



# Public Document Pack

## Melksham Town Council

Town Hall, Melksham, Wiltshire, SN12 6ES

Tel: (01225) 704187

Locum Town Clerk Tracy Predeth BA(Hons), MPA, FLSCC

To:

Councillor T Price (Town Mayor)  
Councillor S Rabey (Deputy Town Mayor)  
Councillor P Alford  
Councillor P Aves  
Councillor G Cooke  
Councillor J Crundell  
Councillor S Crundell  
Councillor G Ellis  
Councillor C Forgacs  
Councillor A Griffin  
Councillor J Hubbard  
Councillor J Oatley  
Councillor C Stokes  
Councillor A Westbrook  
Councillor J Westbrook

10 June 2024

Dear Councillors

In accordance with the Local Government Act (LGA) 1972, Sch 12, paras 10 (2)(b) you are summoned to attend the **Full Council** meeting of Melksham Town Council. The meeting will be held at the Town Hall on **Monday 17th June 2024** commencing at **7.00 pm**.

A period of public participation will take place in accordance with Standing Order 3(e) prior to the formal opening of the meeting. The Press and Public are welcome to attend this meeting in person, alternatively the public and press may join the meeting via Zoom.

In accordance with the Council's commitment to being open and transparent; all Town Council meetings are recorded and broadcast live. The right to do so was established under the Openness of Local Government Bodies Regulations.

Yours sincerely

*TPredeth*

Mrs T Predeth BA(Hons), MPA, FSLCC  
Locum Town Clerk

**Melksham Town Council  
Full Council  
Monday 17 June 2024  
At 7.00 pm at the Town Hall**

**Public Participation** – To receive questions from members of the public.

*In the exercise of Council functions. Members are reminded that the Council has a general duty to consider Crime & Disorder, Health & Safety, Human Rights and the need to conserve biodiversity. The Council also has a duty to tackle discrimination, provide equality of opportunity for all and foster good relations in the course of developing policies and delivery services under the public sector Equality Duty and Equality 2010.*

**Virtual Meeting Access:**

Please follow the joining instructions below for the virtual Zoom meeting

**Join Zoom Meeting**

<https://us02web.zoom.us/j/83669876198?pwd=WlAvY1ZsYVNyUIM3VktgajFzOHhtdz09>

Meeting ID: 836 6987 6198

Passcode: 481965

**Participants will be directly let in the meeting by clicking on the above link. There is no waiting room**

**AGENDA**

**1. Apologises**

To receive apologies for absence.

**2. Declarations of Interest**

To receive any Declarations of Interest in respect of items on this agenda as required by the Code of Conduct adopted by the Council.

*Members are reminded that, in accordance with the Council's Code of Conduct, they are required to declare any disclosable pecuniary interest or other registrable interests which have not already been declared in the Council's Register of Interests. Members may however, also decide, in the interests of clarity and transparency, to declare at this point in the meeting, any such disclosable pecuniary interests which they have already*

**Email:** [towncouncil@melksham-tc.gov.uk](mailto:towncouncil@melksham-tc.gov.uk) **Web:** [www.melksham-tc.gov.uk](http://www.melksham-tc.gov.uk)  
**Facebook:** [facebook.com/melksham.town](https://facebook.com/melksham.town)

*declared on the Register, as well as any other registrable or other interests.*

**3. Public Participation**

Members of the public are invited to attend the meeting and address the council.

Members of the public are requested to send their public question to [locum@melksham-tc.gov](mailto:locum@melksham-tc.gov) by noon on the working day before the meeting.

**4. Questions from Councillors**

To receive questions from Councillors.

**5. Minutes (Pages 1 - 8)**

To confirm as a correct record the minutes of the Full Town Council meeting held on 28<sup>th</sup> May 2024

**6. Town Mayor's Announcements**

**7. Approval of the Annual Governance Statement and Accounting Statements**

The Locum R.F.O Louise Steele will be joining the meeting via zoom.

**7.1 Annual Governance Statement 2023-2024 (Pages 9 - 10)**

To consider and agree the Annual Governance Statement (AGAR part 1) for the financial year 2023-2024.

**7.2 Accounting Statements 2023-2024 (Pages 11 - 12)**

To consider and agree the Accounting Statements 2023-2024 (AGAR part 2)

**7.3 Dates for Public Inspection of Accounts (Pages 13 - 16)**

To consider and agree the dates for the public inspection of accounts being 24 June 2024 to 2 August 2024.

**8. Internal Audit (Pages 17 - 28)**

To receive the Internal Auditors report 2023-2024 and note the recommendations.

**9. Insurance Policy Renewal (Pages 29 - 36)**

To note the renewal of the policy and consider extending.

To agree the addition of Cyber Insurance.

**10. Review of Public Participation (Pages 37 - 40)**

To receive comments from Councillor Hubbard.

For discussion.

**11. Joint Melksham Neighbourhood Plan (Pages 41 - 170)**

To formally approve draft Neighbourhood Plan (JMNP2), modification statement, evidence documents and community consultation statement for Regulation 14(B) consultation, as a Qualifying Body.

Draft NHP attached. Evidence docs to follow.

**12. Committee Minutes**

**12.1 Economic Development and Planning Committee**

To receive the minutes of the Economic Development and Planning Committee meeting held on 14<sup>th</sup> May 2024.

[Link to minutes](#)

**12.2 Personnel Committee**

To receive the minutes of the Personnel Committee meeting held on 30<sup>th</sup> April 2024.

[Link to minutes](#)



## Melksham Town Council

### Minutes of the Full Council meeting held on Tuesday 28th May 2024

#### PRESENT:

Councillor T Price (Town Mayor)  
Councillor S Rabey (Deputy Town Mayor)  
Councillor P Alford  
Councillor P Aves  
Councillor G Ellis  
Councillor A Griffin  
Councillor J Hubbard  
Councillor J Oatley  
Councillor C Stokes  
Councillor A Westbrook  
Councillor J Westbrook

#### IN ATTENDANCE:

<b>OFFICERS:</b>	Andrew Meacham	Committee Clerk
	Tracy Predeth	Locum Clerk

Two members of the public and one member of the press were present. One member of the public was present virtually.

#### 1/24      **Public Participation**

Sue Mortimer.

KGV Café. No advice on whether or not to tax the building was taken. How much VAT did the Council have to pay back to HMRC at year end? How much has it cost Melksham residents by not seeking professional advice at the start of the project?

The Town Mayor Councillor Price advised that an answer was not available at this time. He asked if in future in depth questions could be emailed to the Locum Clerk in advance so she could try to have an answer available on the night. An answer would be provided within 7 days.

2024/2025 Budget. Included items totally £90000 that were movements between reserves, not expenditure. Why was this amount included in the precept charge?

The Town Mayor Councillor Price said a reply would be provided. Sue Mortimer said that none of her previous questions had been answered. The Locum Clerk said that she did respond advising that a Locum R.F.O had been appointed and she would meet with Sue at some point.

Joe McCann

In May 2023 Council signed off on £50000 funding for upgrading Awdry Avenue play area. This was subsequently delayed because of the wider Park Strategy. Is there a date for the Park Strategy?

No update on the Park Strategy was available. Councillor Oatley advised that Awdry Avenue play area is being looked at by Community Conversations. He and Councillor A Westbrook will be bringing a motion to Asset and Amenities Committee to work with Community Conversations. Councillor Oatley explained that Community Conversations provides funding for deprived areas in Wiltshire and will fund work to Awdry Avenue play area.

The Town Mayor Councillor Price noted the motions on the agenda that may affect park strategy.

**2/24 Apologises**

Apologies were received from Councillor J Crundell and Councillor Forgacs.

**3/24 Declarations of Interest**

There were no declarations of interest.

**4/24 Questions from Councillors**

There were no questions from councillors but Councillor Hubbard did mention his motion on Public Participation. The Town Mayor Councillor Price said he would look into this.

**5/24 Minutes**

The Committee Clerk advised on amendments that had been made to the minutes that were not reflected in the agenda pack but were shown in the version linked to the email sent to members.

789/23 – Councillor A Westbrook was elected Chair.

792/23 – Councillor Griffin's election as Chair was not unanimous.

793/23 – Reference to Asset Management and Amenities changed to Personnel.

The minutes of 20<sup>th</sup> May 2024 20, having previously been circulated, were approved as a correct record and signed by The Town Mayor, Councillor Price.

**6/24 Town Mayor's Announcements**

The Town Mayor, Councillor Price announced that two members of staff, Town Clerk Linda Roberts and Communications & Events Officer Gloria Delves were leaving. The final day for both would be Friday 31<sup>st</sup> May 2024.

**7/24      Reports from Unitary Councillors**

Councillor Alford advised that Wiltshire Council discussed the density of solar farms and had resolved to seek clarity from the Secretary of State on the cumulative impact of Solar Farm schemes.

**8/24      Resolution from Community Development Committee**

Councillor J Westbrook introduced the item.

Concerns were expressed on staffing the event, the current levels of general reserves and that the event had been reported as happening before it had been ratified.

It was proposed by the Town Mayor Councillor Price, seconded by Councillor A Westbrook and

**UNANIMOUSLY RESOLVED** to suspend Standing Orders.

Sue Mortimer referenced the sum she had mentioned earlier which would be available for use.

It was proposed by the Town Mayor Councillor Price, seconded by Councillor Hubbard and

**UNANIMOUSLY RESOLVED** to reinstate Standing Orders.

Councillor Hubbard suggested a friendly amendment so that any request for additional funding would come direct to full council.

It was proposed by Councillor J Westbrook, seconded by the Town Mayor Councillor Price and

**UNANIMOUSLY RESOLVED** to ratify the resolution with the amendment that any additional funding requirements would be subject to review and discussion by Full Council.

**9/24      Motion to Adopt Core Strategy**

It was agreed to advance this item up the agenda as any decision may impact on the other motions.

It was agreed to refer to the strategy as Melksham Town Council Strategy rather than Core Strategy to avoid confusion with Wiltshire Council Core Strategy.

The motion, and the way forward, was discussed. Concerns were raised about the wording of the motion and the specific recommendations imposing a rigid framework of priorities.

It was suggested that the specific recommendations were suggestions and do not form part of the resolution. It was requested that it be specifically minuted that they were suggested actions and not requirements of the motion.

The Committee Clerk read out the motion as he understood it. Councillor J Westbrook queried the omission of the wording “At each meeting...” to “...be provided”. The view was expressed by some councillors that this was unnecessary. It was suggested that this could be considered by the Task & Finish Group.

The Town Mayor Councillor Price called for a vote on the motion as read out by the Committee Clerk.

It was proposed by Councillor Ellis, seconded by Councillor Hubbard and

**UNANIMOUSLY RESOLVED to**

- (i) fully adopt the purpose and core values of Melksham Town Council as set out at the strategy meeting on 19<sup>th</sup> May 2024
- (ii) amend the transport section of the core values to refer to reliable bus and train services
- (iii) set up a Task & Finish Group, open to all councillors, to formulate an action plan.

**10/24 Motion on Green Flag Status**

Councillor A Westbrook introduced the motion. There was general agreement on the benefit of Green Flag status and discussion on the way forward.

It was proposed by Councillor A Westbrook, seconded by Councillor Griffin and

**UNANIMOUSLY RESOLVED**

- (i) To obtain Green Flag status for King George V Playing Field (commonly called the Park)
- (ii) Task and Finish group to consider the formation of a sub committee to include councillors, officers and all users of the park to help the Amenities Team plan, manage and maintain this area for people in Melksham and visitors to our area.
- (iii) Task & Finish group to bring an action plan to full council on 29<sup>th</sup> July 2024.

Membership to be open to all councillors and the locum clerk to set dates for a couple of meetings.

#### **11/24 Motion on Project Assurance Sub-Committee**

Councillor Griffin introduced the motion.

The motion, existing project management reporting and calls on staff resources were discussed. It was felt that the Melksham Town Strategy Task and Finish group may result in the reconfiguration of committees, sub-committees and working groups.

Councillor Griffin, with the agreement of the seconder Councillor J Westbrook, withdrew the motion.

#### **12/24 Motion for Youth Advisory Board**

Councillor Stokes introduced the motion.

Councillor Oatley suggested the age limit should be increased to 25 for young people with SEND and it should be an advisory group rather than allocate specifically to each committee.

Councillor Hubbard suggested speaking to Joe Sutton as Wiltshire Council. Safeguarding would need to be more detailed.

It was proposed by Councillor Stokes, seconded by Councillor and

**UNANIMOUSLY RESOLVED** to set up a Youth Advisory Board and to discuss with Joe Sutton at Wiltshire Council the next steps needed to do this.

#### **13/24 Working Groups**

It was proposed by Councillor Alford, seconded by Councillor Hubbard and

**UNANIMOUSLY RESOLVED** for the Melksham Town Strategy Task & Finish Group to review Working Groups and make recommendations back to Full Council.

#### **14/24 Financial Statements**

##### **14/24.1 Lloyds**

The statements were received.

##### **14/24.2 Unity**

The statements were received.

**14/24.3          Petty Cash**

The statements were received.

**15/24          Committee Minutes**

**15/24.1          Community Development Committee**

The minutes were received.

**15/24.2          Economic Development and Planning Committee**

The minutes were received.

**15/24.3          Finance Administration and Performance Committee**

The minutes were received.

**16/24          Working Group Notes**

The notes were received.

**17/24          Confidential Session**

It was proposed by the Town Mayor Councillor Price, seconded by Councillor J Westbrook and

**UNANIMOUSLY RESOLVED** to go into confidential session for the remainder of the meeting.

**18/24          Cricketers Cafe Lease**

The proposed lease was discussed and some concerns were raised.

It was proposed by Councillor Hubbard, seconded by Councillor Oatley and

**RESOLVED**

- (i) for the Locum Clerk, Councillor Aves, Councillor Hubbard and Councillor Rabey to meet with Craig. If Councillors Aves, Hubbard and Rabey then have no concerns the Locum Clerk is delegated to approve the lease. If there are concerns the matter will be referred back to Full Council
- (ii) The Locum R.F.O is to be asked to investigate the question of VAT on the Pavilion.

Meeting Closed at: 9.20 pm

**Signed:** .....

**Dated:**

This page is intentionally left blank



## Section 1 – Annual Governance Statement 2023/24

We acknowledge as the members of:

Melksham Town Council

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2024, that:

	Agreed		'Yes' means that this authority:
	Yes	No*	
1. We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	✓		prepared its accounting statements in accordance with the Accounts and Audit Regulations.
2. We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	✓		made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.
3. We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	✓		has only done what it has the legal power to do and has complied with Proper Practices in doing so.
4. We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	✓		during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.
5. We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	✓		considered and documented the financial and other risks it faces and dealt with them properly.
6. We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	✓		arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.
7. We took appropriate action on all matters raised in reports from internal and external audit.		✓	responded to matters brought to its attention by internal and external audit.
8. We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements.	✓		disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.
9. (For local councils only) Trust funds including charitable. In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/assets, including financial reporting and, if required, independent examination or audit.	Yes	No	N/A
			has met all of its responsibilities where, as a body corporate, it is a sole managing trustee of a local trust or trusts.

**\*Please provide explanations to the external auditor on a separate sheet for each 'No' response and describe how the authority will address the weaknesses identified. These sheets must be published with the Annual Governance Statement.**

This Annual Governance Statement was approved at a meeting of the authority on:

DD/MM/YYYY

and recorded as minute reference:

MINUTE REFERENCE

Signed by the Chair and Clerk of the meeting where approval was given:

Chair

SIGNATURE REQUIRED

Clerk

SIGNATURE REQUIRED

www.melksham-tc.gov.uk PUBLICLY AVAILABLE WEBSITE/WEBPAGE ADDRESS

This page is intentionally left blank

## Section 2 – Accounting Statements 2023/24 for

### Melksham Town Council

	Year ending		Notes and guidance
	31 March 2023 £	31 March 2024 £	
1. Balances brought forward	920,205	1,310,511	<i>Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.</i>
2. (+) Precept or Rates and Levies	966,204	999,784	<i>Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.</i>
3. (+) Total other receipts	554,863	223,096	<i>Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.</i>
4. (-) Staff costs	579,403	546,345	<i>Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.</i>
5. (-) Loan interest/capital repayments	0	0	<i>Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).</i>
6. (-) All other payments	551,358	843,791	<i>Total expenditure or payments as recorded in the cashbook less staff costs (line 4) and loan interest/capital repayments (line 5).</i>
7. (=) Balances carried forward	1,310,511	1,143,255	<i>Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).</i>
8. Total value of cash and short term investments	1,346,668	1,201,957	<i>The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.</i>
9. Total fixed assets plus long term investments and assets	5,941,051	5,970,622	<i>The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.</i>
10. Total borrowings	0	0	<i>The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).</i>

For Local Councils Only	Yes	No	N/A	
11a. Disclosure note re Trust funds (including charitable)		✓		<i>The Council, as a body corporate, acts as sole trustee and is responsible for managing Trust funds or assets.</i>
11b. Disclosure note re Trust funds (including charitable)			✓	<i>The figures in the accounting statements above exclude any Trust transactions.</i>

I certify that for the year ended 31 March 2024 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

**Signed by Responsible Financial Officer before being presented to the authority for approval**

*T. J. Predelt*

Date

7/6/24.

I confirm that these Accounting Statements were approved by this authority on this date:

as recorded in minute reference:

Signed by Chair of the meeting where the Accounting Statements were approved

SIGNATURE REQUIRED

This page is intentionally left blank

## Melksham Town Council

### NOTICE OF PUBLIC RIGHTS AND PUBLICATION OF UNAUDITED ANNUAL GOVERNANCE & ACCOUNTABILITY RETURN

ACCOUNTS FOR THE YEAR ENDED 31 MARCH 2024

Local Audit and Accountability Act 2014 Sections 26 and 27  
The Accounts and Audit Regulations 2015 (SI 2015/234)

#### NOTICE

**1. Date of announcement 19 June 2024**

**2. Each year the smaller authority's Annual Governance and Accountability Return (AGAR) needs to be reviewed by an external auditor appointed by Smaller Authorities' Audit Appointments Ltd. The unaudited AGAR has been published with this notice. As it has yet to be reviewed by the appointed auditor, it is subject to change as a result of that review.**

**Any person interested has the right to inspect and make copies of the accounting records for the financial year to which the audit relates and all books, deeds, contracts, bills, vouchers, receipts and other documents relating to those records must be made available for inspection by any person interested. For the year ended 31 March 2024, these documents will be available on reasonable notice by application to:**

Tracy Predeth – Locum Clerk  
Melksham Town Hall  
Market Place  
Melksham SN12 6ES  
T: 01225 704187  
E: [locum@melksham-tc.gov.uk](mailto:locum@melksham-tc.gov.uk)

commencing on **Monday 24 June 2024** \_

and ending on **Friday 2 August 2024**

**3. Local government electors and their representatives also have:**

- The opportunity to question the appointed auditor about the accounting records; and
- The right to make an objection which concerns a matter in respect of which the appointed auditor could either make a public interest report or apply to the court for a declaration that an item of account is unlawful. Written notice of an objection must first be given to the auditor and a copy sent to the smaller authority.

The appointed auditor can be contacted at the address in paragraph 4 below for this purpose between the above dates only.

**4. The smaller authority's AGAR is subject to review by the appointed auditor under the provisions of the Local Audit and Accountability Act 2014, the Accounts and Audit Regulations 2015 and the NAO's Code of Audit Practice 2015. The appointed auditor is:**

PKF Littlejohn LLP (Ref: SBA Team)  
15 Westferry Circus  
Canary Wharf  
London E14 4HD  
([sba@pkf-l.com](mailto:sba@pkf-l.com))

**5. This announcement is made by Tracy Predeth**

## LOCAL AUTHORITY ACCOUNTS: A SUMMARY OF YOUR RIGHTS

**Please note that this summary applies to all relevant smaller authorities, including local councils, internal drainage boards and 'other' smaller authorities.**

### **The basic position**

The [Local Audit and Accountability Act 2014](#) (the Act) governs the work of auditors appointed to smaller authorities. This summary explains the provisions contained in Sections 26 and 27 of the Act. The Act and the [Accounts and Audit Regulations 2015](#) also cover the duties, responsibilities and rights of smaller authorities, other organisations and the public concerning the accounts being audited.

