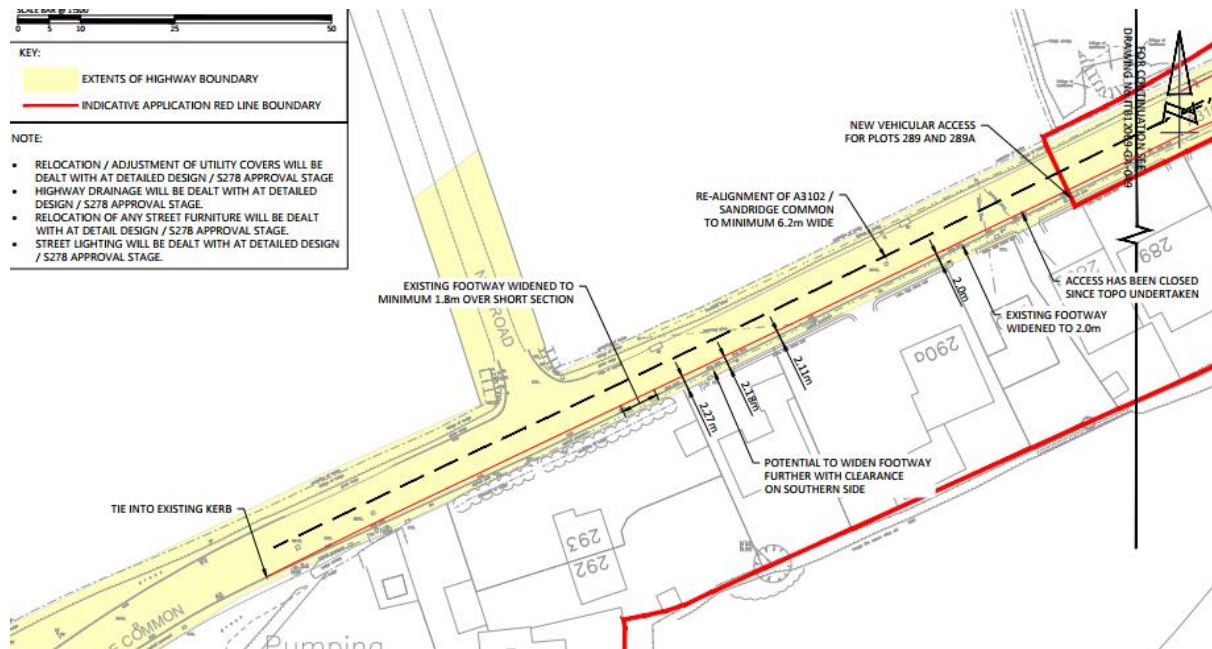


Proposed Ghost Island Right Turn Lane onto Sandridge Common Road (Drg no. ITB12069-GA-049 rev B)

The application is fully supported by a detailed Transport Assessment and Framework Travel Plan by i-Transport dated December 2023 and a technical update note dated

August 2024. The Transport Assessment/ technical update concludes that safe access can be provided onto the highway network alongside taking up the opportunities for promotion of sustainable transport modes to key local destinations.

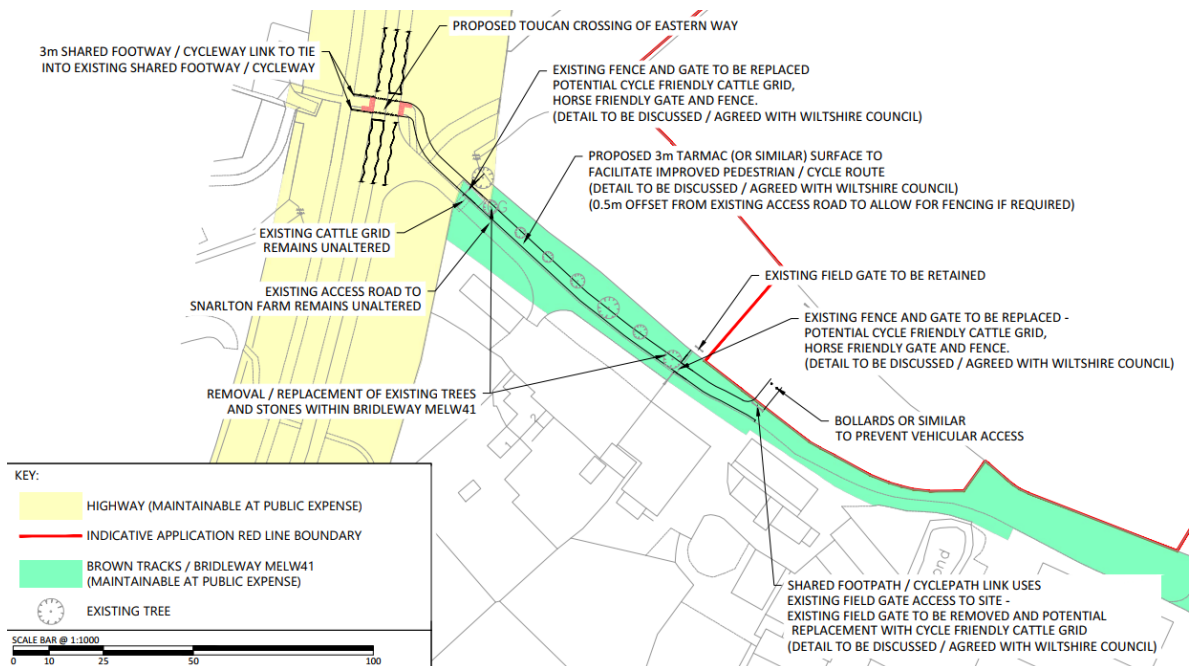
Vehicular and pedestrian access is proposed via a ghost island priority junction (as illustrated on the previous page). The proposal also seeks to provide a new 2m wide footway along the southern side of the A3102 which would connect with Eastern Way to be secured by condition (see plan below). An emergency vehicular access is proposed at a location to the east of the proposed vehicular access and east of Blackmore Farmhouse.



Proposed footway improvements Sandridge Common Road

The scheme also includes a pedestrian and cycle access via an improved Bridleway MELW41 to the south of the site including the construction of a toucan crossing off Eastern Way (see plan below). The bridleway will be upgraded between the existing field access gate and Eastern Way to allow for shared pedestrian / cycle and equestrian use, providing a new 3m wide all-weather surfaced route with the adjacent grass verge maintained for equestrian use.

The upgraded bridleway would be located adjacent the access road that serves the commercial development at Snarlton Farm as detailed in the plan below. These alterations are to be secured by condition.



Proposed bridleway MELW41 shared pedestrian/cycle route

Further pedestrian access via an improved Footpath MELW27 (resurfacing/removal of access furniture) would be secured via a s106 financial contribution of £22,500) and a controlled crossing of Eastern Way in the form of a puffin crossing is also proposed (secured by condition).

Public footpath MELW26 would be retained and would form a principal green corridor running through the site as detailed in the illustrative landscape masterplan above. Additional funding (£4,080) would be provided (secured by s106 agreement) in order to provide a mobility kissing gate. Other improvements agreed include furniture upgrades to MELW30 (£3,000), also to be secured by s106 agreement.

Comments of the council's public rights of way team and suggested obligations towards public footpath improvements in the area are noted. However, planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development (statutory regulation 122 tests). As stated above the scheme includes improvements to MELW27 (secured through s106 agreement) which runs through the site, MELW41 (secured through condition) located to the south of the site and MELW30 located to the southwest. All of these improvements are directly related to the development and are considered acceptable and would meet the Regulation 122 legal tests.

However, a series of additional developer contribution requests from the Council's PRow team fail to meet the legal tests and whilst the reasons given for delivering improvements to some stretches of public footpath in the wider Melksham community area are noted, other funding mechanisms exist that could be accessed to fund infrastructure upgrades to include all or some of the following:

MELW26 cycle conversion order, and improvements to MELW23A, MELW23B, MELW25, MELW25A, MELW29, MELW30, MELW40, SEEN21, SEEN33, SEEN54

and ROWD22) and the request for contributions towards the future restoration of the Wilts and Berks Canal (located 2.2kms to the south of the site).

The above listed requests are not considered reasonable, and they would fail to meet Regulation 122 legal tests, and as such, they do not appear listed in the s106 Heads of Terms – which are set out later on in this report.

