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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

Tuesday 6th January 2026

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

You are summoned to attend the Planning Committee Meeting which will be held on **Monday 12th January 2026 at 7.00pm at Melksham Without Parish Council Offices (First Floor), Melksham Community Campus, Market Place, SN12 6ES** to consider the agenda below:

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

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Or go to www.zoom.us or Phone 0131 4601196 and enter: **Meeting ID: 279 181 5985**
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YOU CAN ACCESS THE AGENDA PACK HERE

Yours sincerely,

A handwritten signature in black ink that reads 'T. Strange'.

Teresa Strange, Clerk



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AGENDA

1. Welcome, Announcements & Housekeeping

- To note that the Wiltshire Council Strategic Planning Committee Meeting on 13th January 2026 has been cancelled.

2. To receive Apologies and approval of reasons given

3. Declarations of Interest

- a. To receive Declarations of Interest.
- b. To consider for approval any Dispensation Requests received by the Clerk and not previously considered.

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

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

5. Public Participation

6. To consider the following new Planning Applications, including Permission in Principle applications received within the required timeframe (14 days):

- a. [PL/2025/09373](#) **Wiltshire School Of Gymnastics, Lysander Road, Bowerhill, Melksham, SN12 6SP** Full planning permission: Demolition of existing entrance and construction of a new entrance lobby and internal refurbishment of the reception area. Applicant Name: Wiltshire School of Gymnastics. **Comments By: 8th January 2026 (extension requested)**
- b. [PL/2025/09489](#) **20 Blenheim Park, Bowerhill, Melksham, SN12 6TA.** Householder planning permission: To build a single-story extension at the rear of the property. To create a new kitchen and dining room. Applicant Name: Mr James Humphry. **Comment By: 13th January 2026**
- c. [PL/2025/09841](#) **CHURCH FARM, BATH ROAD, SHAW, MELKSHAM, SN12 8EF.** Prior Approval Part 3, Class MA: Commercial, business and service uses to dwellinghouses: Proposed Change of Use to Create 6 Dwellings. Applicant Name: Mr Hillier. **Comments By: 15th January 2026**
- d. [PL/2025/09851](#) **Kelso, 161b West Hill, Whitley, Melksham, SN12 8RB.** Householder planning permission: Erection of single storey side/rear extension following demolition of existing conservatory, garage external shed/store. Installation of a wood burner and flue. Applicant Name: Hawker & Rogers. **Comments By: 26th January 2026**

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

- a. [PL/2025/05552](#) **Land South of Brockleaze, Neston, Corsham, SN13 9TE.** Full planning permission: Battery Energy Storage System with associated infrastructure. **Comments by 12th January 2026.**

8. **Current planning applications:** Standing item for issues/queries arising during period of applications awaiting decision.
- a. **[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 new comments from Drainage, Melksham Town Council, Conservation, Arboriculture, Environment Agency and Public Open Space.
 - To note communication regarding extinguishment of MELK103.
- b. **[PL/2025/06749](#) - Land North of Bath Road (A365), Melksham (Adjacent to Melksham Oak Community School)**
Outline planning application (with all matters except access reserved) for mixed use development comprising residential (up to 205 dwellings), land reserved for expansion of secondary school, public open space, landscaping and associated engineering works. Applicant Name: Hannick Homes & Developments Ltd
- To note correspondence regarding holistic review of A365 Bowerhill and to consider next steps.
- c. **[PL/2025/06105](#) Land at Bowerhill Lane, Bowerhill, Melksham (Old Loves Farm)**
Outline Planning Permission: Erection of up to 50 No. dwellings and associated works
- No new documents or comments.
- d. **[PL/2024/11426](#): Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, Wilts (Gompels):** Outline planning permission: All matters reserved. Construction of warehouse with office space, parking and associated landscaping including site access.
- To note new Ecologist response, Ecological Impact and comments from Public Protection.
 - To consider correspondence from Nic Thomas in relation to Freedom of Information request follow up.
- e. **[PL/2025/07391](#) - Land South of Western Way, Melksham, Wiltshire**
Approval of reserved matters: Reserved Matters (appearance, landscaping, layout and scale) for 210 residential dwellings (Use Class C3), along with associated open space, landscaping, and parking, pursuant to Condition 2 of Outline Planning Permission ref. PL/2022/08504. Applicant Name: BWD Trading
- To note new comment from Highways.
- f. **[PL/2025/00626](#) Land North of Berryfield Lane, Melksham, SN12 6DT:** Outline planning application for up to 68 dwellings and formation of new access and associated works (All matters reserved other than access).
- To note new comments from Public Open Space and Public Protection

- g. [PL/2024/09725](#) **Land off Corsham Road, Whitley, Melksham (Middle Farm)**
Outline planning application (with access, layout and landscaping to be approved) for up to 22 dwellings, new access off Corsham Road, public open space, drainage and associated works.
 - To note Draft Heads of Terms for Section 106 Agreement and comments from Ecology.
- h. [PL/2025/08987](#) **Land at First Lane, Whitley, SN12 8RL**
Outline planning application with all matters reserved except for access for the erection of 2 No. self-build plots and associated works. Applicant Name: Mr S.A Rogers
 - To note new comments from Drainage, Ecology and Arboriculture.

9. Proposed Energy Installations

- a. Lime Down Solar
 - To note the comments submitted on behalf of Community Action Whitley and Shaw and on behalf of Melksham Without Parish Council.
 - To note Wiltshire Council's consultation submission and outcome of the Extraordinary Cabinet Meeting held on Tuesday 6th January 2026.
- b. Wick Solar Farm ([20/06840/FUL](#)), Studley Solar Farm ([PL/2021/08690](#)) and associated cable installation ([PL/2025/05856](#))

To note the public consultation event regarding Studley cable route to be held in Whitley Reading Rooms on Wednesday 14th January 2026, 6-8pm.

- c. To receive an update on Wiltshire Council Engagement about Cumulative Impact.

10. Planning Policy:

- a. **Joint Melksham Neighbourhood Plan (NHP):**
 - To reflect on responses to planning applications for future review of the Neighbourhood Plan
 - To consider use of NHP checklist to aid responses to consultation.
- b. **Wiltshire Council's Draft Local Plan Examination:** To consider any updates <https://www.localplanservices.co.uk/wiltshirelpexamination>
 - To note Wiltshire Local Plan examination – Inspectors' post Stage 2 hearings letter.
- c. **National Planning Policy Framework (NPPF)**
 - To note consultation on changes to NPPF and headlines. Consultation deadline of 10th March 2026.
- d. **Planning and Infrastructure Act**
 - To note the Planning and Infrastructure Act came into effect in December 2025.

11. Premises Licenses applications and decisions:

- a. [PR2025 12-591320](#) World of WOMAD Ltd, Neston Park Home, Neston, Corsham, SN13 9TG. Consultation ends 7th January 2026.
- b. Correspondence relating to New Inn, Berryfield.

12. Appeals

a. Appeal Hearings

[PL/2024/07097](#): Land south of Snarlton Farm – start Tuesday 20th January 2026

[PL/2024/10674](#): Land off Woodrow Road – start Tuesday 3rd February 2026

To receive update on parish council's representation and strategy.

b. [PL/2023/05883](#): Land to the rear of 52e, Chapel Lane, Beanacre

To note final comments from Appellant and appeal decision (if determined)

13. Planning Enforcement: To note any new planning enforcement queries raised and updates on previous enforcement queries.

a. Top Lane, Whitley

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

a. Updates on ongoing and new S106 Agreements

i. Pathfinder Place

ii. To receive feedback from S106 cemetery contribution requests (if received)

iii. To note any S106 decisions made under delegated powers

b. Contact with developers:

i. To approve notes from meeting for reserved matters for Land at Blackmore Farm with David Wilson Homes (Outline PL/2023/11188) held on 10th December 2025.

ii. To arrange/provide feedback from meeting with new owners of Cooper Tires site related to demolition works.

Copy to all Councillors

Teresa Strange

From: Harlow, Craig <Craig.Harlow@wiltshire.gov.uk>
Sent: 22 December 2025 08:23
To: Fiona Dey
Cc: Teresa Strange
Subject: RE: Proposed Extinguishment of Footpath Melksham 103 (part), Skylark Road, Melksham, SN12 7GD

Good morning Fiona,

Many thanks for your response on behalf of the parish council.

I can confirm the land just to the north of Skylark Road is public open space and as such would remain so if the public footpath were to be extinguished. The strip of land behind the properties of Fieldfare Way is not protected in that manner and if the public footpath were to be extinguished this land could be subject to being incorporated into residential properties, subject to the relevant permissions.

If the footpath is not extinguished it may be subject to surfacing and works to improve the path, via monetary contributions from the planned development to the north of Sandridge Road, pending outcomes in relation to that planning application.

I will keep the parish council informed as to any decision on this application.

Best Regards

Craig

Craig Harlow MIPROW
Definitive Map Officer
Definitive Map and Highway Records
Wiltshire Council
County Hall
Trowbridge
BA14 8JN

Wiltshire Council

Direct Line: 01249 468568
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From: Fiona Dey <office@melkshamwithout-pc.gov.uk>
Sent: 19 December 2025 12:48
To: Harlow, Craig <Craig.Harlow@wiltshire.gov.uk>
Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Subject: Proposed Extinguishment of Footpath Melksham 103 (part), Skylark Road, Melksham, SN12 7GD

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Dear Craig,

Thank you for consulting with Melksham Without Parish Council on the proposed extinguishment of Footpath Melksham 103 (part). Melksham Without Parish Council note that the footpath is not in the parish but is adjacent to the boundary.

Councillors support the extinguishment in principle but as the land currently provides a wildlife corridor, they want to see it maintained as green infrastructure as per Melksham Neighbourhood Plan Policy 12 – Green and Blue Infrastructure, and not incorporated into residential curtilage. If this is not possible, members do not support the extinguishment.

Kind regards
Fiona

Fiona Dey
Parish Officer
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Teresa Strange

From: Corps, Kimberly <Kimberly.Corps@wiltshire.gov.uk>
Sent: 18 December 2025 17:16
To: nick.holder@wiltshire.gov.uk
Cc: Teresa Strange; Collins, Gary; Green, Kenny
Subject: RE: Requests for major development planning applications on the A365 Bowerhill

Dear Nick,

Thank you again for your email. My apologies for the delay in responding.

I understand the request with these three applications, which are at varying stages of the planning process and I understand the principle of taking a holistic view to improve the network in this area.

The highway matters on planning applications PL/2024/11426 (Gompels warehouse) and PL/2025/06105 (Old Love's Farm) have been considered thoroughly and we have an agreed approach for the respective highway improvements required for these developments. I note that the Gompels application has previously been presented to Strategic Planning Committee and deferred to address issues including ecology, noise and flood risk. In my view, it would be difficult to justify a request for further improvements through these applications, that would be legally compliant, as the highway impacts have been considered. In terms of legal compliance, we must ensure that requests are necessary to make the development acceptable, directly related to the development and proportionate and reasonable in scale and kind to the development.

There is, however, an opportunity to improve the road environment being pursued through application PL/2025/06749 (local plan allocation site), given the scale of the development and location of this site. This application is under consideration, and the highways team are in active discussions with the developer team. You may be aware that highways officers have requested amendments to this scheme, a key element being to include a roundabout at the proposed access point on Bath Road. This element would provide a different and safer environment giving a traffic calming approach to the eastern edge of the town. In terms of the speed limit request, this aspect would be explored further following the receipt of the outcome of the developer's response to this request. The approach to this application is also seeking improved active travel facilities along this stretch towards the school. It is my view that the team have demonstrated a holistic approach in requesting the amendments on this application, as improvements to the local environment have also been considered to inform the response and negotiations that are now underway. The outcome of this request is awaited, as the developer investigates this further.

I will keep you updated.

Kind regards,

Kim

Kimberly Corps
Head of Service, Transport Policy and Strategy

Wiltshire Council



Tel: 01225 770222

Email: kimberly.corps@wiltshire.gov.uk

Website: www.wiltshire.gov.uk

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From: Corps, Kimberly
Sent: 17 December 2025 16:56
To: Green, Kenny <Kenny.Green@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Collins, Gary <Gary.Collins@wiltshire.gov.uk>
Subject: RE: Requests for major development planning applications on the A365 Bowerhill

Dear Nick,

Further to Kenny's email below, I anticipate providing the response tomorrow following the review.

Kind regards,

Kim

Kimberly Corps
Head of Service, Transport Policy and Strategy



Tel: 01225 770222
Email: kimberly.corps@wiltshire.gov.uk
Website: www.wiltshire.gov.uk

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From: Green, Kenny <Kenny.Green@wiltshire.gov.uk>
Sent: 16 December 2025 12:10
To: Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; Collins, Gary <Gary.Collins@wiltshire.gov.uk>; Corps, Kimberly <Kimberly.Corps@wiltshire.gov.uk>
Subject: RE: Requests for major development planning applications on the A365 Bowerhill

Hi Nick

Thanks for your email. I note that your request to highways remains outstanding. It may well be the case that Kim has asked a member of her team to review and provide a full response, which given the matters being explored can take several weeks. I will nevertheless reach out to Kim in the meantime. I am sure you will appreciate that officers across all the services (especially planning and highways are very stretched) but I am sure a considered highway response will be forthcoming.

Yours sincerely,
Kenny

Kenny Green (BA, MA (Hons) MRTPI)
Planning Manager
Development Management
Place Directorate
Tel: 01225 770251

Ext 15251
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Please note that I work a compressed week and a Friday is a non working day for me.

From: Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Sent: 16 December 2025 09:44
To: Green, Kenny <Kenny.Green@wiltshire.gov.uk>
Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Subject: RE: Requests for major development planning applications on the A365 Bowerhill

Hi Kenny,
Just as an FYI we have had no response from Kim

Nick

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

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Wiltshire Council

Tel: 07931 905520
Email: nick.holder@wiltshire.gov.uk
Facebook@Cllr Nick Holder for Bowerhill

From: Holder, Nick
Sent: 07 December 2025 16:07
To: Corps, Kimberly <Kimberly.Corps@wiltshire.gov.uk>
Cc: Green, Kenny <Kenny.Green@wiltshire.gov.uk>; 'Teresa Strange' <clerk@melkshamwithout-pc.gov.uk>
Subject: RE: Requests for major development planning applications on the A365 Bowerhill

Hi Kimberley,

As the local member for the Bowerhill unitary division, I wish to add my support to this request and I will attach to the email the amended comments what have been submitted by the Parish Council on each of th3 developments as you may not have seen them.

To clarify one request, we are asking for contributions from all 3 applications, obviously only those that are approved, to address an holistic approach to traffic management on the A365, to include funding to enable the introduction of an advisory 20MPH limit outside Melksham Oak High School for which there is significant local support.

I have also copied in Kenny Green from the planning team.

I would be interested to hear your views.

Regards,

Nick

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

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Tel: 07931 905520
Email: nick.holder@wiltshire.gov.uk
Facebook@Cllr Nick Holder for Bowerhill

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 05 December 2025 13:52
To: Corps, Kimberly <Kimberly.Corps@wiltshire.gov.uk>; Wiltshire, Mark <mark.wiltshire@wiltshire.gov.uk>; Jones, Hannah <Hannah.Jones@wiltshire.gov.uk>; Lear, David <DavidLear.DavidLear@wiltshire.gov.uk>
Cc: Green, Kenny <Kenny.Green@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Fiona Dey <office@melkshamwithout-pc.gov.uk>
Subject: Requests for major development planning applications on the A365 Bowerhill

Dear Highways Planning officers

Melksham Without Parish Council wanted to draw to your attention the highways s106 requests that they have made for 3 planning applications for major development on the A365 at Bowerhill, so that there is a co-ordinated approach to these requests and on the cumulative effect of the applications.

PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham (Gompels warehouse)

PL/2025/06105 Land at Bowerhill Lane, Melksham (Old Love’s Farm) 50 dwellings

PL/2025/06749 Land north of Bath Road, Melksham (adjacent to Melksham Oak school) 205 dwellings (site allocation in draft Local Plan for 135 dwellings)

We have been asking for a holistic review of this stretch of road, and a holistic review to the approach to the planning application on this stretch for some time, rather than a piecemeal approach by application; with different Planning Officers and different Highway Officers commenting on them.

We have just submitted new comments on the email below, to 3 applications, but note that these applications are also very close to the proposed A350 eastern bypass route, Melksham Oak school, and have been subject to a recent accident with life changing injuries (junction with Bowerhill Lane) and new LHFIG solutions to improve safety concerns.

Issue 09-24-27 Junction A365 with Bowerhill Lane, just implemented following accident
Issue 09-24-12 Junction A365 with Hornchurch Road, to be approved following scheme design, same issue as accident at junction with Bowerhill Lane, evidence from covert cameras earlier in the year

Report on accident:

<https://www.bbc.co.uk/news/articles/c9qj983dn04o>

We hope that you will support these highway requests.

With kind regards, Teresa

Teresa Strange
Clerk & Responsible Financial Officer
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From: Fiona Dey <office@melkshamwithout-pc.gov.uk>

Sent: 05 December 2025 11:59

To: developmentmanagement@wiltshire.gov.uk

Cc: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; kenny.green@wiltshire.gov.uk;
nick.holder@wiltshire.gov.uk; Brown, Russell <russell.brown@wiltshire.gov.uk>; sasha.acourt@gompels.co.uk;
sam@gompels.co.uk

Subject: Additional Melksham Without Parish Council comments on PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham

Dear Development Management,

Please can you add the following comments from Melksham Without Parish Council to PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham:

Melksham Without Parish Council have significant concerns about the safety of the A365 in this area. There are already road safety concerns relating to the safety of turning into/out of Melksham Oak Community School, Bowerhill Lane and Hornchurch Road, speeding and inappropriate overtaking. There are number of new developments, including this one, that need to be considered as part of a holistic review of the safety measures needed for the road including the cumulative impact of these new developments.

If Wiltshire Council is minded to approve this application, Melksham Without Parish Council would like the following conditions/s106 contributions to be included:

- 1) Funding contribution towards a holistic review of the safety measures needed on the A365
- 2) Funding contribution towards any engineering and traffic Regulation Orders (TROs) arising from the holistic review
- 3) Funding contribution towards reduction of the speed limit on the A365 outside Melksham Oak Community School to 20 mph at the beginning and end of the school day and during term time only.

Kind regards

Fiona

Fiona Dey
Parish Officer
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Teresa Strange

From: Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>
Sent: 24 December 2025 13:19
To: Teresa Strange; Foster, Adrian
Subject: RE: CAS-6686-EIR-Economic Development input on planning applications

Dear Teresa,

Thank you for your further e-mail about this.

Your question is seeking clarity over what is an internal matter about how officers work together to discuss and weigh up different planning considerations. My job as the council's Chief Planning Officer and those managers leading the various teams in the Directorate is to make sure that where reports are presented that makes a recommendation on a planning application, that the decision maker is aware of relevant policies, relevant planning considerations and understands the recommendation that is being made and the reasons for that recommendation. How we structure our report and how different colleagues within the organisation feed into that process is an internal matter for the council. There is no legal requirement or government guidance on how a council should be structured, how a report should be written or how different colleagues should feed into that process. Every council is structured differently. Some, for instance, won't have any specialist officers dealing with matters such as economic development, or climate change, or urban design. Others have large teams of people dealing with such matters. Those internal arrangements don't affect the requirement for councils to consider the various competing planning matters (as set out in legislation and policy).

With the above in mind, we make internal decisions about how we consider different subjects as part of the consideration of planning applications. Some matters might be technical or specialist (such as archaeology) and in those instances, we might feel it appropriate to obtain a written comment from our internal specialist to help the case officer. In other instances, the matter is less specialist, but nevertheless there will be an internal discussion between colleagues to make sure the case officer understands the various competing perspectives. One such example might be where we interpret planning policy where officers regularly have internal discussions about the weight that might be attached to a certain policy or document. We rarely seek written comments in those types of situations as we strive for greater efficiency and seek to provide clearer and more simple officer reports.

Economic development and regeneration considerations are another matter where a formal comment is rarely necessary. That might not always be the case if the case officer and/or other colleagues feels the matter is technical or complex and a written comment could be obtained. However, that is an internal matter for the team to consider amongst themselves. For most situations, the case officer will have internal discussions with colleagues and will set out issues that they consider to be relevant in the appropriate section of the report.

You have referred to a FOI request, and I am not surprised that there might have been times in the past where comments have been provided by internal consultees. We have been reviewing our internal consultation arrangements during 2025, seeking to reduce the number of non-statutory internal consultations and making responses more concise, more consistent and easier to understand. These changes will take time to fully embed. Just because there might have been instances in the past where the case officer has asked for a written comment from a colleague, that doesn't mean this is necessary or appropriate in future situations. The legal and/or policy requirement for the council (via the case officer) to consider relevant planning matters is unaffected by our internal processes.

We have also been reviewing our officer report template to provide a better structure and more consistency to report writing across our different committees. I am hopeful that this will make it easier for councillors and for the public to understand where to look to find the case officer's views on certain planning matters. This was introduced towards the end of 2025 and again it will take a little time for the officers to get used to the new ways of working.

I hope this helps to answer your queries.

Kind regards,

Nic Thomas
Director – Planning, Economy and Regeneration

Wiltshire Council

Tel: 01225 713283

Email: nic.thomas@wiltshire.gov.uk

Web: www.wiltshire.gov.uk

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

Sent: 18 December 2025 13:50

To: Thomas, Nic <Nic.Thomas@wiltshire.gov.uk>; Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>

Subject: FW: CAS-6686-EIR-Economic Development input on planning applications

Dear Nic and Councillor Foster

Melksham Without Parish Council writes in relation to Wiltshire Council's stated position that the Economy and Regeneration Team does not provide public comments on individual planning applications. The Parish Council acknowledges the explanation provided by Wiltshire Council in its response to our FOI (below) that this approach is intended to support a corporate "One Council" position and to avoid individual service comments potentially undermining the overall officer assessment, including at committee or in any subsequent appeal proceedings.