As a local elector, or an interested person, you have certain legal rights in respect of the accounting records of smaller authorities. As an interested person you can inspect accounting records and related documents. If you are a local government elector for the area to which the accounts relate you can also ask questions about the accounts and object to them. You do not have to pay directly for exercising your rights. However, any resulting costs incurred by the smaller authority form part of its running costs. Therefore, indirectly, local residents pay for the cost of you exercising your rights through their council tax.

### **The right to inspect the accounting records**

Any interested person can inspect the accounting records, which includes but is not limited to local electors. You can inspect the accounting records for the financial year to which the audit relates and all books, deeds, contracts, bills, vouchers, receipts and other documents relating to those records. You can copy all, or part, of these records or documents. Your inspection must be about the accounts, or relate to an item in the accounts. You cannot, for example, inspect or copy documents unrelated to the accounts, or that include personal information (Section 26 (6) – (10) of the Act explains what is meant by personal information). You cannot inspect information which is protected by commercial confidentiality. This is information which would prejudice commercial confidentiality if it was released to the public and there is not, set against this, a very strong reason in the public interest why it should nevertheless be disclosed.

When smaller authorities have finished preparing accounts for the financial year and approved them, they must publish them (including on a website). There must be a 30 working day period, called the 'period for the exercise of public rights', during which you can exercise your statutory right to inspect the accounting records. Smaller authorities must tell the public, including advertising this on their website, that the accounting records and related documents are available to inspect. By arrangement you will then have 30 working days to inspect and make copies of the accounting records. You may have to pay a copying charge. The 30 working day period must include a common period of inspection during which all smaller authorities' accounting records are available to inspect. This will be 1-12 July 2024 for 2023/24 accounts. The advertisement must set out the dates of the period for the exercise of public rights, how you can communicate to the smaller authority that you wish to inspect the accounting records and related documents, the name and address of the auditor, and the relevant legislation that governs the inspection of accounts and objections.

### **The right to ask the auditor questions about the accounting records**

**You should first ask your smaller authority** about the accounting records, since they hold all the details. If you are a local elector, your right to ask questions of the external auditor is enshrined in law. However, while the auditor will answer your questions where possible, they are not always obliged to do so. For example, the question might be better answered by another organisation, require investigation beyond the auditor's remit, or involve disproportionate cost (which is borne by the local taxpayer). Give your smaller authority the opportunity first to explain anything in the accounting records that you are unsure about. If you are not satisfied with their explanation, you can question the external auditor about the accounting records.

The law limits the time available for you formally to ask questions. This must be done in the period for the exercise of public rights, so let the external auditor know your concern as soon as possible. The advertisement or notice that tells you the accounting records are available to inspect will also give the period for the exercise of public rights during which you may ask the auditor questions, which here

means formally asking questions under the Act. You can ask someone to represent you when asking the external auditor questions.

Before you ask the external auditor any questions, inspect the accounting records fully, so you know what they contain. Please remember that you cannot formally ask questions, under the Act, after the end of the period for the exercise of public rights. You may ask your smaller authority other questions about their accounts for any year, at any time. But these are not questions under the Act.

You can ask the external auditor questions about an item in the accounting records for the financial year being audited. However, your right to ask the external auditor questions is limited. The external auditor can only answer 'what' questions, not 'why' questions. The external auditor cannot answer questions about policies, finances, procedures or anything else unless it is directly relevant to an item in the accounting records. Remember that your questions must always be about facts, not opinions. To avoid misunderstanding, we recommend that you always put your questions in writing.

### **The right to make objections at audit**

You have inspected the accounting records and asked your questions of the smaller authority. Now you may wish to object to the accounts on the basis that an item in them is in your view unlawful or there are matters of wider concern arising from the smaller authority's finances. A local government elector can ask the external auditor to apply to the High Court for a declaration that an item of account is unlawful, or to issue a report on matters which are in the public interest. You must tell the external auditor which specific item in the accounts you object to and why you think the item is unlawful, or why you think that a public interest report should be made about it. You must provide the external auditor with the evidence you have to support your objection. Disagreeing with income or spending does not make it unlawful. To object to the accounts you must write to the external auditor stating you want to make an objection, including the information and evidence below and you must send a copy to the smaller authority. The notice must include:

- confirmation that you are an elector in the smaller authority's area;
- why you are objecting to the accounts and the facts on which you rely;
- details of any item in the accounts that you think is unlawful; and
- details of any matter about which you think the external auditor should make a public interest report.

Other than it must be in writing, there is no set format for objecting. You can only ask the external auditor to act within the powers available under the [Local Audit and Accountability Act 2014](#).

### **A final word**

You may not use this 'right to object' to make a personal complaint or claim against your smaller authority. You should take such complaints to your local Citizens' Advice Bureau, local Law Centre or to your solicitor. Smaller authorities, and so local taxpayers, meet the costs of dealing with questions and objections. In deciding whether to take your objection forward, one of a series of factors the auditor must take into account is the cost that will be involved, they will only continue with the objection if it is in the public interest to do so. They may also decide not to consider an objection if they think that it is frivolous or vexatious, or if it repeats an objection already considered. If you appeal to the courts against an auditor's decision not to apply to the courts for a declaration that an item of account is unlawful, you will have to pay for the action yourself.

For more detailed guidance on public rights and the special powers of auditors, copies of the publication [Local authority accounts: A guide to your rights](#) are available from the NAO website.

If you wish to contact your authority's appointed external auditor please write to the address in paragraph 4 of the *Notice of Public Rights and Publication of Unaudited Annual Governance & Accountability Return*.

This page is intentionally left blank





**MULBERRY**  
LOCAL AUTHORITY SERVICES LTD

Eastgate House  
Dogflud Way, Farnham  
Surrey, GU9 7UD

t 07428 647069  
e office@mulberrylas.co.uk  
w www.mulberrylas.co.uk

Mrs T Predeth  
Melksham Town Council  
Town Hall  
Market Place  
Melksham  
Wiltshire  
SN12 6ES

7 June 2024

Dear Tracy

**Re: Melksham Town Council**  
**Internal Audit Year Ended 31 March 2024 – Year-End Audit report**

**Executive summary**

Following completion of our year-end internal audit on 7 June 2024 we enclose our report for your kind attention and presentation to the council. This report contains details of the additional testing conducted at year-end and should be considered alongside the interim audit report issued following our interim audit on 1 December 2023. The audits were conducted in accordance with current practices and guidelines and testing was risk based. Whilst we have not tested all transactions, our samples have where appropriate covered the entire year to date.

Our report is presented in the same order as the assertions on the internal auditor report within the published AGAR. The start of each section details the nature of the assertion to be verified. Testing requirements follow those detailed in the audit plan previously sent to the council, a copy of this is available on request. The report concludes with an opinion as to whether each assertion has been met or not. Where appropriate **recommendations for action are shown in bold text and are summarised in the table at the end of the report.**

Our sample testing did not uncover any errors or misstatements that require reporting to the external auditor at this time. A more detailed review of concerns raised regarding processes is to be arranged in September to provide assurances in these areas.

**Regulation**

The Accounts and Audit Regulations 2015 require smaller authorities, each financial year, to conduct a review of the effectiveness of the system of internal control and prepare an annual governance statement in accordance with proper practices in relation to accounts. In addition to this, a smaller authority is required by Regulation 5(1) of the Accounts and Audit Regulations 2015 to “undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.”

Internal auditing is an independent, objective assurance activity designed to improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The purpose of internal audit is to review and report to the authority on whether its systems of financial and other internal controls over its activities and operating procedures are effective.

Internal audit’s function is to test and report to the authority on whether its specific system of internal control is adequate and working satisfactorily. The internal audit reports should therefore be made available to all Members to support and inform them when they considering the authority’s approval of the annual governance statement.

### Independence and competence

Your audit was conducted by Andy Beams of Mulberry & Co, who has over 30 years' experience in the financial sector with the last 13 years specialising in local government.

Your auditor is independent from the management of the financial controls and procedures of the council and has no conflicts of interest with the audit client, nor do they provide any management or financial assistance to the client.

### Engagement Letter

An engagement letter was previously issued to the council covering the 2023/24 internal audit assignment. Copies of this document are available on request.

### Planning and inherent risk assessment

The scope and plan of works including fee structure was issued to the council under separate cover. Copies of this document are available on request. In summary, our work will address each of the internal control objectives as stated on the Annual Internal Audit Report of the AGAR.

It is our opinion that the inherent risk of error or misstatement is low, and the controls of the council can be relied upon and as such substantive testing of individual transactions is not required. Testing to be carried out will be "walk through testing" on sample data to encompass the period of the council year under review.

### Year-End Audit

The year-end audit was conducted on site. Information was requested from the council in advance of the audit taking place, and this was reviewed along with other information published on the council's website [www.melksham-tc.gov.uk](http://www.melksham-tc.gov.uk)

### Table of contents

		TEST AT INTERIM	TEST AT FINAL	PAGE
	<b>INTERIM AUDIT – POINTS CARRIED FORWARD</b>			3
B	<b>FINANCE REGULATIONS, GOVERNANCE AND PAYMENTS</b>	✓	✓	4
C	<b>RISK MANAGEMENT AND INSURANCE</b>	✓	✓	4
D	<b>BUDGET, PRECEPT AND RESERVES</b>	✓	✓	4
E	<b>INCOME</b>	✓	✓	5
F	<b>PETTY CASH</b>	✓	✓	5
G	<b>PAYROLL</b>	✓	✓	6
H	<b>ASSETS AND INVESTMENTS</b>	✓	✓	6
I	<b>BANK AND CASH</b>	✓	✓	6
J	<b>YEAR END ACCOUNTS</b>		✓	6
K	<b>LIMITED ASSURANCE REVIEW</b>		✓	8
L	<b>PUBLICATION OF INFORMATION</b>		✓	9
M	<b>EXERCISE OF PUBLIC RIGHTS – INSPECTION OF ACCOUNTS</b>	✓	✓	9
	<b>ACHIEVEMENT OF CONTROL ASSERTIONS AT FINAL AUDIT DATE</b>		✓	10

**Interim Audit - Points Carried Forward**

Audit Point	Audit Findings	Council comments on actions taken since interim visit
<b>B. FINANCIAL REGULATIONS, GOVERNANCE AND PAYMENTS</b>	<p>The External Audit documents have been published on the council website along with the Notice of Conclusion of Audit as part of the meeting documents, but not under the relevant finance and audit sections of the website. I understand from the Locum Clerk this is due to ongoing issues with the website provider and recommend this is resolved by the year-end as the External Auditor may question the correct publication process being followed as the information is not readily accessible</p> <p>I note that the most recently appointed councillor's form is missing from the website and that two former councillor's Register of Interest forms are still listed, and this should be updated as soon as possible.</p>	A review and update of the website remain required to ensure that information is published in the most transparent way possible.
<b>B. RISK MANAGEMENT AND INSURANCE</b>	Based on the balances held at the date of the interim internal audit, I recommend the council considers increasing the Internal Crime level to ensure it covers the maximum balance held at any point during the year.	To be reviewed at the next interim audit.
<b>E. INCOME</b>	The Locum Clerk confirmed that a review of fees and charges has not been carried out yet, and this will need to be completed by the end of the financial year to comply with the requirements of the Financial Regulations.	Evidence was provided at the final audit that a review had taken place earlier in the year and this internal control objective has been achieved.
<b>F. PETTY CASH</b>	I note that there is evidence of other amounts being paid into the petty cash which is contrary to FR 6.18(b). The council must ensure that cash received is banked and allocated correctly to the appropriate nominal code in the accounting software, and I will review the compliance with this at the year-end internal audit to confirm if a positive sign-off for this internal control objective can be achieved.	There is evidence that this practice continued after the internal audit took place, partly due to issues with a lack of availability of credit slips, but this remains a breach of Financial Regulations.
<b>I. BANK AND CASH</b>	I note that although the bank reconciliations have been signed, there is no evidence of the bank statement being signed and I will need to see evidence of this activity being completed before the year-end to achieve a positive sign-off for this internal control objective.	At the final audit, I was shown evidence of the bank reconciliations being checked and signed, and the bank statement entries being initialled by a councillor, which shows that the principle of the Financial Regulation has been followed. I encourage the councillor completing the checks to also sign the bank statement next to the balance which they have agreed the reconciliation to.

## B. FINANCE REGULATIONS, GOVERNANCE AND PAYMENTS

### Internal audit requirement

*This authority complied with its Finance Regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for.*

### Audit findings

*Check that the council's Finance Regulations are being routinely followed.*

The final internal audit was conducted with locum staff members, following changes in the senior management team during the year. There have been concerns raised over practices with the approval of payments and processes for the award of contracts and tenders, and the locum staff are aware of these concerns.

With the focus for the year-end audit the sign-off of the AGAR, a full review of these issues has not been conducted during this visit. I have discussed the prospect of two interim visits next year with the locum staff, to include one in September with a focus on reviewing approval processes and resolving any VAT issues, which will be conducted by a member of our audit team with specialist knowledge in these areas.

## C. RISK MANAGEMENT AND INSURANCE

### Internal audit requirement

*This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.*

### Audit findings

We discussed assertion 8 on the Annual Governance Statement and whether this had any impact on the council.

*"We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and, where appropriate, have included them in the accounting statements."*

The locum staff are aware of certain issues outstanding at year-end and will prepare an explanation for submission to the External Auditor.

## D. BUDGET, PRECEPT AND RESERVES

### Internal audit requirement

*The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.*

### Audit findings

There is evidence within the minutes of meetings that reviews of financial performance take place during the year, providing councillors with sufficient information to make informed financial decisions.

Analysis of the council's year-end income and expenditure report shows total income for the year reported as 103.1% and total expenditure as 60.3%.

At the end of the financial year, the council held circa £648,659 in earmarked reserves (EMR) including circa £53,660 allocated as a Community Infrastructure Levy (CIL) EMR. The council also held circa £494,596 in the general reserve at the end of the financial year. I was able to compare reserve information across the management accounts and the AGAR working documents and found the totals to be consistent.

The Joint Panel on Accountability and Governance (JPAG) Practitioner's guide states 'the generally accepted recommendation with regard to the appropriate minimum level of a smaller authority's general reserve is that this should be maintained at between three and twelve months of net revenue expenditure' (para 5.33).

The general reserve balance is within the recommended range.

## E. INCOME

### Internal audit requirement

*Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.*

### Audit findings

At the interim audit, I noted that 'Financial Regulation 9.3 states 'The council will review all fees and charges at least annually, following a report of the Town Clerk.'

*The Locum Clerk confirmed that a review of fees and charges has not been carried out yet, and this will need to be completed by the end of the financial year to comply with the requirements of the Financial Regulations.'*

At the final audit, evidence was provided to confirm that the fees and charges had, in fact, been reviewed in May 2023 and evidenced within the minutes of the relevant meeting.

## F. PETTY CASH

### Internal audit requirement

*Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for.*

### Audit findings

At the interim audit, it was noted that the council maintains a small petty cash float used for incidental expenditure items and this is reconciled monthly and managed as a separate cashbook through the accounting system.

The council's adopted Financial Regulations include details on the management of petty cash and include FR 6.18 which states 'The Town Clerk may provide petty cash to officers for the purpose of defraying operational and other expenses. Vouchers for payments made shall be forwarded to the Town Clerk with a claim for reimbursement.

- a) The Town Clerk shall maintain a petty cash float of £250 for the purpose of defraying operational and other expenses. Vouchers for payments made from petty cash shall be kept substantiating the payment.*
- b) Income received must not be paid into the petty cash float but must be separately banked, as provided elsewhere in these regulations.*
- c) Payments to maintain the petty cash float shall be shown separately on the schedule of payments presented to council under 5.2 above.'*

A review of the petty cash records showed that receipts were maintained for expenditure items in accordance with the Financial Regulations, but there was evidence of other amounts being paid into the petty cash which is contrary to FR 6.18(b).

**There is evidence that this practice continued after the internal audit took place, partly due to issues with a lack of availability of credit slips, but this remains a breach of Financial Regulations and consequently I must conclude that the requirements of this internal control objective has not been met.**

**G. PAYROLL****Internal audit requirement**

*Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.*

**Audit findings**

I reviewed the total figure being included within box 4 (staff costs) on the Annual Governance and Accountability Return (AGAR) and was able to confirm from the accounting software that this includes only salary payments, HMRC payments and pension contributions.

**H. ASSETS AND INVESTMENTS****Internal audit requirement**

*Asset and investments registers were complete and accurate and properly maintained.*

**Audit findings**

I confirmed the asset register total matches that included in box 9 (total fixed assets plus long term investments and assets) on the AGAR and was able to trace the changes to the previous year's total against the asset register.

The council has no borrowing and has no long-term investments.

**I. BANK AND CASH****Internal audit requirement**

*Periodic and year-end bank account reconciliations were properly carried out.*

**Audit findings**

At the interim audit I noted 'I noted that the reconciliation and bank statement have not been signed in accordance with the Financial Regulations, and I will need to see evidence of this practice being reintroduced at the final internal audit to allow for a positive sign-off for this internal control objective.'

At the final audit, I was shown evidence of the bank reconciliations being checked and signed, and the bank statement entries being initialled by a councillor, which shows that the principle of the Financial Regulation has been followed. I encourage the councillor completing the checks to also sign the bank statement next to the balance which they have agreed the reconciliation to.

I reviewed the March 2024 bank reconciliation for all accounts and was able to confirm the year-end balances to the bank statements and found no errors.

Due to the size of the council's annual budget, it does not benefit from the £85,000 protection limit offered by the Financial Services Compensation Scheme (FSCS).

**J. YEAR END ACCOUNTS****Internal audit requirement**

*Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.*

**Audit findings**

The council, at its meeting to sign off the year-end accounts, must discuss Section 1 of the AGAR (Annual Governance Statement) and record this activity in the minutes of the meeting. **COUNCIL IS REMINDED THAT THIS MUST BE A SEPARATE AGENDA ITEM PRIOR TO THE SIGNING OF SECTION 2 OF THE AGAR (ANNUAL ACCOUNTS).**

**Section 1 – Annual Governance Statement**

Based on the internal audit finding I recommend using the table below as the basis for that discussion.

	<b>Annual Governance Statement</b>	<i>'Yes', means that this authority</i>	<b>Suggested response based on evidence</b>
1	We have put in place arrangements for effective financial management during the year, and for the preparation of the accounting statements.	<i>prepared its accounting statements in accordance with the Accounts and Audit Regulations.</i>	<b>YES</b> – accounts follow latest Accounts and Audit Regulations and practitioners guide recommendations.
2	We maintained an adequate system of internal control including measures designed to prevent and detect fraud and corruption and reviewed its effectiveness.	<i>made proper arrangements and accepted responsibility for safeguarding the public money and resources in its charge.</i>	<b>YES</b> – there is regular reporting of financial transactions and accounting summaries, offering the opportunity for scrutiny.
3	We took all reasonable steps to assure ourselves that there are no matters of actual or potential non-compliance with laws, regulations and Proper Practices that could have a significant financial effect on the ability of this authority to conduct its business or manage its finances.	<i>has only done what it has the legal power to do and has complied with Proper Practices in doing so.</i>	<b>YES</b> – the Clerk advises the council in respect of its legal powers.
4	We provided proper opportunity during the year for the exercise of electors' rights in accordance with the requirements of the Accounts and Audit Regulations.	<i>during the year gave all persons interested the opportunity to inspect and ask questions about this authority's accounts.</i>	<b>YES</b> – the requirements and timescales for 2022/23 year-end were followed.
5	We carried out an assessment of the risks facing this authority and took appropriate steps to manage those risks, including the introduction of internal controls and/or external insurance cover where required.	<i>considered and documented the financial and other risks it faces and dealt with them properly.</i>	<b>YES</b> – the council has a risk management scheme and appropriate external insurance.
6	We maintained throughout the year an adequate and effective system of internal audit of the accounting records and control systems.	<i>arranged for a competent person, independent of the financial controls and procedures, to give an objective view on whether internal controls meet the needs of this smaller authority.</i>	<b>YES</b> – the council has appointed an independent and competent internal auditor.
7	We took appropriate action on all matters raised in reports from internal and external audit.	<i>responded to matters brought to its attention by internal and external audit.</i>	<b>NO</b> – not all matters raised in internal and external audit reports have been addressed.
8	We considered whether any litigation, liabilities or commitments, events or transactions, occurring either during or after the year-end, have a financial impact on this authority and. Where appropriate, have included them in the accounting statements.	<i>disclosed everything it should have about its business activity during the year including events taking place after the year end if relevant.</i>	<b>YES</b> – the council will provide an explanation to the external auditor over pending matters.
9	Trust funds including charitable – In our capacity as the sole managing trustee we discharged our accountability responsibilities for the fund(s)/asset(s), including financial reporting and, if required, independent examination or audit.	<i>has met all its responsibilities where, as a body corporate, it is a sole managing trustee of a local trust or trusts.</i>	<b>N/A</b> – the council has no trusts.