The s106 will also commit the applicant to safeguarding the future unfettered highway access and connections to the site from the west (i.e. land that is also allocated by Policy 18) (as illustrated and noted below) which is not under the control of the applicant.

A suitably worded s106 obligation would be necessary to avoid any ransom strip being created. This would mean that any future applicant bring forward a development on the said land, would not have their proposals compromised through a lack of highway connections through the remainder of the emerging site allocation when progressing with an application to deliver a road connection to the roundabout (which would likely form part of a further employment land provision to accord with the emerging Local Plan).



Illustrative Masterplan section detailing safeguarded access to existing roundabout off Eastern Way/Skylark Road

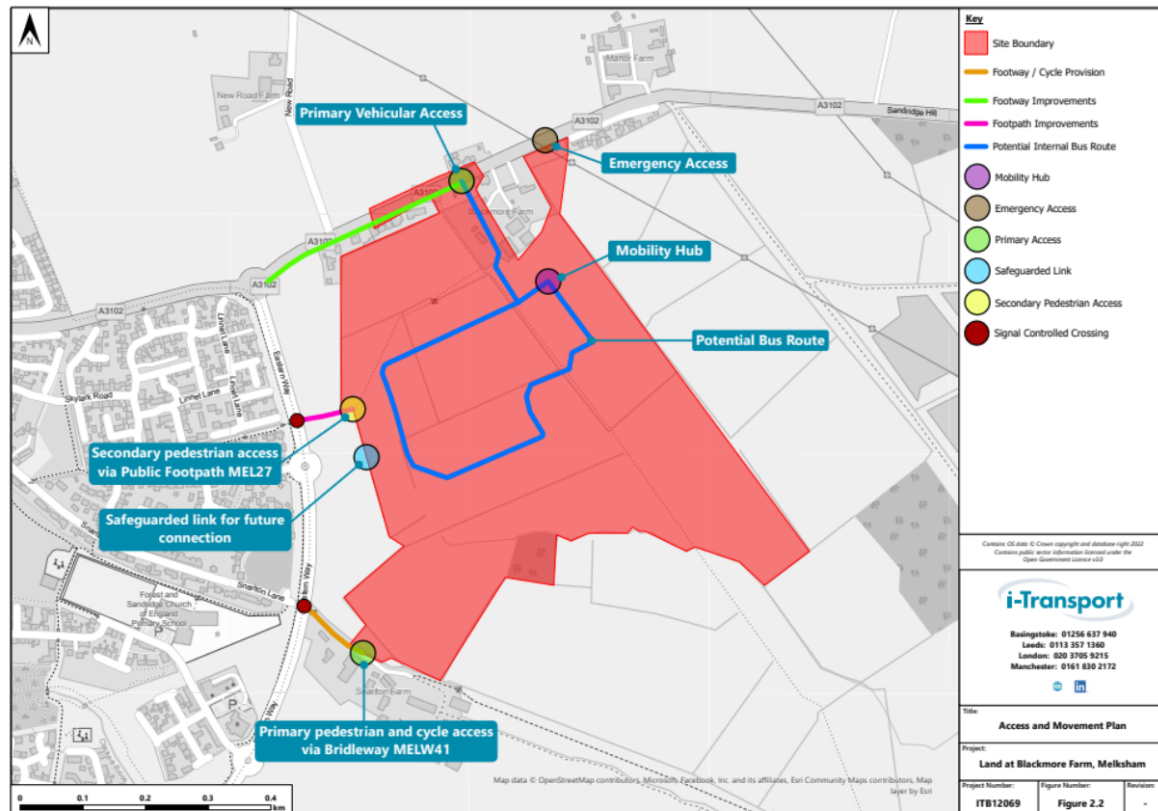
A new bus service connecting the site with the town centre and station (accessing the site via the proposed A3102 Sandridge Common access junction) is also proposed; and it is proposed that the site would be served by an hourly town bus service provided by a single decker bus.

It is understood that the full specification of the route would be confirmed under follow up details which can be enshrined within the s106 prior to its sealing. It is anticipated

that a 5-year funding programme is justified for this application to accommodate the phased delivery of the development and to enable the bus service to become financially viable.

A developer contribution of £750,000 has been negotiated by the Council's highways and public transport advisor and this has been agreed by the applicants to fund this service for the 5-year period, to be secured through a S106 Legal Agreement.

The access strategy for the site is summarised in the following indicative plan –



Access and Movement Plan

In addition to the two controlled crossings of Eastern Way, the following offsite improvements are also proposed (to be secured by a s106 legal agreement)

- Where Snarlton Lane meets A3102 Sandridge Common, a s106 contribution would be provided towards a scheme to widen the existing footway within the public highway to also provide for cyclists between the double mini roundabouts (£21,990).
- A s106 financial contribution to a wayfinding strategy (£10,000), directing pedestrians and cyclists between the site, key local facilities and services and the town centre and station.
- A s106 financial contribution towards pedestrian improvements on the route between the site and the town centre including provision of dropped kerbs and tactile paving at Ingram Road/Blackmore Road junction and Ruskin Avenue/Lowbourne junction (£8,000).

In terms of construction traffic, a temporary access is proposed from the A3102 Sandridge Common Road in the location of the proposed emergency access and east of Blackmore Farm. Details of the temporary access would be secured by use of condition (via submission of a construction management plan).

Concern has been raised by third parties with regard to the proposed location of employment land within the southwest section of the site and issues of highway safety. However, in response, officers submit that the employment uses proposed for the site would fall under use class E(g)(i)) and class E(g)(ii)) (of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) and include office use and research and development uses.

These uses are considered by the planning profession to be acceptable within a residential area where class E(g) is summarised as - *being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*

The indicative proposed employment uses would not include light or heavy industrial forms of development or warehousing and as such it is not expected that the site would have significant volumes of heavy vehicle traffic traversing through the site on a regular basis.

It should however be noted that this would be a future matter for detailed consideration under the follow up REM applications and after a thorough employment site marketing exercise is carried out. From the details that have been submitted at this outline stage, the submitted Illustrative Masterplan seeks to facilitate slow traffic speeds with vehicular traffic being dispersed through the site, which is supported by planning and highway officers alike.

The submitted Transport Update Note (dated August 2024) provided more detail and revised trip generation calculations for the proposed 5000sq.m of employment use in the southwest part of the application site, and calculated weekday morning (0800-0900) and evening (16.45-17.45) peak hour trip generation at the rate of 65 car journeys (considered worst case) during these peak hours.

In response, the Council's highways team commented as follows:

The reviewed figures are accepted along with associated modelling as being a good, modelled representation of the trips and impacts on infrastructure from these proposals.'

The level of peak hour trips generated by the proposed employment uses are therefore considered acceptable and would not generate the level of harm to highway safety or an unacceptable impact on the road network (paragraph 116 of the revised NPPF) to warrant a recommendation for refusal.

The internal site layout, including road, footway and cycleway routes is a matter to be addressed at reserved matters stage.

The proposed development is a mixed use of commercial, residential and education facilities. In that regard the development will result in trips both to and from the site during the peak periods of each associated use. The council's highway officer states *'Overall, the site location and distance to facilities is a concern in terms of the site promoting walking and cycling as genuine choice for trips for all purposes. The proposed site sits outside the reasonable zone of walking distance for a significant number of identified facilities, which all sit to the west. There is likely to be a reliance on private car use where available.'* However, the council's highways officer continues...*with the introduction of bus services and improvements to walking and cycling routes it has to be considered that the proposed scale of development provides a good offer to encourage walking and cycling to those where the full choice of travel modes is available.'*

It should be noted that the application initially proposed a roundabout access into the site from A3102 Sandridge Common Road which was not supported by the highway authority. These concerns have been addressed by the applicants with the current scheme, detailed above, for the construction of a ghost island priority junction. The highways officer states - *In planning terms, the ghost island arrangement provided is acceptable, subject to a detailed technical approval.*

In addition, **Design West**, as part of their review of the scheme, concluded that:

'The single vehicular access is understood to be agreed by Council's highways, and the panel also believes it is workable, though this represents the largest amount of development that can be well served by one vehicular access and achieving a second access across third party land will significantly improve connectivity, particularly for buses.'

The Council's highway officer further advises that

'The proposed access can sufficiently serve the level of movement associated with vehicles and in the form proposed is considered to be safe and the most suitable that could be achieved at this location.'