The Parish Council notes, however, from a review of consultation records, that there appear to be at least 5 instances in 2025 where comments attributed to the Economy and Regeneration Team, or officers within that service, have been recorded after the policy change was made. The Parish Council would be grateful for clarification as to whether these entries represent historic exceptions, a different form of internal consultation being recorded for transparency, or a change in practice over time.

The Parish Council fully recognises that responsibility for the assessment of planning applications rests with the Development Management case officer, who must balance a range of material considerations in reaching a recommendation. As economic impacts — including employment creation or loss and business retention — are material planning considerations where relevant, the Parish Council seeks confirmation of how Wiltshire Council ensures that such matters are properly and transparently addressed within officer reports.

In particular, the Parish Council would welcome confirmation that, where economic impacts are relevant to an application, the officer's report will include a clear assessment of economic considerations (whether as a discrete section or clearly identified within the overall analysis), setting out how those impacts have been taken into account and weighed in the planning balance.

This clarification would be helpful in light of Planning Inspectorate expectations, which focus on whether all relevant material considerations have been identified, assessed, and transparently weighed in the officer's reasoning, rather than on the Council's internal consultation arrangements. The Parish Council understands

that clear acknowledgment and assessment of economic impacts within officer reports, even where such impacts are ultimately outweighed by other considerations, assists decision-makers and strengthens the Council's position at appeal.

The Parish Council raises this matter in the interests of clarity, transparency, and good planning practice, and not as a challenge to Wiltshire Council's internal management arrangements.

Melksham Without Parish Council looks forward to your response.

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

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Want to keep in touch?

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

On X: [@melkshamwithout](#)

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

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From: Information Governance <InformationGovernance@wiltshire.gov.uk>

Sent: 08 December 2025 12:29

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

Subject: RE: CAS-6686-EIR-Economic Development input on planning applications

Dear Teresa Strange

Request for Information - Environmental Information Regulations Case ID CAS-6686

Thank you for your request for information received on 13/11/2025, in which you asked for the following information:

- *When was the decision made to change your procedures so that that Economic Development no longer comment on individual planning applications?*
- *What was the trigger, justification and reason for reviewing and changing your procedures so that that Economic Development no longer comment on individual planning applications?*
- *When and why was the decision made for Economic Development to not comment on application PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham?*
- *How many and which applications have received comments from Economic Development since that date?*
- *How many and which applications have not received comments from Economic Development since that date?*

Under the Environmental Information regulations 2004 (EIR) the Council is obliged to make environmental information, that it holds, available on request.

I can confirm that Wiltshire Council holds the information you have requested, however **Regulation 6 (1) (b)** removes the obligation to provide you with some of the information as it is publicly available and easily accessible to you.

- When was the decision made to change your procedures so that that Economic Development no longer comment on individual planning applications? – **A verbal operational decision was made in 2024 and applied more formally in 2025.**
- What was the trigger, justification and reason for reviewing and changing your procedures so that that Economic Development no longer comment on individual planning applications? - **Our economy and regeneration service merged with our planning service to become one Directorate. This was an important step in making sure our approach to supporting economic development and regeneration activity is aligned across our different functions. This also allows a more co-ordinated approach to making sure that we protect the historic and natural environment and the amenity of local residents, providing more joined up advice to stakeholders.**

The planning application process for the PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage application has involved assessing a range of issues and opinions to arrive at a recommendation that can be fully justified and defended if we end up in an appeal situation. It is important that individual services or officers are not put in a difficult position to express opinions that might not align with the officer's overall view and that might undermine the officer's case either at committee or in any subsequent appeal proceedings. This is not in the spirit of our One Council approach, can affect the council's reputation, and could expose the taxpayer financially in the event of a costs claim by an appellant. For this reason, we have a clear position that our economy and regeneration team does not express views on individual planning applications.

Our officer assessment of planning applications is a matter for the Development Management case officer, who balances a range of competing issues. They work closely with our economy and regeneration colleagues where they need to better understand the benefit of business retention and employment opportunities so this can be considered alongside the range of other matters.

- When and why was the decision made for Economic Development to not comment on application PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham? - **No information held. A verbal operational decision was made in 2024 and applied more formally in 2025.**

- How many and which applications have received comments from Economic Development since that date? - **This information is excepted by virtue of Regulation 6(1)(b). All applications and comments on applications are held on the public website: [Planning and building control - Wiltshire Council](#).**
- How many and which applications have not received comments from Economic Development since that date? – **This information is excepted by virtue of Regulation 6(1)(b). All applications and comments on applications are held on the public website: [Planning and building control - Wiltshire Council](#).**

If you are dissatisfied with the response to your request you can ask for a review of the handling of your request for information. Details of the complaints procedure are below.

Regards,
Karen

Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Environmental Information Regulations Complaints and Review Procedure

Any person who has requested information from Wiltshire Council which has been dealt with under the Environmental Information Regulations is entitled to make a complaint and request an internal review of the handling of their request if they are dissatisfied with the response they have received.

Requests for review of an Environmental Information Regulations request should be made, in writing, which includes email, to:

Freedom of Information and Records Lead
Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Please include the Case ID number, the date of your request and details of why you are asking for a review. Requests for a review should be brought to our attention within 40 working days of our response to your request.

Any request for a review will be acknowledged in writing confirming the reasons for the review. The review will be allocated to someone who is independent of the original decision. Regulation 11(4) allows a maximum of 40 working days to respond to a complaint however, the person conducting the review will set a target date for a response with the intention to complete the review within 20 working days. The reviewer will conduct a full review of the handling of the request for information and the decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case taking into account any matters raised by the requester.

On completion of the review the reviewer will contact the requester with the result of the review. If the requester is still dissatisfied with the council's handling of their request they should contact the Information Commissioners Office (ICO). The ICO can be contacted using the following details:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel; 0303 123 1113 (local rate)
01625 545 745 (national rate)
<https://ico.org.uk/global/contact-us/contact-us-public/>

From: Information Governance
Sent: 13 November 2025 10:32
To: 'Teresa Strange' <clerk@melkshamwithout-pc.gov.uk>
Subject: CAS-6686-EIR-Economic Development input on planning applications

Dear Teresa Strange

Freedom of Information Request Case ID CAS-6686

Thank you for your request for information received on 13/11/2025 in which you asked for the following information:

- When was the decision made to change your procedures so that that Economic Development no longer comment on individual planning applications?
- What was the trigger, justification and reason for reviewing and changing your procedures so that that Economic Development no longer comment on individual planning applications?
- When and why was the decision made for Economic Development to not comment on application PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham?
- How many and which applications have received comments from Economic Development since that date?
- How many and which applications have not received comments from Economic Development since that date?

Your request is being processed under the provisions of the Freedom of Information Act 2000 and you will receive a response within 20 working days of receipt of your request.

Regards,

Karen
Information Governance Officer
Legal & Governance
Wiltshire Council
E-mail: informationgovernance@wiltshire.gov.uk

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 12 November 2025 17:36
To: Information Governance <InformationGovernance@wiltshire.gov.uk>
Subject: FOI request from Melksham Without Parish Council

Dear Wiltshire Council

Please take this email as a request for information from Melksham Without Parish Council, under the Freedom of Information Act.

- When was the decision made to change your procedures so that that Economic Development no longer comment on individual planning applications?
- What was the trigger, justification and reason for reviewing and changing your procedures so that that Economic Development no longer comment on individual planning applications?
- When and why was the decision made for Economic Development to not comment on application PL/2024/11426 Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham?
- How many and which applications have received comments from Economic Development since that date?

- How many and which applications have not received comments from Economic Development since that date?

With many thanks,

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

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Draft Heads of Terms for Section 106 Agreement

Site: Land off Corsham Road, Whitley, Melksham, Wiltshire

LPA Reference: PL/2024/09725

Proposal: Outline planning application (with all matters except access reserved) for up to 22 dwellings, new access off Corsham Road, public open space, drainage and associated works

Applicant: Mr Clinton Dicks

Local Planning Authority: Wiltshire Council

Date: 16th December 2025

1. Introduction

These Draft Heads of Terms set out the planning obligations proposed to be secured through a Section 106 Agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), in connection with the above development proposal.

The obligations reflect discussions with Wiltshire Council and are subject to refinement and agreement prior to completion of the formal Section 106 Agreement.

2. Affordable Housing

- **Provision:** 40% of the total number of dwellings to be provided as affordable housing.
- **Tenure mix and type:** To be agreed with the Council's Affordable Housing Officer at Reserved Matters stage, in accordance with the Council's adopted affordable housing policies and SPD.
- **Delivery:** Affordable housing units to be provided on-site and transferred to a Registered Provider approved by Wiltshire Council.
- **Occupation:** Affordable dwellings to remain affordable in perpetuity, subject to the provisions of the Housing Act 1985 and 1988.

3. Public Open Space and Public Rights of Way

- **Kissing Gates Contribution:**
£1,800 towards the installation of two kissing gates in the vicinity of the site, to improve public access.
- **Public Right of Way (MELW85) Contribution:**
£2,000 towards drainage improvements and the installation of a raised path through the gateway section of Public Right of Way MELW85.

4. Transport and Highways

- **Bus Stop Improvements Contribution:**
£25,000 towards improvements to the two existing bus stops serving Corsham Road, to include new shelters, raised kerbs and real-time information displays, as appropriate.
- **Waste and Recycling Contribution:**
£2,222 towards the provision of household waste and recycling containers for the new dwellings.

5. Indexation and Payment Triggers

- All financial contributions to be index-linked from the date of the Section 106 Agreement to the date of payment using the relevant indices (e.g. BCIS or CPI as appropriate).
- Payment triggers to be agreed, but generally expected to be:
 - 50% prior to occupation of the 10th open market dwelling; and
 - 50% prior to occupation of the final open market dwelling, unless otherwise agreed with the relevant service provider.

6. Legal and Administrative Provisions

- The developer to pay the Council's reasonable legal and monitoring fees associated with the preparation, execution, and monitoring of the Section 106 Agreement.
- The obligations shall bind the land and be enforceable by Wiltshire Council as Local Planning Authority.
- The Section 106 Agreement will include standard clauses relating to notices, mortgagee exclusion, and variation/discharge under Section 106A of the Act.

7. Summary of Financial Obligations

Obligation	Amount	Recipient / Purpose
Waste & Recycling Containers	£2,222	Wiltshire Council - waste services
Kissing Gates	£1,800	Public access improvements
PROW MELW85	£2,000	Drainage and path improvements
Affordable Housing	40%	On-site provision
Bus Stop Improvements	£25,000	Highways/transport
Total (excluding affordable housing)	£31,022	—

9. Next Steps

These Heads of Terms are provided for discussion and agreement with Wiltshire Council prior to the drafting of the formal Section 106 Agreement by the Council's Legal Services team.



Joint Melksham Neighbourhood Plan 2

2020 – 2038

Referendum Version

AGENDA ITEM 08g NHP Policy 7.5 Middle Farm



MELKSHAM
NEIGHBOURHOOD
PLAN

Land at Middle Farm, Corsham Road, Whitley

Policy 7.5: Allocation of Land at Middle Farm, Corsham Road, Whitley

The 3-hectare plot of land at Middle Farm, Corsham Road, Whitley as identified in figure 9a is allocated for development of about 55 dwellings including affordable and accessible housing and bungalows, and 1 hectare of buffer landscape and open space.

A single comprehensive masterplan, phasing and delivery strategy for the development must be prepared, and then approved by the Local Planning Authority, as part of, or 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. Detailed Planning applications must be in accordance with the approved

masterplan.

Development proposals for the site will:

Heritage

1. Be informed by a proportionate heritage assessment approved by Wiltshire Council.
2. Protect the setting of neighbouring listed buildings, Whitley House and barn (Grade II), in conformity with JMNP2 Policy 21.
3. Investigate the presence and significance of archaeological remains and avoid high value remains where preservation in situ is to be required.

Landscape, Green and Blue Infrastructure and Biodiversity

4. Be informed by arboriculture, landscape and ecology surveys and an approved management and

construction management plan to secure the protection of existing and enhanced landscape features, priority species and ecology within the site.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space of about 1 hectare that minimises impacts on rural openness and tranquillity, protects existing trees, contributes positively to resident health and wellbeing and increases on-site tree canopy cover by 20% in accordance with JMNP2 Policies 12, 14, 17 and 18.

6. Deliver a minimum 10% net gain in on-site biodiversity.

Design

7. Be of a layout and form that minimises visual impacts and safeguards the amenities of neighbouring residents.

continued overleaf

8. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including "Buildings for a Healthy Life" (Homes England), and the Wiltshire Design Guide (2024).

9. Be of a distinctive high quality design, appearance and materials in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023).

10. Address climate change through mitigation and adaptation and contribute to Wiltshire Council's carbon neutrality ambitions by including a significant use of low-carbon and renewable energy technologies, the re-use of the existing built fabric, and the application of the energy hierarchy.

Flood Risk

11. Be supported by a proportionate flood risk assessment and strategy.

12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and prevent and where possible reduce flood risk to neighbouring land where it relates to the allocation site.

Access and Movement

13. Provide a vehicular, pedestrian and cycle access from Corsham Road.

14. Provide safe and convenient walking and wheeling connections to existing pavements in Corsham Road and the existing Public Right of Way through the site.

15. Fund a new pedestrian crossing of Corsham Road to adoptable standard.

16. Protect and enhance the existing Public Right of Way along the site's northern boundary with connections to on-site public open space provision in conformity with JMNP2 Policy 11.

17. Implement residential and employee vehicle and cycle parking in conformity with adopted Wiltshire Council parking standards.

18. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 Policy 4.

Infrastructure

19. Make appropriate and relevant financial contributions to infrastructure, which may include proportionate contributions to:

- **Early years, primary and secondary education.**
- **Off-site healthcare capacity to meet the needs created by the development.**
- **Measures to positively support walking, wheeling and public transport use.**

Land at Middle Farm, Corsham Road, Whitley

The reason for the policy

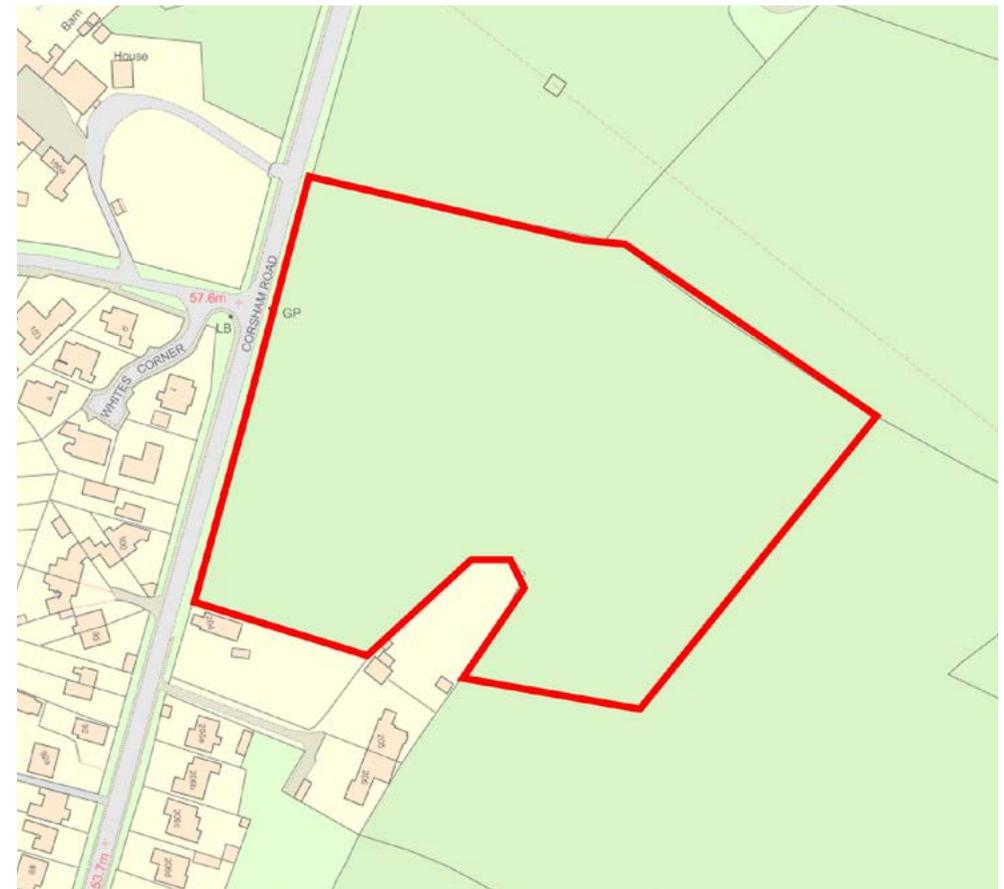
4.8.47 JMNP1 allocated 1.6 hectares of land at Middle Farm for development of about 18 dwellings immediately to the north east of Whitley settlement boundary. The JMNP1 allocation is replaced and updated with a new allocation site of around 3 hectares. This incorporates all of the previously allocated c1.6 hectares of land and adds a c1.5 hectare area to its east. The allocation provides capacity for approximately 55 dwellings and 1 hectare of buffer landscape and open space.

4.8.48 The overall allocated area is confined to the redline area in order to minimise landscape and visual impacts that were given significant weight in the assessment of suitability of the site.

4.8.49 33% of the allocation site is to be retained as green infrastructure and buffer landscape. This will significantly reduce the extent of housing development and soften views from the countryside, also strengthening the visual separation between Whitley and the nearby electricity sub-station and provide enhanced biodiversity and amenity for residents.

4.8.50 The allocation site is well-located to enable walking and cycling to local facilities and public transport stops and will utilise a single access point onto Corsham Road, together with providing

Figure 9a: Land at Middle Farm (approximate area / not to scale)



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new pedestrian facilities on the busy road as part of the allocation requirements. Coordinated planning of both sites enables local housing needs to be met within an efficient use of the site. Single ownership of both sites enables this coordinated approach.

4.8.51 The site is allocated for the development of two, three and four bedroom dwellings, addressing identified housing needs within an efficient use of the site. This reflects the character of smaller houses similar to existing development in Whitley.

4.8.52 In conformity with adopted Wiltshire Development Plan policy, housing will include at least 16 Affordable Homes. Housing types will be required to meet the specific local housing needs of Shaw and Whitley. In particular it will provide smaller and accessible homes and bungalows.

4.8.53 The site owner has committed to providing bungalows within the housing mix and 10% of the market housing designed to be accessible to wheelchair users, above emerging Local Plan standards.

4.8.54 The updated allocation continues to require the provision of a new pedestrian crossing facility and footway connections to link into the existing pavement along Corsham Road.

Teresa Strange

From: Vaughan Thompson <vaughan@placestudio.com>
Sent: 20 August 2025 13:44
To: Teresa Strange
Subject: Whitley Middle Farm Bungalows

Follow Up Flag: Follow up
Flag Status: Flagged

Teresa

I stumbled on this in the BBC local news and immediately connected it with Middle Farm allocation that prioritises bungalows. These are potentially exemplars that could be models for the site.

Vaughan

Swindon Borough Council Social Media Post

“This bungalow has taken so much stress away from us... to help our son live the best life he can.”

Three brand-new accessible bungalows in Ashley Close, Walcot, are now ready for residents. Each has step-free interiors, wider doorways, wet rooms, adjustable-height kitchen counters, private gardens, and off-road parking, with solar panels and air source heat pumps to keep running costs low.

Amber and her partner Claire (pictured) are among the first to move in, along with their young children. Their son lives with Duchenne muscular dystrophy, a progressive muscle-wasting condition that made their previous home a constant challenge. Stairs, getting in and out of the bath and even moving between rooms were becoming harder as his mobility needs increased.

Their new bungalow removes those barriers, giving him a safe, accessible space to grow up in and giving Amber and Claire peace of mind that their home will continue to meet his needs in the future.

Built on unused council land by local firm R J Leighfield & Sons Ltd, and part-funded through developer contributions and Right to Buy receipts, the project supports a Fairer, Greener, Better Swindon by creating homes that offer safety, independence, and strong foundations for residents.

To:	Isobella Wise	From:	Drainage Team
------------	---------------	--------------	---------------

Planning App Ref:	PL/2025/08987
Service Ref:	Drainage
Date:	02/01/2026

PROPOSAL

Outline planning application with all matters reserved except for access for the erection of 2 No. self-build plots and associated works.

SITE LOCATION

Land at First Lane, Whitley, SN12 8RL

SUMMARY OF THE CONSULTEE POSITION

Object	
Holding Objection: Further information required	
Support	
No comment	
No objection	
No objection subject to conditions	X
Consultation not required	

APPLICATION DOCUMENTS REVIEWED

- Application Form
- Flood Risk Assessment
- Illustrative Master Plan
- Location Plan
- Parameter Plan
- Planning, Design and Access Statement

ASSESSMENT OF THE PROPOSAL

Context

In planning terms, flood risk refers to the potential for development to increase the likelihood or severity of flooding on-site or elsewhere, while drainage considerations relate to the capacity of the site and surrounding infrastructure to manage surface water runoff in a sustainable and effective manner.

The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

Assessment

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.

The application proposals are in outline and comprise 2 no. self-building detached residential properties with parking areas.

The proposed development manages surface water through combined collection, storage, and controlled discharge. Rainwater from roofs, driveways, and roads is first captured at source, with rainwater butts provided for reuse. Permeable paving is used for roads and driveways, allowing water to infiltrate and store within a tanked sub-base, providing approximately 100 m³ of attenuation across two zones. Flow is controlled using orifice plates to restrict discharge to 0.5 l/s per zone, which provides betterment over greenfield rates and meets local policy requirements. A swale on the western side intercepts overland flows and conveys water to the existing on-site ditch, which then discharges into South Brook, a natural watercourse. The design includes a 45% climate change allowance and urban creep factor. Overall, the strategy is robust and sustainable, though confirmation of ditch capacity and detailed maintenance plans should be requested before final approval.