**Section 2 – Accounting Statements**

AGAR box number		2022/23	2023/24	Internal Auditor notes
1	Balances brought forward	920,205	1,310,511	Agrees to 2022/23 carry forward (box 7)
2	Precept or rates and levies	966,204	999,784	Figure confirmed to central precept record
3	Total other receipts	554,863	223,096	Agrees to underlying accounting records
4	Staff costs	579,403	546,345	Agrees to underlying accounting records. Includes only expenditure allowed as staff costs (see section G)
5	Loan interest/capital repayments	0	0	Council has no borrowing
6	All other payments	551,358	843,791	Agrees to underlying accounting records
7	Balances carried forward	1,310,511	1,143,255	Casts correctly and agrees to balance sheet
8	Total value of cash and short-term investments	1,346,668	1,201,957	Agrees to bank reconciliation for all accounts
9	Total fixed assets plus long-term investments and assets	5,941,051	5,970,622	Matches asset register total and changes from previous year have been traced
10	Total borrowings	0	0	Council has no borrowing
11a	Disclosure note re Trust Funds (including charitable)	No	No	No – the council is not a sole trustee
11b	Disclosure note re Trust Funds (including charitable)	N/A	N/A	N/A – the council is not a sole trustee

**Audit findings**

The year-end accounts have been correctly prepared on an income and expenditure basis with the box 7 and 8 reconciliation explained due to year-end debtors, creditors, accruals, payments in advance and receipts in advance.

The AGAR correctly casts and cross casts and last year's comparatives match the figures submitted for 2022/23 and published on the council website.

The variance analysis had not been completed at the date of the final internal audit, although the locum clerk is aware of the requirement and will complete the document using the variance report produced from the Rialtas accounting system.

**K. LIMITED ASSURANCE REVIEW****Internal audit requirement**

*IF the authority certified itself as exempt from a limited assurance review in 2022/23, it met the exemption criteria and correctly declared itself exempt. (If the authority had a limited assurance review of its 2022/23 AGAR tick "not covered")*

**Audit findings**

The council did not certify itself exempt in 2022/23 due to exceeding the income and expenditure limits and this test does not apply.



**L: PUBLICATION OF INFORMATION****Internal audit requirement**

*The authority published the required information on a website/webpage up to date at the time of the internal audit in accordance with the relevant legislation*

**Audit findings**

For councils with a turnover over £25,000, it is recommended best practice to follow the Local Government Transparency Code 2015, but not a statutory requirement and therefore not subject to verification during the internal audit.

All councils are required to follow The Accounts and Audit Regulations which include the following requirements:

**13(1)** An authority must publish (which must include publication on that authority's website)

- (a) the Statement of Accounts together with any certificate or opinion entered by the local auditor in accordance with section 20(2) of the Act; and
- (b) the Annual Governance Statement approved in accordance with regulation 6(3)

**13(2)** Where documents are published under paragraph (1), the authority must

- (a) keep copies of those documents for purchase by any person on payment of a reasonable sum; and
- (b) ensure that those documents remain available for public access for a period of not less than five years beginning with the date on which those documents were first published in accordance with that paragraph.

I was able to confirm that pages 4 (Annual Governance Statement), 5 (Accounting Statements) and 6 (External Auditor's Report and Certificate) of the AGAR are available for review on the council website for financial years 2018/19 to 2022/23 inclusive.

**M: EXERCISE OF PUBLIC RIGHTS - INSPECTION OF ACCOUNTS****Internal audit requirement**

*The authority has demonstrated that during summer 2023 it correctly provided for the exercise of public rights as required by the Accounts and Audit Regulations.*

**Audit findings**

Inspection – key dates	2022/23 Actual	2023/24 Proposed
Date AGAR signed by council	26 June 2023	TBC
Date inspection notice issued	27 June 2023	TBC
Inspection period begins	28 June 2023	TBC
Inspection period ends	8 August 2023	TBC
Correct length (30 working days)	Yes	Yes
Common period included (first 10 working days of July)	Yes	Yes

I am satisfied the requirements of this control objective were met for 2022/23, and assertion 4 on the Annual Governance Statement can therefore be signed off by the council.

The Locum Clerk is aware of the requirements for the period and will complete the notice once a decision on the date of the council meeting is made.

**Achievement of control assertions at year-end audit date**

Based on the tests conducted during the year-end audit, our conclusions on the achievement of the internal control objectives are summarised in the table below and are reflected in the completion of the Annual Internal Audit Report within the AGAR.

	INTERNAL CONTROL OBJECTIVE	YES	NO	NOT COVERED
A	Appropriate accounting records have been properly kept throughout the financial year	✓		
B	This authority complied with its Finance Regulations, payments were supported by invoices, all expenditure was approved, and VAT was appropriately accounted for	✓		
C	This authority assesses the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these	✓		
D	The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	✓		
E	Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for	✓		
F	Petty cash payments were properly supported by receipts, all petty cash expenditure was approved, and VAT appropriately accounted for		✓	
G	Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	✓		
H	Asset and investments registers were complete and accurate and properly maintained.	✓		
I	Periodic bank account reconciliations were properly carried out during the year.	✓		
J	Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	✓		
K	If the authority certified itself as exempt from a limited assurance review in 2022/23, it met the exemption criteria and correctly declared itself exempt. <i>(If the authority had a limited assurance review of its 2022/23 AGAR tick "not covered")</i>			✓
L	The authority published the required information on a website/webpage up to date at the time of the internal audit in accordance with the relevant legislation	✓		
M	The authority, during the previous year (2022/23) correctly provided for the period for the exercise of public rights as required by the Accounts and Audit Regulations <i>(evidenced by the notice published on the website and/or authority approved minutes confirming the dates set)</i> .	✓		
N	The authority has complied with the publication requirements for 2022/23 AGAR.	✓		
O	Trust funds (including charitable) – The council met its responsibilities as a trustee.			✓

Should you have any queries please do not hesitate to contact me.

Yours sincerely



**Andy Beams**

**Mulberry Local Authority Services Ltd**

# Annual Internal Audit Report 2023/24

Melksham Town Council

www.melksham-tc.gov.uk

PUBLICLY AVAILABLE WEBSITE/WEBPAGE ADDRESS

During the financial year ended 31 March 2024, this authority's internal auditor acting independently and on the basis of an assessment of risk, carried out a selective assessment of compliance with the relevant procedures and controls in operation and obtained appropriate evidence from the authority.

The internal audit for 2023/24 has been carried out in accordance with this authority's needs and planned coverage. On the basis of the findings in the areas examined, the internal audit conclusions are summarised in this table. Set out below are the objectives of internal control and alongside are the internal audit conclusions on whether, in all significant respects, the control objectives were being achieved throughout the financial year to a standard adequate to meet the needs of this authority.

Internal control objective	Yes	No*	Not covered**
A. Appropriate accounting records have been properly kept throughout the financial year.	✓		
B. This authority complied with its financial regulations, payments were supported by invoices, all expenditure was approved and VAT was appropriately accounted for.	✓		
C. This authority assessed the significant risks to achieving its objectives and reviewed the adequacy of arrangements to manage these.	✓		
D. The precept or rates requirement resulted from an adequate budgetary process; progress against the budget was regularly monitored; and reserves were appropriate.	✓		
E. Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.	✓		
F. Petty cash payments were properly supported by receipts, all petty cash expenditure was approved and VAT appropriately accounted for.		✓	
G. Salaries to employees and allowances to members were paid in accordance with this authority's approvals, and PAYE and NI requirements were properly applied.	✓		
H. Asset and investments registers were complete and accurate and properly maintained.	✓		
I. Periodic bank account reconciliations were properly carried out during the year.	✓		
J. Accounting statements prepared during the year were prepared on the correct accounting basis (receipts and payments or income and expenditure), agreed to the cash book, supported by an adequate audit trail from underlying records and where appropriate debtors and creditors were properly recorded.	✓		
K. If the authority certified itself as exempt from a limited assurance review in 2022/23, it met the exemption criteria and correctly declared itself exempt. (If the authority had a limited assurance review of its 2022/23 AGAR tick "not covered")			✓
L. The authority published the required information on a website/webpage up to date at the time of the internal audit in accordance with the relevant legislation.	✓		
M. In the year covered by this AGAR, the authority correctly provided for a period for the exercise of public rights as required by the Accounts and Audit Regulations (during the 2023-24 AGAR period, were public rights in relation to the 2022-23 AGAR evidenced by a notice on the website and/or authority approved minutes confirming the dates set).	✓		
N. The authority has complied with the publication requirements for 2022/23 AGAR (see AGAR Page 1 Guidance Notes).	✓		
O. (For local councils only)	Yes	No	Not applicable
Trust funds (including charitable) – The council met its responsibilities as a trustee.			✓

For any other risk areas identified by this authority adequate controls existed (list any other risk areas on separate sheets if needed).

Date(s) internal audit undertaken

Name of person who carried out the internal audit

01/12/2023 07/06/2024

ANDY BEAMS, MULBERRY LAS LTD

Signature of person who carried out the internal audit

Beams

Date

07/06/2024

\*If the response is 'no' please state the implications and action being taken to address any weakness in control identified (add separate sheets if needed).

\*\*Note: If the response is 'not covered' please state when the most recent internal audit work was done in this area and when it is next planned; or, if coverage is not required, the annual internal audit report must explain why not (add separate sheets if needed).

This page is intentionally left blank



# Welcome to Coalition

This signature bundle contains **2 documents** that each must be signed prior to the issuance of your Coalition insurance policy.

1

**Coalition Risk Solutions Limited -  
Electronic Consents**

2

**Application**



## COALITION RISK SOLUTIONS LIMITED - ELECTRONIC CONSENTS

### Electronic Signature and Electronic Delivery of Disclosures and Notices

By signing below, you consent to use electronic communications, electronic records, and electronic signatures rather than paper documents for the forms provided on this web site. Those forms include:

- Insurance application
- Insurance policy and other related documents
- All updates and details regarding your policy
- Responses to communications from you
- All changes and updates to these disclosures, notices, and documents

You understand that your electronic signature is legally binding, just as if you had signed a paper document. Your consent to use electronic signatures and documents applies to materials related to purchasing and effecting your insurance policy.

### System Requirements

In order to use electronic signatures and to receive electronic communications, you must have

- a personal computer or other device that can connect to the Internet
- an e-mail address
- a web browser
- software that enables you to receive and view Portable Document Format (PDF) files, such as Adobe Acrobat Reader (available for a free download at <https://get.adobe.com/reader>)

### Withdrawal of Electronic Acceptance of Disclosures and Notices

You may withdraw your consent to receive electronic communications at any time. If you wish to do so, you must email us at [help@coalitioninc.com](mailto:help@coalitioninc.com) with the following subject line: "WITHDRAW ELECTRONIC CONSENT." The body of the email must include your name, policy number, effective and expiration dates of the policy, the effective date of your withdrawal, and whether you want (a) all communications to be in paper form and (b) your insurance policy to be sent to you in paper form.

### Applicant Security Contact Information for Security Notifications

By providing the information below, you authorise Coalition to contact you in the event of a security event Coalition deems significant. These contact methods may include:

- E-mail
- Phone (including voicemail)
- Mail

### Terms of Use and Privacy Policy

By signing below, you have read and agreed to Coalition's Terms of Use and Privacy Policy (available at <https://www.coalitioninc.com/en-gb/legal/terms> and <https://www.coalitioninc.com/legal/privacy>).

**Policyholder/Applicant's Signature:** \_\_\_\_\_

**Print Name of Authorised Representative:** \_\_\_\_\_

**Policyholder/Applicant's Phone Number:** \_\_\_\_\_

**Title:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Security Contact Email:** \_\_\_\_\_

**Security Contact Phone Number:** \_\_\_\_\_

## AUTO RENEWALS

To give the policyholder peace of mind and ensure they have continuous cover, we will automatically renew their cover, **subject to the policy meeting our automatic renewal eligibility criteria.**

If, after our auto-renewal assessment, the policy **does not** meet the eligibility criteria, we will inform you 90 days prior to the policy expiry date. This means that any renewal will go through the standard manual underwriting review process. If renewal terms are offered, it will require your explicit instructions to renew and a payment of premium.

If we **do not** inform you that the policy **will not** automatically renew, then when the policy automatically renews, you'll receive the renewal policy and invoice approximately one week prior to the current policy's expiration date.

The policyholder can opt-out of automatic renew at any time, by either the policyholder or the broker emailing us at [renewals@coalitioninc.com](mailto:renewals@coalitioninc.com) or by calling +44 (0)20-4536-4690.

If the policyholder does not want to renew the policy, or any details have changed, please contact us before the renewal date. For cancellation rights and terms, please refer to the policy documents.



## CYBER POLICY APPLICATION

### General Information

Named Insured	Melksham Town Council
Website and email Domain(s) <i>Please list all website addresses including web and email domains</i>	melksham-tc.gov.uk
Address	Melksham Melksham, England SN12 6ES
Industry	State Level Government - Local Government (Parish / Town Councils (United Kingdom Only))
Number of Employees	26-50
Turnover (expected over the next 12 months)	£1,200,000
Gross Profit / Net Turnover (expected over the next 12 months)	N/A

### Loss History

1. During the past three years, did Melksham Town Council experience a cyber incident, claim or loss, whether insured or not, which could have been covered under a policy similar to the proposed insurance, this includes but is not limited to any:	No
(i) actual or reasonably suspected data breach or security failure, including notifying consumers or third parties of a data breach or security failure	
(ii) claims or complaints with respect to privacy injury, breach of information or network security, unauthorised disclosure of information, defamation, or content infringement;	
(iii) government action, investigation, or subpoena regarding any alleged violation of a privacy law or regulation; or	
(iv) actual or attempted extortion demand with respect to (insured's) data or computer systems.	
(If Yes) Please provide details.	
2. Does Melksham Town Council have knowledge or information regarding any fact, circumstance, situation, or event that could reasonably give rise to a claim or loss under the proposed insurance?	No
(If Yes) Please provide details.	

*If Melksham Town Council has knowledge or information regarding any fact, circumstance, situation, or event that may give rise to a claim or loss under the proposed insurance policy, any claim or loss arising therefrom is excluded from the coverage.*

### Security Controls

3. Does Melksham Town Council implement encryption on laptop computers, desktop computers, and other portable media devices?	Sometimes
4. Does Melksham Town Council collect, process, store, transmit, or have access to any Payment Card Information (PCI) or Personally Identifiable Information (PII), other than employees of Melksham Town Council?	Yes

a.	(If Yes) What is the estimated annual volume of payment card transactions (credit cards, debit cards, etc.)?	<100,000
b.	(If Yes) How many PII records does Melksham Town Council collect, process, store, transmit, or have access to?	<100,000
5.	Does Melksham Town Council maintain at least weekly backups of all sensitive or otherwise critical data and all critical business systems offline or on a separate network?	Yes
6.	For which of the following services do you enforce Multi-Factor Authentication (MFA)?	
a.	Email	Yes
b.	Virtual Private Network (VPN), Remote Desktop Protocol (RDP), RDWeb, RD Gateway, or other remote access	Yes
c.	Network / cloud administration or other privileged user accounts	Yes
7.	Does Melksham Town Council require a secondary means of communication to validate the authenticity of both:	
a.	Funds transfer requests (Bacs, Faster Payments, CHAPS, SWIFT, etc.) before processing a request in excess of £5,000?	Yes
b.	Any request to change banking details (Bacs, Faster Payments, CHAPS, SWIFT, payroll distribution, etc.)?	
8.	Within the last 3 years has Melksham Town Council been subject to any complaints concerning the content of its website, advertising materials, social media, or other publications?	No
9.	Does Melksham Town Council enforce procedures to remove content (including third party content) that may infringe or violate any intellectual property or privacy right?	Yes

**Important Notice**

Before a contract of insurance is entered into, the applicant is required to give a fair presentation of the risk in accordance with the Insurance Act 2015. We will rely on this information in deciding whether to offer insurance, setting the terms and for setting the premium.

You must disclose every material circumstance which you know or ought to know, or failing that, make a disclosure which gives us sufficient information to put a prudent insurer on notice that it needs to make further enquiries for the purpose of revealing those material circumstances. Such disclosure must be made in a manner which would be reasonably clear and accessible to a prudent insurer and following a reasonable search of information held within your organisation or held by any other person or third party.

A circumstance or representation is material if it would influence the judgement of a prudent insurer in determining whether to take the risk and, if so, on what terms. If you have any questions regarding your duty to make a fair presentation of the risk, then you should contact your insurance broker for further information.

**Declaration**

I/we declare that I/we have made a fair presentation of the risk. This declaration is signed by a director or officer who is authorised to arrange insurance on behalf of the applicant.

_____ <b>Signature</b>	_____ <b>Date</b>
_____ <b>Print Name of Authorized Representative</b>	
_____ <b>Title</b>	
_____ <b>Email</b>	

## DATA PROTECTION

We collect and use relevant information about you to provide you with your insurance cover or the insurance cover that benefits you and to meet our legal obligations. This information includes details such as your name, address and contact details and any other information that we collect about you in connection with the insurance cover from which you benefit. Exceptionally, this information may include more sensitive details such as information about your health and any criminal convictions you may have and we may need your consent to process such information about you. Where this is the case you will be asked for consent separately. If you withdraw your consent (which you may do at any time), this may affect our ability to provide the insurance cover from which you benefit and may prevent us handling your claims.

The way insurance works means that your information may be shared with, and used by, a number of third parties in the insurance sector for example, insurers, agents or brokers, reinsurers, loss adjusters, sub-contractors, regulators, law enforcement agencies, fraud and crime prevention and detection agencies and compulsory insurance databases. We will only disclose your personal information in connection with the insurance cover that we provide and to the extent required or permitted by law.

Where you provide us or your insurer, agent or broker with details about other people, you must provide this notice to them.

For more information about how we use your personal information please see our full privacy notice(s), which is/are available online on our website(s) at <https://www.coalitioninc.com/legal/privacy>.

You have rights in relation to the information we hold about you, including the right to access your information. If you wish to exercise your rights, discuss how we use your information or request a copy of our full privacy notice(s), please contact us, or the agent or broker that arranged your insurance who will provide you with our contact details at: [legal@coalitioninc.com](mailto:legal@coalitioninc.com)

Coalition is a trading name of Coalition Risk Solutions Ltd. which is an appointed representative of Davies MGA Services Limited, a company authorised and regulated by the Financial Conduct Authority under firm reference number 597301 to carry on insurance distribution activities. Coalition Risk Solutions Ltd. is registered in England and Wales company number 13036309. Registered office at 34-36 Lime Street, London, United Kingdom, EC3M 7AT.

## **Motion to amend how Public and Member Questions are managed by Council Meetings.**

### **Amend section 3**

*3.e Members of the public may make representations, answer questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda.*

To read

*3.e Members of the public may make representations, answer questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda (subject to the conditions set out in Section 3)*

**Remove** the following items from current standing orders:

*3f - The period of time designated for public participation at a meeting in accordance with standing order 3(e) shall not exceed (15) minutes unless directed by the chair of the meeting.*

*3g - Subject to standing order 3(f), a member of the public shall not speak for more than three minutes.*

*3h - In accordance with standing order 3(e), a question shall not require a response at the meeting nor start a debate on the question. The chair of the meeting may direct that a written or oral response be given.*

### **Add new Section 3**

To insert a new section 3 called "Questions to Council" and then renumber remainder of document accordingly.