In response to the concerns raised by Active Travel England (ATE), ATE requested a revised multi-modal trip generation assessment to include a daily multi-modal trip rate and that more ambitious Travel Plan targets are provided based on these daily trip rates. However, this was not considered necessary or reasonable given the local plan site selection and after a full review by the Council's local highways team who raise no objection subject to planning conditions and the S106 agreement requiring the respective developer(s) to submit Full Travel Plans to be submitted to and approved in writing by Wiltshire Council prior to first occupation of the development and consistent with other major developments, officers are satisfied that the additional request can be adapted when the travel plan targets are being prepared in the years ahead.

Concerns have also been raised by ATE with regard to the necessary off-site improvements and public access to the site. As detailed above the scheme includes a pedestrian and cycle access via an improved Bridleway MELW41 to the south of the site including the construction of a toucan crossing off Eastern Way. ATE has

requested that MELW27 be upgraded to also provide for cycling. This cannot be secured under this application on its own for legal reasons as the PRow connection crosses third party land and instead, the applicant would be obligated to contribute a financial sum to remove some PRow access furniture and resurface this route, there is no ability to widen the route to cater for cyclists as part of this planning application. Footpath MELW27 is therefore provided as a pedestrian connection to the site, with cycling connectivity provided for via improvements to bridleway MELW41 to the south of the site as detailed above.

In addition, the proposal includes the future delivery of a mobility hub (mixed use hub) and provision of two bus stops within the site and a developer contribution of £750,000 to support a bus service around the site. The submitted indicative layout provides for a loop arrangement within the site, allowing buses to enter via Sandridge Common, circulate through the site and exit from Sandridge Common.

The officer identified s106 legal agreement would include provision for a link up to the site's western boundary to allow for a future connection with Eastern Way (via third party land) which would enable a vehicular connection into the site from Eastern Way in the future should the adjacent land come forward for development

In conclusion the highway team raise no objections to the scheme subject to conditions and s106 obligations.

9.4 Impact on the setting of the adjacent listed building

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 207-9 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 203 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness. Paragraph 208 of the NPPF requires that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal"

The Council's Core Strategy Policy CP58 requires that "*designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.*" Core Policy 57 supports the above policy by requiring development to respond positively to the existing townscape and landscape in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines.

The application site is located immediately south of Sandridge Common Road (A3102) and east of Eastern Way. Fields lie to the south of the A3102 Sandridge Common Road. Blackmore House, located within Blackmore Farm, is a grade II listed building and is located adjacent the northern boundary of the site. The application site wraps around the farmhouse to the east, south and west.



View of the south facing elevation of the Grade II listed Blackmore House

The application is accompanied by an Archaeological and Heritage Assessment by The Environmental Dimension Partnership Ltd dated December 2023 and additional heritage technical notes dated March 2024.

The submitted Heritage Assessment concludes that the significance of the building lies largely with its historic interest, including its fabric, its form, layout and vernacular design and materials and from the contribution it makes to the understanding and experience of the historic agricultural landscape surrounding Melksham. In addition, the surrounding agricultural land has a historic and functional connection with the house that contributes to its significance and its understanding as a farmstead within the rural landscape.

The conservation officer considers that the development would introduce a suburban form of development which is out of character with the existing agricultural landscape, over a large area, and would result in the loss of a substantial part of the wider rural setting within which the listed farmhouse is experienced and a consequent diminution of its significance.

However, the omission of built development from the area to the east of the farm does allow the farm to retain something of its connection with the surrounding agricultural landscape. Similarly, the introduction of additional landscaping to the south of the boundary to the farm provides some further mitigation.

It is also acknowledged that there has been some erosion of the immediate setting of the house via the loss of much of the historic farmstead. However, the area of land covered remains very large and approaching from the north, the farm would be viewed against a new backdrop of suburban housing development in place of the current agricultural character of the landscape. As a result, there will continue to be a level of harm to the setting of the farmhouse which would result from the proposed development, albeit at the medium end of the spectrum of less than substantial harm.

Given that there would be no direct impact on any historic fabric, the harm can be taken as **"less than substantial harm"** for the purposes of interpreting the NPPF.

In accordance with Paragraph 215 of the NPPF as detailed above, the planning judgement must weigh up all the public benefits of the scheme and assess the noted less than substantial level of harm, the development of the site would have on the setting of the stated listed building. This planning balance is contained within the conclusion section of this report.

9.5 Amenity Issues and Living Conditions of Future Occupiers

Core Policy 57 requires in criteria vii for developments to have *"regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)"*. Paragraph 135 of the Framework also requires planning policies and decisions to ensure developments have *"a high standard of amenity for existing and future users"*.

This application seeks outline planning permission only at this stage; and while the application is accompanied by an illustrative density and heights plan, these are indicative only.

Residential development is located on along the northern boundaries of the site with properties fronting Sandridge Common Road (A3102). However, it is considered the illustrative Masterplan (Drg no. 417 rev B) demonstrates that the site is capable of being developed with acceptable property separation and having a clear plan on how to avoid detrimentally affecting the amenities of adjacent residents. In addition, existing residential development is also located to the west on the eastern edge of Melksham. However, due to separation distance and intervening land and highway it is considered the development would result in no harm to the amenity of these residents. Officers are therefore satisfied that the scheme as illustrated would not result in significant impacts on the living conditions of neighbouring residents in terms of loss of privacy or overlooking or loss of light and overbearing impact.

There is potential for the proposed development to impact the amenity of local residents during the construction phase of the development. However details of methods to minimise and control disturbance to neighbouring occupiers and the environment during the construction phase of the development could be addressed through the submission of a construction management plan, which should be requested by a planning condition on any planning permission granted.

Considering the above, officers are satisfied that the scheme would not have a significant adverse impact on the living conditions of neighbouring residents or future occupiers and the proposal is considered policy compliant.

9.6 Drainage and Flood Risk

Core Policy 67 of the adopted WCS outlines that all new development should include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable. Policy 3 of the 'made' JMNP requires proposals for major development to include the *"provision of Sustainable Drainage Systems (SuDs), where appropriate, as part of the Natural Flood Management approach and wider Green Infrastructure networking"*.

Paragraph 181 of the Framework requires local planning authorities when determining any planning applications to *"ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment"*.

The site is located in flood zone 1 (low risk of fluvial flooding). A small area of the site is impacted by surface water flooding associated with Clackers Brook, as well as an overland flow path which originates off-site and runs from north to south through the site as detailed on the plan below.



Risk of Surface Water Flooding Map (fig 6.1 Flood Risk Assessment and Drainage Strategy)

The application is accompanied by a Flood Risk Assessment and Drainage Strategy by Odyssey dated December 2023, a Water Resource and Flood Risk report and a Phase 1 Geo-Environmental Desk Study by BRD Environmental Ltd also dated December 2023.

Surface water generated by the proposed development would be attenuated in detention basins located at topographical low points, prior to discharge to the watercourse. Discharge rates would be limited to greenfield run off rates with 20% betterment. The basins have been designed to attenuate flows for all rainfall up to the 1 in 100-year plus 45% climate change event in line with the latest Environment Agency guidance.

The applicants advise groundwater monitoring has been carried out, and the records show very shallow groundwater in some parts of the site. It is proposed the basins would be lined to prevent ingress of groundwater and the lining would be designed to ensure there would not be any flotation risk. It is also proposed that residential units would be constructed with Finished Floor Levels (FFL) set at least 150mm above existing ground levels and overland flow routes would be designed to be outside of developable areas to mitigate the risk of groundwater flooding on site.

With regards to foul drainage the site would be split into three areas. It is proposed that foul flows from the western side of the development located north of the tributary of the Clackers Brook would drain by gravity to a foul pumping station located at a topographical low point on site. Foul flows from the area south of the tributary would drain to a second separate foul pumping station, prior to being pumped to the foul pumping station north of the tributary. The pumping station north of the tributary would pump foul flows to a new foul manhole in the public Wessex Water foul network at the entrance to the site, adjacent Sandridge Common.

Subject to planning conditions there are no objections to the scheme from the Council's Drainage team or from Wessex Water.