RECOMMENDATION

No objection subject to the following conditions

- 1. No development shall take place until a surface water drainage strategy, complying with Wiltshire Council requirements, NPPF, PPG, and the National Standards for SuDS, has been submitted to and approved in writing by the Local Planning Authority.**

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

- The applicant shall submit detailed information on all proposed rainwater reuse measures, including their location, capacity, integration within the drainage layout.
- A hydraulic capacity assessment of the receiving ditch shall be submitted to confirm that it can accommodate the proposed restricted discharge rate without causing downstream flooding or erosion; this can be done through comparing the pre and post development discharge rates to the watercourse to demonstrate that there has been no increase.
- Prior to commencement of development, the applicant shall submit detailed hydraulic calculations for the proposed swale. These calculations must demonstrate that the swale provides sufficient attenuation storage to meet the required discharge rates (including 1 in 30-year and 1 in 100-year + climate change events). In addition, the applicant shall identify and provide safe overland flow routes for exceedance events that go beyond the design storm capacity, ensuring that any excess surface water is directed away from buildings and critical infrastructure to prevent uncontrolled flooding.
- The access to the site is predicted to flood, therefore in line with the National Planning Policy Framework, an emergency plan needs to be agreed with Wiltshire Council. Guidance on the preparation of an emergency plan can be found [here](#).
- The applicant shall submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features) over the lifetime of the development.

INFORMATIVES

- 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.

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.

Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere.

RELEVANT PLANNING POLICY & GUIDANCE

National Planning Policy Framework (NPPF) [NPPF December 2024 Link](#)
Planning and Flood Risk (Paras 170–182)

Wiltshire Core Strategy – Adopted January 2015 [Wiltshire Core Strategy Link](#)
Core Policy 67 requires that all new development must address flood risk from all sources and not increase flood risk elsewhere. It supports the use of Sustainable Drainage Systems (SuDS) and requires that developments demonstrate how surface water will be managed sustainably.

Wiltshire Local Plan (emerging) [Local Plan Review Link](#)
Development must avoid high flood risk areas using the sequential approach. Proposals require a Flood Risk Assessment, Surface Water Drainage Strategy, and Groundwater Assessment where relevant. All schemes must include Sustainable Drainage Systems (SuDS), with major developments achieving a 30% reduction in runoff compared to greenfield rates, following the surface water discharge hierarchy.

Culverting and building over watercourses is discouraged, and natural drainage features should be retained or restored. Drainage strategies must ensure safety during extreme flood events (1-in-100-year + climate change) and provide safe access/egress. SuDS should also deliver biodiversity, amenity, and water quality benefits.

Supplementary Planning Documents

Wiltshire Council Drainage Betterment Strategy (2024) [SPD Link](#)
This technical guidance outlines expectations for surface water discharge hierarchy, attenuation, exceedance routes, water quality, and post-development monitoring.

Wiltshire Design Guide (March 2024) [SPD Link](#)
Includes principles of good design, including integration of SuDS and flood resilience.

Other Relevant Policies and Guidance

Planning Practice Guidance (PPG) – Flood Risk and Drainage [Guidance Link](#)
Covers detailed expectations for flood risk assessments, SuDS design, discharge hierarchy, sequential testing and climate change allowances.

Wiltshire SFRA (2024) [SFRA Link](#)
This document underpins the Sequential and Exception Test application and provides site screening evidence.

Section 19 Flood Investigation Reports [Section 19 Reports Link](#)

These documents summarise investigations into significant local flood incidents and establish what caused the flooding, how authorities responded, and actions needed to prevent future floods.

National Standards for Sustainable Drainage Systems (SuDS) June 2025 [Guidance Link](#)

Establishes mandatory criteria for runoff destination hierarchy, interception, flood resilience, water quality, amenity, biodiversity, and long-term maintenance for all new developments in England.

SuDS Manual (CIRIA C753)

This document set outs design principles, especially where attenuation, exceedance routing, and water quality are discussed.

Infiltration drainage design must be supported by ground investigations, including infiltration testing in accordance with *British Research Establishment (BRE) Digest 365 – Soakaway Design*, and groundwater level monitoring that accounts for seasonal variation.

Teresa Strange

From: CAWS <whitley.and.shaw@gmail.com>
Sent: 05 January 2026 17:20
To: Foster, Adrian
Cc: Teresa Strange; Thorn, Ian; phil.alford@wiltshire.gov.uk; nick.holder@wiltshire.gov.uk; andrew.griffin@wiltshire.gov.uk; MATHEW, Brian (MP); sarah.gibson.mp@parliament.uk; roz.savage.mp@parliament.uk; CAWS; Atworth Clerk; Phil Alford; Peter Richardson
Subject: Re: Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

Dear Cllr Foster

Thank you for your email.

As I mentioned previously, I will not be able to attend tomorrow. However I am grateful for your comments regarding your request to the Planning Team and the confirmation that Cabinet will consider that response when it meets. As all that is now in progress following my email of 29/12/2025, any statement I might make in the public participation tomorrow would be largely redundant anyway.

CAWS submitted its Relevant Representation on 02/01/2026 and I know MWPC plans to submit before the deadline too.

On a related matter regarding Cumulative Impact, I would be remiss not to mention the public consultation on the Brocklease BESS which closes on 12 September 2026 (PL/2025/05552). By way of scale, the proposed Brocklease BESS (450 MW / 1,800 MWh comprising 216 containers) is larger in both total stored energy and container count than the Battery Energy Storage System as part of the Lime Down Solar Park Development Consent Order. Obviously your meeting tomorrow is rightly focussed on Lime Down, but the Brocklease (near Neston) BESS is a component of the cumulative impact issues CAWS are concerned about and so if you are able to weave a short Cumulative Impact reference to Brocklease into the discussion I am sure residents in Melksham, Neston, Atworth, Shaw, Whitley, Beanacre and Gastard et al would be appreciative.

Kind Regards

Peter Richardson
CAWS Chair and Parish Councillor

On 4 Jan 2026, at 21:19, Foster, Adrian <Adrian.Foster@wiltshire.gov.uk> wrote:

Dear Teresa,
Stop Lime Down are going to attend the Cabinet meeting to make representations and Caws and the Parish council are welcome to attend also, as they are welcome to make representation to the Planning Inspector, which both Stop Lime Down and Wiltshire Council will be.

Cllr Adrian Foster

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

Sent: 03 January 2026 15:48

To: Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>

Cc: Thorn, Ian <Ian.Thorn@wiltshire.gov.uk>; Alford, Phil <Phil.Alford@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Griffin, Andrew <Andrew.Griffin@wiltshire.gov.uk>; MATHEW, Brian (MP) <brian.mathew.mp@parliament.uk>; sarah.gibson.mp@parliament.uk; roz.savage.mp@parliament.uk; CAWS <whitley.andshaw@gmail.com>; Atworth Clerk <atworthclerk@gmail.com>; Phil Alford <phil.alford@melksham-tc.gov.uk>; CAWS <whitley.and.shaw@gmail.com>; Peter Richardson <peter.richardson@melkshamwithout-pc.gov.uk>

Subject: RE: Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

Dear Cllr Foster

Thank you for your reply to Peter Richardson, Chair of CAWS (Community Action: Whitley & Shaw).

As you may be aware, Peter is also a Melksham Without Parish Councillor, representing the Beanacre, Shaw, Whitley and Blackmore Ward.

For clarity, I write to confirm that Melksham Without Parish Council fully endorse and support the comments made by CAWS on the Lime Down application.

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

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Want to keep in touch?

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

On X: [@melkshamwithout](#)

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

From: Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>
Sent: 01 January 2026 16:50
To: Phil Alford <phil.alford@melksham-tc.gov.uk>; CAWS <whitley.and.shaw@gmail.com>
Cc: Thorn, Ian
<Ian.Thorn@wiltshire.gov.uk>; phil.alford@wiltshire.gov.uk; nick.holder@wiltshire.gov.uk; andrew.griffin@wiltshire.gov.uk; MATHEW, Brian (MP)
<brian.mathew.mp@parliament.uk>; sarah.gibson.mp@parliament.uk; Teresa Strange
<clerk@melkshamwithout-pc.gov.uk>; roz.savage.mp@parliament.uk; CAWS
<whitley.andshaw@gmail.com>; Atworth Clerk <atworthclerk@gmail.com>
Subject: RE: Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

Dear Peter,

I can assure you that the Councils previous administration and the present one are as one in believing this planning proposal is totally inappropriate.

I am assured by our planning team that they have to give a technically correct and defensible response and have taken legal advice on information they have and what the response they should make (given the knowledge that we as an administration whole heartedly against this application). We are committed to working with both the objectors and applicants, to that end we have met with the Stop Lime Down campaigners on many occasions and although invited the applicants, they have declined to attend.

We are meeting as a cabinet to discuss this application and some proposed amendments to our response following recommendations by Stop Lime Down. I will ask the Planning team to comment on your recommendations and ask the cabinet to consider them, following constructive responses from our planning department and legal advisers.

Kind regards

Adrian Foster

Cllr Adrian Foster

From: Phil Alford <phil.alford@melksham-tc.gov.uk>
Sent: 29 December 2025 21:00
To: CAWS <whitley.and.shaw@gmail.com>; Foster, Adrian <Adrian.Foster@wiltshire.gov.uk>
Cc: Thorn, Ian <Ian.Thorn@wiltshire.gov.uk>; Alford, Phil <Phil.Alford@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Griffin, Andrew <Andrew.Griffin@wiltshire.gov.uk>; MATHEW, Brian (MP) <brian.mathew.mp@parliament.uk>; sarah.gibson.mp@parliament.uk; Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; roz.savage.mp@parliament.uk; CAWS
<whitley.andshaw@gmail.com>; Atworth Clerk <atworthclerk@gmail.com>
Subject: Re: Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

Some people who received this message don't often get email from phil.alford@melksham-tc.gov.uk. [Learn why this is important](#)

Dear Peter,

Thank you for this very helpful and well considered email. I would agree with you wholeheartedly. At full council and at several cabinet meetings, by the current and previous administrations it was unanimously agreed that this authority would object in the strongest possible terms to this unwanted industrialisation of the countryside.

It is now vital that this council commits fully to objecting at every level. We cannot oppose in public but then offer no meaningful resistance outside of public scrutiny. Anything less than total opposition is a betrayal of our residents and will expose our promises as hollow lip service.

Adrian- can we look again at the timeline for the submission and give officers additional time to write a more comprehensive response? Can we also work more effectively with key partners to ensure all the relevant issues are given full consideration?

Many thanks

Cllr Phil Alford
Melksham without and Shurnhold.

Sent from [Outlook for Android](#)

From: CAWS <whitley.and.shaw@gmail.com>
Sent: Monday, December 29, 2025 6:01:12 pm
To: adrian.foster@wiltshire.gov.uk <adrian.foster@wiltshire.gov.uk>
Cc: ian.thorn@wiltshire.gov.uk <ian.thorn@wiltshire.gov.uk>; Phil Alford <Phil.Alford@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Griffin, Andrew <Andrew.Griffin@wiltshire.gov.uk>; MATHEW, Brian (MP) <brian.mathew.mp@parliament.uk>; sarah.gibson.mp@parliament.uk <sarah.gibson.mp@parliament.uk>; Teresa Strange <clerk@melkshamwithout-pc.gov.uk>; roz.savage.mp@parliament.uk <roz.savage.mp@parliament.uk>; Phil Alford <phil.alford@melksham-tc.gov.uk>; CAWS <whitley.andshaw@gmail.com>; Atworth Clerk <atworthclerk@gmail.com>
Subject: Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

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

Dear Cllr Foster

I am writing on behalf of CAWS (Community Action: Whitley and Shaw) regarding the draft Wiltshire Council submission to the Planning Inspectorate (PINS) in relation to the Lime Down Solar Development Consent Order (DCO).

We are extremely concerned that, as currently drafted, the Council's submission may not robustly reflect or safeguard the interests of residents in Shaw, Whitley and Melksham, particularly in relation to fire risk, hydrology, pollution pathways and cumulative impacts. Having reviewed the draft Relevant Representation and Cabinet briefing note alongside our own detailed submission, we believe there are material gaps that require urgent scrutiny.

Our concern is also one of timing. The interval between the planned Cabinet meeting and the deadline for submission to the Planning Inspectorate allows little or no practical time to consider,

test or incorporate any material changes that may be identified. If these issues are not addressed before the Council's position is effectively finalised, there will be no meaningful opportunity to strengthen or correct the Council's stance once it has been submitted to PINS. I should also note that I am unable to take part in the public participation session on 6 January 2026 due to a pre-existing hospital appointment, which further limits the opportunity for these concerns to be raised at that stage. For these reasons, I am raising these matters directly with you now and copying relevant councillors, MPs and local representatives.

We respectfully ask that you urgently satisfy yourself that the Planning Director and his team can provide clear, evidenced answers to the following questions before the Council's position is confirmed:

Battery Energy Storage System (BESS) fire risk

1. On what technical basis does the Council conclude that there is "no evidence" that the proposed BESS presents unacceptable fire risk, given that officers state they do not hold in-house BESS fire expertise?
2. Which specific version of NFCC guidance is being relied upon in assessing the BESS design – the extant NFCC guidance (November 2022) or draft/consultation material – and how has compliance been independently verified?
3. Has the Council considered credible worst-case fire scenarios, including escalation, propagation and the implications of multiple or prolonged incidents in an area with clustered energy infrastructure?

Fire and emergency response

4. What formal advice has already been received from Dorset & Wiltshire Fire and Rescue Service, and does it address operational readiness, water demand, site access and prolonged incident management?
5. How will the Council ensure that DCO requirements to "consult" emergency responders result in enforceable safety outcomes, rather than procedural compliance alone?

Firewater contamination and hydrology

6. Has the Council assessed firewater contamination pathways from a BESS incident through Source Protection Zones, local watercourses and onward to the River Avon at Melksham?
7. What firewater containment and pollution control measures are proposed at the BESS and solar sites, and are these secured at the consent stage rather than deferred to later plans?
8. How does the Council's approach address the specific risks posed by emergency firewater discharge, as distinct from routine groundwater monitoring during construction?

Cable route through Shaw & Whitley

9. Given the acknowledged absence of formal drainage along the cable route, how has the Council assessed construction-phase risks arising from the complex hydrology of Shaw and Whitley, particularly during extreme weather events?
10. Will the Council require a construction-phase, catchment-scale hydrological and pollution risk assessment that explicitly treats Shaw and Whitley as downstream receptors?

Cumulative impacts

11. How has the Council assessed cumulative impacts and risks in Shaw and Whitley, taking into account the unusually high concentration of existing, consented and proposed energy and enabling infrastructure?
12. Does the Council accept that a site-by-site approach may be inadequate in this clustered context, and if so, how is this reflected in its submission to PINS?

These questions go to the heart of whether the Council's submission is precautionary, technically robust and defensible, and whether it genuinely reflects the lived risks faced by residents in the affected communities.

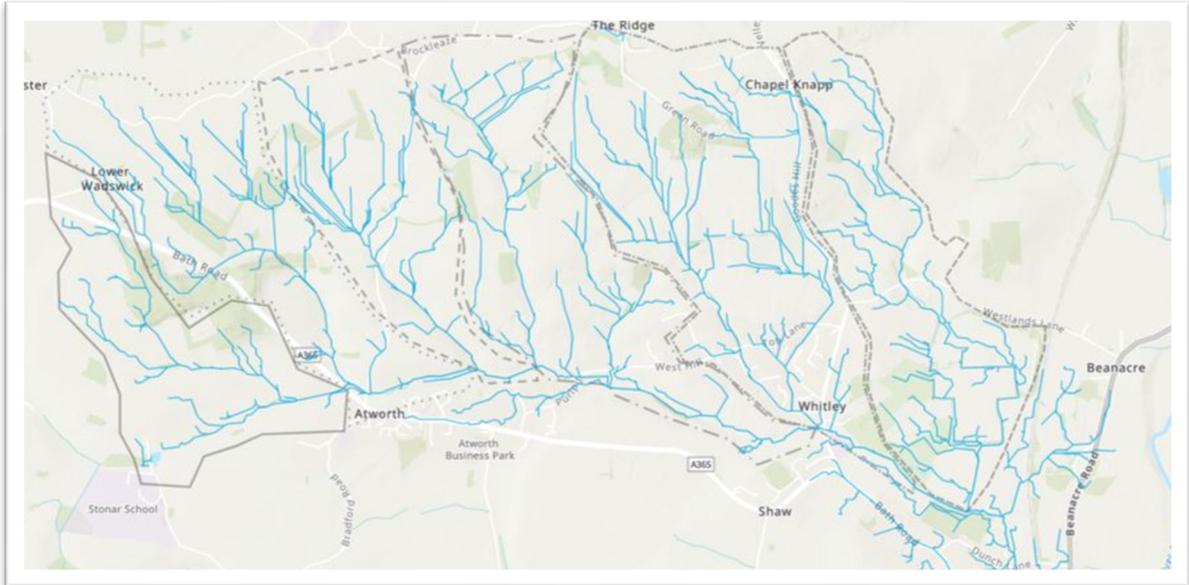
We would be grateful for confirmation that you are able to review these matters urgently with officers, and we would welcome the opportunity to provide any further clarification or technical detail that may assist you in doing so.

Thank you for your time and attention to this matter.

Yours sincerely,
Peter Richardson
CAWS Chair and Parish Councillor

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South Brook Catchment. Source: Bristol Avon Rivers Trust

RELEVANT REPRESENTATION

Lime Down Solar Park (EN010168)

Cumulative and System-Level Impacts Affecting Shaw and Whitley

1. Introduction and Status of this Representation

1.1 This Relevant Representation is submitted by Community Action: Whitley and Shaw (CAWS) in relation to the Lime Down Solar Park Development Consent Order (DCO) application (EN010168).

1.2 CAWS is a local community group representing the interests of residents of Shaw and Whitley, two rural settlements within Melksham Without Parish. CAWS's role in the Examination is to identify and evidence how the proposed development, when considered in the round and in combination with other development, affects these settlements, particularly where impacts arise indirectly, cumulatively, or beyond the Order Limits.

1.3 CAWS supports renewable energy generation and the UK's net zero objectives. This submission does not object to renewable energy in principle, nor does it assert that the Lime Down Solar (LDS) proposal would necessarily be unacceptable if assessed in isolation.

1.4 CAWS's focus on Shaw and Whitley arises because these settlements occupy a down-slope, downstream, and down-network position relative to the LDS proposal and associated infrastructure. As a result, they are particularly sensitive to:

- cumulative construction disturbance;
- surface-water exceedance and contamination pathways;
- infrastructure-enabled risk transmission; and
- constraints on emergency response and system capacity.

1.5 The purpose of this Relevant Representation is to assist the Examining Authority in determining whether the LDS application provides a sufficiently robust evidence base to assess cumulative impacts affecting Shaw and Whitley, and whether the information before the Examination is adequate to support a properly informed and legally resilient decision.

1.6 CAWS's concerns arise not solely from the LDS red-line boundary, but from connected and interacting impact pathways which extend beyond the Order Limits and operate across shared systems. These include, but are not limited to:

- hydrological pathways linking construction areas, cable routes, and BESS sites to Shaw and Whitley;
- linear construction impacts associated with the 22 km Cable Route Corridor;
- safety, contamination, and emergency response considerations arising from clustered Battery Energy Storage Systems; and
- system-level reliance on Melksham Substation as a regional energy hub.

1.7 Melksham Substation plays a critical enabling role in the LDS proposal and in the wider cluster of energy infrastructure affecting the area. Increased reliance on this single node raises issues of operational resilience, single-point vulnerability, and coordinated emergency response, with potential implications for communities connected to and downstream of that infrastructure, including Shaw and Whitley.

1.8 Taken together, these matters give rise to cumulative effects and risks that are not readily captured by site-by-site or asset-specific assessment. CAWS submits that, in the absence of a system-level understanding of how impacts accumulate, interact, and propagate through shared networks, the Examining Authority cannot be satisfied that cumulative impacts have been adequately assessed.

1.9 This Relevant Representation is therefore structured around questions of evidential sufficiency and cumulative assessment, addressing whether the LDS application enables the Examining Authority to assess the proposal's impacts on Shaw and Whitley in the round, across construction, operation, safety, contamination, emergency response, and infrastructure resilience.

1.10 CAWS is not asserting that the Applicant has failed to submit technical material altogether, nor that each individual technical document is inherently flawed in isolation. CAWS's concern is whether the Applicant's evidence base, taken together, is sufficiently integrated, cumulative, and construction-phase specific to enable the Examining Authority to understand how risks and effects interact across shared systems affecting Shaw and Whitley.

2. Strategic Planning Context and Development Plan Weight

2.1 The Joint Melksham Neighbourhood Plan 2 (JMNP2) is a made neighbourhood plan and forms part of the statutory development plan for Melksham Without Parish, including Shaw and Whitley.

2.2 Although the LDS application is determined under the Planning Act 2008, neighbourhood plan policies remain material considerations, particularly where they address:

- flood risk and drainage;
- renewable energy and associated infrastructure;
- cumulative impacts;
- landscape character and settlement separation;
- community safety, amenity, and infrastructure capacity.

2.3 CAWS submits that multiple JMNP2 policies are directly engaged by the LDS proposal and that compliance with those policies cannot currently be demonstrated when cumulative impacts are properly taken into account.

2.4 CAWS notes that the Government has also published a consultation draft of a revised National Planning Policy Framework. While this consultation document does not constitute adopted policy and carries no statutory weight for the purposes of this Examination, it signals a clear direction of travel in national planning policy towards treating flood risk as a primary spatial constraint, strengthening expectations around drainage and surface-water management, and reinforcing the need for robust consideration of cumulative impacts. This emerging policy direction is consistent with, and reinforces, the principles within the current NPPF and relevant National Policy Statements, highlighting the importance of ensuring that cumulative impacts are adequately assessed at the consent stage rather than deferred.