## **3. Questions/Representations to Council**

### **1) Method for asking questions.**

- a) There shall be a period of no more than 30 minutes at the start of all meetings of the Town Council for members of the public and Council to ask questions and/or make representations. This time should, at the discretion of the Chair, be split 20 minutes for public questions and 10 for member questions.
- b) Where there are a number of people who are wanting to speak, these will be taken one at a time.
- c) The Committee Clerk will, prior to the formal opening of the meeting, ask all members of the public and councillors who wish to ask a question or make a representation to indicate and note their names for the record.
- d) Each member of the public will then be invited to ask their first question or make their representation. Once all members of the public who wish to speak have been given the opportunity then a second round of questions can begin for those who have additional questions. Such a process to be continued until there are no more questions or the maximum time limit has been reached.
- e) The same process to be followed for Member questions if required.

### **2) Members of the Public**

- a) Members of the public are encouraged to attend meetings of the Town Council and to raise questions of public concern at any meeting of the Full Council. At these meetings the public may ask questions or make a representation relating to any issues of council business.
  - b) Members of the public are restricted to making one representation at a meeting and should speak for no more than 3 minutes (including any question they may have relating to their representation).
  - c) Where questions are asked at committee or sub-committee meetings these should be restricted to the subject area covered by the committee/sub-committee's Terms of Reference. Where a question is asked that is not relevant to the committee/sub-committee then it should be passed on to the relevant officer for the correct committee and a written answer provided or, at the questioner's request, asked at the next meeting of the appropriate committee.
  - d) All questions should be directed to the Chair of the meeting who will either respond or request another councillor or officer to do so on their behalf.
  - e) Where possible all questions should be submitted in writing not less than 5 working days before the council meeting to allow the appropriate officer/councillor to prepare a proper written response which should normally be published at least 24 hours prior to the meeting. There may be occasions where this is not possible and in these cases such notice will be given to the person submitting the question and a verbal response will be given at the meeting.
  - f) Members of the public may ask questions without having given advance notice but must be aware that a detailed answer may not be possible with the opportunity to research the matter. In these instances, a written answer will be provided after the meeting, normally with 7 working days.
  - g) Where a written or verbal answer is given the original questioner may ask ONE supplementary question.
  - h) There is no debate on public questions and, unless otherwise invited by the Chair, no member of the public, elected member or officer should speak to an issue raised.
- 3) Elected Members of the Council**
- a) Members of the council are welcome to submit questions for inclusion on the agenda of a meeting no less than 5 working days before the date of the meeting.
  - b) Where a question is submitted within this deadline but after the agenda for a meeting being published the question should still be considered as valid and published as a supplement to the agenda.
  - c) Any questions submitted as above should receive a substantive written response at least 24 hours in advance of the meeting.
  - d) Members are entitled to ask questions at the beginning of a meeting without prior notice but must accept that a detailed answer is unlikely, and a subsequent written answer will be provided within 7 working days.
  - e) Where questions are asked at committee or sub-committee meetings these should be restricted to the subject area covered by the committee/sub-committee's Terms of Reference. Where a question is asked that is not relevant to the committee/sub-committee then it should be passed on to the relevant officer for the correct committee and a written answer provided or, at the Member's request, asked at the next meeting of the appropriate committee.

- f) All questions should be directed to the Chair of the meeting who will either respond or request another councillor or officer to do so on their behalf.
- g) There is no debate on public questions and, unless otherwise invited by the Chair, no member of the public, elected member or officer should speak to an issue raised.
- h) Where a written or verbal answer is given the original questioner may ask ONE supplementary question.

This page is intentionally left blank





# Joint Melksham Neighbourhood Plan 2

2020 – 2038

Pre-Submission Consultation Draft **B** June 2024



MELKSHAM  
NEIGHBOURHOOD  
**PLAN**

## Overview Information

This Neighbourhood Plan has been prepared by the Joint Melksham Neighbourhood Plan (JMNP) Steering Group. A pre-submission draft of the Neighbourhood Plan was shared in October 2023 as part of our first formal public consultation (Regulation 14 Consultation) on the updated Joint Melksham Neighbourhood Plan - JMNP2 for short.

Since the 2023 Consultation on JMNP2, there has been a significant change in circumstances, which the JMNP needs to adapt to. Therefore a second Regulation 14 Consultation will be held on an updated pre-submission draft. Two policy areas are updated: Allocations of Land for Housing (draft policies 7.1 - 7.5), and Green Wedges (draft policy 19).

Together with its associated documentation this draft Neighbourhood Plan is to be used for this intended purpose only.

Related information and the Plan evidence base can be found on the website: [melkshamneighbourhoodplan.org](https://melkshamneighbourhoodplan.org)

Questions and further information can also be directed at Melksham Without Parish Council or Melksham Town Council:

Melksham Without Parish Council  
[clerk@melkshamwithout-pc.gov.uk](mailto:clerk@melkshamwithout-pc.gov.uk) | Telephone: 01225 705700

Melksham Town Council  
[clerk@melksham-tc.gov.uk](mailto:clerk@melksham-tc.gov.uk) | Telephone: 01225 704187

## Thanks and acknowledgements to:

All those who have contributed considerable time to shape the content of this plan, in particular Steering Group and Task Group members and Town and Parish staff members.

Many of the Plan photographs were provided by Linda De Santiz as well as by members of the Plan Steering Group. Front Cover Aerial Photo: Catherine Fallon Operations. Aerial of Sandridge Solar Farm: Foresight Group. Ruth Balnave and Phil McMullen for logo design.

Wiltshire Council Spatial Planning Officer, David Way, who has provided invaluable input and time into the preparation of this Plan.

Locality who administered grant funding and gave advice and support.

Plan Consultants – [Place Studio](#), together with AECOM

*Map License information where not otherwise stated:*

© Crown copyright and database rights 2019 Ordnance Survey 100049050

© Crown copyright and database right. All rights reserved (100055420)

2023, Contains OS data © Crown copyright and database right 2023

*Melksham Town Council PSGA Member Licence: 100055420*

*Melksham Without Parish Council PSGA Member Licence.: 100056463*



# Foreword

The first Joint Melksham Neighbourhood Plan (JMNP) 2020 – 2026 was brought into force on 1 July 2021. It is adopted as part of the Development Plan for Wiltshire to be used to guide and decide upon planning applications.

Ongoing and new issues like providing affordable homes in the right places, tackling climate change and helping local businesses recover from the impact of COVID make it imperative that our Neighbourhood Plan evolves to provide strong local powers, alongside Wiltshire's upcoming new Local Plan that will set out where new homes and jobs will be provided looking ahead to 2038.

To achieve this Melksham Town and Melksham Without Parish Councils, and the Steering Group have jointly launched the review of the Neighbourhood Plan to look ahead to 2038. The current Neighbourhood Plan has been updated and added to in order to make sure it remains up-to-date, forward looking and strong.

**We consulted with you back in October 2023 as part of our first formal public consultation (Pre-Submission Draft, Regulation 14, Consultation) on the draft updated Joint Melksham Neighbourhood Plan - JMNP2 for short.**

**Thank you if you took part in this consultation on what we are now calling the pre-submission draft A of JMNP2. We received over 980 individual comments. These comments have been very helpful to us and we are currently revising our Plan as a result.**

**Since the 2023 Consultation on the pre-submission draft of JMNP2, significant further work has been done to proposed site allocations at Melksham and Whitley in response to feedback. In addition, despite local opposition, outline planning permission was granted through appeal for 210 dwellings and a 70 bed care home on Land South of Western Way. Our updated plan therefore proposes its allocation to make these numbers count, minimise harm the development may cause, and maximise the community benefits it delivers.**

**In this 2024 Pre-Submission Consultation on draft B of the JMNP2, we are seeking any comments you may wish to make on Policy 7 - divided into five allocations of land for housing, and Policy 19 - Green Wedges.**

There are no other changes to the JMNP2 at this stage, which remains as it was in the 2023 Consultation. All previous comments submitted to the 2023 Consultation are still valid, and are being taken into consideration. There is no need to submit these comments to us again.

In this second pre-submission consultation on draft B of the JMNP2, updated areas will be indicated with a yellow strip at the side and this symbol:

**UPDATED!**

Following the contents page, we set out how you can respond to this consultation on the updated elements.

# Contents

(if reading this as a pdf on a computer – click on the green text in the contents to jump to that part of the plan)



<b>Foreword</b>	<b>5</b>		
<b>1 Introduction</b>	<b>6</b>	<b>4.1 Index of policies</b>	<b>27</b>
1.1 What is a Neighbourhood Plan?	7	<b>Sustainable Development and Climate Change</b>	<b>30</b>
1.2 Reviewing the Joint Melksham Neighbourhood Plan (JMNP)	8	Policy 1: Sustainable Design and Construction	31
1.3 What changes has JMNP2 introduced?	9	Policy 2: Local Renewable and Low Carbon Energy	35
1.4 What area does the JMNP relate to and what time period does it cover?	10	Policy 3: Flood Risk and Natural Flood Management	37
1.5 Who has prepared the Neighbourhood Plan?	10	Policy 4: Ultra Low Emission Vehicle Charging	39
1.6 How does the Neighbourhood Plan represent the community's views?	11	<b>Housing and Infrastructure</b>	<b>41</b>
2 Navigating the Plan	12	Policy 5: Pre-application Community Engagement	42
<b>2 Setting the Agenda</b>	<b>13</b>	Policy 6: Housing in Defined Settlements	44
2.1 Why a Joint Neighbourhood Plan?	13	<b>Allocations of Land for Housing</b>	<b>47</b>
2.2 Neighbourhood Plan Review: updating key issues and evidence	13	Policy 7.1REV: Land at Cooper Tires	51
2.3 Some key facts about the Plan area	15	Policy 7.2REV: Land at the Former Melksham Library Site	56
2.4 The Wider Context	16	Policy 7.6NEW: Land South of Western Way, Bowerhill	60
2.5 Draft Local Plan Housing Target and Site Allocations	16	Policy 7.3REV: Land at Whitley Farm, Whitley	64
2.6 The Approach to the Neighbourhood Plan	17	Policy 7.7NEW: Land at Middle Farm Plot A	68
2.7 Melksham Town Introduction	19		
2.8 Melksham Without Introduction	21	Policy 8: Infrastructure Phasing and Priorities	72
2.9 Sustainable Development and Climate Change	22	<b>Shopping, Working and Getting Around</b>	<b>73</b>
<b>3 The Vision and Objectives</b>	<b>24</b>	Policy 9: Town Centre	74
3.1 Vision	24		
3.2 Objectives	25		
<b>4 Planning Policies</b>	<b>26</b>		

Policy 10: Employment Sites	78
Policy 11: Sustainable Transport and Active Travel	80
Community Well-being and Nature	84
Policy 12: Green Infrastructure	85
Policy 13: Biodiversity	87
Policy 14: Open Spaces	90
Policy 15: Community Facilities	92
Policy 16: Local Green Spaces	96
Natural and Built Environment	99
Policy 17: Trees and Hedgerows	100
Policy 18: Landscape Character	104
Policy 19REV: Green Wedges	106
Policy 20: Locally Distinctive, High Quality Design	109
Policy 21: Local Heritage	112

5 Priority Statements	116
Glossary	119
Footnotes	123
Appendix 1: Community Engagement Protocol	125
Appendix 2: Evidence Base Summary	129

## Consultation – key information

Consultation on this draft B version of the JMNP2 will run for 8 weeks between 20th June and ends on midnight 15th August 2024.

We will be making sure that people are aware of the consultation through the following ways:

**Local News:** As has been done to date, information and updates will be included in the Melksham Independent News.

**Email:** We will be emailing those who have expressed an interest in being kept informed, as well as the Statutory Bodies we must consult.

**Online:** The draft Plan and evidence base reports will be available to view on the Neighbourhood Plan pages of the Neighbourhood Plan website: [melkshamneighbourhoodplan.org](http://melkshamneighbourhoodplan.org) and there will also be updates on social media.

### Hard Copies:

- at the Town Hall
- at the Parish Council offices on the first floor of the Community Campus
- at the library
- at Sprockets Cafe at Spindles Bike Shop, Top lane, Whitley

**Face to Face Events:** There will also be face to face events as part of the consultation so people can chat through the Plan with local representatives – please check the website and Melksham Independent News for details.

**Please submit your views to us, stating clearly which policy your comment relates to, via email:**

[contact@melkshamneighbourhoodplan.org](mailto:contact@melkshamneighbourhoodplan.org)

**For help or to ask questions, call:**

**Melksham Without Parish Council**  
**Telephone: 01225 705700**

**Melksham Town Council**  
**Telephone: 01225 704187**

# 1 Introduction



## 1.1 What is a Neighbourhood Plan?

1.1.1 The Localism Act 2011 provided local communities with the power to produce their own Neighbourhood Plan which will guide future development in their area. Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use.

1.1.2 The first JMNP 2020 – 2026 (referred to as ‘the first Plan’) was brought into force on 1 July 2021, when 84% of those voting, said YES to the Plan in a local referendum. It is part of the Development Plan for Wiltshire to be used to guide both those proposing development, and those who consider and decide upon planning applications at Wiltshire Council.

1.1.3 Neighbourhood Plans are focused on shaping the future use and development of land, and can:

- Identify a shared vision and common goals for a neighbourhood
- Define where new homes should be built and what community benefits should be delivered with the development
- Set out what key green spaces and networks of green infrastructure should be protected and enhanced

1.1.4 Melksham, local villages and our rural parish is a great place to live. It has a good range of housing choice, a strong economy, good transport connections, an historic town centre, green spaces, the new Campus, beautiful countryside and the River

Avon. Consequently, it is a focus of much housing development. It is therefore vital that our Neighbourhood Plan maximises its powers to plan and manage growth alongside the Wiltshire Local Plan.

1.1.5 It is important to note that the legislation does not allow Neighbourhood Plans to prevent development. There is a national and regional shortage of housing. Instead, the Plan will help to shape new development, ensuring that local needs and aspirations are taken into account.

1.1.6 Neighbourhood Plans can consider what infrastructure needs to be provided in their Plan area. Additional infrastructure has been highlighted by many residents as important to enable Melksham and Melksham Without to grow in a sustainable way.

1.1.7 This update of the JMNP (referred to as JMNP2) has been drawn up with the continued aim of ensuring that the growth of Melksham, and that the opportunities that this provides, are balanced with a clear understanding of the community’s aims and aspirations for the future and the protection of the distinct identity, places and spaces we value locally.



## 1.2 Reviewing the JMNP

1.2.1 There is no set time period within which the first Neighbourhood Plan must be reviewed. But it is imperative that our Plan is kept up to date and strong beyond 2026.

1.2.3 The first Plan was adopted (or 'made' to use the planning term) in 2021. Due to the early stages of the review of the Wiltshire Local Plan, and to avoid conflicts with its emerging spatial strategy, the decision was taken that site allocations for Melksham should be considered in the review of the first Plan once the draft Local Plan Review has reached an appropriately advanced stage. With the Draft Regulation 19 Local Plan published, it is considered this stage has been reached. This reviewed and updated JMNP2 also picks up on a number of other more detailed issues such as the designation of Local Green Spaces not covered in the first Plan.

1.2.4 The review process is similar to making the first Plan. Only when this draft JMNP2 has run through all the required stages of consultation and successfully passed an independent examination and local referendum will it come into force. It will then replace the first Plan. Until this point is reached the first Plan remains the adopted Neighbourhood Plan and its policies will be used.

### 1.2.5 Undertaking the review:

- Extends the effective lifetime of our Neighbourhood Plan to 2038. This aligns our Neighbourhood Plan's policies and lifetime with the period for the new Wiltshire Local Plan, which also looks ahead to 2038. The Local Plan sets strategic policies and new housing and employment growth targets for Wiltshire. It sets out where the majority of new homes and jobs will be provided at Melksham and housing targets for Shaw and Whitley. It is important the two plans are in general conformity with each other.
- Saves and updates the first Plan's adopted policies. It will add stronger evidence so that our plan can continue to protect our economy, environment and community life and deliver on its long term aims. No policy areas have been removed.
- Adds new policies to protect our green spaces and valued countryside that have become high priorities since the first Plan.
- Refreshes and strengthens how the Neighbourhood Plan informs and shapes development and conservation in the town, villages and countryside of the Plan Area.



#### Jargon Alert!

Though we have tried to make this a reader friendly document, planning can be full of unavoidable jargon, so a glossary of key terms is included at the end of the Plan (click for **page 119**). This is followed by a list of all references contained within the footnotes in the Plan (click for **page 122**).



## 1.3 What changes has JMNP2 Introduced?

### 1.3.1 Updated Existing Policies:

- Strengthening Policies 1 and 2, addressing updated climate change and sustainable construction priorities and targets
- Widening Policy 7 to address local housing needs through new site allocations at Melksham and Shaw and Whitley. (together with the Local Plan)
- Reinforcing Policy 9, with a new master plan to support future vitality of the town centre
- Adding local detail to Policy 20: Locally Distinctive and High Quality Design with new Local Design Guidelines and Codes
- Adopting a new local heritage asset list to strengthen heritage Policy 21 to protect locally treasured historic buildings and features.

### 1.3.2 New policies to address housing need and to protect areas of open countryside and green spaces:

- New Policy 7 Allocation of various sites for housing
- New Policy 16 Designating Valued Local Green Spaces
- New Policy 19 Green Wedges – to protect the countryside that acts to separate our town and villages.

### 1.3.3 Updated Priority Statements;

- Update of the first Plan's Priority Statements to take account of changes that have occurred since 2020.

The updates have been informed by consultation, and are based on evidence and research to inform our approach to sustainable development for the Neighbourhood Plan area.



### What is Sustainable Development?

The purpose of the planning system is to contribute to the achievement of 'sustainable development', which is defined as **'meeting the needs of the present without compromising the ability of future generations to meet their own needs'**.

(National Planning Policy Framework 2023)

## 1.4 What area does the Neighbourhood Plan relate to, and what time period does it cover?

1.4.1 The Melksham Neighbourhood Area was formally designated by Wiltshire Council on 14<sup>th</sup> July 2014 (amended 8th November 2017) shown in Figure 1.

1.4.2 The Neighbourhood Plan is a joint one prepared by Melksham Town Council and Melksham Without Parish Council. The Neighbourhood Plan area totals approximately 3,360 hectares (8,300 acres) and included 11,363 properties in June 2022.

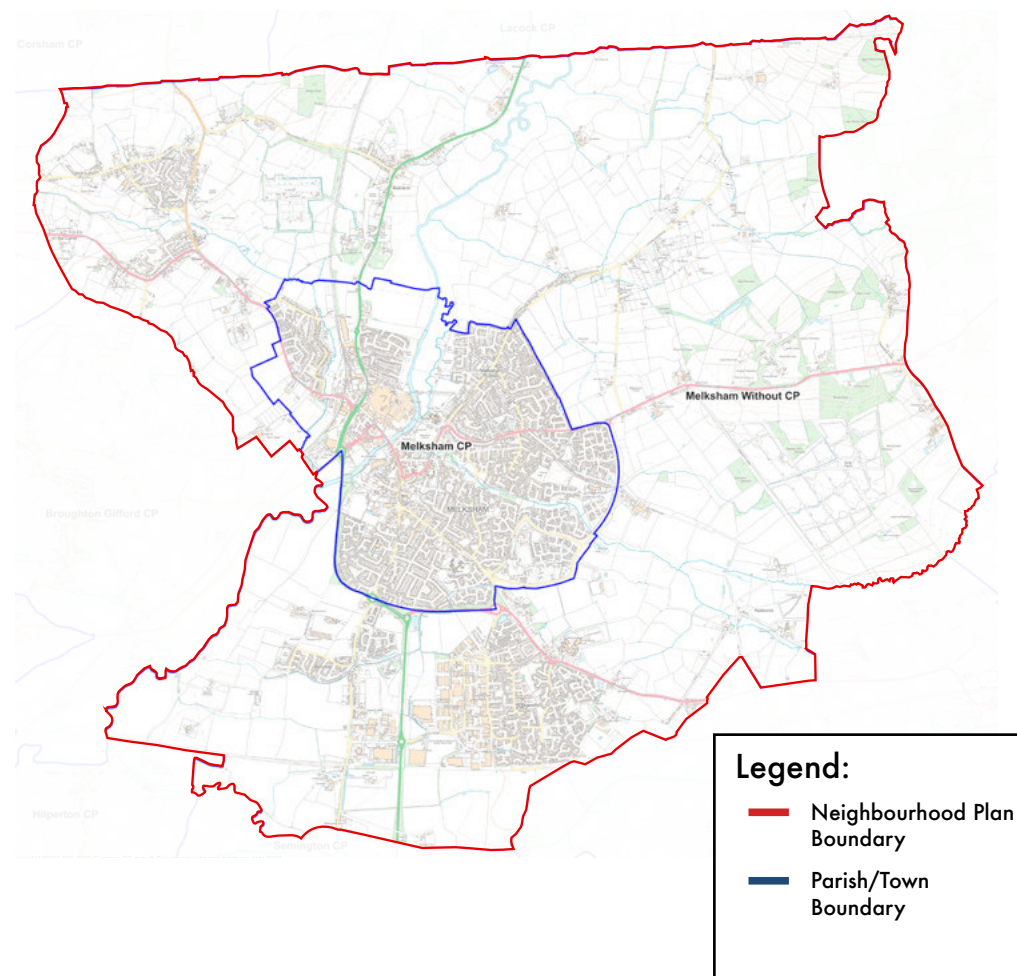
1.4.3 It is an update that will cover the period 2020 – 2038.