9.7 Ecology Issues

Core Policy 50 of the adopted WCS requires development proposals to *“demonstrate how they protect features of nature conservation and geological value as part of the design rationale”* and requires all proposals to *“incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development”*. All developments are also required to seek opportunities to enhance biodiversity with proposals for major development required to include *“measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services”*. Improving biodiversity has been enshrined within the environmental objective contained within paragraph 8 of the Framework for achieving sustainable development. The Framework also requires net gains for biodiversity to be provided including by *“...establishing coherent ecological networks that are more resilient to current and future pressures”* in paragraph 187d.

The application is accompanied by a habitats survey including a bat and other protected species surveys, a Biodiversity Net Gain (BNG) Assessment and hedgerow survey by EAD Ecology dated December 2023. These documents form section 10 'Biodiversity' of the submitted Environmental Statement. In addition, an Ecology Technical Note dated April 2024 by EAD Ecology was also submitted.

A single European designated site is located within 10km of the Site. This is the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), which lies approximately 9.4km north-west of the Site at its nearest point.

Much of the site comprises poor semi-improved grassland fields bordered by a network of hedgerows and ditches. A watercourse is located in the south of the site (Clackers Brook). Two waterbodies are also present on site.

Numerous buildings and areas of hardstanding were also present and adjacent to the northern boundary of the site, associated with Blackmore Farm. These buildings included a variety of agricultural buildings and a bungalow. Scrub and mature trees are scattered throughout the site but are generally confined to hedgerows. There is a small area of semi-natural broadleaved woodland on the south side of Clackers Brook.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The Council's ecologist has confirmed that

'This application was submitted prior to Biodiversity Net Gain (BNG) becoming mandatory on 12th February 2024, therefore BNG is not obligatory.'

In addition, chapter 10 Technical Appendix 10.3: Biodiversity Net Gain Assessment (EAD, December 2023) demonstrates that the development will not result in a net loss of local biodiversity resource and substantive gains are possible as demonstrated within the Illustrative Landscape Masterplan.

All trees and buildings within the site were assessed for bat roost suitability. Bat activity transect surveys were undertaken to determine the use of the survey area by bats by identifying the species present, commuting routes and foraging areas.

Ten static bat detectors were deployed on pre-determined habitat features considered likely to be of value for bats. All buildings identified as providing 'Low' to 'High' bat roost suitability were subject to dusk/dawn emergence/ re-entry surveys. One of the buildings (Blackmore Farm bungalow) was identified as a 'Confirmed' pipistrelle bat roost. In addition, trees identified as directly /indirectly affected and providing 'Moderate' to 'High' batroost suitability were subject to dusk/dawn emergence/re-entry surveys. These surveys identified a total of seven trees which contained bat roosts.

In terms of bat activity at least eight species of bat were identified during the transect surveys of the site. Areas of higher bat activity recorded during the surveys generally correlated with the north-east and south-west parts of the area.

Relatively lower levels of bat activity were recorded surrounding the woodland in the south-east of the site. At least ten species of bat were identified during the static detector surveys of the area. Greater horseshoe bat (GHS) was recorded in low numbers (three or less) across the survey area while Lesser horseshoe bats (LHS) were recorded at all static detector locations.

In terms of other protected species, hedgerows, scrub and woodland within the site provided suitable habitat for hazel dormouse and evidence of hazel dormouse was recorded in hedgerows in the central part of the site. No evidence of otter was recorded during surveys, but periodic use of the watercourse (Clacker's Brook) was likely. Four outlier badger setts were identified within the area and were considered to be active, however, none of the setts was a Main Sett. Other evidence of badger activity was noted on site, including well-worn paths.

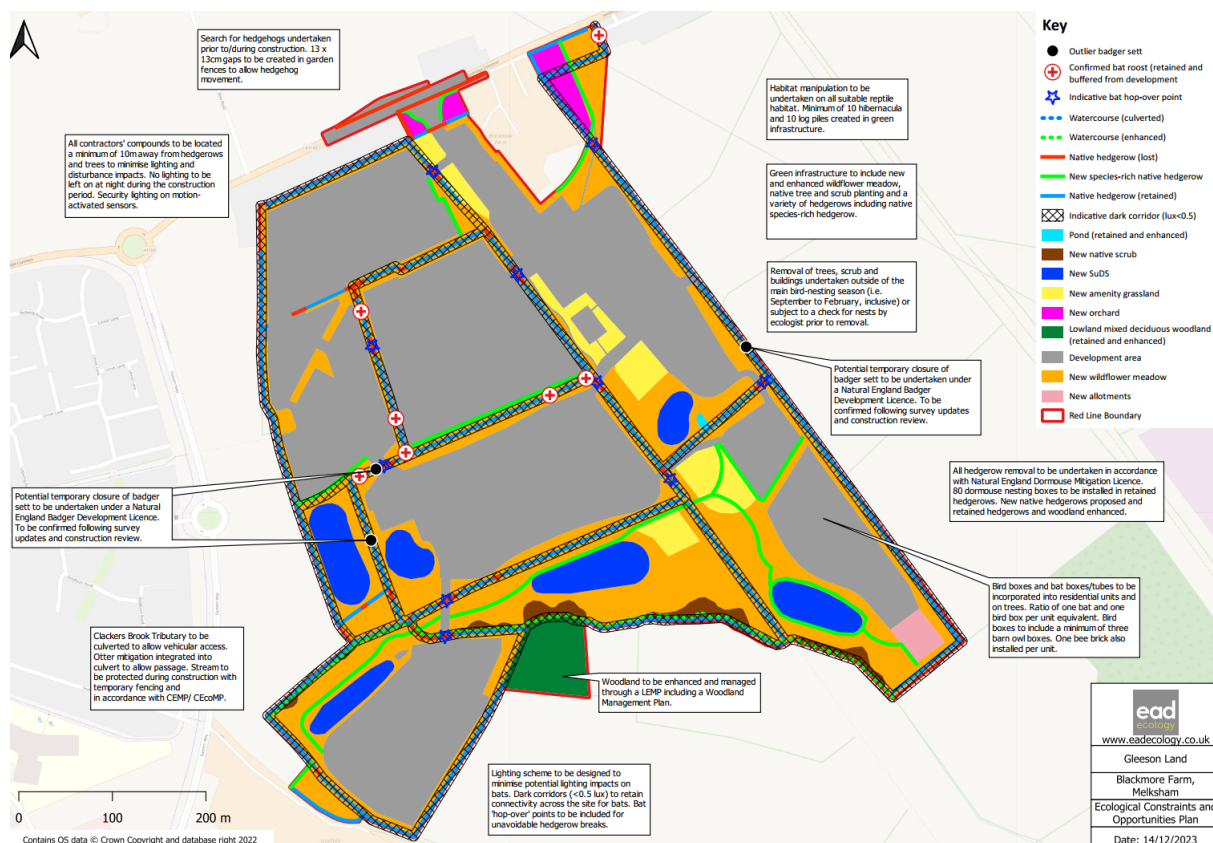
Several invertebrates have been recorded within the 2km site and there are a number of suitable habitats for invertebrates on site. Species of amphibian were also identified within the 2km site including great crested newt (GCN).

There are 2 ponds on site and other water bodies within close proximity to the site however surveys of these found no evidence of GCN and their presence on site was considered unlikely. Limited reptile activity was found on site. No barn owl roosts/nesting sites were identified within the area, but suitable barn owl foraging habitat was identified on site.

Mitigating and enhancement measures are proposed in section 10 of the Environmental Statement. The proposed green infrastructure and off-site compensation measures would provide habitats for invertebrates, amphibians, reptiles, bats and birds amongst other protected species. Proposed mitigation measure include –

- Bird and bat box incorporated into dwellings and on trees (one box per dwelling equivalent)
- Hedgehog passes created within all new garden fences
- Bee bricks would be installed on new buildings and walls (one box per dwelling equivalent)
- Hibernation sites and log-piles would be created in green infrastructure for amphibians and reptiles
- 80 dormouse boxes installed in retained vegetation
- Otter passage to be incorporated into Clackers Brook culvert

Ecological constraints and mitigation measures are summarised on the following plan –



Ecological Constraints and Opportunities Plan (Environmental Statement Chapter 10: Biodiversity)

Habitat creation and green infrastructure would include new enhanced wildflower meadow planting, new native hedgerows and retained hedgerows to be enhanced, the woodland on the southern boundary of the site would be enhanced and managed and new allotments in the southwest corner of the site are proposed. With regards bat mitigation indicative dark corridors for the development are shown on the above Ecological Constraints and Opportunities Plan (subject to the detailed design of the development at reserved matters stage). In addition, a lighting assessment would also accompany any reserved matters application with emphasis of minimising the impact of lighting on bats.