3. Exceptional Concentration of Energy Infrastructure

3.1 Based on the cumulative evidence assembled by CAWS, including analysis of operational, consented, proposed and reasonably foreseeable schemes, the Shaw and Whitley area represents one of the most concentrated clusters of energy infrastructure in Wiltshire and nationally.

3.2 Approximately 79 operational, consented, proposed or reasonably foreseeable energy and enabling projects affect the Melksham–Shaw–Whitley area, including:

- large-scale solar developments;
- multiple Battery Energy Storage Systems (BESS);
- substations and grid parks;
- underground cable corridors;

- enabling and reinforcement works.

3.3 This pattern of development is strategic in effect, not incremental. It represents a functionally linked infrastructure cluster, not a series of isolated schemes.

3.4 JMNP2 Policy 2 requires that renewable and associated infrastructure proposals do not result in unacceptable cumulative impacts when considered together.

3.5 The LDS application does not demonstrate that adding LDS to an already saturated infrastructure environment avoids unacceptable cumulative impacts on Shaw and Whitley.

4. Why Site-by-Site Assessment Is No Longer Adequate

4.1 The LDS Environmental Statement relies predominantly on site-specific assessment, assuming:

- stable baseline conditions;
- independent impacts;
- mitigation operating in isolation;
- sufficient capacity in shared systems such as hydrology, roads, and emergency services.

4.2 In the Shaw and Whitley context these assumptions no longer hold. Baseline conditions are already eroded, impacts interact and amplify, and multiple systems have finite capacity.

4.3 Site-by-site assessment therefore systematically underestimates cumulative risk, contrary to the intent of cumulative assessment under the EIA Regulations, the NPPF, and established guidance.

4.4 CAWS notes that the Applicant has provided additional topic appendices and plans (including Flood Risk Assessments for separate parcels, a Cable Route Construction Method Statement, BESS Fire Emissions Modelling, and a High-Level Electromagnetic Field Assessment). CAWS's submission is not that no assessment exists, but that the assessments remain predominantly asset-specific, and do not provide the integrated, construction-phase, catchment-scale and cluster-scale understanding needed to assess effects on Shaw and Whitley "in the round".

5. Hydrology and Flood Risk – A Core Cumulative Pathway

5.1 Headwater catchment sensitivity

5.1.1 Shaw and Whitley lie within an exceptionally dense headwater drainage network, with multiple small streams, ditches and ephemeral channels draining from higher ground and converging through, not around, the settlements. The map at Annex C highlights these drainage pathways that flow through Whitley and converge on South Brook in Shaw and onwards towards the River Avon in Melksham.

5.1.2 Flood risk arises primarily from surface-water exceedance, not main-river flooding, making the villages highly sensitive to up-slope land disturbance.

5.2 Construction-phase flood risk

5.2.1 The construction phase represents the period of greatest hydrological vulnerability.

5.2.2 Risks include:

- cable trenching cutting across drainage paths;
- trenches acting as preferential flow routes;
- soil compaction reducing infiltration;
- temporary haul roads intercepting runoff;
- sediment mobilisation reducing ditch and culvert capacity.

5.2.3 Flood Zone mapping does not capture these mechanisms. Reliance on Flood Zone classification alone is therefore insufficient.

5.3 Cumulative hydrological effects and evidential sufficiency

5.3.1 While individual schemes may claim “minor” impacts, multiple schemes disturbing multiple headwaters simultaneously creates a foreseeable and material flood risk for Shaw and Whitley.

5.3.2 CAWS acknowledges that the Applicant has submitted multiple Flood Risk Assessments and drainage strategies for discrete site parcels and for the Cable Route Corridor. These provide useful local context and mitigation assumptions. However, they remain predominantly asset-specific and do not provide a construction-phase, catchment-scale cumulative assessment that tests how multiple disturbed headwaters may interact, whether exceedance conditions may arise, or how downstream receptors (including Shaw and Whitley) would be affected where flow pathways converge through the settlements.

5.3.3 Flood Zone mapping does not capture the principal construction-phase mechanisms of concern (including soil compaction, trenching effects, temporary haul routes, altered flow pathways, sediment mobilisation, and reduced ditch/culvert capacity). Reliance on Flood Zone classification and site-by-site assessment is therefore insufficient to demonstrate that downstream flood risk to Shaw and Whitley would not increase during construction.

5.3.4 CAWS therefore submits that compliance with JMNP2 Policy 3, NPPF paragraphs 159–169 and EN-1 paragraph 5.7 has not been demonstrated in respect of construction-phase and cumulative surface-water flood risk affecting Shaw and Whitley.

6. Cable Route Corridor: Construction Uncertainty and Cumulative Effects

6.1 Scale and character of the Cable Route Corridor

6.1.1 The LDS proposal includes a 22 km underground Cable Route Corridor (CRC) connecting the site to Melksham Substation.

6.1.2 Although underground in operation, the CRC constitutes a linear, high-intensity construction project, with impacts arising from its length, repetition, duration, and interaction with other infrastructure projects.

6.2 Design uncertainty and deferral

6.2.1 The final cable alignment, extent of trenchless sections, and construction methods will not be confirmed until detailed design.

6.2.2 The ES therefore relies on wide Order Limits, a 25m construction corridor, and interchangeable use of trenching and HDD.

6.2.3 This defers key decisions beyond examination and prevents a clear understanding of where impacts will concentrate or repeat.

6.3 Construction intensity and haul routes

6.3.1 Works involve deep and wide trenches, continuous working corridors, HDD launch pits, heavy plant movements, and temporary haul roads.

6.3.2 The ES treats these impacts as temporary and localised, but does not assess their combined effect when repeated along the full 22 km corridor.

6.4 Drainage, watercourses and cumulative disturbance

6.4.1 The CRC crosses multiple watercourses and headwater systems within a flood-sensitive landscape.

6.4.2 The ES does not assess cumulative disturbance within shared catchments or the interaction of CRC works with other construction activity.

6.4.3 CAWS draws the Examining Authority's attention to relevant experience arising from National Grid's Visual Impact Provision (VIP) programme in the Cotswolds and North Wessex Downs, under which sections of overhead transmission infrastructure have been replaced with underground cable in sensitive rural landscapes. Evidence from the VIP project near Bishops Cannings, provided at Annex E, documents repeated construction-phase surface-water flooding associated with underground cable installation, including focused runoff, surcharge of drainage infrastructure, and off-site impacts beyond the immediate works area. While CAWS does not suggest direct equivalence between schemes, this experience demonstrates that underground cable works in rural headwater environments can materially alter surface-water behaviour during construction. In the context of the proposed Lime Down Cable Route Corridor and its proximity to Whitley, this precedent evidence reinforces the need for a corridor-wide, construction-phase hydrological assessment, rather than reliance on outline construction methods and site-by-site assumptions.

6.5 Corridor-wide cumulative construction effects and evidential sufficiency

6.5.1 The length, phasing and construction programme of the Cable Route Corridor mean that construction impacts do not arise from a single, isolated intervention, but from repeated and sequential works along a 22 km route over an extended period.

6.5.2 Even where a "worst case" construction scenario is assumed for an individual section, the Environmental Statement does not assess the effect of repeated worst-case conditions occurring sequentially or concurrently along the corridor, including where multiple sections intersect the same headwater catchments draining towards Shaw and Whitley.

6.5.3 The cumulative effect on downstream receptors arises not only from the magnitude of a single local impact, but from the repetition, duration and interaction of impacts across multiple locations within connected drainage systems, combined with reinstatement lag and overlapping construction activities.

6.5.4 In the absence of a corridor-wide, construction-phase cumulative assessment addressing these mechanisms, the Examining Authority cannot be satisfied that Cable Route Corridor impacts

will remain acceptable when assessed in the round, nor that impacts affecting Shaw and Whitley have been adequately identified or mitigated.

6.5.5 Against this evidential background, and in light of the risks, uncertainties and constraints arising from the complex and highly interconnected local hydrology, particularly within sensitive headwater catchments draining towards Shaw and Whitley, CAWS submits that the Applicant should have given substantive consideration to reasonable alternative cable route alignments or connection strategies. This should include alternatives that would reduce construction-phase disturbance within shared catchments, avoid repeated crossings of headwater drainage pathways, and minimise cumulative surface-water exceedance and downstream flood risk. As demonstrated by the National Grid Visual Impact Provision underground cabling project at Bishops Cannings (see Section 6.4.3 and Annex E), construction-phase surface-water flooding and off-site impacts are credible and evidenced outcomes in rural headwater environments. In the absence of a corridor-wide, construction-phase hydrological assessment and a transparent comparison of reasonable alternatives, it has not been demonstrated that the selected Cable Route Corridor represents the least harmful reasonable option in cumulative or hydrological terms

6.5.6 CAWS further submits that the continued deferral of fundamental matters — including the detailed alignment of the Cable Route Corridor, construction methods, drainage interactions, and mitigation performance under exceedance conditions — has substantive consequences for risk allocation. In a hydrologically complex, downstream-sensitive environment, deferral does not remove or reduce risk; it transfers that risk from the developer to affected communities, downstream receptors, and public services. Where construction-phase hydrological disturbance, surface-water exceedance, contamination pathways and emergency response capacity are central to the acceptability of the scheme, these matters cannot be treated as secondary details to be resolved post-consent. Their deferral prevents the Examining Authority from understanding how cumulative risks would arise, interact and be managed in practice, and therefore from being satisfied that impacts affecting Shaw and Whitley have been adequately assessed or reduced so far as reasonably practicable.

7. Battery Energy Storage System

7.1 Introduction and clustered context

7.1.1 The Lime Down Solar (LDS) proposal includes a large-scale Battery Energy Storage System (BESS) which, although physically located away from Shaw and Whitley, connects into the Melksham Substation, a node that sits at the centre of a highly concentrated cluster of energy infrastructure. As a result, the LDS BESS contributes to cumulative and system-level impacts arising from the intensification of energy infrastructure associated with that node, with implications for communities, environments, and emergency response systems connected to it, including Shaw and Whitley.

7.1.2 While BESS technology plays a role in the transition to low-carbon energy, it is associated with distinct fire, explosion, toxic plume, and contamination hazards, as recognised in national fire service guidance and international incident experience.

7.1.3 The impact of the LDS BESS therefore cannot be assessed in isolation. The safety case must be considered in the context of:

- clustered BESS installations (such as those near Shaw and Whitley);
- shared hydrological pathways;
- finite emergency response capacity; and

- interacting cumulative risk mechanisms.

7.2 Status of NFCC guidance

7.2.1 The Applicant relies extensively on references to “revised” or “updated” National Fire Chiefs Council (NFCC) guidance within the Outline Battery Safety Management Plan and associated documents.

7.2.2 However, the only formally issued NFCC guidance currently in force is Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services, Version 1.0 (November 2022).

7.2.3 The NFCC guidance is explicit that it is intended to:

- support safe and effective emergency response;
- inform planning decisions; and
- ensure risks are reduced so far as reasonably practicable, with public and responder safety as the primary consideration.

7.2.4 Reliance on draft, consultation, or anticipated revisions cannot displace or dilute the requirements of the extant 2022 guidance. Where departures occur, a clear, evidence-based justification is required. In several key respects, such justification has not been provided.

7.2.5 CAWS has set out its concerns regarding the adequacy, status, and application of current NFCC guidance in formal correspondence with the National Fire Chiefs Council, a copy of which is provided at Annex D. That correspondence highlights evidence of escalating and non-linear cumulative risk arising from clustered BESS development, the increasing gap between site-specific guidance and area-wide risk manifestation, and the growing tendency for developers to rely on draft or anticipated revisions to NFCC guidance to justify departures from the extant Version 1.0 (November 2022). While that correspondence is directed to the NFCC, it is material to this Examination insofar as it evidences wider, systemic concerns regarding the interpretation and application of NFCC guidance within the planning process, and reinforces the need for the Examining Authority to assess the Applicant’s safety case against formally issued guidance rather than consultation drafts or future intentions.

7.3 Site layout, spacing, and escalation risk

7.3.1 NFCC guidance states that a minimum separation distance of 6 metres between BESS units should be provided unless a competent, evidence-based fire engineering case demonstrates that reduced spacing will not increase fire propagation risk.

7.3.2 The LDS BESS layout assumes significantly reduced separation distances, with final spacing deferred to post-consent detailed design and future testing.

7.3.3 This approach:

- reverses the NFCC precautionary logic;
- relies on assumed performance rather than demonstrated outcomes; and
- leaves the Examining Authority without assurance that escalation and propagation risks are acceptably managed at the consent stage.

7.3.4 The assessment is site-specific and does not address how reduced spacing interacts with clustered BESS development, where multiple installations exist within a limited geographic area and are connected to shared infrastructure and emergency response resources.

7.4 Fire scenario assumptions and plume modelling

7.4.1 The Applicant's Fire Emissions Modelling is based on a single-container fire scenario, assuming that detection, suppression, and layout design prevent propagation beyond one enclosure.

7.4.2 NFCC guidance, by contrast, requires emergency planning to address credible worst-case scenarios, including escalation, prolonged incidents, vapour cloud release, and defensive firefighting strategies.

7.4.3 The modelling further relies on:

- 1-hour averaging periods, despite acknowledging that peak conditions may occur over shorter timescales;
- occupational exposure benchmarks for particulates rather than public-health-based thresholds; and
- incomplete background datasets for certain toxic gases.

7.4.4 While such assumptions may be defensible for a single isolated site, they are not robust when considered cumulatively, where:

- incident duration may be prolonged;
- emergency response may be delayed or resource-constrained; and
- concurrent or sequential incidents cannot be excluded.

7.5 Firewater, contamination, and hydrological connectivity

7.5.1 NFCC guidance requires explicit consideration of water supply, firewater runoff, and environmental protection, including containment and management of contaminated water.

7.5.2 CAWS has demonstrated that Shaw and Whitley sit within a highly interconnected headwater drainage network that feeds into the River Avon at Melksham. Surface water, firewater and any associated contaminants released at the LDS BESS site would be conveyed via Gauze Brook into the River Avon, while South Brook, which flows directly through Shaw and Whitley, also discharges into the same river system. These shared downstream pathways create functional hydrological connectivity between the LDS BESS and Shaw and Whitley, giving rise to cumulative contamination and water-quality risks that cannot be understood or mitigated on a site-by-site basis.

7.5.3 A credible cumulative pathway therefore exists:

thermal runaway → toxic plume → contaminated firewater → headwater drainage → downstream receptors

7.5.4 The same hydrological characteristics that increase flood risk — shallow soils, rapid runoff response, connected ditches, and limited attenuation capacity — also facilitate contaminant conveyance.

7.5.5 The LDS application does not provide:

- a satisfactory catchment-scale assessment of contaminated firewater flows;
- analysis of exceedance or failure conditions during prolonged incidents; or
- assessment of how cumulative BESS development alters contamination risk beyond the Order Limits.

7.5.6 In the absence of a detailed catchment-scale contamination and water-quality risk assessment, the Examining Authority cannot be satisfied that risks to Gauze Brook, the River Avon, or connected downstream receptors have been adequately identified, assessed, or mitigated.

7.6 Policy and decision-making implications

7.6.1 JMNP2 Policy 2 requires renewable energy infrastructure not to create unacceptable safety impacts, and Policy 12 requires protection of green and blue infrastructure networks.

7.6.2 National Policy Statements EN-1 and EN-3 require decision-makers to be satisfied that energy infrastructure is safe, that risks are adequately assessed, and that impacts beyond the site boundary are properly considered.

7.6.3 The NFCC guidance constitutes an important and relevant matter in this context. Where an application departs from that guidance, or addresses it only partially or prospectively, equivalent or superior protection must be demonstrated.

7.6.4 In the present case, reliance on:

- site-specific assumptions;
- future design refinement; and
- non-binding draft guidance

does not provide a sufficiently robust basis for concluding that BESS fire, plume, contamination, and escalation risks are acceptable when considered cumulatively.

7.6.5 This approach is consistent with appeal decisions such as Pound Road, Hawkchurch (APP/U1105/W/22/3312300), which confirm that, where the scale of harm is high and receptors are sensitive, fire safety is a determinative issue and not a matter capable of resolution through post-consent conditions.

7.6.6 Further, the Department for Energy Security and Net Zero's guidance "Health and safety in grid scale electrical energy storage systems" (April 2024) confirms that planning decisions should be taken only with a complete assessment of credible worst-case risks to both the project and its surroundings, including fire, explosion, toxic gas release and contaminated runoff. Failure to grapple with this guidance, which constitutes a material consideration, would undermine the lawfulness and robustness of decision-making.

7.7 Conclusion

7.7.1 CAWS submits that the LDS application contains a material evidential gap between the requirements and principles of the National Fire Chiefs Council (NFCC) Grid Scale BESS Guidance (Version 1.0, November 2022) and the Applicant's site-led safety case, which is framed predominantly around single-container incidents and scheme-specific mitigation.

7.7.2 That gap is compounded by the fact that, although the LDS BESS is geographically distant from Shaw and Whitley, it is functionally and operationally connected to the Melksham

Substation, a node at the centre of a highly concentrated cluster of energy infrastructure. In this context, cumulative impacts arise not from proximity alone, but from the intensification of system-level risk, emergency response demand, and environmental consequence associated with that shared infrastructure.

7.7.3 The contamination and hydrological pathways arising from BESS fire and firewater runoff are set out in detail at Section 7.5 and are not repeated here.

7.7.4 In the absence of:

- a cumulative BESS major accident assessment addressing clustered and system-level risk;
- a catchment-scale assessment of contaminated firewater mobilisation and downstream receptors; and
- evidence of cluster-wide emergency response planning aligned with formally issued NFCC guidance,

the Examining Authority cannot be satisfied that BESS-related risks have been reduced so far as reasonably practicable, or that the proposal complies with national policy and guidance when impacts are assessed in the round and cumulatively.

8. Emergency Response Capacity

8.1 Rural emergency services have finite capacity. BESS incidents are prolonged and resource-intensive, including scenarios where toxic plume behaviour constrains safe access, appliance positioning or sustained deployment, further compounding response limitations within a clustered infrastructure context.

8.2 The application does not provide cumulative emergency response modelling or evidence of preparedness for clustered incidents.

8.3 Risk is therefore transferred from developers to communities and public services.

8.4 CAWS notes that information obtained through Freedom of Information (FOI) requests indicates that Dorset & Wiltshire Fire and Rescue Service (DWFRS) preparedness to respond to a BESS incident remains uncertain, notwithstanding the Applicant's stated engagement with the Service. The FOI responses indicate that detailed, site-specific operational planning, training, and resourcing arrangements for BESS incidents are either undeveloped or contingent, and that reliance is placed on evolving guidance and future engagement rather than established operational readiness. In this context, Applicant-FRS discussions cannot be treated as evidence that emergency response capacity is assured. Rather, they highlight a material uncertainty as to whether DWFRS currently has the capability, capacity, and defined operational framework to respond effectively to a prolonged or complex BESS incident within a clustered energy infrastructure environment. This uncertainty is directly relevant to the Examination, as emergency response readiness is a core component of risk acceptability and cannot be deferred beyond the consent stage.

9. Landscape, Heritage, and Settlement Identity

9.1 Assessments are largely asset-by-asset and do not address cumulative coalescence.

9.2 The cumulative effect of LDS contributes to the erosion of Shaw and Whitley's separate rural identity, engaging JMNP2 Policies 18 and 19.

10. Melksham Substation and System-Level Vulnerability

10.1 LDS further intensifies reliance on Melksham Substation as a regional hub.

10.2 No system-level resilience or cascading failure assessment is provided, contrary to EN-1.

11. Evidence Base and Cumulative Impact

11.1 CAWS's evidence demonstrates that risks are cumulative, interactive, and capacity-limited.

11.2 Failure to engage with this evidence undermines decision-making robustness.

11.3 CAWS notes that the Applicant has submitted a High-Level Electromagnetic Field Assessment concluding that predicted EMF levels are below applicable public exposure limits. CAWS does not pursue EMF as a residual health risk. CAWS's concern remains focused on cumulative system behaviour, construction-phase risk, and cluster-scale safety, environmental and emergency response capacity.

12. Requests to the Examining Authority

12.1 CAWS respectfully requests that the Examining Authority require:

- a construction-phase, catchment-scale hydrology and flood-risk assessment;
- a corridor-wide cumulative construction impact assessment;
- a cumulative BESS major accident and emergency response assessment;
- a firewater containment and contamination management strategy;
- a cumulative landscape and settlement-setting assessment;
- a cumulative public health assessment;
- a system-level resilience assessment for Melksham Substation.

12.2 CAWS further submits that any additional assessments or information required by the Examining Authority should explicitly include Shaw and Whitley within their scope, having regard to their down-slope, downstream, and down-network position relative to the Lime Down proposal and associated infrastructure. Assessments that are confined to the immediate Order Limits or the LDS site alone would not address the cumulative impact pathways identified in this Relevant Representation and would therefore be insufficient to inform a robust assessment of effects on affected communities.

12.3 CAWS further submits that, given the material hydrological sensitivity of the area and the cumulative construction risks associated with the 22 km Cable Route Corridor, the Examining Authority cannot be satisfied that the Applicant has complied with the requirement to consider reasonable alternatives. The relevance of construction-phase flood risk associated with underground cabling in rural headwater environments is demonstrated by the National Grid Visual Impact Provision project at Bishops Cannings, as set out at Section 6.4.3 and Annex E. That evidence confirms that surface-water exceedance, focused runoff and off-site impacts are credible outcomes where cable works intersect sensitive drainage networks. This evidential gap is directly relevant to Question AQ9 and reinforces CAWS's position that, without a corridor-wide, construction-phase hydrological assessment and a documented appraisal of reasonable alternatives, the Examining Authority lacks a robust basis on which to conclude that cumulative impacts have been minimised or that the proposed route is acceptable in principle.

13. Conclusion

13.1 This Relevant Representation has focused on whether the Lime Down Solar Park application provides a sufficiently robust and complete evidence base to enable the Examining Authority to assess cumulative impacts affecting Shaw and Whitley in the round.