## 1.5 Who has prepared the JMNP2?

1.5.1 Where there is a Town and/or Parish Council, they will always be the responsible or 'Qualifying Body' that will take forward a Neighbourhood Plan. In this case, Melksham Town Council and Melksham Without Parish Council are the Qualifying Bodies.

1.5.2 The process of reviewing the first Plan and drafting the Second Plan has been driven by a Steering Group of representatives from councillors representing the town and parish, as well as people from the wider community, with support and guidance from Wiltshire Council and consultants.

Figure 1: Joint Melksham Neighbourhood Plan Area



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

## 1.6 How does the JMNP2 represent the community's views?

1.6.1 Following the positive local referendum community vote for JMNP1, the Steering Group of local representatives have worked hard to make sure this second edition of the JMNP continues to reflect the hopes and addresses the concerns of the community of the town and the rural area.

1.6.2 As with the first Plan, the review and drafting of the JMNP2 has been informed by the community as well as stakeholders such as Wiltshire Council. How this has been undertaken is detailed in the Consultation Statement which can be found on the Plan website ([www.melkshamneighbourhoodplan.org](http://www.melkshamneighbourhoodplan.org)).

1.6.3 As set out in the first pages, this is a draft version of the second edition of the JMNP and is now published for a **second** period of formal consultation known as Regulation 14 pre-submission consultation. This **second pre-submission consultation** on **draft B** of JMNP2 gives people the opportunity to feedback on key changes to policies 7 and 18, that the Steering Group considered vital to respond and adapt to in an updated draft of the JMNP2.

1.6.4 The consultation will run for 8 weeks between the 20th June and 15th August 2024. This stage invites local people, businesses and landowners and many others to comment on the draft Plan. It also includes agencies on a list of statutory consultees in accordance with the Neighbourhood Planning Regulations 2012.

1.6.5 All comments received as part of the pre-submission, Regulation 14, consultation about this draft second Plan (from both the 2023 consultation, and the 2024 consultation) will be carefully considered by the Steering Group. Changes will be made to the Plan and the associated evidence base in response to the feedback, where appropriate and necessary.

1.6.6 Following consideration of the Regulation 14 consultation responses and any amendments to the draft plan, it will be formally submitted to Wiltshire Council. Wiltshire Council then arrange a second public consultation which is also required under the regulations. An Independent Examiner then considers the Plan and the representations received through the consultation and the Plan is modified as recommended by the Examiner and put to a community referendum. If the JMNP2 also gets a positive referendum vote from the community, the first 2020 – 2026 Plan will be replaced by the updated and second 2020 – 2038 Plan (JMNP2), to become part of the overall development plan for Wiltshire to guide developers, planning officers and Councillors, when considering planning applications in the Neighbourhood Plan Area.

1.6.7 The Plan will continue to be actively used, reviewed and monitored to see how it is being used by applicants and Wiltshire Council in relation to planning matters. Future policy contexts, challenges and opportunities, together with community concerns and aspirations will inform future updates.

## 1.7 Navigating the Plan

1.7.1 After this introduction, this Plan continues with information that sets the scene for the Neighbourhood Plan area today and future challenges.

1.7.2 Planning policies form the main focus of this Plan.

1.7.3 The Planning Policies (page 26 onwards), are in five overall sections, related to our plan objectives. We have colour coded each section with the aim of making it easier to follow:

- A section that addresses some of the challenges of climate change at the very local level is in **red**
- A section that addresses future housing and infrastructure needs is in **orange**
- A section that addresses the town centre, employment and travel is in **green**
- A section that addresses our open spaces and community facilities is in **blue**
- A section that addresses our built and natural environment is in **purple**

1.7.4 For each policy there is one or more objective, then the policy itself is presented within a box and written in bold, and then we set out the key reasons behind the policy.

1.7.5 The policies must be right for the Neighbourhood Plan area and also strong enough to shape responsive and appropriate developments.

1.7.6 Priority Statements (pages 116 onwards) are also included to illustrate the commitment of the two Councils to bring their influence to bear on things we can't address in this Plan, but which are important issues to our local community.

1.7.7 There are a number of separate evidence base reports which underpin the Plan and its policies. They set out detailed information which links to our planning policies and priority statements. The evidence base reports can be found on the Neighbourhood Plan website: [www.melkshamneighbourhoodplan.org](http://www.melkshamneighbourhoodplan.org)

Please contact the Town or Parish Council for access if you are not online.



# 2 Setting the Agenda to 2038



## 2.1 Why a Joint Melksham Town and Melksham Without Parish Neighbourhood Plan?

2.1.1 Consultation on the First Neighbourhood Plan as well as the current Wiltshire Core Strategy highlighted the following key issues faced by the two parishes. These remain relevant to planning for Melksham beyond 2026 up to 2038:

- Climate change and the need to be locally resilient
- Pressure for more housing development
- The need for affordable houses and a mix of development types
- The loss of greenfield sites and the need to prioritise brownfield land where possible
- High level of inter-dependency between the town and parish
- Limited employment and training opportunities
- Recent and future job losses
- A need to improve the retail offer in Melksham
- Insufficient facilities to meet the needs of the growing population (particularly school provision and health care)
- A need to protect heritage – particularly The Spa and the Conservation Area in the town, as well as the local villages
- Traffic congestion

2.1.2 These issues could not be addressed successfully through independent plans. At its simplest, the whole Neighbourhood Plan area operates as a classic market town and catchment. This interdependence is further highlighted by the likelihood of future

housing growth, much of which is likely to take place in Melksham Without. A single, joint Plan increases the value for the communities of both town and parish.

2.1.3 This Neighbourhood Plan has been created to give the residents of Melksham and Melksham Without positive input into, and some control over, the key issues and future development in the Neighbourhood Plan area.

2.1.4 This Neighbourhood Plan sets out its ambitions and aspirations for future development through a vision, objectives and policies that will guide development on a range of matters. The Plan also operates as an informal community strategy, setting out a number of 'priorities' and projects which illustrate the commitment of both councils to use their influence to bear on matters outside the scope of this Plan.

## 2.2 Neighbourhood Plan Review: Updating key issues and Evidence

2.2.1 To enable the Second Plan to maintain and update robustly evidenced policies and add new evidence and policies that reflect and respond to community priorities the Steering Group undertook a programme of engagement and technical evidence gathering.

2.2.2 Throughout the spring and summer of 2022, the Neighbourhood Plan Steering Group undertook a series of community and stakeholder communication and consultations to build community input into the priority issues that the updated

Second Plan should address. This enabled areas of new priority to be raised and focused on updating and adding evidence in the key local issues of:

- Local Housing Needs survey;
- The need and potential for further Neighbourhood Plan Housing Sites Allocations;
- The identification and protection of green spaces and areas of open countryside;
- The identification of valued local heritage assets;
- Understanding the character and design quality of the Neighbourhood Plan area;
- Informing the priorities for future vitality of the Town Centre;
- Updating on Melksham by-pass and Wilts & Berks canal link projects;

A full report of engagement can be read in the Consultation Statement that accompanies this draft Plan.

2.2.3 Throughout 2022 and early 2023, further technical analysis has been undertaken to understand changing circumstances and

context relating to:

- Baseline Evidence
- Initial review of changes in National and Strategic Policy affecting the Neighbourhood Plan
- A review of planning proposals and the use of the first Neighbourhood Plan
- Changes and advances in sustainable development and renewable energy best practice and local policy
- Local Housing Needs data assessment
- Available development site assessments
- Local Green Space designation assessments
- Important Rural Green Gap surveys and assessments
- Assessments of potential Non-designated Heritage Assets
- Town Centre master plan Study and Report
- Design Guidelines and Codes for Melksham and Melksham Without

A record of technical evidence gathered can be referenced within Papers and Evidence Base Reports that support this Plan.

## 2.3 Key facts about the Neighbourhood Plan area



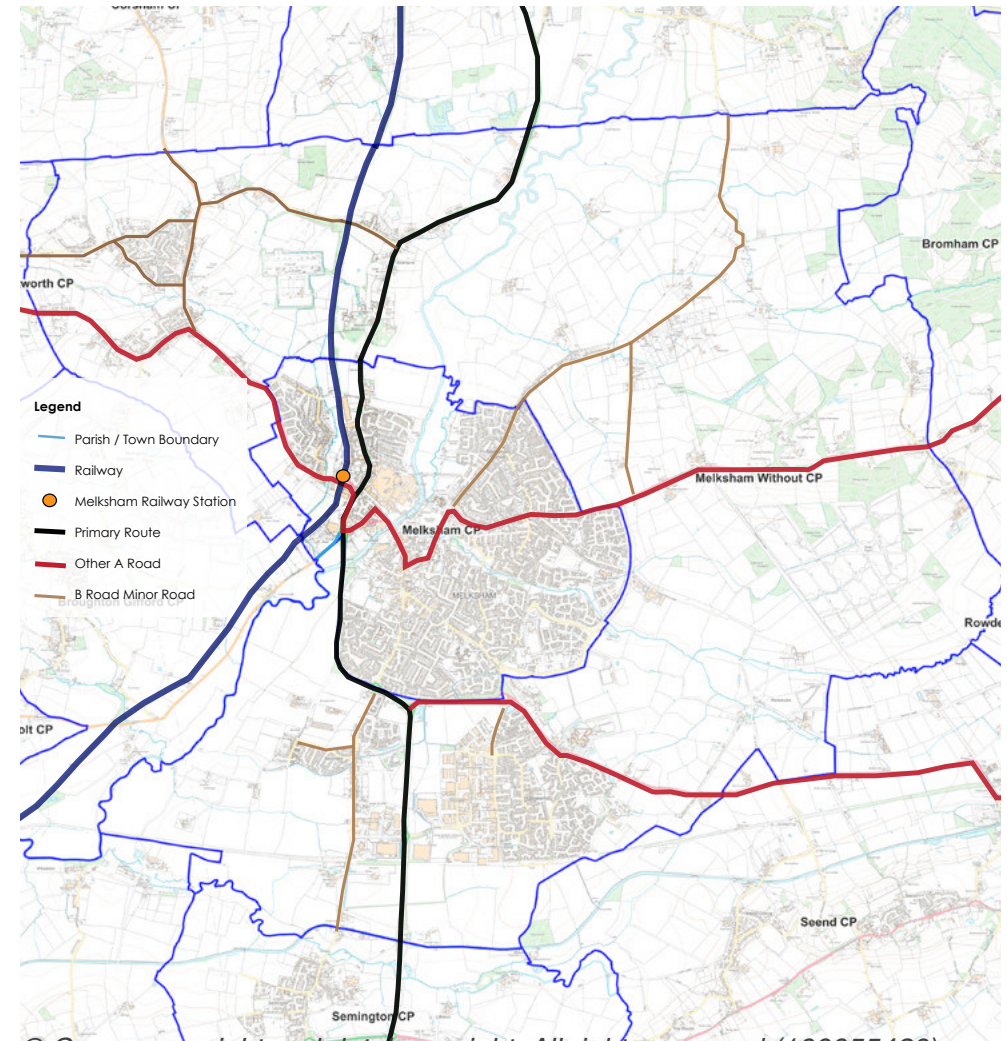
### Maps and Evidence Base Reports

All maps and evidence base reports referenced in the Plan are also available on [melkshamneighbourhoodplan.org](https://melkshamneighbourhoodplan.org) as individual files

### 2.3.1 The facts, figures and studies that make up the Plan evidence base have helped to build up a picture of the Neighbourhood Plan area today, and what may be needed in the future.

- The total resident population of the Neighbourhood Plan area (Melksham Town and Melksham Without) in 2021 was estimated to be 25,300 an increase of 15.4% since 2011 when the population was 21,907<sup>1</sup>.
- There are lower than national averages of people between the ages of 15-44. The predominant age band was '50 to 54' closely followed by '55-60' which is a little above the national average and our population is ageing<sup>2</sup>.
- The Employment Land Review noted that total jobs have grown by 16.6% since 2009<sup>3</sup> with a high concentration of jobs in manufacturing.
- We have a well qualified resident work force. However, there are differences between average earnings by workplace and average earnings by residence in Wiltshire, suggesting that Wiltshire's higher skilled resident workers commute outside of the county for work.
- We have a railway station, but public transport generally is limited in the area, and the area around the station is in need of investment and improvement.
- The Neighbourhood Plan area is strategically located on the A350 between Chippenham and Trowbridge. There is also a proposal for a bypass which will change the demand for services and working practices.

Figure 2: Rail and Key Roads Routes



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

## 2.4 The wider context

2.4.1 The National Planning Policy Framework (NPPF) was last updated in September 2023 and together with Planning Guidance covers most forms of development and sets out the Government's economic, environmental and social priorities for planning in England. Neighbourhood Plans must have regard to and be in general conformity with principles and policies in the NPPF.

2.4.2 Neighbourhood Plans are also required to be in 'general conformity' with the adopted policies of the strategic plan. In Wiltshire, our current Local Plan is the Wiltshire Core Strategy (WCS), adopted in 2015. The Government requires every Local Plan to be reviewed at least once every five years. Wiltshire's Local Plan, the Wiltshire Core Strategy, was adopted in 2015, and is therefore being reviewed. The emerging Local Plan will replace the Core Strategy when it is adopted. The Steering Group have held regular meetings with Wiltshire Council to ensure that the Neighbourhood Plan policies are updated in line with the emerging policies in the Wiltshire Local Plan Review.

2.4.3 The draft Local Plan is currently at the stage of the final public pre-submission consultation, which ran until Wednesday 22<sup>nd</sup> November 2023. It will be submitted for examination in 2024 and Wiltshire Council expect adoption at the end of 2024.

2.4.5 The draft Local Plan Review provides an indicative target for future development of homes, employment space and community infrastructure for Melksham and Bowerhill and a separate figure for Shaw and Whitley up to 2038. That figure will be delivered

through both the Local Plan and the Neighbourhood Plan.

## 2.5 Draft Local Plan Housing Target and Site Allocations

2.5.1 Wiltshire Council draft Local Plan has identified a revised housing target figure of 1,170 for Melksham and 73 in Shaw and Whitley to be delivered by 2038. It has also identified strategic site allocations to the north-east and south-east of Melksham. It will not be identifying sites for allocation at Shaw and Whitley.

2.5.2 The Local Plan suggests that land for a further 200 dwellings at Melksham should be delivered through housing site allocations made by the review of the Neighbourhood Plan and after planning permissions and the JMNP 1 allocation is taken into account, a reduced "residual" target of about 50 dwellings in Whitley and Shaw.

2.5.3 The Neighbourhood Plan is aiming to meet many of the required housing numbers through brownfield allocation. For more detail on the approach to housing allocation, **turn to page 47**.



## 2.6 The approach to the Neighbourhood Plan

2.6.1 *“The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.”* (Neighbourhood Planning Practice Guidance paragraph 009)

2.6.2 This is particularly relevant to the JMNP2 because Wiltshire Council is set to allocate some development to Melksham in their Local Plan review. Working in partnership with Wiltshire Council has been essential in the formulation of the Plan.

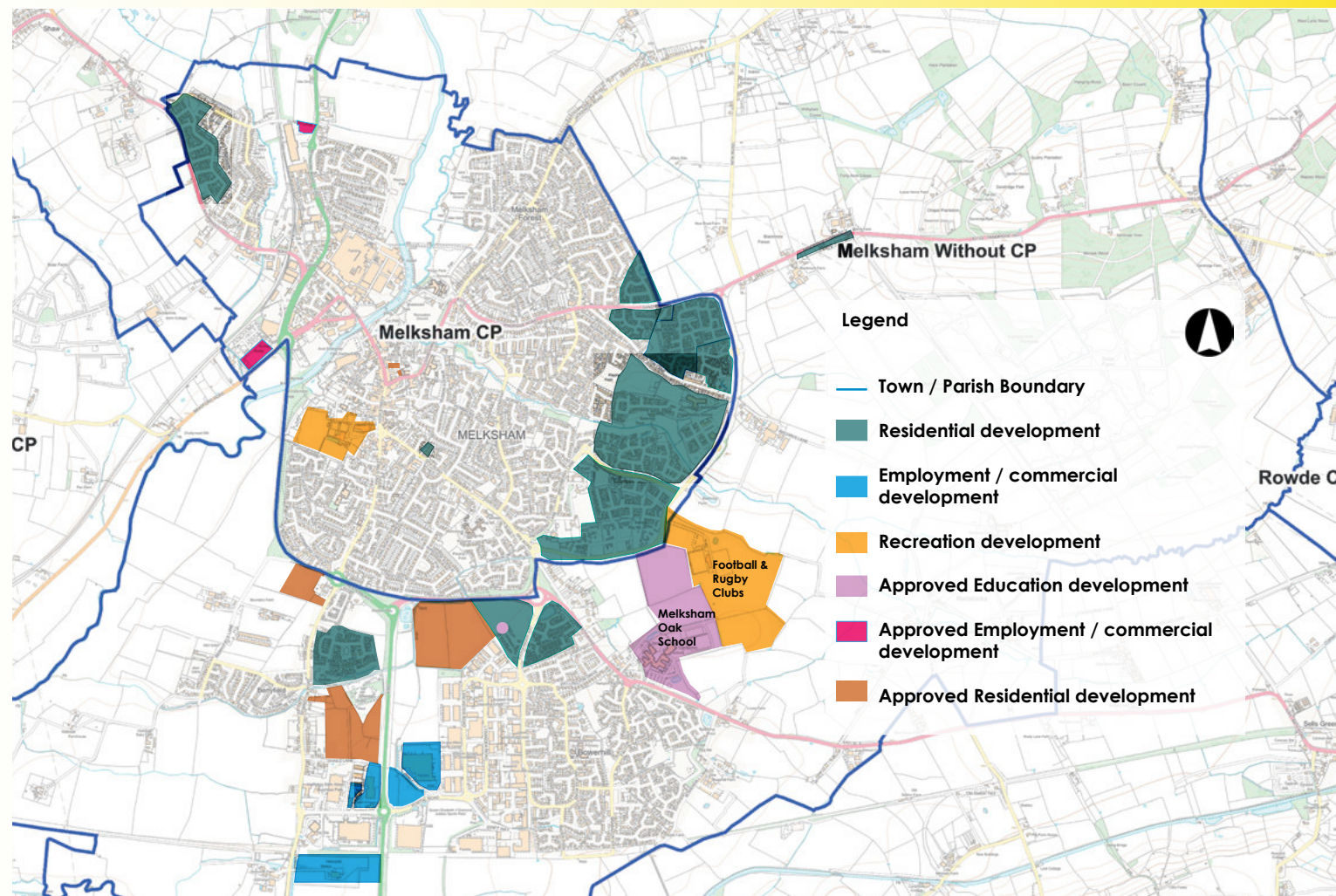
2.6.3 Although there is no requirement to allocate housing in this Neighbourhood Plan, there is ongoing development pressure in the Neighbourhood Plan area, and as set out earlier, there is a target figure set out in the Local Plan. The Steering Group therefore felt it important to review potential development sites in the Plan area with a particular focus on what community benefit development could offer. Landowners submitted potential land for development and more than 100 sites have been independently assessed, some emerging as potentially suitable and some as unsuitable (see the Housing Evidence Base Report available on the Neighbourhood Plan website). All this information has given us an informed evidence base from which to make an informed and proactive approach to development in our Neighbourhood Plan area.