As such, and subject to planning conditions the Council's ecologist has no objection to the development. The development is therefore considered in accordance with local and national policy.

9.8 Open Space/ Sports Provision

Paragraph 96 of the NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles for example through the provision of safe and accessible green infrastructure and sports facilities. Paragraph 103 of the NPPF states access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Core Policy 52 of the WCS 'Green infrastructure' states developers will need to make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards.

The proposed development would provide 15 ha of open space provision including 2 equipped play spaces (one for children and one for teenagers). The scheme would also provide 2 ha of land for a primary school including sports pitch. **Details of the open space and sports pitch would form part of a future reserved matters application.**

Wiltshire Council Public Open Spaces Team have requested the following contributions -

- 17,464m² (1.7 ha) of Public Open Space (POS)
- 885m² of Equipped Play in the form of two equipped play spaces
- Sports contribution of £118,000 towards a 3G Artificial Turf Pitch within the Melksham Community Area

Whilst the consultation comments from Sport England are noted, the Councils leisure and Public Open Space team have agreed the following for this application:

'There is the requirement for an offsite sports contribution to meet the strain on infrastructure of the new development. The Primary School pitches do not service this requirement.'

As such the Council open spaces team have requested a developer contribution amounting to £118,000 to go towards the delivery of a 3G Artificial Turf Pitch off-site but in the community area which has been agreed by the applicants and would be secured by a s106 legal agreement.

Sports England also asked for a developer contribution of circa £250,000 to £353,000 is required for a sports hall and circa £280,000 to £390,000 for a swimming pool. These two requests do not comply with the Regulation 122 legal tests and the Council's leisure team do not seek such developer obligations. It is also likely to be the case that the request when made by Sport England failed to appreciate the recent completion of the Melksham Community Campus located in the town centre, which includes a fitness studio and swimming pool.

Based on the above, officers are satisfied that the level of open space/ sports provision is acceptable, and the development complies with local and national policy, and through developer contributions, suitable off-site improvements / new facilities can be funded through this development on an acceptable and proportionate basis.

9.9 Loss of Agricultural Land

The application site extends to just over 32.7 hectares of largely dairy farmland which the Council's mapping system identifies as predominately grade 3 and 4 (adjacent the southern boundaries of the site) agricultural land.

Natural England's Agricultural Land Classification (ALC) defines Grade 3 land as 'good to moderate quality agricultural land', which has *"moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where*

more demanding crops are grown yields are generally lower or more variable than on land in grades 1 and 2".

Grade 4 is defined as '*poor quality agricultural land with severe limitations which significantly restrict the range and level of yield of crops.*'

Paragraph 187 of the Framework requires planning policies and decisions to contribute to and enhance natural and local environment and includes in criterion b) '*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*'

The Framework defines 'best and most versatile agricultural land' (BMV) as land that is considered to fall within grades 1, 2 and 3a of the ALC.

The application is accompanied by an Agricultural Land Classification report by Askew Land & Soil Limited dated August 2019. The report concludes the quality of agricultural land across the site has been classified as Subgrade 3b which is outside of the NPPF (2019) best and most versatile (BMV) category as detailed above.

There are no in principle objection to the scheme from Natural England, and with the site being put forward for a significant mixed-use housing led allocation enshrined within the emerging Local Plan, the Council has committed to accepting the loss of the lower grade agricultural land for housing and employment growth and from reviewing all the material considerations set out within the particulars for this planning application, officers consider this proposal to be compliant with local and national policy.

9.10 Other Issues

A (£150,000) public arts contribution has been agreed with the applicant amounting to £300 per dwelling.

Concern has been raised by third parties about increased pollution in particular, during the construction phase of the development. This would be a detailed matter for both discharge of conditions and any future REM applications to address, but at this stage, officers are mindful that the applicants submitted an Air Quality Assessment report (Environmental Statement chapter 13) which was reviewed by the Council's public protection team and concluded as long as best practice measures were implemented, any impacts during the construction phase of the development would not be significant.

Concern has also been raised with regards crime/ anti-social behaviour. There is no substantive evidence that would support this concern, which at outline stage is not a matter that can reasonably influence the decision on the application. As reported earlier within this report, the Council consulted with the Police design liaison officer and no objections were raised.

10. Developer Obligations

Core Policy 3 of the adopted WCS states that all new development would be required *“to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal”* which would be delivered directly by the developer and/or through a financial contribution. Policy 8 of the made JMNP also requires *“infrastructure requirements, in proportion to their scale and in accordance with prevailing Wiltshire policies, will be delivered through the Community Infrastructure Levy, planning conditions and section 106 agreements”*.

The following s106 contributions have been identified by internal consultees and are considered to be reasonable, necessary and directly related to the development –

- Housing – 40% Affordable Housing (AH) 200 units (with the agreed mix being 25% First Homes, 60% affordable rent and 15% shared ownership – with the detailed breakdown in terms of bedrooms per dwelling per tenure to be based on most up to date needs and be enshrined within the s106).
- NHS – developer financial contribution of £512,727 to fund additional primary care floorspace at Giffords Surgery and Spa Medical Centre in Melksham
- Open space/ sports provision –
 - 17,464m² of on-site Public Open Space (POS)
 - 885m² of Equipped Play in the form of two equipped play spaces (on-site)
 - A developer financial contribution of £118,000 to fund an off-site 3G Artificial Turf Pitch within the Melksham Community Area; and provision of
 - Allotments (0.17ha) on-site
- Education – developer financial contributions for the following:
 - Early Years Places - £17,522 x 59 = £1,033,798
 - Primary School Places - 94 x £18,758 = £1,763,252
- Arts Contribution – £300 per dwelling (£150,000)
- £101 per dwelling for waste and recycling totalling £50,500
- Highway improvements and sustainable transport –
 - Bus service developer contribution – £750,000
 - Walking and cycling enhancement contributions in the form of the following:
 - Improvements on Snarlton Lane up to Blackmore Road (£21,990)
 - Dropped kerb works and tactile paving at the Ingram Road/Blackmore Road junction (£6,000)
 - Tactile paving works on the south side of Ruskin Avenue/Lowbourne Road (£2,000)
 - Wayfinding improvements in the vicinity of the development (£10,000))
 - Green Travel Voucher – (in the sum of £300 to be made available upon request in accordance with the provisions of the Travel Plan to the initial occupiers of each dwelling)
 - Cycle maps contribution – £1,000
 - Residential travel plan to be provided
 - Travel plan monitoring fee – £7,000
 - Rail accessibility contribution – £8,547 (to be used towards rail accessibility improvements at Melksham station)
- Improvements to public footpaths –

- Surfacing works to and removal of access furniture on footpath MELW27 (£22,500)
- MELW26 cycle conversion order cost - £5000
- MELW26 – Delivery of a Woodstock Medium Mobility kissing gate plus installation – £4080
- MELW30 – Countryside access furniture upgrades - £3000
- Management and maintenance of the open spaces and play areas including option for Melksham Without Parish Council to adopt play area
- A developer commitment to provide the Council with suitably detailed confirmation in writing on the timing / specification for the delivery of a serviced primary school.
- A developer commitment to provide the Council with suitably detailed confirmation in writing on the timing / specification for the delivery of the mixed-use hub, or commitment to financially contribute an agreed proportionate sum to part fund any advanced off-site provision.
- A developer commitment to provide the Council with suitably detailed confirmation in writing on the timing and delivery of the employment land including the necessary engagement with the Council's economic development team and the submission of a marketing strategy.
- A developer commitment to avoid any ransom strip being created on the site's western edge pursuant to safeguarding a future road connection to the Skylark Road/Eastern Way Roundabout.
- A S106 monitoring fee would also be required to be included within the S106 Legal Agreement which would be 1% of the total financial contributions capped at £10,000

11. Conclusion (The Planning Balance)

Paragraph 11(d) and footnote 8 of the revised NPPF state that where a Local Planning Authority cannot demonstrate a five-year housing land supply then, for applications including housing provision, the policies which are most important for determining the application should be considered out-of-date.