13.2 As set out in Section 1, CAWS's concern is not the principle of renewable energy development, but whether the evidence before the Examination is sufficient to assess cumulative and system-level impacts affecting Shaw and Whitley.

13.3 The evidence presented demonstrates that Shaw and Whitley occupy a down-slope, downstream, and down-network position relative to a highly concentrated cluster of energy infrastructure. In this context, impacts arising from construction activity, hydrology, cable routes, Battery Energy Storage Systems, emergency response, and system-level reliance on Melksham Substation do not operate independently, but interact and compound.

13.4 The Environmental Statement and supporting documents assess these matters largely on a site-by-site and asset-specific basis, with key elements deferred to outline plans or post-consent stages. CAWS submits that this approach does not provide the Examining Authority with sufficient certainty to understand how cumulative effects arise, how thresholds are approached or exceeded, or how risks are managed when multiple schemes operate concurrently.

13.5 In particular, the absence of:

- a construction-phase, catchment-scale hydrology and flood-risk assessment;
- a corridor-wide cumulative assessment of cable route construction impacts;
- a cumulative BESS major accident and emergency response assessment; and
- a system-level resilience assessment for Melksham Substation

means that material questions remain unanswered at the consent stage.

13.6 CAWS submits that, without this further information, the Examining Authority cannot be satisfied that cumulative impacts affecting Shaw and Whitley have been adequately identified, assessed, and mitigated, or that the proposal complies with relevant development plan policies and national policy when impacts are considered cumulatively.

13.7 CAWS therefore respectfully invites the Examining Authority to require the additional assessments and information identified in Section 12, in order to support a properly informed, robust, and legally resilient decision on the Lime Down Solar Park application.

ANNEX A – EXAMINING AUTHORITY QUESTIONS

Lime Down Solar Park (EN010168)

Cumulative Impacts on Shaw and Whitley

A. Hydrology and Flood Risk (Construction Phase and Cumulative Effects)

AQ1

How has the Applicant assessed construction-phase hydrological impacts arising from cable trenching, haul roads, soil compaction, and temporary drainage interference on surface-water flood risk affecting Shaw and Whitley?

AQ2

Why has a catchment-scale hydrology and flood-risk assessment not been undertaken, given the exceptionally dense headwater drainage network feeding directly through Shaw and Whitley? Please refer to Annex C in responding.

AQ3

How does the Applicant demonstrate that simultaneous disturbance of multiple headwaters by different energy and enabling schemes will not result in cumulative downstream flood risk affecting Shaw and Whitley and their receiving watercourses?

B. Cable Route Corridor (CRC): Construction Uncertainty and Cumulative Impact

AQ4

The Cable Route Construction Method Statement confirms that the final cable alignment, locations of trenchless sections, and selection of construction techniques will be determined at detailed design stage. Please explain how the Examining Authority can be satisfied at the consent stage that cumulative construction impacts along the 22 km Cable Route Corridor are acceptable in principle.

AQ5

Please confirm whether any corridor-wide assessment has been undertaken to consider the cumulative effects of repeated trenching, haul road construction, HDD operations, and reinstatement along the full length of the Cable Route Corridor, and if not, why not.

AQ6

Please provide information on:

a) the anticipated duration that haul routes will remain in place along different sections of the Cable Route Corridor; and

b) how repeated compaction, use, and reinstatement effects are assessed cumulatively rather than on a section-by-section basis.

AQ7

Given the number of watercourse and drainage crossings along the Cable Route Corridor, how have cumulative effects within shared catchments been assessed, including the potential for simultaneous or sequential disturbance at multiple locations, and their implications for downstream receptors including Shaw and Whitley?

AQ8

Please identify whether construction of the Cable Route Corridor overlaps temporally or spatially with other major energy or infrastructure projects in the area, and how any resulting cumulative construction impacts have been assessed.

AQ9

Please explain what consideration has been given to reasonable alternative cable route alignments or connection strategies to Melksham Substation, including alternatives that would reduce construction-phase flood risk, drainage disturbance, or proximity to Shaw and Whitley, and how the selected route was determined to represent the least harmful reasonable option.

C. Battery Energy Storage Systems (BESS): Cumulative Fire and Major Accident Risk**AQ10**

How has the Applicant assessed cumulative BESS fire and major accident risk arising from clustered installations connected to the same grid node in the Melksham–Shaw–Whitley area?

AQ11

What assessment has been undertaken of cascading, concurrent, or sequential BESS incidents within the cluster, and how is this reflected in the safety case, including consideration of impacts on connected and downstream communities such as Shaw and Whitley?

D. Status and Application of NFCC Guidance**AQ12**

The Applicant refers to revised or updated National Fire Chiefs Council (NFCC) guidance within its Battery Safety Management Plan. Please confirm:

- a) which version of NFCC Grid Scale BESS Planning Guidance has been formally issued and was relied upon in preparing the application; and
- b) where draft or anticipated revisions have been relied upon, what weight the Examining Authority should attach to those drafts when assessing safety and emergency response compliance.

E. BESS Layout, Spacing, and Escalation Scenarios**AQ13**

NFCC Guidance (Version 1.0, November 2022) suggests a minimum separation distance of 6 metres between BESS units unless a competent, evidence-based fire engineering case demonstrates that reduced spacing will not increase propagation risk. Please provide the fire engineering justification relied upon for the proposed separation distances at Lime Down, including how that justification accounts for clustered BESS development.

AQ14

The Fire Emissions Modelling is based on a single-container fire scenario. Please explain:

- a) why multi-container escalation scenarios have been excluded; and
- b) whether prolonged or defensive firefighting scenarios have been considered, and if not, why they are not considered credible in the context of clustered BESS development.

F. Firewater, Contamination, and Hydrological Connectivity

AQ15

Please explain how the proposed firewater containment and drainage measures would perform under exceedance or failure conditions during a prolonged BESS fire, including scenarios involving heavy rainfall or delayed emergency response, and how contaminated water would be prevented from entering connected headwater drainage systems or downstream receptors, including those affecting Shaw and Whitley and the River Avon catchment.

G. Emergency Response Capacity**AQ16**

What evidence demonstrates that emergency services have sufficient capacity to respond to prolonged or concurrent BESS incidents within the Melksham–Shaw–Whitley infrastructure cluster?

AQ17

How has emergency response planning accounted for non-linear escalation of risk arising from clustered energy infrastructure, including the potential for resource saturation?

H. Landscape, Heritage, and Settlement Identity (Cumulative Effects)**AQ18**

How has cumulative visual coalescence arising from multiple energy and grid developments affecting Shaw and Whitley been assessed?

AQ19

How does the proposal comply with policies protecting settlement separation and rural identity when impacts are assessed cumulatively rather than scheme-by-scheme?

I. Grid and Substation Resilience**AQ20**

What assessment has been undertaken of system-level resilience and cascading failure risk associated with increased reliance on Melksham Substation?

AQ21

How has the Applicant considered the implications of single-node dependency for safety, reliability, and community risk?

J. Procedural Sufficiency**AQ22**

In the absence of the cumulative and system-level assessments identified above, on what basis does the Applicant consider that the Examining Authority can reach a robust, reasoned, and lawful conclusion on cumulative impacts affecting Shaw and Whitley?

AQ23 – Deferral of Fundamental Matters and Risk Allocation

The application defers key matters integral to the acceptability of the proposal — including detailed Cable Route Corridor alignment, construction methods, drainage interactions under exceedance conditions, and aspects of construction-phase mitigation — to outline plans, post-consent approval mechanisms or future engagement.

Please explain:

a) how the Examining Authority can be satisfied at the consent stage that construction-phase hydrological, contamination and safety risks affecting downstream receptors, including Shaw and Whitley, are acceptable in principle;

b) why deferral of these matters does not result in the transfer of unresolved risk from the Applicant to affected communities and public services; and

c) on what basis such deferral is considered compatible with the precautionary approach required by the EIA Regulations, NPPF paragraphs 159–169, and National Policy Statement EN-1 paragraph 5.7.

ANNEX B – POLICY FRAMEWORK

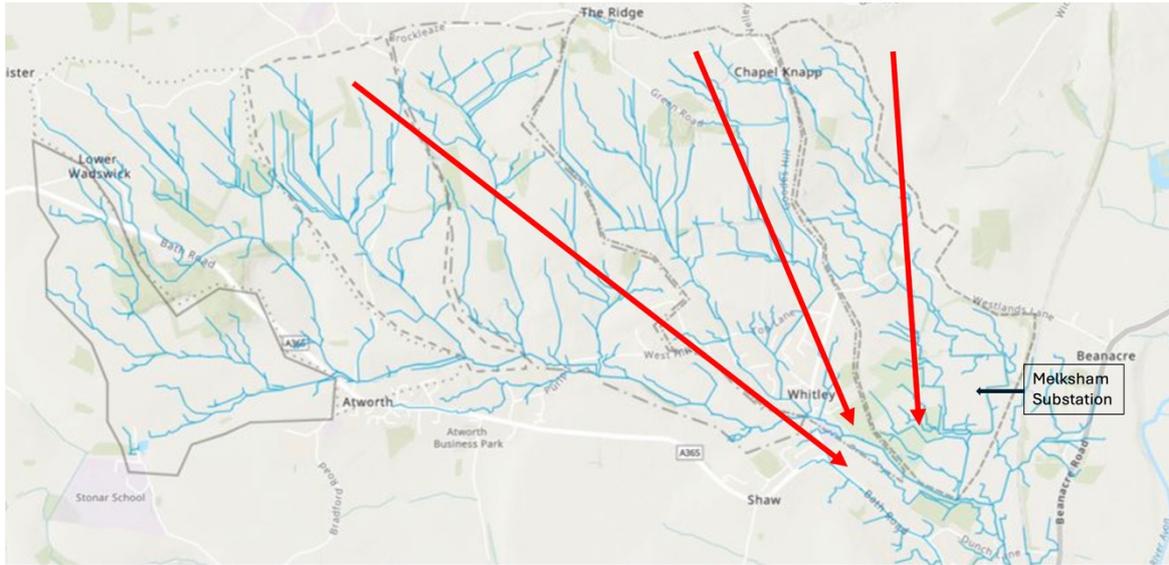
Joint Melksham Neighbourhood Plan 2 Policies 2, 3, 8, 12, 18, 19, 20

National Planning Policy Framework Paras 113, 159–169, 174–180, 185, 199–202

National Policy Statements EN-1 (4.2, 4.11, 4.14, 5.7, 5.15) EN-3 (energy infrastructure safety)

Wiltshire Core Strategy Policies 56 and 61

ANNEX C – WHITLEY HYROLOGY



Note land slopes north to south. Red arrows show the primary water flow direction. This frequently results in flooding in Whitley and Shaw.

Image source: Bristol Avon Rivers Trust

This Annex C provides a spatial illustration of the hydrological mechanisms analysed in Section 5 of this Relevant Representation. The annotated map shows the dense and highly interconnected headwater drainage network feeding Shaw and Whitley, the convergence of multiple surface-water pathways **through** the settlements, and the downstream connectivity of these flows. It visually demonstrates how construction-phase disturbance at multiple locations within the catchment has the potential to propagate through connected drainage systems and affect downstream receptors, including by facilitating the conveyance of sediment, pollutants or contaminated runoff under exceedance or incident conditions. The map is intended to support and contextualise, rather than restate, the analytical evidence set out in Sections 5.1–5.3.

ANNEX D – LETTER TO NFCC



Community Action: Whitley and Shaw (CAWS)
Lagard Farm
First Lane
Whitley
Melksham
SN12 8RL

13 December 2025

Phil Garrigan OBE KFSM, Chair
Susannah Hancock, Chief Executive Officer
National Fire Chiefs Council
71–75 Shelton Street
Covent Garden
London
WC2H 9JQ

By email: nfccadminsupport@nationalfirechiefs.org.uk

Dear Mr Garrigan and Ms Hancock,

Subject: Urgent need to strengthen NFCC guidance on Battery Energy Storage Systems in light of escalating cumulative risk and the Environment Agency’s revised position

We are writing to the National Fire Chiefs Council (NFCC) to raise serious concerns regarding the adequacy of current national fire-safety guidance for Battery Energy Storage Systems (BESS), particularly in areas experiencing intense clustering of large-scale installations. These concerns are grounded in extensive local evidence, formal Freedom of Information responses, international experience of BESS fires, and recent changes in regulatory understanding - most notably the Environment Agency’s revised national position on BESS risk.

We respectfully submit that existing NFCC guidance (Version 1.0, November 2022) is no longer sufficient, and that urgent tightening and strengthening of this guidance is now required.

1. Escalating and non-linear risk from BESS clustering

The Shaw and Whitley area in Wiltshire now represents one of the most concentrated clusters of proposed and operational BESS developments in the UK. Analysis shows that cumulative risks arising from such clustering are non-linear, escalating sharply as development density increases. These risks include fire, toxic gas release, contaminated firewater runoff, aquifer pollution, pressure on emergency services, and impacts on public safety and wellbeing.

Current NFCC guidance remains largely site-specific, yet the risks manifest cumulatively across landscapes, hydrology, and fire-service capacity, leaving a significant and growing policy gap.

2. Brockleaze BESS – a material probability of fire

The proposed Brockleaze BESS (450 MW / 1,800 MWh; 216 containers) provides a stark example. Based on established failure data, including the EPRI BESS Failure Incident Database, the probability of at least one cell failure - and therefore a serious fire - during the project lifetime is estimated at approximately 36%, equating to roughly a 1-in-2.75 chance.

Most BESS failures occur early in operational life, often within the first three years. Despite this, the Brockleaze proposal has proceeded without a site-specific fire safety plan, response plan, or cumulative fire-risk assessment, and with significant underestimation of water and containment requirements. This directly undermines the intent of existing NFCC guidance and exposes both firefighters and the public to unacceptable risk.

3. International experience confirms BESS fires are credible and severe

Recent large-scale BESS fires internationally - including Moss Landing in the United States - demonstrate that prolonged, high-consequence incidents involving toxic gas release, extreme water demand, and widespread contamination are credible and foreseeable. These events are not outliers; they are consistent with the failure characteristics of high-energy lithium-based systems operating at scale.

UK fire-safety guidance must reflect this global evidence base rather than relying on optimistic assumptions or voluntary compliance.

4. Fire and Rescue Service unpreparedness

Freedom of Information responses from Dorset and Wiltshire Fire and Rescue Service (DWFRS) confirm that no site-specific fire safety or response plans exist for any local BESS development, nor is there any assessment of cumulative risk or multi-site incidents. DWFRS has also stated that BESS operators should not rely on the fire service as the primary risk-control measure.

This reveals a systemic issue: guidance is non-mandatory, consultation is non-statutory, and emergency planning is fragmented. The result is a growing cluster of high-risk installations without a coherent emergency-response framework.

5. Developers routinely flouting NFCC guidance

Evidence from multiple planning applications demonstrates a consistent pattern of non-compliance, including:

- Understated firewater volumes and containment,
- Refusal to scale BESS layouts as recommended,
- Absence of cumulative fire-risk analysis,
- Explicit reliance on a future revision of NFCC guidance rather than compliance with the current version.

Without stronger, enforceable standards, guidance alone is proving ineffective.

6. Developers' misuse of draft NFCC guidance during consultation

We are increasingly concerned that developers are misrepresenting the status of the NFCC's ongoing consultation on revised BESS guidance, treating draft or anticipated changes as if they were already settled national policy.

In planning submissions and public engagement, developers routinely:

- Cite the NFCC consultation as justification for departing from or downplaying compliance with existing guidance,
- Present anticipated revisions as evidence that current requirements are “out of date” or overly precautionary, and
- Assert that fire and environmental risks will be “addressed in updated guidance” despite the fact that no revised guidance has yet been confirmed, adopted, or implemented.

This approach is fundamentally flawed. Consultation drafts have no formal status, do not carry regulatory weight, and cannot reasonably be relied upon to justify weaker mitigation or incomplete safety planning. Treating unfinalised guidance as “gospel” undermines both the planning system and public confidence, while placing Fire and Rescue Services in an increasingly exposed position.

More importantly, risk has not remained static during this consultation period. The concentration, scale, and capacity of proposed BESS developments have continued to increase, while the Environment Agency has now materially strengthened its national position on cumulative BESS risk - explicitly recognising non-linear escalation, contamination pathways, and the justification for restricting further approvals in saturated areas.

In this context, it is no longer credible for developers to argue that future NFCC guidance will “resolve” current safety concerns. The risk baseline has shifted, and any revised guidance must therefore be more stringent, not more permissive, than the existing version.

7. Claims regarding emerging BESS chemistries do not justify reduced fire-safety standards

We are aware that some developers now argue that emerging changes in battery chemistry - most commonly a claimed transition from lithium-ion chemistries to lithium iron phosphate (LFP) - materially reduce fire risk and therefore justify lighter regulatory or fire-safety requirements.

We see no credible evidence to support this position as a basis for national policy or operational guidance.

While different chemistries may exhibit different failure characteristics, they do not eliminate the core hazards associated with large-scale battery energy storage. LFP systems remain capable of:

- Thermal runaway under fault conditions,
- Sustained high-temperature fires once ignition occurs,
- Toxic gas release and hazardous by-products,
- Extremely high firewater demand and contaminated runoff,
- Multi-container propagation events in densely packed installations.

International incident data continues to record serious fires involving LFP systems, and there is no long-term operational evidence demonstrating that large, containerised LFP BESS installations operating at grid scale present a materially lower overall risk profile when cumulative impacts, emergency-response demands, and environmental pathways are considered.

Crucially, even if relative risk were marginally reduced at the cell level, this does not translate into reduced system-level or area-level risk in clustered environments. Increasing container counts, higher total stored energy, shared grid infrastructure, and spatial concentration all act to increase consequence severity, regardless of chemistry.

Fire-safety guidance must be chemistry-agnostic, consequence-based, and grounded in verified operational evidence. Until independent, peer-reviewed, long-term data demonstrates a clear and substantial reduction in real-world fire, contamination, and emergency-response risk at grid scale, no relaxation of standards is justified.

In short, speculation about future battery chemistry cannot be allowed to weaken present-day safety requirements, particularly in areas already experiencing high BESS density and cumulative risk.

8. Environment Agency's revised position fundamentally alters the risk landscape

The Environment Agency's 2025 Chief Scientist's report explicitly states that cumulative risks from BESS installations escalate sharply with density, that firewater runoff presents serious pollution risks (particularly in Source Protection Zones), and that restricting further approvals in saturated areas is justified.

This represents a decisive regulatory shift. NFCC guidance must now be updated to align with this position, reflecting higher consequence severity, increased likelihood of multi-site incidents, and the limits of emergency-response capacity.

9. Our request to the NFCC

We therefore urge the NFCC to:

1. Significantly tighten national BESS fire-safety guidance, moving beyond advisory language.
2. Explicitly require cumulative fire-risk assessment where clustering exists or is proposed.
3. Mandate site-specific and area-wide fire-response planning prior to consent.
4. Align guidance formally with the Environment Agency's revised position on cumulative environmental risk.
5. Clarify minimum standards for water demand, runoff containment, toxic plume management, and firefighter safety at scale.
6. Support the introduction of statutory consultation roles for Fire and Rescue Services in BESS planning decisions.

Conclusion

We support the transition to low-carbon energy, but it must not come at the expense of public safety, environmental protection, or the operational resilience of fire and rescue services. The prolonged consultation on revised NFCC guidance has unintentionally enabled developers to defer compliance, while cumulative risk has continued to rise unchecked and regulatory expectations elsewhere - most notably within the Environment Agency - have become more stringent.

NFCC leadership is now essential. Strengthened, precautionary, and enforceable guidance would materially improve safety outcomes nationwide and restore confidence that both UK evidence and international lessons are being properly addressed.

We would welcome the opportunity to engage further and to contribute constructively to the development of revised NFCC guidance.

Yours sincerely,

Peter Richardson
CAWS Chair and Parish Councillor

Copy to:

Dr Brian Mathew MP
Sarah Gibson MP
Cllr Philip Alford

ANNEX E – NATIONAL GRID VIP PROJECT, BISHOPS CANNINGS

Purpose of this Annex

This annex provides illustrative photographic evidence from the National Grid North Wessex Downs Visual Impact Provision (VIP) underground cable project near Bishops Cannings. It demonstrates construction-phase alteration of surface-water behaviour arising from underground cable installation in a rural headwater environment.

The evidence is provided to illustrate observed and plausible impacts, not to assert direct equivalence between schemes. It is relevant to the assessment of construction-phase flood risk and cumulative hydrological effects associated with the proposed Lime Down Cable Route Corridor and its proximity to Whitley.