Figure 3: Neighbourhood Plan Area Settlements and Neighbourhoods



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

Figure 4: Major planning permissions granted during the current Wiltshire Core Strategy (Adopted 2015) period (at December 2023)



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023



## 2.7 Melksham Town Introduction

2.7.1 The market town of Melksham is about 7km (c.4.5 miles) northeast of Trowbridge and 10km (c.6 miles) south of Chippenham. It is Wiltshire's fifth-largest settlement after Swindon, Salisbury, Chippenham and Trowbridge. It occupies a strategic location on the north-south A350 road from the M4 motorway, junction 17 near Chippenham, to Poole on the south coast; by rail it is directly linked to Trowbridge & Westbury and Chippenham & Swindon where connections to the rest of the rail network are possible.

2.7.2 Melksham was first recorded as 'Melchesa' in the 1086 Domesday Survey, the name is assumed to derive from the Old English words 'meolc' (milk) and 'ham' (village). The settlement was based around a ford across the river Avon and the naming implies that milk was always an important part of the settlement's economy.

2.7.3 Melksham is a true market town, having a Royal Charter awarded in 1219. The granting of a charter was seen as a royal prerogative and only granted if the proposed new market town was at least a day's travelling distance from the nearest existing market town.

2.7.4 The streets around the river Avon and up to the Market Place were the sites of small industries. Independent weavers worked at home in their cottages. Other local trades and crafts typical of a small market town, including tanners, blacksmiths

and millers, occupied small workshops and legacies of the town's industrial past can be seen in the weavers' cottages in Canon Square and the two round houses, originally used for drying cloth.

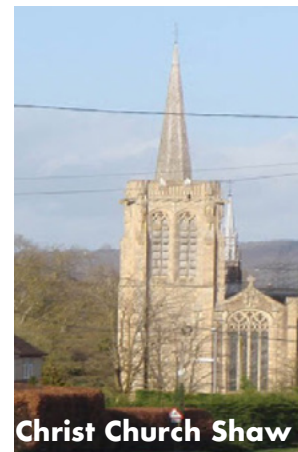
2.7.5 The Market Place has recently been refurbished to return it to the open area it once was. It once hosted the town pump which provided drinking water for passing travellers. The newly paved and developed Market Place commemorates the location of the well.

2.7.6 In 1889 the Avon Rubber Company moved to Melksham, occupying a disused cloth mill. Originally to provide materials for the railway industry, by the end of the 19th century, Avon Rubber was focused on pneumatic tyres, as well as milking machine tubes. Rapidly expanding during the 50s and 60s it changed to an international group of companies. In 1997 Avon Tyres was sold to Cooper Tires with the factory closing in December 2023, but other divisions of Avon are still in Melksham. Melksham continues to serve as an employment, facilities, service and retail hub for the greater Melksham community.

2.7.7 Melksham has an abundance of historical buildings including many Grade II listed buildings with some unique architecture, reflecting the town's historical past. The town centre is within an identified Conservation Area.

2.7.8 Melksham has a strong sense of community with many community groups run by dedicated volunteers contributing positively to the health and well-being of local people.





## 2.8 Melksham Without Introduction

2.8.1 Melksham Without Parish was created under the Local Government Act of 1894, which divided the ancient parish of Melksham into Melksham Within (the town or urban district council area) and the rural Melksham Without. Parts of Melksham Without, adjacent to the town, were subsequently transferred to Melksham Within in 1895, 1914 and 1934, in the 1960s, 1991, 2017 and 2021.

2.8.2 Melksham Without surrounds the town of Melksham on three sides – the northern, eastern and southern. In the past, the three villages in the north – Beanacre, Shaw and Whitley – were ancient centres of population. Whitley is mentioned in the Domesday book. The eastern parts of the parish, bounded by the River Avon to the west and the Semington Brook to the south, were part of the royal forest of Melksham whose bounds were first set in 1228.

2.8.3 Whitley was probably settled around the same time as Shaw and the origin of both names relate to woods. At its heart, the village is an agricultural centre with a number of working farms, and farms that have been converted to residential use but the agricultural land associated with them dispersed to other local farms. The village is rich with listed buildings. The agricultural heritage, the listed buildings along with some other significant 20th century residential development, give Whitley its unique character, charm, and local distinctiveness.

2.8.4 Medieval Shaw was a small community centred on its manor house and the chapel here seems to have had more to do with the barony of Castle Combe than local needs. The settlement remained small and rural but by the 17th century there were a reasonable number of houses. The population grew during the 19th century and a church and school were provided.

2.8.5 Through the passage of time the villages of Whitley and Shaw have grown but continue to be distinct settlements.

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

2.8.7 In the southern part of the parish are two areas that were devoted to farming but were given over to military purposes in the 20th century. From 1940 until 1964 Royal Air Force Melksham was based at Bowerhill, with housing for the base being built at Bowerhill and Berryfield. In 1970 Bradford and Melksham Rural District Council purchased land (151.3 acres) at Bowerhill from the MOD and, from 1971 onwards, Bowerhill developed into a large residential village with a thriving industrial estate. Berryfield too has become a separate village community.



## 2.9 Sustainable Development and Climate Change

2.9.1 Land use planning is recognised as having the potential to make a valuable contribution to sustainable development and to help address climate change. Whilst the Neighbourhood Plan was being drafted, the urgency of addressing climate change became even clearer with the latest overwhelming scientific evidence of climate change.

2.9.2 Recent reports<sup>4</sup> illustrate how urgent it is that action is taken. Extreme weather events have been seen around the world, and now there is incontrovertible evidence that human activity has raised and continues to raise the risk of extreme weather

2.9.3 In the summer of 2019, the 2008 Climate Change Act was amended, committing the UK to net zero carbon emissions by 2050. As a result, changes or additions to national planning policy, building regulations and other policy areas are in flux.

2.9.4 In July 2019, Wiltshire Council made a resolution to seek to make the county carbon neutral by 2030. Wiltshire Council's Environment Select Committee established a task group of councillors and officers to look at some of the main issues, including planning. The Wiltshire Local Plan review builds on this work and strengthens its approach to both sustainable development and climate change in planning.

2.9.5 Both the Town and Parish Council are proactively addressing the need to mitigate and adapt to the impacts of climate change.

2.9.6 Melksham Town Council is committed to creating a more resilient, productive and healthy environment for present and future generations and has acknowledged the very real issue that is 'climate change'. It has pledged to overhaul its working practices; to raise awareness in the community through climate change events; to lead by example and support the community to mitigate the effects of climate change; embrace the refill scheme; brought in a paperless committee system and is replacing fossil fuel vehicles with electric ones.

2.9.7 As part of its effort to support Wiltshire Council's July 2019 resolution, Melksham Without Parish Council have decided to install drinking water fountains in various public open spaces within the parish, such as Bowerhill and Shaw Playing Fields, to help reduce the single use of plastic water bottles. With climate change and more regular periods of hot weather this will provide somewhere for people to get fresh drinking water.

2.9.8 The Parish Council also encourage, where appropriate, the planting of trees to combat climate change and help reduce CO<sub>2</sub> in the atmosphere, by signing up to the Tree Charter ([www.treecharter.uk](http://www.treecharter.uk)). They have also worked with volunteers to plant hundreds of trees supplied by the Woodland Trust. The community in Shaw and Whitley have planted their own trees too. The Town Council have regularly organised community tree planting schemes where residents of Melksham can obtain free trees for planting in their gardens. In November 2023 more intensive residents tree planting scheme took place.

2.9.9 All the objectives and policies in the Plan support sustainable development and a number of specific objectives and policies regarding this topic are highlighted in their own section.

2.9.10 The Plan includes a number of other policies that specifically address the challenge of climate change including:

- Promoting green, environmentally sustainable building standards – **Policy 1: Sustainable Design and Construction**
- Supporting the installation of electric (or other ultra-low emission) vehicle charging points – **Policy 4: Ultra Low Emission Vehicles**
- Supporting a vibrant town centre so that people can shop locally – **Policy 9: Town Centre**
- Supporting local employment opportunities to reduce the need for out-commuting – **Policy 10 Employment Sites**
- Giving proper consideration to routes for buses, cyclists, footpaths and green/blue infrastructure in our housing developments – **Policy 11: Sustainable Transport and Active Travel**
- Protecting or promoting a network of biodiverse green spaces and green corridors, conserving established trees and hedgerows – **Policy 12: Green Infrastructure and Policy**

## 16: Trees and Hedgerows



# 3 The Vision and Objectives



## 3.1 The Vision

**The vision of the Neighbourhood Plan is to make the town of Melksham and the parish of Melksham Without great places to live, to work, to play and to visit; attractive, healthy, convenient and environmentally sustainable, with access to employment, education, shops and services via walking, cycling and public transport.**

Through this Plan we aim to balance the needs of today with the challenges of the future. The Neighbourhood Plan will provide the foundations for Melksham to grow sustainably for the benefit of those that live and work here, and will promote Melksham as an attractive place for businesses to locate and for people to work. Improvement and expansion of the variety of retail provision and other facilities in the town will be promoted.

Through this Plan the benefit of being located within the A350 employment growth area will be enhanced by the attractive offer of a high quality built and natural environment. As well as the necessary housing and employment growth, we want to see community, health and education provision keep pace with the needs and aspirations of our communities.

A sustainable transport network will be promoted, so that options such as walking and cycling to work, the town centre or local facilities will be a choice open to as many of our residents as possible, and we will make full use of a key local asset, the Melksham railway station.

Our network of environmental assets, such as the river Avon and Clackers Brook, together with the extensive network of open spaces, will be protected and enhanced.

Early and positive engagement on any development proposals with our communities will be key to realising our vision.



## 3.2 Objectives

Looking to the future we want to use the Plan to help shape:

### **A 21st century community ... meeting the challenges of sustainable development and climate change through:**

1. Reducing carbon emissions to contribute to carbon neutrality in Wiltshire by 2030 and beyond.
2. Planning for new development that addresses the impact of climate change.
3. Encouraging and promoting the use of sustainable technologies and renewable energy.

### **Great places to live ... where our housing and infrastructure needs are balanced with global and regional issues through:**

4. Enabling and promoting the importance of early community engagement in change and development.
5. Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
6. Promoting the delivery of infrastructure to address the needs of the population.

### Great places for **shopping, working and getting around** through:

7. Protecting and enhancing the vitality of Melksham town centre.
8. The retention, regeneration and intensified use of previously developed employment land.
9. Supporting improved transport infrastructure for the increasing Neighbourhood Plan Area population.
10. Encouraging cycling and walking and journeys by rail and bus to reduce the need to travel by car.

### Places where **community well-being and open spaces** are protected and enhanced by:

11. Protecting, connecting and increasing our network of green spaces.
12. Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.
13. Protecting, improving and expanding existing services and community facilities to promote health, education and social needs.

### A locally distinctive and high quality **built and natural environment** through:

14. Protecting settlements' rural setting and countryside gaps between Melksham, Bowerhill and surrounding villages.
15. Conserving and enhancing the quality of the natural landscape.
16. Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.



Riverside Walk

# 4 Planning Policies

The planning policies are presented in five overall sections, related to the Plan objectives.

For each policy there is one or more objective, then the policy itself in coloured boxes, and then the key reasons behind the policy.

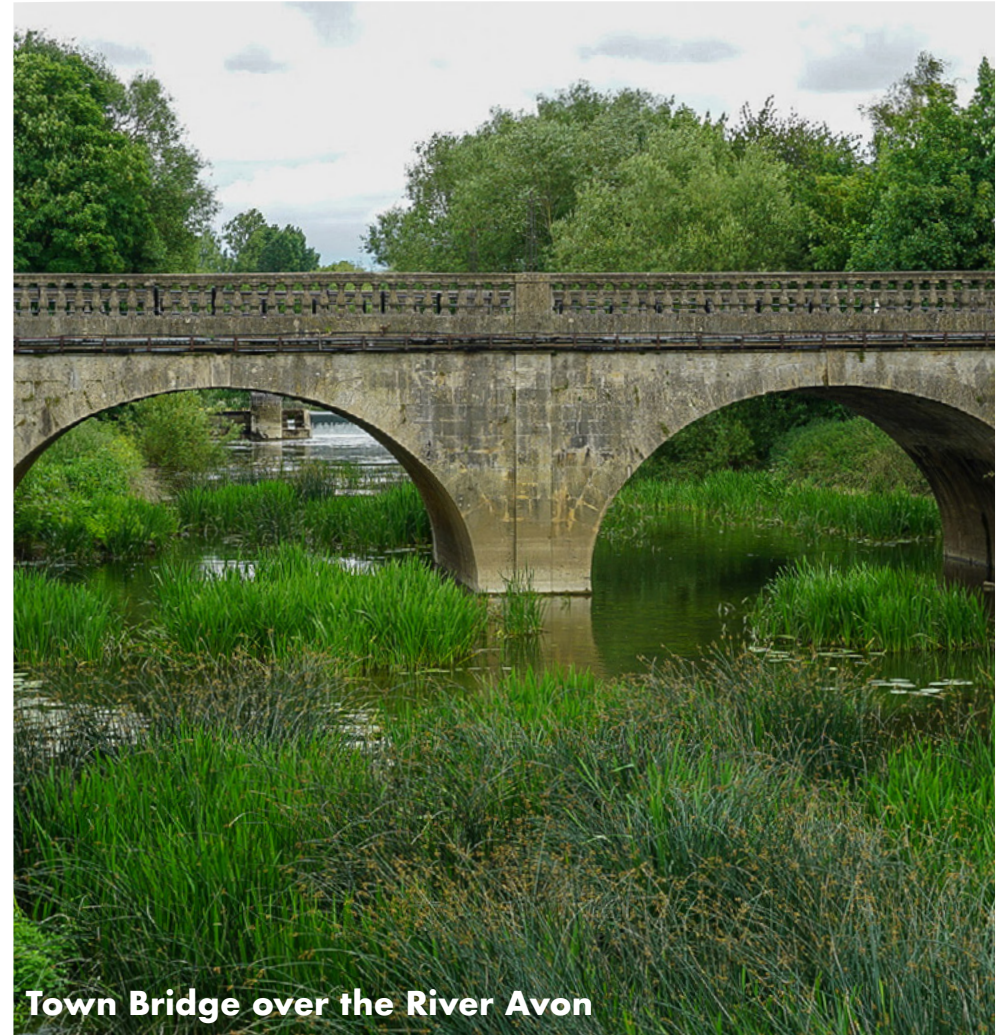
Page 67



## What is a Planning Policy?

The planning policies included in the Plan will be used to help determine planning applications within the Neighbourhood Plan area. Government guidance sets out that policies in Neighbourhood Plans should be: *"clear and unambiguous... It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared"*.

(Neighbourhood Planning Practice Guidance 2019).



Town Bridge over the River Avon



## 4.1 Index of Policies

### Sustainable development and climate change

- Policy 1: Sustainable Design and Construction
- Policy 2: Local Renewable and Low Carbon Energy
- Policy 3: Flood Risk and Natural Flood Management
- Policy 4: Ultra Low Emission Vehicle Charging

### Housing and infrastructure needs

**UPDATED!**

- Policy 5: Pre-application Community Engagement
- Policy 6: Housing in Defined Settlements
- Policy 7.1REV: Land at Cooper Tires
- Policy 7.2REV: Land at the Former Melksham Library Site
- Policy 7.6NEW: Land South of Western Way, Bowerhill
- Policy 7.3REV: Land at Whitley Farm, Whitley
- Policy 7.7NEW: Land at Middle Farm, Whitley
- Policy 8: Infrastructure Phasing and Priorities

### Shopping, working and getting around

- Policy 9: Town Centre
- Policy 10: Employment Sites
- Policy 11: Sustainable Transport and Active Travel

### Community well-being and nature

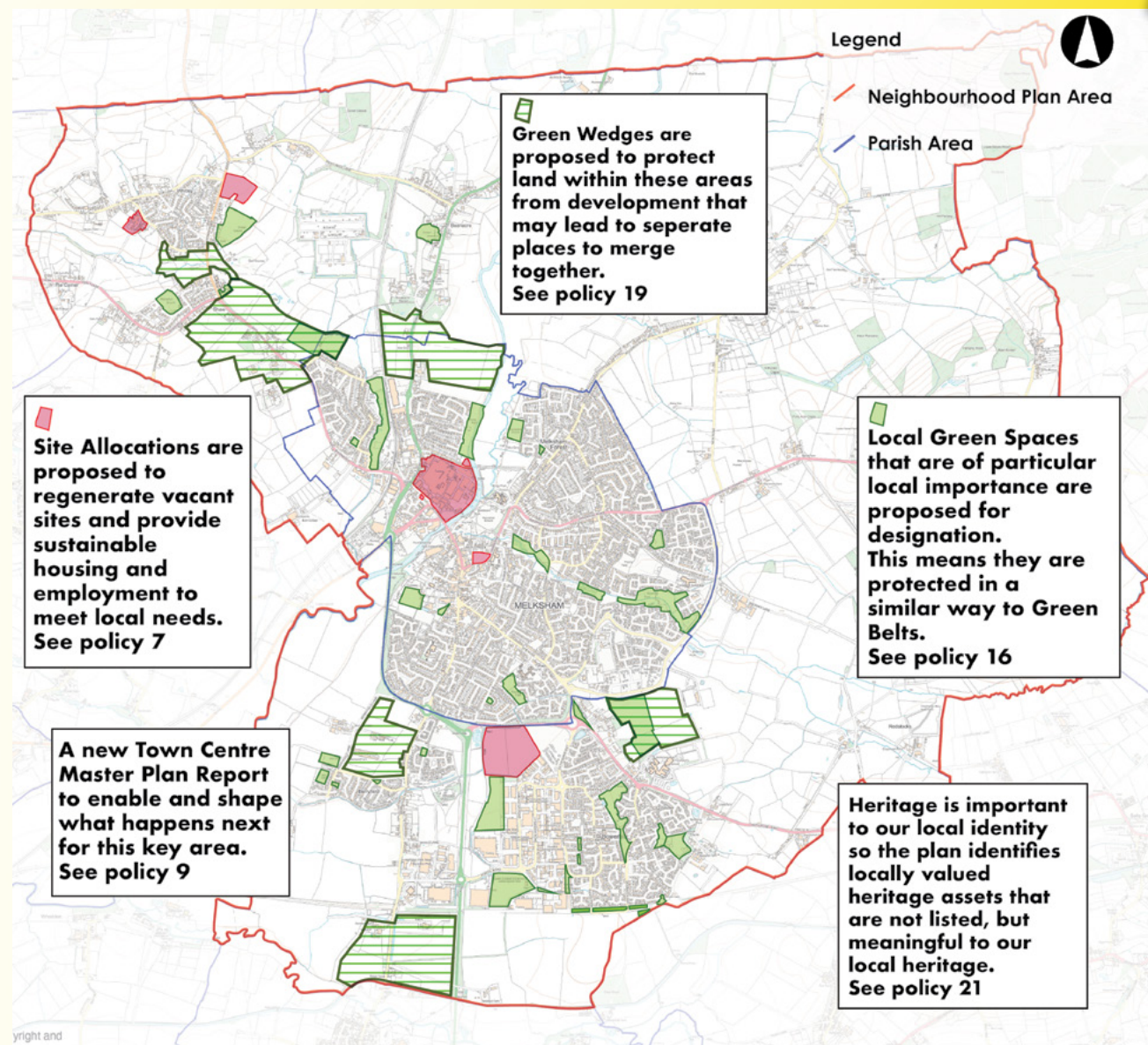
- Policy 12: Green Infrastructure
- Policy 13: Biodiversity
- Policy 14: Open Spaces
- Policy 15: Community Facilities
- Policy 16: Local Green Spaces

### Built and natural environment

**UPDATED!**

- Policy 17: Trees and Hedgerows
- Policy 18: Landscape Character
- Policy 19REV: Green Wedges
- Policy 20: Locally Distinctive, High Quality Design
- Policy 21: Local Heritage

Figure 5: Strategy Overview



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023



# Sustainable Development and Climate Change



**"The Neighbourhood Plan should encourage renewable energy production in ways that will deliver community benefits"**

## **Policies in this section:**

- Policy 1: Sustainable Design and Construction
- Policy 2: Local Renewable and Low Carbon Energy
- Policy 3: Flood Risk and Natural Flood Management
- Policy 4: Ultra Low Emission Vehicle Charging



### Sustainable Design and Construction

**This policy helps meet objective 1:** Reducing carbon emissions to contribute to carbon neutrality in Wiltshire by 2030 and beyond.  
**...and objective 2:** Planning for new development that addresses the impact of climate change.