As a result, the presumption in favour of sustainable development (often referred to as the 'tilted balance') is invoked and permission should be granted unless protection policies set out in footnote 7 of the NPPF apply, or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.

In this particular case, there are no protection policies that would prevent the titled balanced being engaged and there are no technical objections to the application.

The application proposals have been informed by the emerging local plan site allocation and through negotiation, the scheme has been revised with robust supporting statements and assessments which would not lead to a substantive conflict with the emerging local plan expectations. This application is ready to be determined at a time when the Council has a significant housing supply deficit at 2.03 years when tested against the 5-year requirement (plus a 5% buffer), and given the lack of any technical objection, the delivery of 500 dwellings and the applicants commitment to provide 40% (up to 200 units) being affordable homes, and this merits very significant weight in the planning balance. Securing delivery of the mix of uses as anticipated by the emerging local plan including employment and community uses, as well as

connections through the site into Melksham is important to the sustainability of the development.

Paragraph 14 of the NPPF states that in situations where the presumption (at paragraph 11(d)) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits. However, in this particular case, the application site forms a substantive part of the emerging local plan Policy 18 allocation and as such this helps in supporting this application in terms of principle.

Moreover, the Council's strategic planning team were consulted and confirmed that there would likely be no prematurity argument and due cognisance must be afforded to the amendments and delivery commitments the applicants have agreed to, which broadly comply with the emerging Local Plan.

Through the submission of various supporting plans and statements, including a comprehensive illustrative masterplan that goes some way to address the details set out in draft Policy 18 of the emerging Local Plan, the applicants have evidenced the 37 hectares being capable of accommodating the proposed quantum of housing at suitable densities and also set aside land for the future delivery of employment land, a primary school and a significant amount of green space (totally about 46% of the site).

It is fully recognised that the made Joint Melksham Neighbourhood Plan is less than 5 years old and contains policies and allocations to meet its identified housing requirement, however Wiltshire Council's local housing need is now based on a Countywide calculation which has been recently adjusted by Central Government and in mid-December has been confirmed as being significantly in deficit, which is a significant material consideration.

In terms of the benefits of the scheme, they include the provision of up to 300 open market dwellings and up to 200 affordable dwellings at a time when the Council has such a significant housing supply deficit is a very significant material consideration to significantly boost homeownership across many house types.

Given the Council's significant shortfall in housing land supply and through fully appreciating central government-imposed changes to housing needs that significantly increased what needs to be planned for across Wiltshire. The site forms a substantive part of an emerging local plan allocation which has been subject to a site selection and local plan making process. It is considered to be a sustainable site and the principle of development (which this outline seeks to secure) should be supported by the Council.

It is also necessary to reactivate the 2023 Action Plan for the Council - which was shared with members via briefing note and set out how the Council would effectively restore its 5-year housing land supply in the face of the acknowledged shortfall and confirmed that: -

‘...the Council will positively consider speculative applications where there are no major policy obstacles material to the decision other than the site being outside the settlement boundaries or [being] unallocated.’

There would be some short-term benefits secured through the construction phase of the development with direct and indirect job creation and the future householders of the properties contributing to future Council Tax revenues.

In addition, the development would contribute towards CIL infrastructure funding in the area, with the total sum going to the local parish in recognition that there is a made Neighbourhood Plan in place.

Longer term economic benefits would also be secured through the delivery of a mixed-use hub and employment land that would generate employment growth within the area.

On this particular aspect, the NPPF at paragraph 85 states that “

Significant weight should be placed on the need to support economic growth and productivity...”

In line with the revised NPPF, significant weight must be afforded in this case.

The supporting information that accompanies the application has been subject to a rigorous assessment involving many stakeholders/consultees and officers have concluded that it demonstrates that the site can accommodate up to 500 dwellings without adversely impacting the living conditions and amenities of existing local residents.

The application proposal has been subject to a design review by the Council’s appointed external body of experts and the site, and the quantum of development were supported in principle.

From the indicative details provided, the applicants have demonstrated that the scheme can accommodate a range of densities, and through the future detailed REM phased submissions and with the necessary s106 legal agreement safeguards and planning conditions, the scheme can be made acceptable in terms of its effects on the landscape, highways and accessibility, site permeability, drainage and ecological matters.

The development would be served by a safe access to the highway network and the scheme would not result in severe cumulative harm to highway safety or result in harm to pedestrian safety.

Subject to securing and delivering a range of mitigation measures, the development would cause no harm to local biodiversity interests. The site is within flood zone 1, land that has the least risk of flooding, and a suitable on-site drainage scheme can be delivered with no technical objections having been received from the drainage authority.

The scheme would cause 'less than substantial harm' to the character and setting of the grade II listed building known as Blackmore House. However as detailed above, the site is allocated in the emerging Local Plan and through appropriate siting /set back distances being agreed as part of a future REM submission and securing suitable lower development densities for the land to the immediate south of the nearby listed building, officers are satisfied that an appropriate development can be delivered that would result in significant public benefits which would outweigh the harm created to the diminution of the rural setting for the listed farmhouse.

In addition, the scheme includes public benefits that go beyond the wider development pursuant to several upgrades to be made to the local transport infrastructure and PRow improvements.

Turning to the adverse impacts, the proposal fails to comply with the development plan as a whole given the policy conflict with CP1, CP2 and CP15 of the Wiltshire Core Strategy, and Policy 6 of the Neighbourhood Plan. By reason of the site being located outside the limits of development the conflict with these policies cannot be afforded full weight by virtue of the housing land supply deficit, but the Plan conflicts nevertheless are significant, but these are not considered sufficient to outweigh the aforementioned public benefits.

The development would also result in the loss of grade 3b and 4 classified agricultural/ rural land which is a negative implication and there would be a significant change to the local landscape character. However, the application avoids using the best quality land and given that the site is being allocated for development in the emerging Local Plan, officers do not consider it would be reasonable for the Council to oppose the principle of the development which has been identified for 425 dwellings and 5 hectares of employment land scheme. Indeed, a refusal on such grounds would potentially expose the Council to a costs award. For the foregoing reasons, the loss of the agricultural land is considered an acceptable consequence.

Wiltshire Council is currently unable to demonstrate a five-year housing land supply, and the shortfall is very significant. This proposal would not only make a significant contribution to addressing the land supply for open market housing, through the applicant's commitment to deliver up to 200 affordable homes (at 40%), in the absence of technical grounds to refuse the application, it is recommended that the application being endorsed as an approval, be subject to the following planning conditions and require the applicant to commit to completing and sealing a s106 legal agreement to secure all the summarised heads of terms set out in section 10 of this report.

RECOMMENDATION: To defer and delegate to the Director of Planning to grant outline planning permission subject to the completion of a S106 Legal Agreement and subject to the following planning conditions and informatives:

1. The development hereby permitted shall be begun either before the expiration of two years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. Application(s) for the approval of all of the reserved matters (should this development be advanced on a phased manner) shall be made to the Local Planning Authority before the expiration of three years from the date of outline permission being granted.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

3. No development shall commence on site until details of the following matters (in respect of which approval is expressly reserved) have been submitted to and approved in writing by the Local Planning Authority:

- (a) The scale of development;
- (b) The layout of the development;
- (c) The external appearance of the development;
- (d) The landscaping of the site.

The development shall then be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 5 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

4. The development hereby approved shall be carried out in accordance with the following approved plans and documents:

Site Location Plan - drg no. 18045_220 rev B
Parameter Plan – Composite drg no. 18045_520 rev E
Parameter Plan – Heights drg no. 18045_522 rev C
Parameter Plan – Density drg no. 18045_523 rev D
Proposed Ghost Island Right Turn Lane drg no. ITB12069-GA-049 rev B
Proposed Pedestrian Cycle Emergency Access drg no. ITB12069-GA-057 rev A
Proposed Temporary Construction Access and 1:1000 drg no. ITB12069-GA-054 rev A

REASON: For the avoidance of doubt and in the interests of proper planning.

5. No application for reserved matters shall be submitted until there has been first submitted to and approved in writing by the Local Planning Authority a detailed Phasing Plan and order of delivery schedule for the entire application site indicating geographical phases for the entire development.

Where relevant these phases shall form the basis for the reserved matters applications, and each phase shall include within it the defined areas and the

quantities of open market and affordable housing as well as the community and employment uses and associated infrastructure relevant to any given phase.