Figure E1 – Cable Route Context and Headwater Setting

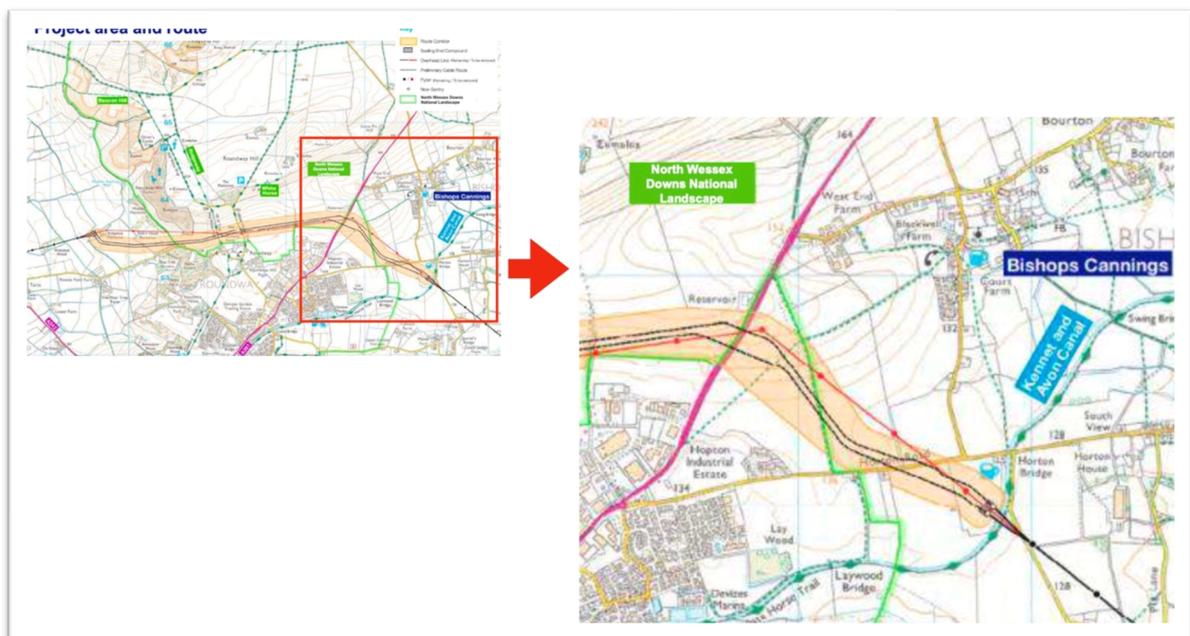


Figure E1: Location of the National Grid North Wessex Downs VIP underground cable route in the vicinity of Bishops Cannings, illustrating the rural headwater context and proximity to local drainage networks.

Relevance:

Establishes a hydrological and landscape context comparable to the Lime Down cable route near Whitley, where small watercourses and field drains form part of a connected headwater system.

Figure E2 – Engineering Works and Ground Disturbance

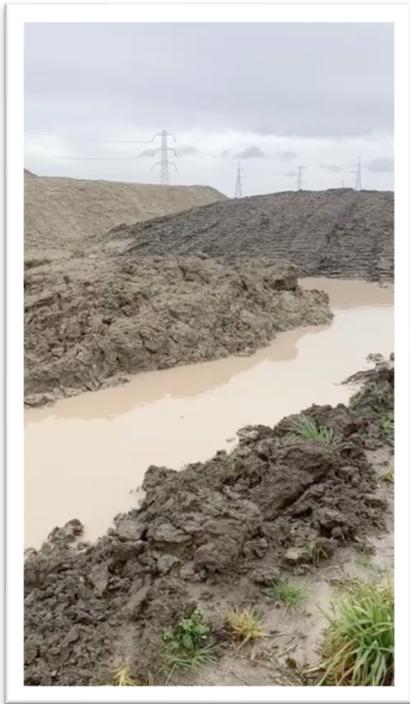


Figure E2: Engineering works and joint bays within Camp Field, showing extensive ground disturbance and soil exposure associated with underground cable installation.

Relevance:

Demonstrates the scale and intensity of ground disturbance typically associated with underground cable works, particularly at jointing locations, with implications for infiltration, runoff generation, and sediment mobilisation.

Figure E3 – Surface-Water Runoff Leaving the Worksite



Figure E3: Surface-water runoff from cable works discharging from Camp Field onto Horton Road (26 January 2025), illustrating focused runoff arising during construction.

Relevance:

Provides direct evidence of construction-phase runoff leaving the site boundary, contradicting assumptions that impacts remain localised or contained within the works area.

Figure E4 – Highway Flooding and Drainage Surcharge



Figure E4: Inundation of Horton Road and surcharge of adjacent drainage infrastructure following construction-phase runoff from cable works (26–27 January 2025).

Relevance:

Demonstrates off-site flooding and interaction with highway drainage, showing how construction-phase water can overwhelm existing drainage capacity and affect third-party infrastructure.

Figure E5 – Sustained and Repeated Flooding Behaviour

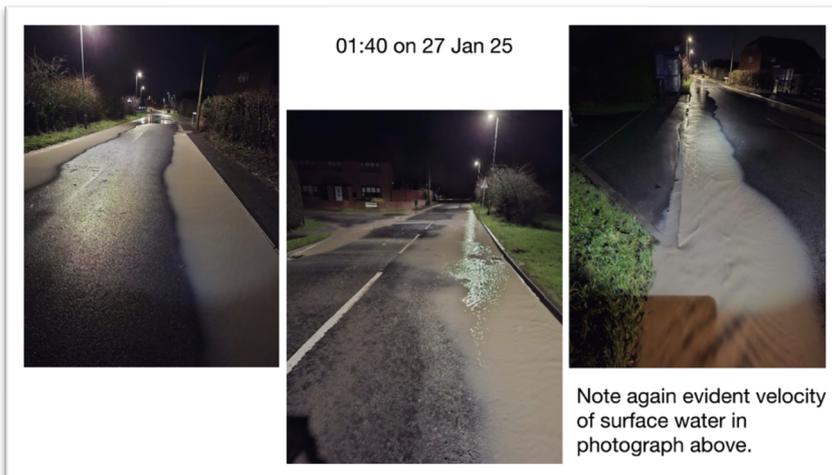


Figure E5: Sustained and repeated surface-water flooding associated with the cable works, including night-time conditions and subsequent events in February 2025.

Relevance:

Shows that impacts were not isolated peak events, but recurrent and prolonged, supporting concerns about cumulative effects during extended construction programmes.

Interpretation and Relevance to the Lime Down Proposal

The photographic evidence presented above demonstrates that underground cable installation in rural headwater environments can:

- materially alter surface-water pathways during construction;
- generate focused runoff and increased flow velocities;
- cause flooding beyond the immediate works boundary; and
- result in repeated and sustained impacts over time.

While CAWS does not suggest direct equivalence between the Bishops Cannings VIP project and the proposed Lime Down Cable Route Corridor, this documented experience provides empirical evidence that construction-phase flood risk associated with underground cabling is credible and observable, particularly where works intersect sensitive drainage networks.

In the context of the Lime Down proposal, and given the Cable Route Corridor's proximity to Whitley and its location within a similarly connected headwater system, this evidence reinforces the need for a corridor-wide, construction-phase hydrological assessment to demonstrate that comparable impacts would not arise

ANNEX F - ABBREVIATIONS

Abbreviation	Meaning
BESS	Battery Energy Storage System
CAWS	Community Action: Whitley and Shaw
CRC	Cable Route Corridor
DCO	Development Consent Order
DWFRS	Dorset & Wiltshire Fire and Rescue Service
EIA	Environmental Impact Assessment
EN-1	National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy Infrastructure
ES	Environmental Statement
ExA	Examining Authority
FOI	Freedom of Information
HDD	Horizontal Directional Drilling
JMNP2	Joint Melksham Neighbourhood Plan 2
LDS	Lime Down Solar (Lime Down Solar Park)
NFCC	National Fire Chiefs Council
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
VIP	Visual Impact Provision (National Grid Project)



December 2025



Studley Solar Farm Construction Update

Dear neighbour,

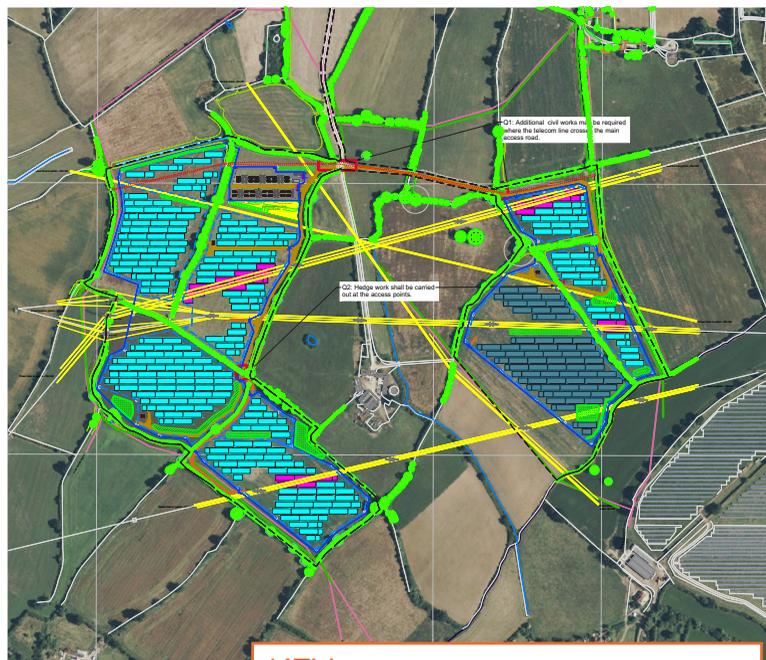
We are about to start construction in Q1 2026 on a solar farm and battery storage located on land at Studley Farm, Atworth, Melksham, SN12 8JN.

Verdant Energy will deliver Studley Solar Farm and Battery Storage through the construction phase and into operations. Verdant Energy brings decades of experience in project development, delivery, and operations of renewable projects across the UK and abroad.

The Solar Farm will be connected into the local electricity network. This will power the equivalent of 5,730 homes and displace 5,030 tonnes of CO₂ every year it is in operation.

Works on the cable route on Westlands Lane will commence late January 2026 - March 2026. This has been planned closely with Wiltshire council and another Contractor to limit the impact of the work to the local residents and road network. Access to homes along Westlands Lane will still be possible during this time but may be subject to minor disruption.

We will be holding a Public Information Event on Wednesday 14th of January 2026 from 6-8pm at the Whitley Reading Rooms, Melksham, SN12 8QR. This will give local residents in Whitley and the surrounding area the opportunity to meet with key members of the Verdant Energy team and ask them any questions they may have.



Site layout plan

KEY			
	MV STATION		OVER HEAD LINE
	PLANT BOUNDARY		33KV UNDERGROUND UTILITY
	FENCE / GATE		HEDGES
	LAYDOWN AREA		SWALE
	PEDESTRIAN GATE		FOOT PATH
	CCTV		PEDESTRIAN ACCESS
	ACCESS ROAD		VEHICLE ACCESS TO PYLON
	MAINTENANCE ACCESS		USED AREA
	MODULE STRUCTURE(615Wp)		BALLAST STRUCTURE
	MODULE STRUCTURE(620Wp)		EXPORT CABLE

While Whitley and the surrounding area isn't close to where the solar panels will ultimately be sited, a portion of the proposed cable route runs through Whitley. The project team at Verdant Energy are in discussion with Wiltshire Council to explore the viability of partial re-routing through Top Lane-West Hill-Pulpit from Whitley toward Atworth.

Contact Information

General Enquiries | Cem Sabri | Communications Lead | contact@studleysolarfarm.co.uk

We've set up a dedicated webpage for the construction of the project where you will find further information and regular updates.

www.studleysolarfarm.co.uk



Indicative Timeline



1. Site Preparation & Groundworks | Q1 2026 – Q3 2026

- Access Tracks
- Perimeter Fencing
- CCTV
- Foundations for ancillary buildings



2. Array Framework Installation | Q1 2026 – Q2 2026

- Strong and durable frames made from high-quality materials are installed which are designed for specific climate and weather conditions at the site.
- Expert technicians use specialised equipment to drive the frames into the ground



3. Solar Panel Array Assembly | Q3 2026

- Solar panels are placed onto the frames and securely fastened
- Panels are positioned to ensure optimal exposure to the sun
- Technicians ensure proper spacing and alignment between the panels and frames
- Final checks are performed to ensure panels are functioning properly and securely mounted



4. Battery Energy Storage System (BESS) & Connection Equipment | Q2 2026 – Q4 2026

- Ground preparation and sustainable drainage provided for the BESS and Connection equipment.
- Prefabricated Battery, PCS and MV Twin skid Units are installed along with a “customer substation” switchgear unit.
- Cables connect the inverters and the BESS technology to the switchgear unit which will then be connected to National Grid infrastructure.



5. Testing & Commissioning | Q3 2026 – Q1 2027

- Final testing of solar farm equipment and systems
- Connection of solar farm to the electrical grid



6. Landscaping (According to Planting Season) | TBC7

- Seeding and planting of site and boundaries
- Implementation of a custom planting plan
- Planting at the next suitable opportunity if outside of ideal planting seasons

Teresa Strange

From: Cem Sabri <cem.sabri@alpacacommunications.com>
Sent: 06 January 2026 11:52
To: Teresa Strange
Subject: Studley Solar Farm (Ref: PL/2021/08690), on land at Studley Farm, Atworth, Melksham, SN12 8JN - update
Attachments: 47996 Studley leaflet v2.pdf

Dear Teresa,

I'm writing to you on behalf of Verdant Energy with regards to Studley Solar Farm, (Ref: [PL/2021/08690](#)), on land at Studley Farm, Atworth, Melksham, SN12 8JN.

I wanted to get in touch to inform you that we will be holding a Public Information Event on Wednesday 14th of January 2026 from 6-8pm at the Whitley Reading Rooms, Melksham, SN12 8QR. This will give local residents in Whitley and the surrounding area the opportunity to meet with key members of the Verdant Energy team and ask them any questions they may have.

You may have received the attached newsletter which was sent to residents in December.

We would be very happy to see you there and if you have any questions in the meantime please do let us know.

Many thanks,

Cem

Cem Sabri | Account Director
1 Triton Square, London, NW1 3DX | T 020 7499 2842 | M: 07940 755 794 | alpacacommunications.com

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Examination of the Wiltshire Local Plan Review

Inspectors: Philip Mileham BA (Hons) MA MRTPI
Gareth Wildgoose BSc (Hons) MSc MRTPI

Programme Officer: Ian Kemp
Email: ian@localplanservices.co.uk

22 December 2025

Dear Mrs Clampitt-Dix,

Wiltshire Local Plan examination – Inspectors’ post Stage 2 hearings letter

1. Further to the hearing sessions held on 11-13 November 2025 and our post hearings letter sent on 17 November 2025, we are now writing to you to set out our initial views on the next steps of the Wiltshire Local Plan (the Plan) Examination. In summary, having had regard to the written statements received in response to our Matters, Issues and Questions and the subsequent discussions in the hearing sessions to date, we have identified several significant issues in terms of the Plan as submitted which we go on to set out in detail in this letter.
2. We are satisfied at this stage that there is sufficient prospect that the existing legal compliance and soundness deficiencies we have identified could be overcome. This is, however, subject to the Council outlining an achievable timetable for the preparation and submission of additional evidence that would not unreasonably delay the progress of the Examination. The timetable should be provided to us by not later than **5pm on Friday 30 January 2026** and should include provision for monthly progress updates. To assist with the preparation of the timetable, we set out in this letter the further work which we consider to be necessary at this stage to overcome the shortcomings that we have identified so far.
3. In reaching our initial conclusions, we have considered all evidence submitted and representations made relating to the Plan to date, including the written statements and oral contributions at the hearing sessions. Our overall conclusions on soundness and legal compliance will be given in the Final Report, which will be produced taking into account all stages of the Examination. As such, any views expressed in this note are preliminary and may alter in the light of any further evidence that emerges. This includes as part of any subsequent consultation process and any necessary work on the sustainability appraisal (SA) or habitats regulations assessment (HRA). It therefore follows that the views expressed in this letter are without prejudice to the conclusions of our Final Report.

Initial Views and Required Actions

Housing Need and the Housing Requirement

4. As submitted, the housing requirement is 36,738 dwellings over a plan period of 2020 to 2038. This is based on a local housing need calculation (LHN) of 2,041 homes per year. However, the base date of that calculation was 1 April 2022 and more recent Office for National Statistics (ONS) workplace affordability ratios have since been published.
5. The Council has referred to the Planning Practice Guidance (PPG) which advises that the LHN calculated using the standard method may be relied upon for two years from submission of the Plan. However, it is evident that the LHN calculation informing the Plan was already more than two years old when the Plan was submitted on 28 November 2024. The PPG is clear that the LHN calculation should be kept under review and revised where appropriate.
6. It follows that we request the Council to rebase the Plan period to 1 April 2023 to match the date of the median workplace-based affordability ratios (at the time of the Plan's submission). The Council should then recalculate the LHN for the Plan period. In doing so, the housing requirement may also need to be recalculated. If the Plan period were to be extended (see later paragraphs) this would likely result in a significantly higher number of homes to be delivered. This is evident even before any detailed testing of the housing supply and would have significant implications for the examination going forward.

Stepped Housing Requirement / Distribution of Development

7. Turning to the proposal to include a stepped housing requirement in the Plan as submitted, we consider that it is neither positively prepared nor justified. Whilst we note that the HRA indicates that a stepped trajectory should be considered, no clear evidence has been provided to justify at what level the step might be set at or its duration. Furthermore, the level of the step does not appear to have been subject to SA. Evidence was also provided during the hearings that the step was lower than current rates of housing delivery in the County. We are therefore concerned that it is not justified and would serve to unnecessarily delay meeting identified housing needs. In reaching this view, we note that there has not been a significant change in the level of the proposed housing requirement in the Plan when annualised and compared with the Wiltshire Core Strategy (document DP/01). Moreover, the housing trajectory provided in the submitted Plan does not seemingly correspond with a reliance upon strategic sites that would have phased delivery, nor is a majority of housing to be delivered later in the Plan period.
8. The approach pursued is instead influenced by rigidly following a distribution of development between the four Housing Market Areas (HMAs) informed by the Wiltshire Local Housing Need Assessment Update Volume One (document

SD/21). In doing so, the strategy is derived from nutrient neutrality constraints in the HRA (document SD/65) which affects the short-term deliverability of some sites in the Salisbury HMA in advance of upgrades to existing wastewater treatment works. However, in pursuing that strategy, there has been insufficient consideration of alternative distributions of development between the four HMAs which could have supported a much higher rate of housing delivery over the Plan period. This includes the alternative of allocating additional sites in HMAs other than Salisbury to provide sufficient deliverable sites in Wiltshire upon adoption and throughout the Plan period. It is necessary to assess those alternatives, given that they have the potential to be a realistic means of meeting identified housing needs in the early years of the Plan period.

9. Further work is therefore required to consider a range of alternative distributions between the four HMAs to ensure that housing needs can be met in the earlier parts of the Plan period. This should be informed by updates to the SA, which should consider a range of reasonable alternatives.

Proposed Salisbury Area New Community

10. The hearing sessions confirmed our earlier concerns (see document ID1) that there is no substantive evidence to justify the proposed search area for a new community, or the related approach in Policy 21 and the Key Diagram. This is also reflected in the SA Annex 3 (document CD/03U) which provides very little detail on how Policy 21 meets SA objectives. There is also insufficient evidence to inform the HRA conclusion of no likely significant effect on European sites. The latter finding is inconsistent with the Plan, which expects around 300 homes from the new community. In that regard, we do note that there is no evidence of a reasonable prospect that any homes from this new community could realistically be delivered within the Plan period as submitted.
11. Setting aside the inconsistency between the HRA and the Plan, the intention of Policy 21 to confirm the new community only through a future review suggests it is not currently supported by sufficient evidence. The Plan also conflicts with paragraph 22 of the NPPF, which requires that where large-scale developments (such as new settlements or significant extensions to existing villages and towns) form part of the strategy for the area, that policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. In addition, the evidence provided does not adequately show the likely nature or scale of development likely to come forward, meaning the Plan cannot be modified to meet this requirement.
12. In reaching the above view, it is appreciated that the delivery of large-scale developments may need to extend beyond an individual plan period and the associated infrastructure requirements may not be capable of being identified fully at the outset. However, when taking account of the shortcomings of the SA assessment and the lack of detailed HRA

assessment, the Plan's approach is not justified nor consistent with national policy insofar as seeking to establish the principle for the strategic distribution of development beyond the Plan period and deferring the detail to a future Plan review.

13. We therefore consider that the inclusion of the proposed Salisbury area new community is not supported by sufficient evidence and is unsound. Having considered the extent of work that would likely be required to justify its inclusion in the Plan, we consider that it would not be achievable in a reasonable timescale during this Examination. Accordingly, the proposed Salisbury area new community should be removed from the Plan.

Broad Locations

14. The NPPF paragraph 68 b) allows for the identification of a supply of land for homes for years 6-10 and where possible for years 11-15 years of the Plan, to include broad locations for growth. NPPF paragraph 23, however, indicates that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. In that context, we appreciate that broad locations by their very nature often have a degree of ambiguity in terms of the precise location, scale of development, infrastructure requirements and delivery timescales. Nonetheless, the approach of the Plan to the proposed broad locations still falls considerably short of the expectations of the NPPF. The broad locations have not been identified on the Key Diagram, and need to be more specific in terms of the extent of growth that is expected to be brought forward/required during the Plan period.
15. The lack of certainty regarding the intended broad locations in Chippenham, Melksham and Trowbridge is exacerbated by the approach in Policy 3 and its supporting text which relies on further Development Plan Documents (DPDs) to assist in delivering the strategic objectives of the Plan. As such, there is insufficient evidence to demonstrate that there is a reasonable prospect that the proposed broad locations can be developed within the timescales envisaged. Therefore, we consider there are similar shortcomings to Policy 21 in terms of the demonstration of consideration of alternative approaches to the distribution of development and other locations as described above.
16. It follows that the Council are requested to reassess the inclusion of the broad locations in Chippenham, Melksham and Trowbridge. This should be undertaken as part of the additional work required relating to the distribution of development across the plan area, including revisiting the site selection process and updates to the SA and HRA. It should also include consideration and assessment of reasonable alternatives such as the identification of additional specific allocations in each of those settlements or elsewhere in Wiltshire. Following that process, if the Council was to find that one or more of the broad locations are still required, this should be fully justified in evidence including the contribution required from each along with some further details on their location and extent. The justification should also

include proposed main modifications to the Key Diagram and Policy 3 of the Plan to provide a positively prepared and effective strategy that would enable any broad location(s) to be brought forward by the end of a Plan period (without reliance solely on the preparation of a future DPD).

Reserve Sites

17. We also have concerns about the justification and effectiveness of the approach taken in Policy 3 of the Plan as submitted to reserve sites. This is particularly notable given that their limited scale is likely to offer little contingency for the circumstances of housing land supply shortfall identified in the Plan. There is also concern that the trigger for the release of the reserve sites which relies upon the calculation of land supply on an HMA basis is not justified. No clear evidence has been provided why the reserve sites were not proposed to be allocated to simply provide a further land supply buffer.
18. The Council is, therefore, requested to revisit the status of the proposed reserve sites as part of the additional work required on the site selection process and updates to the SA and HRA. This should include consideration of whether they should be allocated immediately.