#### Policy 1: Sustainable Design and Construction

New development schemes that demonstrate how carbon emissions are minimised, with the target of zero-carbon in operation, and how the impacts of climate change impacts are mitigated and adapted to, will be supported. This includes:

- a. demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle;
- b. maximising green and blue infrastructure to sequester carbon and provide other benefits such as shade;
- c. embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping, in order to minimise energy demand for heating, lighting and cooling. All proposals should consider opportunities to provide solar PV and energy storage
- d. residential buildings that, within the constraints of viability, demonstrate how heat and power demands are minimised through three elements of energy metrics, targeting:
  1. space heating demand of less than 30KWh/m2/year;
  2. total energy consumption less than 40kWh/m2/annum;
  3. provision of enough renewable energy output to match the total energy use.
- e. use of appropriate sustainability assessment tools, such as the Building Research Establishment's Environmental Assessment Method (BREEAM), Home Quality Mark for residential development and/or CEEQUAL (or equivalents) for infrastructure development. All major development should set out how embodied carbon in materials has been minimised;
- f. commercial development that achieves BREEAM 'Excellent' certification or equivalent certification;
- g. the retention of existing buildings where possible and retrofitting measures to improve the energy performance of existing buildings (where planning permission is required). Where this relates to designated and non-designated heritage assets appropriate sensitive approaches and materials must be used in order to maintain the significance of heritage assets through the application of established best practice.

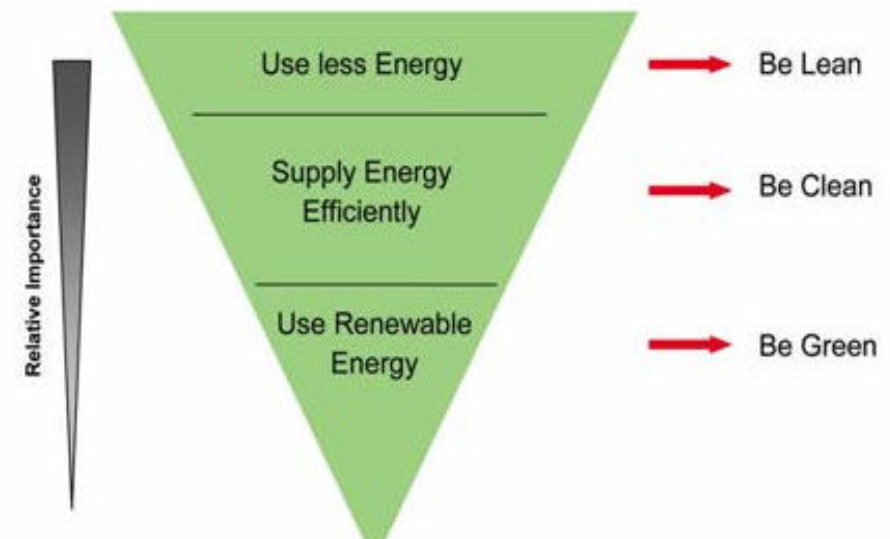
### The reason for the policy

4.2.1 The challenge of climate change can be viewed in terms of both mitigating and adapting. Mitigation is required to reduce the amount of carbon released. Adaptation is also required and associated with becoming more resilient against the impacts of climate change, for example making sure that buildings are designed to avoid overheating.

4.2.2 Since our first Plan, the context for the policy has quickly changed. Published in early 2022, the Wiltshire 2022-2027 Climate Strategy sets out the next five years of the council's journey to becoming a carbon neutral county, contributing towards the legally binding target of net zero carbon for the UK by 2050. The Wiltshire Local Plan Review also updates how the local level of planning policy addresses the challenge of climate change looking ahead to 2038. Policy 4 in the draft Local Plan sets the context for a number of policies which seek to address the broad range of issues relevant for tackling climate change. This, in turn, sets the context for ambitious policies in the JMNP to address adaptation and mitigation of climate change through our very local level planning policies as well as through community action.

4.2.3 The energy hierarchy is a core principle for this policy which means improving building materials, energy efficiency and minimising space heating requirements, before installing renewable energy and then offsetting residual energy if required. It continues

Below: Energy hierarchy diagram (source [designingbuildings.co.uk](https://www.designingbuildings.co.uk))



to acknowledge the importance of a holistic approach to meeting the urgent aim of lowering carbon emissions. It is recognised that a range of factors in the built environment needs to be considered, including how we design and lay out places that incorporate nature and making it easier to get around without the car.



4.2.4 [The Net-Zero Toolkit](#) (Levitt Bernstein, Elementa, Passivhaus Trust and Etude commissioned by West Oxfordshire, Cotswold and Forest of Dean District Councils, funded by the LGA Housing Advisers Programme 2021<sup>5</sup>) has been created to make Net Zero carbon new build and retrofit more accessible. It has been created for building professionals (developers, contractors, architects and engineers) and is also relevant to self-builders, planning officers and other housing professionals. The guide recommends operational targets for new homes and retrofitting existing homes, which are consistent with the [LETI Climate Emergency Design Guide](#)<sup>6</sup>. It outlines that energy use targets for space heating, and total energy consumption are more transparent and robust than carbon reduction targets and are the best way to ensure zero carbon is delivered in practice.

4.2.5 In their report, 'UK Housing: Fit for the Future?'<sup>6</sup> the Committee on Climate Change (CCC) warns: "We will not meet our targets for emissions reduction without near complete decarbonisation of the housing stock. Energy use in homes accounts for about 14% of UK greenhouse gas emissions. These emissions need to fall by at least 24% by 2030 from 1990 levels, but are currently off track... The technology exists to deliver homes that are low-carbon, energy efficient and climate-resilient... The costs are not prohibitive, and getting design right from the outset is vastly cheaper and more feasible than having to retrofit later." The Net Zero Toolkit indicates that a net zero home can be delivered

for a cost increase of 2-6% over Part L Building Regulations 2021.

4.2.6 Innovation in energy and construction technologies is fast-moving, but there are skills and costs considerations that need to be taken into account. In our Plan area we want to see buildings that are responsive to climate change and as energy efficient as possible, placing a lower burden on energy supply and generate renewable energy, as well as keeping down domestic energy bills and commercial overheads. In support of Policy 1 we encourage developers to use these best practice toolkits/design guides and buildings standards to enable the best possible climate responsive design.

4.2.7 This policy also relates to existing buildings which may be retrofitted to improve energy efficiency. For heritage assets, established best practice in the form of technical guidance including climate change adaptation, retrofit and energy efficiency advice is offered by Historic England<sup>7</sup>.



### Towards Net Zero

Flowing from the best practice Design Guides and toolkits, we have seen an increase in Plans incorporating ambitious and pioneering policies which introduce operational energy targets for new buildings to demonstrate net zero carbon development. Research for this policy has included review of Local Planning Authority approaches, notably the Cornwall Council Climate Emergency DPD and the accompanying viability assessment, which set out the need for some flexibility in policy requirements for energy use targets as identified in the Net Zero Toolkit.

Wiltshire Council also include a policy on Sustainable Construction and Low Carbon Energy (policy 85) in the Local Plan Review, which also proposes to the use of operational targets. The policy sets out an expectation that new dwellings will demonstrate the following operational standards:

- space heating demand less than 30kWh/m<sup>2</sup>/annum;
- total energy use less than 40kWh/m<sup>2</sup>/annum;
- on site renewable energy generation to match the total energy use...

Policy 1 also references the use of standards to demonstrate that buildings are built to high environmental standards:

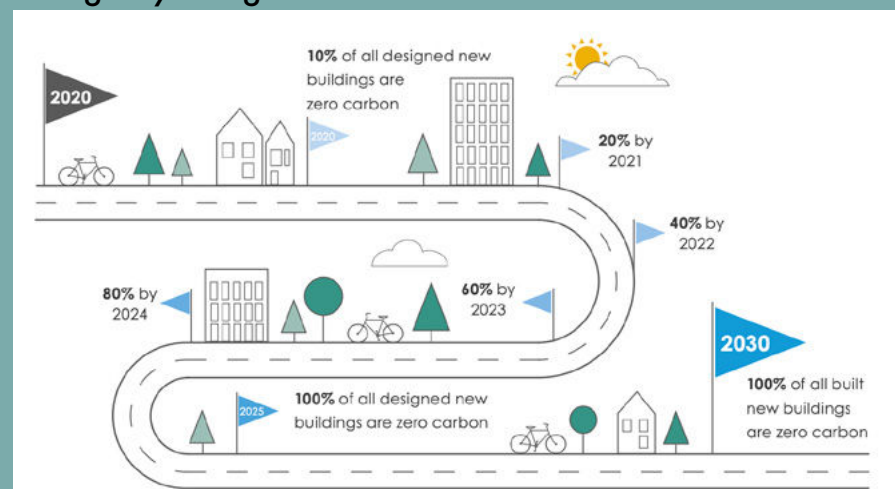
The Home Quality Mark (HQM) helps house builders to demonstrate the high quality of their homes. It gives householders

the confidence that the new homes are well designed and built, and cost effective to run.

BREEAM (Building Research Establishment Environmental Assessment Method) is a sustainability assessment method that is used to masterplan projects, infrastructure and buildings.

Other standards include Passivhaus or AECB Building Standard and will also be supported. Passivhaus buildings provide a high level of occupant comfort while using very little energy for heating and cooling.

*Below: Getting to zero diagram from the Leti Climate Emergency Design Guide*



### Local Renewable and Low Carbon Energy

**This policy helps meet objective 1:** Reducing carbon emissions to contribute to carbon neutrality in Wiltshire by 2030 and beyond.

**...and objective 2:** Planning for new development that addresses the impact of climate change.

#### **Policy 2: Local Renewable and Low Carbon Energy**

**1. Proposals for renewable energy, low carbon energy generation projects/developments, will be supported where it can be demonstrated that:**

- a. the siting and scale of the proposal is appropriate to its setting;**
- b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated;**
- c. the proposal does not create an unacceptable impact on local amenity and safety;**
- d. the proposal does not have an unacceptable degree of impact on a feature of heritage, natural or biodiversity importance. Proposals for stand alone, ground mounted solar photovoltaic development will be expected to demonstrate that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and,**
- e. there are direct benefits to the local community. Proposals for community energy generation projects, where there is full or partial ownership and/or control by a local community, will be strongly supported.**

**2. Schemes where the energy produced can be used on or near the generation site/where energy storage is incorporated will be supported. Proposals for energy storage will be supported, where it meets one or more of the following:**

- a. it is located on or near, existing or proposed renewable energy generation sites;**
- b. it alleviates grid constraints; and**
- c. it enables the delivery of further renewable developments.**

### The reason for the policy

4.3.1 The NPPF states that local planning authorities “should support community-led initiatives for renewable and low carbon energy” (NPPF paragraph 152). As part of moving towards a low carbon future in a changing climate, this Plan supports generation of zero or low carbon energy at the local level from sources such as hydro-electricity, geothermal, biomass or solar energy, particularly where it enables communities to take a more active role in the production of renewable and low carbon local energy.

4.3.2 Community energy refers to the delivery of community-led renewable energy, energy demand reduction and energy supply projects, whether wholly owned and/or controlled by communities or through a partnership with commercial or public sector partners. Community Energy England, for example, estimates that over 65,000 tonnes of carbon savings were made in 2019 from the generation of renewable energy by community-owned projects.

4.3.3 As evidenced by the number of solar farms, solar is a particularly good form of renewable energy for this area. The Planning Practice guidance for ‘Renewable and Low Carbon Energy’ sets out information on how to assess and mitigate the impact of glare and glint from solar panels which can be a problem. The key receptors with respect to glint and glare are residents in surrounding dwellings, road users, train infrastructure (including train drivers), and aviation infrastructure.

### Community Energy generation in Wiltshire

As an example of a community led energy scheme, Nadder Community Energy Ltd raises money in their local area by selling shares which are paid back over a 20 year period, plus interest; this money is used to put solar panels or other renewable energy systems into their community. In a single year they generated approximately 472,458 KW electricity and raised over £90,000 for the community.  
([www.nadderce.org.uk](http://www.nadderce.org.uk))



#### Renewable and Low Carbon Energy

Renewable energy is energy that is collected from renewable resources, which are naturally replenished on a human timescale, such as sunlight and wind as well as plant and animal matter. Another example, heat pumps which draw heat from the ground, air or river and use an electric pump to raise the temperature for use in heating.

Though low carbon energy emits some carbon, levels of emissions are much lower than from burning fossil fuels. Greater precision is required in designing and installing low carbon heating systems.

### Flood Risk and Natural Flood Management

**This policy helps meet objective 2:** Planning for new development that addresses the impact of climate change.

#### **Policy 3: Flood Risk and Natural Flood Management**

**Particularly in the South Brook catchment area, natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, are supported.**

**Where development proposals are in areas with known surface water flooding issues, they should include appropriate mitigation and construction methods, including where appropriate, contributions towards wider catchment projects.**

**All development should demonstrate how flood risk is mitigated. This may include provision of Sustainable Drainage Systems (SuDs), where appropriate as part of the Natural Flood Management approach and wider Green Infrastructure networking.**

#### **The reason for the policy**

4.4.1 Community consultations during preparation of this Plan highlighted strong concerns over development in high flood risk areas, and the importance of protecting homes from flood damage. The risk of flooding must not be increased by new development.

4.4.2 One of the major impacts of a changing climate is an increased risk of flooding and this is a significant issue for parts of the north west and south east of Melksham. The UK Met Office predicts that in a business-as-usual scenario, Britain could experience a decrease in summer rainfall by up to 47%, and up to 35% more rain in winter by 2070. This flood risk is exacerbated by the many drainage streams from the north of Whitley that outfeed in the First Lane area. The UK's winter floods of 2013-14 severely affected parts of the Plan area. There were also two additional incidents of 1 in 150 year storms, in August 2012 and September 2014. Since 2014 there have been further flooding incidents, including in January 2023 and 2024. A local response to the issue of flooding is to recruit and train local residents as flood wardens for ongoing monitoring and immediate response.

4.4.3 Any development has the potential to worsen surface water flooding. Paragraph 157 of the NPPF, sets out that new development should make use of opportunities to reduce the causes and impacts of flooding, where appropriate through the use of

natural flood management techniques

4.4.4 This is an important issue recognised at national level. The National Design Guide (2019), includes guidance on integrated water management that enhances the character of a place and makes it more resilient. The National Model Design Code includes guidance on water and drainage, setting out the expectation that schemes should integrate sustainable drainage systems into the early stages of design to reduce flood risk and improve water quality, biodiversity and amenity.

4.4.5 The NPPF and Planning Practice Guidance<sup>8</sup> together with the current and draft Local Plan (Policy 4 – Addressing Climate Change: section c and Policy 95 – Flood Risk) highlight the importance of development taking place in areas at least risk of flooding where possible, as well as the need to manage flood risk associated with more extreme weather events.

4.4.6 The Melksham Design Guidelines and Codes (July 2023) which has been prepared as part of this updated Plan, includes a section which addresses water management (DC03.11), which sets out the importance of Sustainable Drainage Systems (SuDS), and includes a number of ‘overarching principles’ that could be applied in development to mitigate against the important issue of flood risk – right across our communities and especially in the areas with known surface water flooding issues.



### South Brook

The South Brook catchment area has been identified as a priority flood risk area by both the Environment Agency and Wiltshire Council. South Brook and its tributaries flow through Whitley, Shaw, Shurnhold and Beanacre.

The area has seen many incidents of flooding. Bristol Avon Rivers Trust (BART) have been working in the South Brook catchment area for the delivery of the Natural Flood Management (NFM) works.

[\(bristolavonriverstrust.org/nature-based-solutions-in-south-brook/\)](https://bristolavonriverstrust.org/nature-based-solutions-in-south-brook/)



### Ultra Low Emission Vehicle Charging

**This policy helps meet objective 1:** Reducing carbon emissions to contribute to carbon neutrality in Wiltshire by 2030

**...and objective 3:** Encouraging and promoting the use of sustainable technologies.

#### **Policy 4: Ultra Low Emission Vehicle Charging**

**Development proposals for houses with on-plot parking spaces and/or garages are encouraged to provide appropriately located charging technology for charging low emission vehicles, such as an electric vehicle charging point.**

**Where shared or off-plot parking spaces are provided, the charging provision locations should have appropriate regard for pedestrian movement. Proposals for new employment, leisure or retail developments are also encouraged to make provision for charging facilities for staff and/or other users**

#### **The reason for the policy**

4.5.1 The need to drive private vehicles enables people to carry out their everyday business. However, facilitating the transition to low, or zero emission vehicles is key to lowering our carbon emissions, so increases in the availability of charging technology are welcomed and reflects a national drive towards Ultra Low Emission Vehicles.

4.5.2 The government currently plans to end the sale of new conventional petrol and diesel cars and vans in 2035<sup>9</sup>. This reflects the Independent Committee on Climate Change's advice on what is needed in order for the UK to meet its climate change commitments by 2050. The government's Road to Zero Strategy (2018)<sup>10</sup> outlines a number of ambitious measures including:

- a push for charge points to be installed in newly built homes, where appropriate, and new lampposts to include charging points, potentially providing a massive expansion of the plug-in network
- an ambition for at least 50% of new car sales to be ultra low emission by 2030, alongside up to 40% of new van sales.

4.5.3 Hydrogen fuel cell electric vehicles are also considered to

have the potential to play a significant role in decarbonising road transport, transitioning to vehicles that produce no harmful tailpipe emissions. As part of the commitment to enabling more Ultra Low Emission vehicles, the Town and Parish Council will be working with partners to deliver locations for charging at various sites across the Plan area.

4.5.4 It is also acknowledged that reducing tailpipe emissions does not eliminate pollution as tyre and brake wear (which is worse in heavier cars) still represents a problem. Therefore, measures to reduce or remedy this source of pollution will be supported



### Ultra Low Emission Vehicles

Ultra low emission vehicle (ULEV) is the term used to describe any vehicle that:

- uses low carbon technologies
- emits less than 75g of CO<sub>2</sub>/km from the tailpipe
- is capable of operating in zero tailpipe emission mode for a range of at least ten miles.

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

4.5.5 Improvements to the Melksham railway station (see page 78 for more detail) have provided some initial electric car charging points in the car park. Plans to increase the provision to six charging points as the demand increases have been developed and are supported by the two councils. This both encourages electric car use, and use of the train, typically when commuting or shopping.





# Housing and Infrastructure



**"It's vital that the Neighbourhood Plan supports diverse development that suits the needs of the community.. which delivers real benefits for the local area"**

## Policies in this section:

Policy 5: Pre-application Community Engagement  
Policy 6: Housing in Defined Settlements  
Policy 7.1REV: Land at Cooper Tires  
Policy 7.2REV: Land at the Former Melksham Library Site  
Policy 7.6NEW: Land South of Western Way, Bowerhill  
Policy 7.3REV: Land at Whitley Farm, Whitley  
Policy 7.7NEW: Land at Middle Farm, Whitley  
Policy 8: Infrastructure Phasing and Priorities

**UPDATED!**



### Community Engagement

**This policy helps meet objective 4:** Enabling and promoting the importance of early community engagement in change and development.