The 'order of delivery schedule' shall also specify the order in which each land parcel shall commence.

In addition, detailed plans and an order of delivery schedule for 'non-phase specific' landscape and ecology mitigation measures shall be submitted to and approved in writing by the local planning authority.

The development shall be carried out in strict accordance with the provisions of the approved phasing plan and/or any subsequent amendment to the phasing plan that has been agreed in writing by the Local Planning Authority.

REASON: To ensure the proper planning and delivery of the development and to deliver a sustainable development which is in character with its surroundings and in accordance with the terms of the application.

6. The subsequent reserved matters applications (phased or otherwise) shall make appropriate provision for the following:

- Up to 500 dwellings of which 40% will be affordable housing
- 2.07 ha of land being safeguarded for employment purposes to accommodate a building or buildings up to 5,000sqm falling under Use Classes E(g)(i) & E(g)(ii)).
- 2 ha of land for a primary school (Class F1).
- 0.17 ha of land for a mixed-use hub (Class E / Class F) with space for car parking and a building footprint with a gross floor area of c.400sqm.
- 15 ha of land to be provided and dedicated as public open space, children's play areas, allotments and attenuation ponds to include 17,464m² of Public Open Space (POS), 885m² of Equipped Play in the form of two equipped play spaces and 0.17ha of land for allotments.

The 'layout of the development' reserved matter (which is required to be submitted and approved under condition no. 3) shall accommodate all the above substantially in accordance with the Parameter Plan – Composite drg no. 18045_520 rev D, Parameter Plan – Heights drg no. 18045_522 rev C and Parameter Plan – Density drg no. 18045_523 rev C.

REASON: To ensure the creation of a sustainable development which is in character with its surroundings and in accordance with the terms of the planning application.

Highway Matters

7. Prior to the commencement of works on any given development phase, details of the estate roads, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfalls, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car parking and street furniture, including the timetable for the provision

of such works (for that phase) shall be submitted to and approved in writing by the Local planning Authority. Each phase of the development shall not be first occupied until the works have been undertaken in accordance with the approved details and timetable.

REASON: In order that the development is undertaken in an acceptable manner and to ensure that the roads are laid out and constructed in a satisfactory manner.

8. The roads, including footpaths and turning spaces, shall be constructed so as to ensure that before it is occupied, each dwelling has been provided with a properly consolidated and surfaced footpath and carriageway to at least base course level between the dwelling and the existing highway.

REASON: To ensure that the development is served by an adequate means of access.

9. Prior to commencement of the construction of the development full details of a shared walking/cycling route along the alignment of Bridleway MELW41 from the site access on to Bridleway MELW41 to Eastern Way in accordance with drawing ITB12069-GA-033 rev E (contained in the Transport Update Note section 'Other Drawings') including all necessary permissions, shall be submitted to and approved in writing by the Local Planning Authority.

The shared walking/cycling route shall thereafter be provided in full prior to the occupation of the 325th dwelling on the site and maintained as such thereafter.

REASON: To ensure walking and cycling accessibility between the site and the western side of Eastern Way.

10. Prior to commencement of the construction of the development full details of a signal-controlled Toucan Crossing off Eastern Way in accordance with drawing ITB12069-GA-033 rev E (contained in the Transport Update Note section 'Other Drawings') shall be submitted to and approved in writing by the Local Planning Authority. The Toucan Crossing shall thereafter be provided in full prior to the occupation of the 325th dwelling on the site and maintained as such thereafter.

REASON: To ensure safe and convenient crossing of Eastern Way is provided for pedestrians and cyclists in the interests of highway safety and sustainability.

11. Prior to commencement of the construction of the development full details of a signal-controlled Puffin Crossing off Eastern Way in accordance with drawing ITB12069-GA-056 rev A (contained in the Transport Update Note section 'Other Drawings') shall be submitted to and approved in writing by the Local Planning Authority.

The Puffin Crossing shall thereafter be provided in full prior to the occupation of the 150th dwelling on the site and maintained as such thereafter.

REASON: To ensure safe and convenient crossing of Eastern Way is provided for pedestrians and cyclists in the interests of highway safety and sustainability.

12. Prior to commencement of the construction of the development full details of a widened footway along Sandridge Common Road in accordance with drawing ITB12069-GA-055 rev A (contained in the Transport Update Note section 'Other Drawings') shall be designed and submitted to and approved in writing by the Local Planning Authority.

The widened footway shall be provided in full in accordance with the submitted details prior to the occupation of the 150th dwelling on the site and maintained as such thereafter.

REASON: To ensure safe and convenient access along Sandridge Common Road is provided for pedestrians and cyclists in the interests of highway safety and sustainability.

13. Prior to the occupation of the 150th dwelling on the site, the proposed emergency vehicle access and routing off the A3102/ Sandridge Common Road to the internal road network within the scheme, shall be completed and be made available for any given emergency, and it shall be safeguarded and maintained for the lifetime of the development.

REASON: To ensure that a satisfactory emergency vehicle access is provided in the interests of public and highway safety.

14. Prior to commencement of development a phasing and specification plan for the delivery of up to 2 bus stops excluding the mobility hub within the internal network of the site shall be submitted to and approved by the Local Planning Authority. The bus stops shall be constructed in accordance with the approved details.

REASON: To ensure that bus service infrastructure is delivered in a timely manner to maximise the use of sustainable travel modes.

15. Prior to commencement of development a phasing and specification plan for the Mobility Hub shall be submitted to and approved by the Local Planning Authority. The Mobility Hub shall include as a minimum a bus stop with shelter and associated real time information for bus, cycle parking including electric cycle charging points, electric vehicle fast and rapid charging points. The Mobility Hub shall be constructed in accordance with the approved specifications.

REASON: To ensure that the Mobility Hub is delivered in a timely manner to maximise the use of sustainable travel modes.

Drainage

16. No development (pursuant to each phase) shall commence on site until a scheme for the discharge of surface water from the site, including sustainable drainage systems and all third-party approvals, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. No phase of the development shall be first occupied until the scheme for

the discharge of surface water for that phase has been constructed in accordance with the approved details.

REASON: To ensure that the development can be adequately drained without increasing flood risk to others.

17. No development (pursuant to each phase) shall commence on site until details of the works for the disposal of sewerage including the point of connection to the existing sewer have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be occupied until the approved sewage disposal measures have been fully implemented for that phase in accordance with the approved details.

REASON: To ensure that the development is provided with a satisfactory means of drainage.

Ecology

18. Prior to commencement of development on site, including site clearance, an Ecological Mitigation and Management Plan (EMMP) shall be submitted to and approved in writing by the Local Planning Authority. The plan which will be prepared in broad accordance with the Ecological Constraints and Opportunities Plan (ES Chapter 10: Biodiversity prepared by ead ecology, 14/12/2023) and Environmental Parameters Plan – Composite (Ref Masterplan 417A Rev. B prepared by Origins, 19/12/2023). The plan will include the following elements:

- Evidence of how measures detailed in the Avoidance, Mitigation, Compensation and Enhancement Section (paragraphs 10.134-10.172) and summarised in Table 10.8 of ES Chapter 10: Biodiversity shall be implemented across the Site.
- A drawing/s specifying the location of mitigation and enhancement measures required by the Avoidance, Mitigation, Compensation and Enhancement Section (paragraphs 10.134 - 10.172) and summarised in Table 10.8 of ES Chapter 10: Biodiversity.
- A drawing/s specifying measured habitat unit areas including condition, hedgerow lengths and measured buffer distances along features of conservation importance.
- A drawing/s showing the location, number and specification of new features for nesting birds, roosting bats, reptiles and insects.
- Species specific mitigation strategies for reptiles, bats (roosting, foraging and commuting), dormouse, otter and badger.
- A drawing/s specifying the location and extent of habitats and features with species specific management priorities including reptile receptor areas, bat commuting and commuting habitat including dark corridors and cross over points, dormouse habitat, otter mitigation along Clackers Brook and retained at roosts.
- Mitigation and enhancement strategy for Clackers Brook tributary and retained broadleaved woodland.
- A BNG Calculation for the site, based on Metric 4.0 (as approved).

The approved EMMP shall set a framework for all reserved matters applications, which shall only be permitted where in accordance with the approved EMMP and

will include timescales for implementing the approved measures. The site shall be managed in accordance with the approved EMMP in perpetuity unless agreed in writing by the Local Planning Authority, and monitoring reports shall be submitted to the Local Planning Authority in accordance with the monitoring programme therein.