Employment Need and Delivering the Employment Requirement

19. To reflect the changes to the housing requirement and those that may be required to the Plan period (see later paragraphs), further work will also be required to recalculate the employment land requirement. As part of that process, the Council should provide additional justification for the approach pursued in the Plan. This should include further assessment and explanation of any intended balance between homes and jobs being planned for in each of Wiltshire's Functional Economic Market Areas (FEMAs). It should also set out the extent to which supply and demand for the numbers of workers and sectoral priorities have influenced the distribution of proposed allocations in the Plan.
20. Notwithstanding the above, there are other evident shortcomings in the approach of the Plan to additional employment land in terms of soundness that will also need to be addressed. A significant concern is the approach of Policy 64 which provides support for the principle of development of unallocated sites within or adjacent to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where appropriate to the role and function of the settlement subject to listed criteria. The flexibility afforded in the policy and the absence of prioritisation of the most sustainable locations, serves to demonstrate that there is a deficiency in setting out an overall strategy for the pattern and scale of employment sought to be delivered contrary to NPPF paragraph 20. The spatial strategy therefore lacks justification as the Plan does not bring sufficient employment land forward through allocations and broad locations noting the deliverability risks of some sites identified in the Wiltshire Employment Land Review Update (document SD/20). There is also an evident need for main

modifications to revise the policy for effectiveness to allow opportunities for existing businesses in other locations to appropriately expand.

21. We consider that further work is therefore required insofar as assessing a suitable range of alternative distributions of development between the three FEMAs in the Wiltshire Council area. This should be underpinned by revisiting the approach to site selection that informed the Plan given the potential necessity to identify an additional supply of employment land for an extended Plan period (see later paragraphs). The additional work should include updates to the SA to assess the broader range of reasonable alternatives and the HRA to both inform the proposed modifications to the Plan and to ensure that the cumulative effects are appropriately assessed and addressed.

Planning for Strategic Logistics Development

22. There are further deficiencies of the Plan and Policy 64 in terms of the approach to strategic logistics development adjacent to M4 Junction 17. In that respect, we acknowledge that the evidential basis for identifying a specific quantum of logistics development in the Plan area to address regional and local needs is not currently available. Nonetheless, given the likelihood that planning applications may come forward imminently during this Plan period, it is essential that the policy approach in the Plan is clearly written and unambiguous so that it is evident how a decision maker should react to development proposals for strategic logistics development.
23. It follows that main modifications will be required to refine the criteria-based approach set out in Policy 64 for national and regional logistics development adjacent to M4 Junction 17. For effectiveness, we recommend that this would be most appropriately achieved through a new policy focussed specifically on strategic logistics development. Ideally, such a new policy in the Plan would be supplemented by identifying a new broad location on the Key Diagram or specific allocations to clearly denote the location where the new policy would apply. The identification of a new broad location or alternatively specific allocations would inevitably require additional work to identify the potential scale/boundaries. This process would need to take account of any likely constraints such as capacity of infrastructure and/or protective land-use designations. The identification of a new broad location or specific allocations should also be informed by updates to the SA, including the assessment of reasonable alternatives for bringing sufficient land forward. Updates to the HRA would also be required to assess any proposed changes that the Council provide to us, including in terms of the cumulative effects with plans and projects elsewhere.

The Plan Period

24. As discussed during the hearing sessions, paragraph 22 of the NPPF - September 2023, amongst other things, requires that strategic policies should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities, such as

those arising from major improvements to infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

25. Given the extent of work required in this letter, together with the remainder of the hearings programme and consultation process that would likely follow, we consider it unlikely that the Plan would be adopted until 2027. The Plan period may, therefore, need to be extended by at least a further four years to 2042 to ensure that the Plan is consistent with national policy and effective.
26. The implications of extending the Plan period by a further four years would be that the housing and employment requirements would need to be recalculated as previously stated. Further main modifications may also be required to identify sufficient land to ensure that needs could still be met.

Updates to Key Evidence

27. The Council should be mindful that any proposed changes to the Plan will need to be supported by relevant and up-to-date evidence beyond the specific additional work we have already identified in this letter. Adequate and proportionate updates to key evidence, sufficient to inform robust SA and HRA assessments and justify the proposed changes, are likely to be required. The range of evidential updates required will be dependent upon the extent of necessary changes to the distribution of development and identification of new site allocations and/or new or revised broad locations, and their relationship with their surroundings. However, as a minimum they are likely to include updated transport modelling, viability and infrastructure work. In addition, where applicable and relevant, it may be necessary to undertake further localised assessments of potential effects of any new site allocations and new or revised broad locations, such as upon air quality, historic environment, landscape and flood risk.

Other Matters

28. To address our concerns expressed during the recent hearings regarding the identification of strategic policies, we also request that the Council undertake a thorough review of the policies of the Plan having regard to the strategic priorities insofar as they align with Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2024. When undertaking that process, we encourage the Council to be conscious of the differences between strategic and non-strategic policies in the context of NPPF paragraphs 11, 13, 17, 18, 19, 20, 21, 23, 28, 29, 30, 33, 36, 61, 66, 74, 119, 156 and 160.
29. Following on from the legal opinion provided by the Counsel for the Local Planning Authority regarding the ability to partially supersede policies from the existing Development Plan and the Council's further response on this

matter, we also request that the Council clearly sets out which elements of any existing policies the Council proposes to partially supersede through the Wiltshire Local Plan review.

30. The hearings to date have yet to cover the neighbourhood area designation requirements set out in the Plan. However, we are mindful of our soundness concerns regarding the Plan seeking to defer delivery of its strategy and associated strategic objectives to future DPDs. This is also likely to apply to neighbourhood area designation requirements that are included above and beyond the allocations proposed in the Plan.
31. The additional work set out in this letter provides an opportunity for the Council to prepare additional evidence and/or propose modifications to the Plan that provide greater certainty of how neighbourhood area designation requirements are to be delivered. As a minimum it should be made clear how each of the individual requirement figures have been derived and how they are intended to be met (i.e. existing commitments, windfalls or a combination of the two), and whether the Plan incorporates any specific contingencies should the neighbourhood plan process be unable to deliver the identified local needs.
32. The provision for accommodation for Gypsies, Travellers and Travelling Showpeople is not currently addressed by the Plan on the basis that a separate Gypsies and Travellers DPD is under preparation. The Gypsies and Travellers DPD is identified in the Wiltshire Local Development Scheme - March 2025 (document SD/39A) as expected to be submitted for examination in the 3rd quarter of 2025. It follows that we would be grateful for an update of the progress on the preparation of the DPD in response to this letter. The provision of accommodation for Gypsies, Travellers and Travelling Showpeople is necessary to be included in the development plan for consistency with NPPF paragraph 62. As such, we also request that the Council prepare a proposed modification to the Plan that would provide certainty that the matter will be addressed by a separate DPD.

Next Steps and Concluding Remarks

33. We would like to thank the Council and participants for their co-operation during the Examination to date. Assuming that the Council would be content to progress the Examination based on the actions which we have indicated are necessary, we would be grateful of an estimate of the likely timescales associated with the individual actions. In summary the actions are:

Spatial Strategy

- Consider a range of alternative distributions of housing and employment between the four HMAs to determine whether housing needs can be met in the earlier parts of the plan period. This should be informed by updates to the SA and HRA, which should consider a range of reasonable

alternatives, including whether a stepped housing requirement is needed at all.

- Revisit the site selection methodology to identify additional housing and employment land as may be required.

Broad Locations

- Provide additional evidence to demonstrate that there is a reasonable prospect that the broad locations can be developed within the timescales envisaged, or if not, suggest how the soundness issues can be overcome by main modifications.

Potential for Plan Period Extension

- Assess and set out the implications of extending the Plan period to meet the minimum 15-year plan period envisaged by the NPPF making the Plan period run to 2042.
- Update the housing and employment land requirements accordingly.

Potential Main Modifications

Aside from the issues identified above, the following changes will also be necessary to the Plan and should be addressed by the Council in responding to our Initial Findings:

- Deletion of the Salisbury Area New Community Area of Search;
- Amendments to the approach to employment land and strategic logistics (including possible new policy and allocations);
- Clarification of the relationship with the Gypsies and Travellers DPD;
- Explanation of the approach to delivery of requirements in neighbourhood area designations;
- Clarification of the alignment of strategic policies with legislation and national policy, and;
- Amendments to provide greater specificity of the approach to the partial superseding of existing policies.

Evidence and Assessments

- Updates to any key evidence considered necessary to justify the resultant changes proposed to the Plan.

34. We look forward to receiving a response from the Council **by not later than 30 January 2026**. The Council's response should include the intended programme for the next stage of the Examination consisting of the expected dates of completion for each item of work, key milestones and the dates when monthly progress updates will be provided. Ideally the entire programme of works should be completed as soon as possible to avoid unreasonable delay to the examination. Please note that whether the Examination can proceed to the remaining hearings would then be dependent on our consideration of the additional work provided and the responses to a consultation that will follow.

35. Having regard to the amount of time that has already elapsed since the Plan was submitted, we should be informed as soon as possible if the Council is unable to complete the requested additional work in a timescale that would avoid an overly long examination. In those circumstances, we would have to reconsider how best to take the Examination forward.
36. If there are any procedural or other questions arising from this letter, the Council should contact us via the Programme Officer in the first instance. We would be grateful if this letter could be placed on the examination website at the earliest opportunity. We are not inviting, nor envisage accepting, any comments from other examination participants at this stage.

Yours sincerely,

Philip Mileham

INSPECTOR

Gareth Wildgoose

INSPECTOR

Press release

Housing Sec pledges to 'go further than ever before' to hit 1.5 million homes

The government has launched a major consultation on a revamped National Planning Policy Framework today.

From:

[Ministry of Housing, Communities and Local Government](#), [The Rt Hon Steve Reed OBE MP](#) and [The Rt Hon Rachel Reeves MP](#)

Published

16 December 2025



- Thousands more homes to be built faster in every region thanks to biggest rewrite of planning rules in over a decade
- Changes include saying 'yes' to brownfield, 'yes' to building around train stations and 'yes' to building more blocks of flats, alongside cutting costs and delays for housebuilders and businesses of all sizes
- Accelerating government ambitions to build 1.5 million high-quality homes with the right infrastructure, creating new jobs and boosting clean energy

Hundreds of thousands of new homes will be built under the biggest housebuilding surge in a generation thanks to the most significant rewrite of planning rules in more than a decade.

Having already reversed anti-supply measures in the National Planning Policy Framework (NPPF) last year, the government is going further to make the system clearer, more predictable, and faster to build 1.5 million new homes over this Parliament.

New changes unveiled today (Tuesday 16 December) will help optimise land use through well-designed, higher-density development, simplified biodiversity rules for smaller sites – and fast-track good housing projects that meet national standards for energy efficiency.

With families and children stuck in temporary accommodation and young people locked out of homeownership, the only way to start fixing this for good is to build thousands more good-quality homes in every region.

And today's proposals directly build on the immediate and urgent steps already taken to fix a planning system that too often has blocked rather than built. Key revisions include:

- A default ‘yes’ to suitable homes being built around rail stations, alongside minimum housing density rules.
- Providing the same ‘yes’ to new homes building upwards in towns and cities, fast-tracking development schemes that meet high standards for well-designed homes.
- Making it easier for developers – particularly SME builders – to build higher density housing, such as modern apartments and flats, on smaller sites and under-used land where appropriate.
- The new ‘medium site’ category for sites between 10 to 49 homes so SME builders face proportionate rules and costs for their site size – including considering a possible exemption from the Building Safety Levy.
- Streamlining standards on energy efficiency and Biodiversity Net Gain to give builders certainty on plans for new homes.
- Encouraging a more diverse mix of housing, such as rural affordable homes and accessible homes for older people and those with disabilities, providing certainty for developers to meet the housing need of every group across local communities.
- New builds to include nature-friendly features, such as installing swift bricks, to support wildlife – adding little to building costs whilst delivering a win-win for nature and housebuilding.
- Preferential treatment for developments that strengthen local economies and provide new services, including shops, leisure facilities, and food production.

These measures will pave the way for a stable, rules-based system where developments that meet clear standards can move quickly from plans to construction – the most significant rewrite of national planning policy in over a decade. The new rail and densification policies are expected to unlock a potential 1.8 million homes in the coming years and decades.

To ensure these changes make an immediate difference, the government is proposing that they effectively override conflicting policies from day one, so everyone is working from the same rule book.

This is another major step forward in the government’s unrelenting focus to build 1.5 million high-quality homes, create jobs, and bolster clean, homegrown energy in every corner of the country – tackling record-high housing waiting lists and supporting the dream of homeownership for working families.

Housing Secretary Steve Reed said:

Right now we see a planning system that still isn’t working well enough. A system saying ‘no’ more often than it says ‘yes’ and that favours obstructing instead of building.

It has real-world consequences for those aspiring to own a home of their own and those hoping to escape so-called temporary accommodation – we owe it to the people of this country to do everything within our power to build the homes they deserve.

We’ve already laid the groundwork to get Britain building but our planning overhaul was only the first step to fix the housing crisis we face. And today I’m going further than ever before to hit 1.5

million homes and place the key to homeownership into the hands of thousands more hardworking people and families.

Chancellor of the Exchequer, Rachel Reeves said:

For too long our economy has been held back by a housing system that slows growth, frustrates business, and prices the next generation out of a secure home.

These reforms back the builders not the blockers, unlock investment and make it easier to build the 1.5 million new homes across every region— rebuilding the foundations of our economy and making affordable homes a reality for working people once again.

Within weeks of entering office the government took swift action to overhaul the NPPF, which came into force last December, to restore and raise mandatory housing targets for councils. Changes today will help build more infrastructure to support new housing and bolster public services with vital improvements being made to schools, hospitals, and transport links.

In addition, the government is reaffirming its commitment to back housebuilders through a package of wide-ranging measures to ramp up housing and infrastructure delivery:

- Boosting the rollout of the Small Sites Aggregator across Bristol, Sheffield, and the London Borough of Lewisham, supporting SME builders with an extra £5 million to transform up to 60 small brownfield sites into new social housing.
- Working with local authorities to create new standard house designs to build more high-quality homes through modern methods of construction, so manufacturers can invest in modern factories and increase productivity.
- An additional £8 million for local planning authorities with the highest levels of major housing schemes waiting for a decision, including London Boroughs, to bolster capacity on the ground and quickly process applications at the final stages of approval.
- Biodiversity Net Gain plays a vital role in restoring nature while building the homes this country needs but we've heard clearly from developers, local authorities and ecologists that the system needs to work better for some of the smallest developments, and that there can be particular challenges on brownfield land. Government reforms to BNG will make the process simpler for SME developers while maintaining nature recovery at scale.
- Accelerating the construction of new data centres co-located near energy sites by creating a single planning route for approvals to drive growth, attract more investment, and boost AI Growth Zones for communities to have greater access to power.
- Pressing ahead with the modernisation of planning committees for elected councillors to focus on the most significant proposals, whilst smaller housing projects will be decided by expert trained planners more quickly.

These changes will build on top of the planning overhaul last year, which alone saw the OBR forecast the highest level of UK housebuilding in over 40 years and £6.8 billion added to the UK economy by the end of this decade.

These forecasts also do not account for pro-growth reforms in the Planning and Infrastructure Bill, which will become law before Christmas, in addition to the historic £39 billion investment for the new Social and Affordable Homes Programme.

Following the Budget last month, the government is also investing an extra £48 million to strengthen planning capacity and support the aim to recruit around 1,400 new planning officers this Parliament – currently remaining on track to exceed the manifesto promise of 300 planning officers by the end of next year.

Planning Director at the Home Builders Federation, Catherine Williams said:

“The draft NPPF reinforces Government’s commitment to reforming the planning system and removing barriers to homebuilding, retaining a clear focus on sustainable development while protecting the natural environment. Proposals to reduce the complexity should help to reduce delays, speeding up the time it takes to get permissioned sites to the point when homes can be built and giving some much-needed encouragement to a dwindling number of local SME home builders. This progressive approach is urgently required if the industry is going to reverse the trend of recent years that has seen a decline in the number of homes being consented.”

Chair of Berkeley Group, Rob Perrins said:

“Our country’s housing supply is constrained by the layers of overlapping policies and regulations which make it impossibly slow, complex and expensive to build homes. We commend these positive reforms which, once adopted, will help to rationalise this dysfunctional system and create a more consistent and certain process that actually delivers the high-quality private and affordable homes people need at real scale and pace.”

Chief Executive of Urban&Civic, Nigel Hugill said:

“All experience is that establishing clear presumptions has a material impact on both the direction and the operation of our planning system. We welcome these proposals as addressing the treacle in the existing system which unnecessarily slows down decision making and delivering for our communities.”

Chief Executive and Executive Chair at Vistry, Greg Fitzgerald said:

“This is further evidence of this government’s welcome continued commitment to modernising and streamlining the planning system. At a time when families are stuck in temporary accommodation and young people are locked out of homeownership, delivering thousands of good quality homes in every region is essential to fixing the housing crisis for good. The new National Decision Making Policies and refreshed National Planning Policy Framework will protect quality and encourage delivery at pace. Importantly the changes will provide the clarity needed to take bold decisions, support environmentally responsible new homes and enhance local services. We now need local councils to respond swiftly and grant the permissions required to unlock sustainable and thriving communities.”

Further information

The government has launched a major consultation on a revamped National Planning Policy Framework today and this can be read in full [here](#).

This builds on the initial changes made to the Framework last December which restored mandatory housing targets, strengthened the brownfield-first approach, and put in place rules to allow the release of low quality ‘grey belt’ land for new homes and infrastructure: [Planning overhaul to reach 1.5 million new homes - GOV.UK](#)

The government announced last month that housebuilding near well-connected train stations will receive a default 'yes' in future if they meet certain rules: [Housebuilding around train stations will be given default "yes" - GOV.UK](#)

The government also previously announced a support package for SME housebuilders with new reforms across land, regulation and finance earlier this year: [Government backs SME builders to get Britain building - GOV.UK](#)

At the Budget the government committed an additional £48 million to strengthen planning capacity across local authorities and government planning teams. Of this £28.8 million is dedicated to the Planning Capacity & Capability Programme, enabling the recruitment of 350 additional planners beyond current targets through the programme's existing schemes. Around £20 million will support work across government to help recruit additional planners and improve the performance of environmental regulators.

As part of the Biodiversity Net Gain (BNG) reforms, the government will introduce an area-based exemption for smaller sites (up to 0.2 hectares), alongside consulting rapidly on an additional targeted exemption for residential brownfield development (testing ranges up to 2.5 hectares). The government will also introduce measures to make it easier, quicker, and cheaper to deliver BNG offsite which will benefit medium-sized development. A full consultation response and implementation timeline is expected to be published in the new year, alongside a consultation response on implementing BNG for nationally significant infrastructure projects (NSIPs) which will go live in May 2026.

The government remains committed to remediating buildings as quickly as possible. Remediation funding is already being provided ahead of launch of the Building Safety Levy. Levy receipts will cover the remaining remediation costs once a taxpayer contributions, industry pledges and developers' contractual obligations have been taken into account.

The government is also confirming its commitment to publish its response to the May consultation and to consult further on draft regulations for a National Scheme of Delegation in early 2026. These reforms will modernise planning committees, ensuring they focus on the most significant applications while speeding up the delivery of high-quality homes and promoting development that aligns with the local plan.

The government will launch an expression of interest this week for ambitious local authorities to work with government and key sector partners to create pattern books of standardised, high-quality designs, which will give manufacturers the confidence to invest and help boost productivity across the housebuilding sector.

Teresa Strange

From: Katie Lea <katie@placestudio.com>
Sent: 18 December 2025 12:38
To: Teresa Strange
Cc: Vaughan Thompson
Subject: Re: NEW NPPF out

Hi

It's a consultation on it as a draft proposal. It has not superseded the current NPPF.

Key Dates

- **Opened:** 16 December 2025
- **Closes:** 10 March 2026 (11:45pm)

For decision-taking, the new NPPF kicks off on the day it's published next year. Until then, we have the old/current one.

For plan-making, the new NPPF applies to new-style local plans to be produced through the new system under the Planning and Infrastructure soon-to-be-Act.

All *other* plans - i.e. the many local plans being progressed at the moment under the current system - they will all continue to be examined under the 2024 NPPF.

Katie Lea

place

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M: 07837478699

Bristol and Exeter House, Lower Approach Road, Bristol, BS1 6QS

Please note I don't usually work on Fridays.



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On Thu, 18 Dec 2025 at 11:12, Teresa Strange <clerk@melkshamwithout-pc.gov.uk> wrote:

And I am confused!

Is it published and to be used from yesterday OR is it to be published after the consultation finishes in March?

I am more confused after a quick skim!

From: Teresa Strange
Sent: 18 December 2025 11:05
To: Katie Lea <katie@placestudio.com>; Vaughan Thompson <vaughan@placestudio.com>
Subject: RE: NEW NPPF out

Thanks for this Katie...

Can you answer a quick question please?

The Chair of CPRE Wiltshire told me this week that the appeals in Jan/Feb will be decided by the NEW NPPF out this week.

An ex Wiltshire Councillor/WALPA member who has been Rule 6 participant recently told this this week that the appeals in Jan/Feb will be decided by the NPPF at the time of the decisions (July and August 25).

Which one is correct?! 😊

Thanks, Teresa

From: Katie Lea <katie@placestudio.com>
Sent: 17 December 2025 07:49
To: Vaughan Thompson <vaughan@placestudio.com>; Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Subject: NEW NPPF out

I've scanned it. It's not like other updates. It's looking quite different...however...importantly para 14 remains intact but now in S6;

S6: Neighbourhood plans and the presumption

1. For development proposals involving the provision of housing, the benefits of approving development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, 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 allocation to meet its identified housing requirement (see policy HO2).