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

19. Prior to the commencement of works on a development pursuant to each phase, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the Local Planning Authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective enhancement measures for that phase, as set out in the approved EMMP (Condition 18), to be implemented before and during the construction phase, including but not necessarily limited to, the following:
- Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
 - Mitigation strategies and method statements for protected / priority species, such as nesting birds, badgers, hazel dormice, amphibians, reptiles and bats.
 - The appointment of an Ecological Clerk of Works (ECoW), including role, responsibilities and frequency / timing of attendance on site.
 - Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
 - Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

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

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

20. Prior to the start of construction on any given development phase, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP should include the landscape and ecological avoidance, mitigation and enhancement measures for that phase (as set out in the approved EMMP) and will include:
- Long term objectives and targets in accordance with the EMMP.
 - Monitoring, management and maintenance responsibilities and schedules for each ecological feature within the development for a period of no less than 30 years from the commencement of the scheme.

- The mechanism for monitoring success of the management prescriptions with reference to the appropriate Biodiversity Metric target Condition Assessment Sheet(s) in the EMMP.
- A procedure for review and necessary adaptive management in order to attain targets.
- Details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured.

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

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

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

The approved lighting shall be installed and maintained in accordance with the approved details and no additional public external lighting shall be installed, unless approved in writing by the Council.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site.

Construction Method Statement

22. No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The submitted Construction Method Statement must include safeguarding measures to deal with the following:

- point of access into the site for construction vehicles;
- the parking of vehicles of 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;
- measures to control the emission of dust and dirt during construction;
- a scheme for recycling/disposing of waste resulting from demolition and construction works;
- working hours, including deliveries;

- large vehicle and delivery routing plan;
- the control and removal of spoil and wastes;
- the location and use of generators and temporary site accommodation;
- the cutting or other processing of building materials on site;
- where piling is required, this must be Continuous flight auger piling wherever practicable to minimise impacts;
- communication procedures with the Council and local community regarding key construction issues (newsletters, fliers etc.)

The Construction Method Statement shall subsequently be implemented in accordance with the approved details and agreed timetable. The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

REASON: In order that the development is undertaken in an acceptable manner, to minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

Landscaping

23. A timetable for the implementation of all soft landscaping comprised in the details of landscaping approved under condition 3 for each phase of the development shall be submitted to and agreed in writing with the Local Planning Authority. The works shall be carried out in accordance with the agreed phasing and timetable. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of 5-years, die, are removed or damaged, seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species. All hard landscaping shall also be carried out in accordance with the approved details for that phase and prior to the completion of the final dwelling of any part of the development phase, unless otherwise agreed with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

Climate Change

24. No development above slab level shall take place until a final Sustainable Energy Strategy, including details of operational energy, climate change adaptation measures and sustainable transport, has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development are achieved.

25. No development above slab level shall take place on any non-residential development until a BREEAM Pre Assessment for that part of the development

has been submitted to and approved in writing by the Local Planning Authority. The assessment shall demonstrate that the relevant part of the development is targeting the relevant BREEAM "Excellent" standard (or any such equivalent national measure of sustainable building which replaces that scheme).

Within 6 months of being first brought into use a final Certificate (for that part of the non-residential development) shall have been submitted to the Local Planning Authority certifying that the relevant BREEAM "Excellent" standard (or any such equivalent national measure of sustainable building which replaces that scheme) has been achieved by the development.

REASON: To ensure that the objectives of sustainable development are achieved.

Water Use Efficiencies

26. No development hereby approved shall commence above ground floor slab level until a scheme for water efficiency has been submitted to and approved in writing by the Local Planning Authority. The scheme will demonstrate a standard of a maximum of 110 litres per person per day is applied for all residential development. The scheme shall be implemented in accordance with the agreed details.

REASON: This condition contributes to sustainable development and meeting the demands of climate change. Increased water efficiency for all new developments also enables more growth with the same water resources.

Land Contamination

27. No development shall commence on site until an investigation of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses (including asbestos) has been carried out and all of the following steps have been complied with to the satisfaction of the Local Planning Authority:

Step (i) A written report has been submitted to and approved by the Local Planning Authority which shall include details of the previous uses of the site and any adjacent sites for at least the last 100 years and a description of the current condition of the sites with regard to any activities that may have caused contamination. The report shall confirm whether or not it is likely that contamination may be present on the site and the potential impact of any adjacent sites.

Step (ii) If the above report indicates that contamination may be present on, under or potentially affecting the proposed development site from adjacent land, or if evidence of contamination is found, a more detailed site investigation and risk assessment should be carried out in accordance with DEFRA and Environment Agency's "Model Procedures for the Management of Land Contamination CLR11" and other authoritative guidance and a report detailing the site investigation and risk assessment shall be submitted to and approved in writing by the Local Planning Authority.

Step (iii) If the report submitted pursuant to step (i) or (ii) indicates that remedial

works are required, full details must be submitted to the Local Planning Authority and approved in writing and thereafter implemented prior to the commencement of the development or in accordance with a timetable that has been agreed in writing by the Local Planning Authority as part of the approved remediation scheme. On completion of any required remedial works the applicant shall provide written confirmation to the Local Planning Authority that the works have been completed in accordance with the agreed remediation strategy.

REASON: To reduce and manage the risks associated with land contamination.

Archaeology

28. No underground / ground disturbance related works shall commence on site until an Archaeological Management Plan (AMP) has been submitted to and approved in writing by the Local Planning Authority. The plan shall subsequently be implemented in accordance with the approved details and agreed timetable.

REASON: In order that the development is undertaken in an acceptable manner and to enable the recording of any matters of archaeological interest.

PLANNING INFORMATIVES:

The applicant is advised that the development hereby approved may represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. If the development is determined to be liable for CIL, a Liability Notice will be issued notifying you of the amount of CIL payment due. If an Additional Information Form has not already been submitted, please submit it now so that we can determine the CIL liability. In addition, you may be able to claim exemption or relief, in which case, please submit the relevant form so that we can determine your eligibility. The CIL Commencement Notice and Assumption of Liability must be submitted to Wiltshire Council prior to commencement of development. Should development commence prior to the CIL Liability Notice being issued by the local planning authority, any CIL exemption or relief will not apply, and full payment will be required in full and with immediate effect. Should you require further information or to download the CIL forms please refer to the Council's Website: www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy

The developer is encouraged to provide at least one electric vehicle charger per dwelling through careful consideration of the layout of the development and is encouraged to ensure that the layout of the development optimises the potential for solar power generation.

The following advice is provided by the Environment Agency - This development site appears to have been the subject of past activity which poses a risk of contamination, however this area is limited and confined to the Blackmore Farmyard. The risk to controlled waters is considered low due to this area being located on unproductive

strata and that no infiltration drainage is proposed. We recommend however that developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination.
- Refer to our Guiding principles for land contamination.
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
- Refer to the contaminated land pages on [gov.uk](https://www.gov.uk) for more information.

Waste on site

The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution.
- treated materials can be transferred between sites as part of a hub and cluster project.
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on [GOV.UK](https://www.gov.uk)

Waste to be taken off site.

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment, and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or

greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on [GOV.UK](https://www.gov.uk) for more information.

European and Nationally Protected Species have been confirmed as present on Site. These species are legally protected, and planning permission does not provide a defence against prosecution or substitute for the need to obtain a licence if an offence is likely. The applicant is advised to follow advice from an independent ecologist and that a European Protected Species Licences for bats, dormice and otter will be required before any work is undertaken to implement this planning permission.

In order to discharge the associated drainage conditions, the following additional information should be provided:

- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.
- A plan showing the cross sections and design of any attenuation pond and its components include stated freeboard above the critical 1 in 100yr + climate change storm event.
- A manhole / inspection chamber schedule to include cover and invert levels.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30-year rainfall event.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property.
- Evidence that urban creep been accounted for the hydraulic calculations in line with LASOO guidance.
- Evidence that a sensitivity analysis on the network considering surcharged outfall conditions has been undertaken.
- Clear arrangements for ownership and ongoing maintenance of SuDS over the lifetime of the development.

Wiltshire Council is the land drainage authority under the Land Drainage Act 1991. Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.