HO2

5. In the case of local plans, a housing requirement figure should also be set for designated neighbourhood plan areas, unless it is impractical to do so (because a neighbourhood planning area has been designated at a late stage in the local plan preparation process, or after the plan has been adopted, or in instances where the local plan is out of date; in which case the local planning authority should provide an indicative figure). This requirement figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority. Local planning authorities should avoid setting housing requirement figures for neighbourhood planning areas at nil other than where:

- a. The local plan already meets or exceeds the housing need figure for the neighbourhood planning area;
- b. The neighbourhood planning area has a clear and well evidenced need for no additional housing;
or
- c. The constraints within the neighbourhood planning area are so substantial as to preclude any additional housing of any kind from coming forward.

More careful reading needed!

Katie Lea

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M: 07837478699

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Teresa Strange

From: Katie Lea <katie@placestudio.com>
Sent: 17 December 2025 08:44
To: Vaughan Thompson; Teresa Strange
Subject: Fwd: 🏆 The #Planoraks 2025 - the new NPPF 🏆

This is a good one to read to start getting your head around the changes...

Katie Lea
place
www.placestudio.com

M: 07837478699
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Please note I don't usually work on Fridays.



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----- Forwarded message -----
From: #planoraks <zack@planoraks.com>
Date: Wed, 17 Dec 2025 at 06:59
Subject: 🏆 The #Planoraks 2025 - the new NPPF 🏆
To: <katie@placestudio.com>

It's mid-December. That can only mean one thing: awards season.

🏠 #planoraks

[🏆 The #Planoraks 2025 - the new NPPF 🏆](#)



Santa arriving at a “well-connected rail station”.

Chestnuts roasting. Children laughing. Jack Frost nipping at your nose. It’s beginning to look a lot like... awards season.

So, come on down. Shoes: polished. Bling: sparkly. Bow-ties: optional. But don’t be late. Bring your A-game, and meet me on that

reddest of red carpets for an iconic evening in our planning calendar. The great. The good. They're all there. [*Cue the band*]

Welcome, friends, to the 6th (🤗!) annual... 🏆 #planorak awards 🏆.

[*Hold for applause*].

Thank you. Thank you so much. Please, take your seats.

Well, what a year it's been. So many runners and riders for the big gongs, the envelopes were almost sealed, and then... just this week... a December surprise. Well, not a surprise exactly, in that it seems to be happening every December. And happen it has. Here here we have it, folks, hot off those Marhsam Street presses: [a new draft National Planning Policy Framework](#). Yes, Brenda: [I know what you're thinking](#).

But here we have it. *Another one*. And one produced *just* in time for awards season. Convenient.

As you can imagine, the judges have been reeling with all the last-minute drama. So before we get to handing out the trophies, can I try to help them, and maybe some of you, with a just few things you really do need to know about this planning policy event of the year: [the consultation draft of the new NPPF](#). And then, of course, the awards.

First, the basics:

- The new draft NPPF: [here](#).
- The accompanying consultation doc: [here](#).
- Deadline for responses: 11.45pm on 10th March 2026. You can respond: [here](#). Shouldn't take long. There's only 225 questions to think about.
- The press release: [here](#).

- The written ministerial statement: [here](#).
- The letter to local authority leaders: [here](#).
- Tweaked viability PPG: [here](#).

A health warning - both for what's coming below, and for the many linkedin posts and webinars some of you will be ploughing into this week. This new NPPF's 125 pages and the consultation doc's another 123. It's long, dense and complicated. It's been live for under 24 hours. And, let's be real: it's been a long year, we're all perhaps *just* a little tired. This is BIG stuff that will take weeks - heck, months - to percolate.

Nonetheless, you want a flavour? Well, here's a flavour. Delivered through the medium of 10 quick-hit headlines:

1. The biggest change to national planning policy since 2012 (easily)

First rule: don't listen to any naff "quick-hit" headline write-ups [*Ed. Hang on... 🤔*].

The 2012 NPPF was a seismic change - for some of the reasons I talked about [here](#). Evaluating its implications took years.

We've had 6 new versions since then. Some [good](#). Some reeeeealllly [bad](#).

But this one... this is the first fundamental restructure of national planing policy that we've had since 2012. A new start. With a raft of new concepts, new language and new ideas. Designed to support a new system (e.g. led by spatial development strategies and new-style local plans, supported by national decision-making policies, more of which below).

Remember those quaint side-by-side spot-the-difference tracked change comparisons from years gone by? Well... you can forget those now.

Because wherever you look, there are changes. Some big, some small, some cosmetic, some critical. New tilted balances left, right and centre. New weightings for things. TRAINS. 🚆. This will take months to unpick properly. And we have months... well, we have until 10th March 2026. And there is much to think about before then. Before you sharpen your consultation pencils, and start working through those 225 questions next year. Anyhow, for now, let's dip our toes into it together...

2. Transitioning

When would it all kick in?

For decision-taking, the new NPPF kicks off on the day it's published next year. Until then, well... we have the [old/current one](#).

For plan-making, the new NPPF applies to new-style local plans to be produced through [the new system](#) under the Planning and Infrastructure soon-to-be-Act.

All *other* plans - i.e. the many local plans being progressed at the moment under the current system - they will all continue to be examined under the 2024 NPPF.

3. National Decision-Making Policies (“NDMPs”)

They're here. Scattered into every chapter of the new NPPF.

Big news: the “DM” **doesn't** stand for “*development management*” any more.

Bigger news, albeit [we knew this was coming](#): they're “*non-statutory*” - I'll come back to that in a minute.

Many are similar to NPPF policies we already have. But there are some **huge** changes - again, more of which below.

On their *effect*:

- For plan-making: the NPPF does not want plan-makers to “*duplicate, substantively restate or modify*” what’s in NDMPs: PM6.
- For decision-taking: from day 1 of this new NPPF, development plan policies which are **in any way inconsistent** with the NDMPs get “*very limited weight*”, except where they have been examined and adopted against the new NPPF. Is all of that going to work... I come back to that in a sec.

4. Spatial development strategies a’coming

The Planning and Infrastructure Bill ([here](#)), now on the cusp of becoming law, introduces the concept of “*spatial development strategies*” - new plans which “*must include a statement of the strategic planning authority’s policies (however expressed), in relation to the development and use of land in the strategy area, which are of strategic importance to that area*”.

The new NPPF puts meat on those legislative bones on, for instance, what goes into SDSs, how they get examined, and how they fit into the wider system. Now we know that SDSs are a 20+ year vision for a “*sustainable pattern of growth*”. They set “*objectively assessed needs*” for things including housing for that period. They identify broad locations for new settlements and major urban extensions. They give spatial expression to Local Growth Plans and the National Industrial Strategy. They identify the general extent of Green Belt boundaries, and broad locations for changes to those boundaries. They set out the strategic infrastructure needs to support all of this growth. They communicate all of that using maps and pictures.

A huge amount to unpack in all of this, including a new “*soundness*” test for examining SDSs (PM14). But for now,

what you need to know is that they're coming, and this NPPF tells us how. If the Government sticks around long enough to see this change through, SDSs could be the most powerful driver for strategic growth in the planning system in the last quarter of a century. Big stuff.

5. Local plans a'changing

With the advent of SDSs and NDMPs, the scope of what local plans will have to do is scaled back.

Local plans now only get involved in, for instance, deriving a local housing requirement *if* there is no SDS in place that's already done that job: S1. The local plan needs a vision with 10 max (no more!) measurable outcomes to articulate change over a 15+ year period. New-style local plans will, of course, be governed by a new plan-making regime which the government has already been announced [here](#). And, as I've said, new local plans can't duplicate (or - without very good reason - deviate from) the approach to development management in the NDMPs. Plus NB a new approach to "*soundness*" - they no longer to actually be *effective*, there just has to be a reasonable prospect that they can be delivered.

What local plans become, then, is a vehicle for giving detailed and localised spatial expression to a strategy that's already been worked out in the SDS. Not a battleground for arguing about housing numbers. Or the need for infrastructure. Nor indeed for arguing about detailed development management policy. A detailed map.

Basically. An easily searchable list of allocations and designations. Doable in 30 months. Reviewable at most every 5 years, and maybe less.

Sounds good? We should all hope so in a world where 72% of local plans are over 5 years old, 67% of authorities do not have a 5 year housing land supply, and around 100 authorities will soon be failing the housing delivery test.

We don't currently live in the plan-led world the system envisages - more on that below.

A note of concern? In reality, the whole 30-week structure assumes the development needs for local plans have been fixed by an SDS. Which is fine. If they have been. If they haven't been e.g. because the SDS isn't adopted yet, then local plans will still have much of the time-consuming and contentious work to do that they have now. And that work is currently taking them, on average, not 30 months, but 7 years per plan. So, I suppose the answer to that concern = the sooner SDSs actually come forward, the better.

6. New presumptions, new balances, new tilts

How, in the meantime, are applications to be determined? Since 2012, we've gotten used to the so-called "*tilted*" balance - topic of Supreme Court litigation, (literally) thousands of planning appeals and even the odd blog post [here](#) and [there](#). Well. That's gone.

Remember all those arguments about whether policies are "*out of date*". "*Baskets*" of all of those "*most important*" policies. That stuff? Gone. The concept of "*out-of-datedness*" itself (which I went into a bit [here](#)), that's gone. It's an almost entirely basket-free NPPF.

So what do we have instead? Well, it depends where you are:

Within settlements (S4):

The consultation calls this a "*permanent presumption*" focussed on brownfield, urban land. It's a powerful, pretty dramatic step forward from the idea at §125(c) of the current NPPF. What's happening here? Well...

Any scheme within **any** settlement get's approved.

Unless its benefits are substantially outweighed by adverse effects. And given the substantial weight lots of

those benefits may be getting - more of which below - this sets a really punchy bar for refusing e.g. brownfield schemes within settlements of any kind.

It's a default yes for planning applications within settlements subject to carve outs (including, critically, if e.g. there's an NDMP which tells you to refuse planning permission). But still.

A big step. A bold step. So long as you're sure whether you're actually *within* a settlement or not (which may not always be as obvious a question as it sounds - particularly for places without fixed settlement boundaries).

Outside settlements (S5):

Again, a fundamental change in approach. The detailed unpicking of which is going to need some time and some care. But here's the intro:

The structure of S5 requires **granting** of permission outside settlement unless benefits would be substantially outweighed by adverse effects **if** your scheme falls into a list of particular categories. A bolstered "tilt" to the tilted balance. Equivalent to what the ministers keep calling a "*default yes*".

The flip-side: if you're *outside* those particular categories, you get refused permission absent exceptional circumstances where your benefits substantially outweigh your adverse effects.

So we need to know whether schemes outside settlements fall into these categories or not. What are the categories?

Have a look at S5. Big ones include:

- Redevelopment of PDL.
- Reusing existing buildings.
- Development a reasonable walking distance from well-connected rail stations - more on this in a sec. Because this is a biggie.
- In circumstances where you're meeting an "*evidenced unmet need*" (including, for housing

schemes, cases where there is no 5 year housing land supply) **and** the scheme is: *“well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure”*.

If you fall into one of these S5 categories, then the “tilt” in favour of permission is (to these tired eyes) stronger than the current tilt at §11(d)(ii).

The concept of “strong reasons” to refuse permission is ditched - thank goodness (although NB we still have “strong” reasons to restrict overall scales of development in SDSs: S1). Instead, for decision-making, we’re told that the new tilted balance is likely to be failed if *“the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances”*.

So. Tread carefully now. Because there are a loads of policies in the framework that push one way or pull another. But there are very few that actually prescribe **refusal** in specific circumstances.

7. Dense, denser, densest

Part of the disaster of Gove-ian NPPFs was their vision of new developments aping the style of what we already have.

None of that. Now we’re specifically directed to *increase* densities, to *respond* to what’s already there (e.g. through materials and integrating heritage assets) but not in a way that precludes appropriate *“innovation and change”*, and if you’re near a train station, minimum densities are set. Fall short? You get refused.

In particular, for schemes within reasonable walking distance of a railway station - any railway station - “a

density of at least 40 dwellings per hectare should be achieved within the net developable area of the site”, and that goes up to “50 dwellings per hectare” where the station or stop is defined as “well-connected”. Again, we’ll come back to what that means in a moment.

8. Viability

Hundreds of thousands of homes have consent, but aren’t being delivered because of (among other things) viability challenges. Trying to find a route forward for those stalled consents is something the current [consultations in London](#) are seeking views on. Now p.29 of this consultation document asks you to comment about a really important topic: using section 73 and section 106A of the Town and Country Planning Act 1990 to modify planning obligations in relation to (in particular) affordable housing obligations. Have a look at the letter to local authorities which gives a [steer](#) on the use of section 73 to vary planning obligations, and the requirement to take a “*pragmatic*” approach to s.106A deeds of variation. This is important stuff. More in future posts.

Fwiw, what do I think the government should do? I think they should bring back bring back [section 106BA](#). And if they can’t/won’t do that, they should tweak [section 106A](#) to make it more useful by e.g. (a) prescribing a much shorter period under sub-section (4) for applying to vary or discharge 106 obligations that don’t work, and (b) setting out guidance in PPG to the effect that obligations which prevent a scheme coming forward by rendering it unviable do not, in the Government’s view, serve a “*useful purpose*”.

Anyhow. In the NPPF itself, we get DM5 which tries to limit the circumstances when viability assessments could justify providing e.g. a reduced offer of affordable housing or other infrastructure requirements, e.g. if things have

changed from the viability assessment which informed the local plan. And then we get...

“All viability assessments should reflect the recommended approach in planning practice guidance, utilising the standardised inputs set out in [Annex X – to be added subject to the outcome of this consultation], and should be made publicly available.”

What’s that about? It takes us to Annex B to the accompanying consultation document. The proposal is to insert new material on standardised viability inputs into the NPPF itself. And there are questions to answer about growth testing over the course of delivering strategic, multi-phase schemes, giving more specific figures for developer returns, removing landowner premiums in some cases, and more. Just because those bits aren’t in the draft NPPF itself... don’t miss it. It’s critical.

9. Green / grey belt

The green/grey belt policy I told you about [here](#). It’s now all brought out of the PPG into the NPPF proper.

Anything new? Well, yes actually.

○

Teresa Strange

From: Mark Harris
Sent: 20 December 2025 13:17
To: Teresa Strange; Planning Committee
Cc: saffi.rabey@melksham-tc.gov.uk; Committee Clerk; nick.holder@wiltshire.gov.uk; phil.alford@wiltshire.gov.uk; andrew.griffin@wiltshire.gov.uk; Fiona Dey; CEO
Subject: Re: Planning and Infrastructure Bill receives Royal Assent today

This breaks it down quite nicely although, being from the CPRE, it is biased towards environmental and conservation concerns.

https://www.cpre.org.uk/explainer/the-planning-infrastructure-act-what-does-it-do-and-what-happens-next/?utm_medium=email&utm_source=engagingnetworks&utm_campaign=CU_December25&utm_content=CU+December+Christmas+2025

From: Teresa Strange <clerk@melkshamwithout-pc.gov.uk>
Sent: 18 December 2025 17:19
To: Planning Committee <PlanningCommittee@melkshamwithout-pc.gov.uk>
Cc: saffi.rabey@melksham-tc.gov.uk <saffi.rabey@melksham-tc.gov.uk>; Committee Clerk <committee.clerk@melksham-tc.gov.uk>; nick.holder@wiltshire.gov.uk <nick.holder@wiltshire.gov.uk>; phil.alford@wiltshire.gov.uk <phil.alford@wiltshire.gov.uk>; andrew.griffin@wiltshire.gov.uk <andrew.griffin@wiltshire.gov.uk>; Fiona Dey <office@melkshamwithout-pc.gov.uk>; CEO <ceo@melksham-tc.gov.uk>
Subject: Planning and Infrastructure Bill receives Royal Assent today

Hi all

This planning legislation did get Royal Assent today, so unlike the NPPF changes, is now law!

https://www.housingtoday.co.uk/news/planning-and-infrastructure-bill-receives-royal-assent/5139910.article?utm_medium=email&utm_campaign=Daily%20Housing%20Today%20Daily&utm_content=Daily%20Housing%20Today%20Daily+CID_95e1ba39cdb6a01e67d106156c17e0d8&utm_source=Campaign%20Monitor%20emails&utm_term=Planning%20and%20infrastructure%20bill%20receives%20royal%20Assent

All the best, Teresa

Teresa Strange
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Want to keep in touch?

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

On X: @melkshamwithout

On Instagram: melkshamwithoutpc

On LinkedIn: Melksham Without Parish Council

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**NOTES OF MEETING WITH DAVID WILSON HOMES
ON WEDNESDAY 10th DECEMBER 2025 AT 2:00PM
RE: BLACKMORE FARM**

Present: Councillor Richard Wood (Chair of Planning)
Councillor Alan Baines (Vice Chair of Planning)
Councillor Mark Harris (Planning Committee Member)
Wiltshire Councillor Charlie Stokes (Melksham East)
Wiltshire Councillor Nick Holder (Bowerhill)
Teresa Strange (Parish Clerk, Melksham Without)
Fiona Dey (Parish Officer, Melksham Without)

Callum Warren (TFA Ltd)
Peter Lawson (Barrat Redrow)
Cecelia Hughes (David Wilson Redrow)

Outline planning for the Blackmore Farm site (PL/2023/11188) was approved in May 2025. Site has since been sold onto David Wilson Homes.

David Wilson Homes expect to submit a reserved matters application in early January 2026. They are in the very early stages of pre-application discussion with Wiltshire Council. They are constrained by the conditions from the outline planning approval.

The Developers shared draft plans for phase 1 of the development.

Design

Blackmore Farm is a large development so will be built in 2 phases.

The development will have 40% affordable housing. Affordable housing will be front loaded in phase 1 (118 affordable vs 111 open market) compared with phase 2 (82 affordable vs 189 open market). It was noted that the housing mix was defined in the outline application. A number of the properties (20) will be adapted for accessibility.

The development will be higher density in the north of the site (like the houses along Sandridge Road) and lower density in the south adjacent to the rural areas.

Councillors commented that affordable housing seems to be clustered together meaning that the development may not be tenant blind (as required by Wiltshire Council policies) – it was noted that this may be due to front loading the affordable provision.

The Developers highlighted that there is a bat route on the eastern side of the site leading to lighting restrictions and driving some of the housing orientation decisions.

Councillors highlighted that the Melksham Neighbourhood Plan includes a housing needs assessment and a design guide which should be followed.

Solar panels will be included as per the sustainability energy strategy condition. However, the number of heat pumps that can be installed is limited by the electricity provision. Therefore, some properties will be built with gas boilers.

Councillors were concerned that the long straight road past the community hub may encourage speeding and therefore suggested that the developers include traffic calming measures.

Vehicle Access

Councillors remain concerned that there will be a single access to the development from A3102 – serving 500 houses, a primary school, a community centre and employment land. Councillors are also concerned that the junction is a turning with ghost islands. It was noted that access via a roundabout was not supported by Highways during the outline application consultation phase and therefore was changed to the current arrangement.

Construction Traffic Access

Construction access is proposed to be via the footpath/emergency secondary access which would join the A3102 between Blackmore Farm and Lopes Close. Concerns remain about traffic turning off and onto the A3102. The importance of a detailed construction traffic management plan was highlighted. A temporary reduction of the speed limit on the A3102 should be considered. Councillors stressed that they will want to see the construction traffic management plan as part of the reserved matters application.

Connectivity

Councillors were keen to ensure that the site is porous with connectivity from the site particularly to the existing developments to the west. It was noted that the strip of land between the development site and Eastern Way is not in the control of the developers. The developer suggested that the parish council could ask the landowner for agreement to establish a permissive pathway across the land, and then the developer could put in a temporary footpath.

Community Hub

It was noted that the “Community Hub” land is a long and narrow plot – the Developer will provide information on the dimensions of the plot. Details of the proposed community centre are still being developed between the parish council and Melksham Town Council. To provide an indication of the size on the plan, the Developer offered to plot the Community Hub with a footprint 25% larger than the Berryfield Village Hall (dimensions to be provided to the Developer). It was also discussed that the Community Hub might a 2-storey building.

The parish council were keen to share experiences and learning from building Berryfield Village Hall, especially related to sound proofing/noise restrictions. They suggested that it might be better to provide extra sound proofing on dwellings near to the Community Hub, rather than have very limiting noise restrictions on the Hub (which were required for Berryfield).

It was confirmed that, as per the s106 agreement, the Developer would pay 25% of their contribution towards the Community Hub up-front, with the remaining 75% paid on transfer of the Community Hub Land.

The Developers do not want to construct the Community Hub, as it doesn't fit with their business model. It was noted that construction of the Community Hub will need to be co-ordinated with the Developer's building works.

Parking

Councillors welcomed the planned parking bays as they reduce the need for on-street parking. Concerns were raised generally about the prevalence of trade vans parking on other housing developments around Melksham parking and questioned whether additional parking is required. It was noted that the parking provision will be in line with Wiltshire Council guidelines.

Play Areas and Mobility Hub

The Clerk questioned whether the play area currently marked on the plan as adjacent to the employment land should be closer the dwellings being built in Phase 1. It was also highlighted to the Developer, that some areas should be kept for informal play e.g. having a mown grass area to play football.

Developer commented that a mobility hub, with a major bus stop, bus turning point and EV charging, would be provided but its location has not been defined. It was noted that bus routed and provision of bus stops is still to be considered.

Melksham Without Parish Council Requests

Councillors were positive about the plans presented and the level of engagement from the Developer.

For consistency with other developments, Councillors requested that they are involved in street naming, design of play areas (noting that Wiltshire Council have a standard for play equipment) and public art.

Timelines

Key timelines are not yet available from the Developer, but it was estimated that it will be at least 9 months before house building starts.

Meeting closed at 3:35pm