#### Policy 5: Community Engagement

**Applications that can demonstrate early, proactive, proportionate and effective engagement with the community will be looked on more favourably than applications that have not, in line with National Planning Policy. Pre-application community engagement is also expected for Reserved Matters Applications as well as Outline or Full.**

**Potential applicants are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.**

#### The reason for the policy

4.6.1 When introduced at an early stage, community involvement can change the form and nature of a development for the better – it affects land use.

4.6.2 The importance and benefit of community engagement is strongly endorsed in national planning policy and guidance as key to shaping high quality places to live. The National Planning Policy Framework stresses that *“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”*. (NPPF paragraph 39)

4.6.3 Early discussion between applicants and the local community, as well as with the Local Planning Authority, from the earliest stages enables a more collaborative approach to the process of preparing a development proposal that will need to balance many factors as the design evolves. *“Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective*

*engagement with the community should be looked on more favourably than those that cannot.” (NPPF paragraph 128).*

4.6.4 The Planning Practice Guidance Note on Design (October 2019) emphasises the importance of community engagement:

*“Engagement activities offer an opportunity to work collaboratively with communities to shape better places for local people....It is important that local planning authorities or applicants demonstrate how all views are listened to and considered”.*

4.6.5 The above policy and the Community Engagement Protocol (see Appendix 1, **page 122**) are intended to facilitate a structured approach to enable effective involvement of the local community in outline and full planning applications addressing all aspects of a proposal, from design and layout to issues on climate change and energy generation.

4.6.6 Although applicants cannot be required, only encouraged, to undertake early stage community involvement, putting in place a coherent and consistent approach, in the form of the Protocol, is a key way to deliver this mutual benefit. The nature and scale of engagement should be balanced in appropriate proportion to the scale and likely impact of any proposals.



### Housing Development

**This policy helps meet objective 5:** Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.

#### Policy 6: Housing in Defined Settlements

Proposals for sustainable housing development within the settlements of the Neighbourhood Area will be supported where they accord with the Settlement Boundary provisions of Wiltshire Local Plan Policy 1 and adopted site allocations.

New housing will be supported where proposals demonstrate how housing types and tenures have responded positively to meeting local needs, informed by the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023).

In Melksham Town, new housing will prioritise delivering a balanced mix, of two, three and four bedroom dwellings and bungalows.

In Shaw and Whitley, new housing will increase the proportion of smaller two and three bedroom dwellings, to address a shortfall in their availability.

To meet the needs of an increasing population of older and disabled people, 50% of new housing will

meet accessible home standards. Proposals for age restricted housing, extra-care communities and nursing homes will be supported only in the most sustainable locations, closely linked to local services and public transport.

At least 40% of new housing will be provided as affordable housing tenures in conformity with Wiltshire Local Plan policy 76.

To address particular local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes, about 55% of affordable housing should be provided as discounted market affordable housing products, including shared ownership and First Homes products.

25% of all affordable housing provision will be First Homes housing, provided at a 40% discount to address local issues of affordability, identified in the Melksham Neighbourhood Plan Area Housing Needs Assessment (2023).

### The reason for the policy

4.7.1 Wiltshire Local Plan Policy 1 (Settlement Strategy) classifies and establishes settlement boundaries. 'Settlement boundaries' generally delineate the extent of urban areas typically reflecting what has been built. Development within boundaries is generally supported. Land beyond settlement boundaries is countryside. Development outside settlement boundaries will be more controlled in the interests of sustainability and to preserve the character of open countryside. Wiltshire Council will amend boundaries during the Plan period, as development takes place and allocations are built out on the edge of settlements.

4.7.2 Melksham is defined as a Market Town, with the ability to support sustainable patterns of living and potential for significant development that will increase jobs and homes to help sustain and enhance services and facilities and promote better levels of self containment. It also defines Shaw and Whitley together as a single large village, where development will help ensure its communities thrive, by meeting local housing needs and supporting employment services and facilities.

4.7.3 The Neighbourhood Plan will align with Local Plan Policy 1 in supporting appropriate windfall infill sustainable development within Melksham and Shaw and Whitley. JMNP2 will increase local direction and guidance of the delivery and type of housing to meet local people's needs.

4.7.4 Melksham neighbourhood plan area Housing Needs



### Settlement Boundaries

Settlement boundaries are a policy tool used to indicate on a map, where particular policies in the local plan that permit development within settlements, or restrict development outside settlements apply. As such they prevent unplanned expansion. Market Towns and Large Villages have Settlement boundaries; in our case, Melksham & Bowerhill and Shaw & Whitley.

Wiltshire Core Strategy Policies 1 and 15 define the settlements of the Plan area as:

Market Towns: Melksham and Bowerhill village

Large Villages: Shaw and Whitley

Small Villages: Beanacre and Berryfield

Assessment (2023) has provided updated independent evidence of the specific needs for market and affordable housing at Melksham and at Shaw and Whitley.

4.7.5 This technical evidence was reinforced with detailed feedback to a community housing survey undertaken in May 2022 that was answered by 138 local people largely of working age. This re-confirmed concern about recent rates of growth, but support for JMNP2 addressing local housing issues. It pointed to a perceived need for smaller and family affordable market and rental housing, bungalows and accessible homes.

4.7.6 The majority of affordable market and social rental housing is within Melksham, which provides a good range of housing types and tenures, but with notable unmet and predicted needs and demands. There remains a very low proportion of smaller family housing and affordable housing in Shaw and Whitley, with ongoing low levels of delivery.

4.7.7 The Housing Needs Assessment suggested that at Melksham, future housing delivery should be evenly split between 2-bedroom, 3-bedroom, 4-bedroom dwellings. But at Shaw and Whitley the emphasis should be to provide smaller homes to re-balance the opportunities. This mix may require some adjustment for the sub-areas based on the existing dwelling mixes and populations in these areas.

4.7.8 Local households on average incomes are unable to access even entry-level homes in Melksham and Melksham Without, unless they have a large deposit. Private renting of entry level housing is only affordable to average incomes earners.

4.7.8 The report suggests that both affordable rented and market housing is valuable in meeting the needs of local people on various incomes, but particular higher demand for affordable discounted market homes suggests affordable housing delivered through developer contributions should be split:

- 45% affordable rented tenures, either affordable or social rent
- 55% affordable (discounted) home ownership



### First Homes

Government require that 25% of all affordable housing to be delivered as First Homes and this is echoed in the draft Wiltshire Local Plan Review Policy 76.

The local housing needs assessment of affordability for the JMNP area has recommended that First Homes in the Neighbourhood Plan Area are delivered at a 40% discount, extending ownership accessibility to households on below average (mean) incomes.



### Allocations of Land for Housing **UPDATED!**

**These policies help to meet objective 5:** Supporting sustainable development of new housing and associated facilities within settlements and, adjacent to settlements.

#### Background and reason for the allocation policies

4.8.1 This second pre-submission consultation draft of JMNP2 contains significantly amended draft site allocations to those that were in the first Reg 14 draft which was consulted on in Autumn 2023. These amendments are primarily made in response to recent, and significant, new circumstances that JMNP2 should have regard to in creating an effective and up-to-date set of site allocations. Changes have also responded to feedback received from the first Regulation 14 consultation, and further evidence that has been gathered.

#### 4.8.2 Making Comments on Revised Allocations:

- If you made comments on draft allocations 7.1 to 7.5 at the first Reg 14 consultation, you can replace or amend them. Please submit your full representation again. Please help us by referencing the new allocation number and highlighting the amended parts of your representation.
- If you previously made comments on the allocations and do not wish to amend them these will remain valid and taken into account.
- If you did not comment previously, you may make a new comment on the allocations and any part of JMNP2 during this second Reg 14 consultation.

#### 4.8.3 Changes to site allocations:

First Draft Regulation 14 Draft Allocations

##### Melksham

7.1 - Land at Cooper Tires

7.2 - Land at the Former Melksham Library, Lowbourne House and Car Park

##### Shaw and Whitley

7.3 - Land at Whitley Farm

7.4 - Land at Middle Farm (Plot A) - THIS ALLOCATION IS DELETED

7.5 - Land at Middle Farm (Plot B) - THIS ALLOCATION IS DELETED

Second Regulation 14 Draft Allocations (Note - **REV** notes revised / **NEW** denotes a new policy)

##### Melksham

7.1**REV** - Land at Cooper Tires

7.2**REV** - Land at the Former Melksham Library, Lowbourne House and Car Park

7.6**NEW** - Land South of Western Way, Bowerhill

##### Shaw and Whitley

7.3**REV** - Land at Whitley Farm, Whitley

7.7**NEW** - Land at Middle Farm, Whitley



### Finding the right sites for the JMNP2

The Neighbourhood Plan review has undertaken a thorough and robust process to propose a schedule of site allocations that maximise sustainable development opportunities and delivery of benefits to our community.

A new neighbourhood Plan area “call for housing sites” was conducted as part of the JMNP review process. The local call, combined with Melksham area sites listed in the Wiltshire Council “Strategic Housing and Employment Land Availability Assessment” (SHELAA) produced a long-list of potential allocation sites.

Every available site was subject to independent assessment to determine suitability and deliverability to produce a shortlist of sites potentially worthy of further consideration. Site promoters have been approached to re-confirm availability and deliverability and shortlisted sites have been reviewed to consider how they can achieve the JMNP objectives and community needs to produce the selected sites allocations and associated criteria.

### 4.8.3 National and Strategic Policy Context

JMNP2 Policies 7.1REV to 7.7NEW allocate land for housing and other uses in Melksham and at Whitley. Sites allocated through neighbourhood plans can contribute towards meeting the scale of growth set by the Local Plan, as well as meeting local needs. At Melksham, the Wiltshire Draft (Regulation 19) Local Plan suggests that land for a further 1,120 homes need to be planned for up until 2038 within the JMNP area. It has set a requirement for about 200 homes to be allocated at Melksham by JMNP2. The Local Plan also identifies a separate large village housing requirement of around 73 dwellings for Whitley and Shaw, and takes account of the 18 dwellings at Middle Farm, Whitley allocated in the first JMNP.

### 4.8.4 Site Assessment and Selection

Combining the Wiltshire Council Strategic Housing and Economic Land Availability Assessment (SHELAA) and responses to a local “call for sites” undertaken by JMNP2 created a long list of 109 potential site options. These were independently assessed by consultant AECOM employing a robust, logical two stage methodology based on the Government’s National Planning Practice Guidance (PPG) and the Locality Site Assessment Toolkit. This produced a list of 35 brownfield and greenfield sites at Melksham, Shaw and Whitley, Beanacre and Berryfield that were considered ‘potentially suitable and feasible’ for possible allocation in the JMNP2.

4.8.5 The site selection process also included dialogue with landowners; had regard to locally specific circumstances; and considered how each site was capable of addressing the housing requirements and the Neighbourhood Plan objectives. In addition, JMNP2 site selections had to avoid conflict or duplication with greenfield sites being proposed for allocation by Wiltshire Local Plan from the Wiltshire SHELAA.

### 4.8.6 Melksham Brownfield Site Allocations (Policies 7.1REV and 7.2REV)

Community engagement undertaken to shape the Melksham Town Centre Masterplan Report (AECOM 2023), identified strong support for the regeneration of both the Cooper Tires site and the former library site. Assessment of greenfield and brownfield led site allocation options through Strategic Environmental Assessment and sustainability and viability assessments of the potential allocations confirmed that JMNP2 sites represent the most sustainable and a deliverable approach. NPPF Paragraph 124(c) states policy should "...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated ...land".

4.8.7 Both sites are available and capable of contributing to meeting the JMNP2 housing allocation requirement, although each present significant challenges to deliverability. Owners

have provided evidence to support the feasibility of regeneration and confirmed active progress towards implementation of site development within the JMNP2 period. Wiltshire Council together with Melksham Town Council and Melksham Without Parish Council, have agreed a collaborative approach to coordinate Local Plan strategic allocation of greenfield sites with the sustainable brownfield led approach to site allocations in the town by JMNP2.

4.8.8 Allocation of the previously developed land at Cooper Tires remains a high priority of JMNP2. After the first Regulation 14 consultation, significantly more work has been undertaken to respond positively to questions about the suitability and deliverability of the site in the context of greenfield land availability and flood risk on the Cooper Tires site. This work has resulted in significant amendments to the draft allocation that have to be the subject of further Regulation 14 consultation.

**4.8.9 Land at Western Way, Bowerhill (Policy 7.6NEW)**  
In December 2023, after the commencement of the first Regulation 14 version of the JMNP2, planning permission was granted on appeal for the development of 210 dwellings and a 70 bed care home on land south of Western Way. The initial Regulation 14 draft of JMNP2 did not propose allocation of the site which was instead proposed as a Green Wedge between Melksham and Bowerhill as part of Policy 19 in JMNP2. The planning consent has established the principle and amount of residential development.



In doing so it has removed the ability of JMNP2 to designate the land as a Green Wedge. JMNP2 must address these impacts. This draft allocation policy 7.6NEW (Land South of Western Way) is now introduced into JMNP2 to enable a positive approach to shaping and managing the development of this site in these new circumstances, and take account of consented housing numbers.

4.8.10 **Allocations at Shaw and Whitley (Policy 7.3 REV & Policy 7.7 NEW)** At Shaw and Whitley, JMNP2 is taking the lead in addressing the Local Plan housing requirement of around 73 more homes up until 2038, in response to which, two allocation sites at Middle Farm and Whitley Farm are proposed.

4.8.11 The small range of available sites assessed as potentially suitable, taken together with the priority to protect the rural separation between Shaw and Whitley, led to the consideration of more constrained sites that present the potential to efficiently meet the housing requirement and deliver smaller market housing. This also enables around 20 Affordable Homes, which are needed and have not been delivered sufficiently within the villages.

4.8.12 The 2023 consultation draft A JMNP2 proposed allocation to enable limited development at Whitley Farm in First Lane and a larger allocation that combined with the pre-existing allocation in JMNP1 at Middle Farm. In response to feedback received and, importantly, further dialogue with the site promoters, draft

proposals for both allocations have been significantly altered to warrant a further period of Regulation 14 consultation.

4.8.13 The allocation policies follow on the next pages.

### Land at Cooper Tires Factory Site

*continued overleaf*

#### **Policy 7.1REV: Land at Cooper Tires Factory Site**

Land at the former Cooper Tires main factory site, as defined in figure 6, is allocated for development of:

- a. At least 150 dwellings to include a minimum of 10% Affordable Housing to be provided within the JMNP2 period to 2038,
- b. Replacement employment and commercial floorspace (class E, B2 and B8),
- c. Community facility, leisure and cultural uses,
- d. Retail (subject to conformity with adopted town centre retail policy),
- e. New accessible walking and cycling routes,
- f. Riverside public realm,
- g. Flood mitigation infrastructure.

A single comprehensive masterplan, phasing and delivery strategy for the development must be prepared,

and then approved by the local planning authority, in advance of any detailed planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this policy and supporting concept plan. Detailed planning applications must be in accordance with the approved masterplan. Proposals should be prepared with early pre-application consultation with the local community.

Development proposals for the site will:

#### Heritage

1. Be supported by a heritage assessment of the existing buildings and the impact of proposed development.

2. Protect or enhance the setting of on-site heritage assets; Avon House (listed Grade II) and the

former factory canteen (local non-designated heritage asset) and adjacent heritage assets; Town Bridge (Grade II) and Unicorn Public House (Grade II) in conformity with JMNP2 Policy 21.

3. Investigate the presence and significance of archaeological remains and avoid areas of 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 and River Avon environment.

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, contributes positively to

## Housing and Infrastructure

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 a high quality of design, appearance and materials in conformity with JMNP2 Policies 9 and 20 and demonstrate a positive response to Melksham Town Centre Master Plan Report (2023) and Melksham Design Guide and Codes (2023) and the Wiltshire Design Guide (2024).**

**8. Protect the amenity of neighbouring employment and retail uses and residents of Scotland Road, Bath Road and dwellings adjacent to the north-west site boundary.**

**9. 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).**

**10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire carbon neutrality targets including potential significant use**

**of renewable energy, re-use of existing built fabric and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.**

### Flood Risk

**11. Be supported by a proportionate flood risk assessment, testing and mitigation strategy.**

**12. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site, neighbouring land and downstream.**

**13. Include measures to ensure the safety of residents, staff and visitors in the event of flooding.**

### Access and Movement

**14. Make safe and convenient level walking and 'wheeling' connections within the site and to the existing public realm.**

**15. Provide vehicular access to the site and address any necessary off-site works informed by an access and transportation study and strategy.**

**16. Implement resident, visitor and commercial premises parking and servicing in conformity with Wiltshire Council parking standards.**

**17. Ensure ultra-low emission vehicle (ULEV) charging infrastructure provided in line with JMNP2 Policy 4.**

**18. Provide resident and employee travel plans to encourage sustainable travel.**

### Wilts & Berks Canal Link Project

**19. Integrate the future implementation of the Wilts & Berks Canal Link project within the scheme design where it relates directly to the site in conformity with Wiltshire Development Plan policies for safeguarding the route of the Wilts & Berks Canal and explore opportunities for renewable energy installation.**

**Financial Contributions to Infrastructure will make proportionate contributions to:**

**20. Early years, primary and secondary education**

**21. Healthcare capacity to meet the needs created by the development.**

**22. Measures to positively support walking and cycling in Melksham including links between the site, Melksham Railway Station and town centre and neighbouring facilities and communities.**



### The reason for the policy

4.8.14 This is an amended draft allocation.

4.8.15 The 12.8 hectare Cooper Tires main factory site is immediately to the west of the town centre and bank of the River Avon. It is bordered by Bath Road, Scotland Road and the A350. The allocation includes the small “Bakers Yard” car park to the west side of Bath Road.

4.8.16 It has been an industrial site since the 18th Century, producing tyres from the 1890s, and was one of Melksham’s most important employers until it closed at the end of 2023. The whole site is now vacant.

4.8.17 National planning policy provides strong support for development on previously developed land. Planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

4.8.18 Wiltshire Core Strategy existing employment site Core Policy 35 does not identify Cooper Tires as a Principal Employment Site but enables managed diversification of existing employment land. Core Policy 36 supports regeneration opportunities and aims to maximise the re-use of previously developed land and

neighbourhood plans facilitating economic regeneration and the preparation of masterplans for specific sites. The Wiltshire “Employment Land Review” (updated 2023) concluded the site does not meet modern requirements well and has potential for development with a mix of uses, although residential uses were not included.

4.8.19 Place Shaping Priority 1 promoted by the emerging Wiltshire Local Plan “Planning for Melksham” strategy identifies the importance placed on maximising the use of brownfield land in association with town centre regeneration.

4.8.20 Owners of the site have made it available for allocation within the JMNP period (2020-38). The independent assessment of the site considered it potentially suitable for allocation as sustainably located, previously developed and under-used land. However, evidence gathered by JMNP2 and provided by site owners identified that it is significantly constrained by flood risk and contamination.

4.8.21 JMNP2 engagement has demonstrated that allocation of the site for regeneration is well supported by the community and owners and is supported by Wiltshire Council. However, the site is not directly addressed by the Wiltshire Council’s emerging Local Plan and in response to community wishes, national planning guidance and a need to enable re-use of the vacant site, JMNP2

has adopted a proactive and positive approach to planning for the future of the site through its allocation in the Neighbourhood Plan.

4.8.22 The site is highly sustainable brownfield land, within easy walking and cycling reach of the town centre, convenience stores, King George V Recreation Ground and the Campus leisure and library facilities. It is also well connected to employment opportunities within the town centre and at Avonside Enterprise Park, Melksham railway station and by regular bus services to surrounding towns.

4.8.23 Regeneration of the site delivers on nearly all of the Neighbourhood Plan's sustainable development, environmental, housing, economic and wellbeing objectives. It can renew its vitality in a distinct urban neighbourhood of high-quality homes, mixed commercial, recreational, cultural and some retail uses. Regeneration set within new and re-purposed heritage buildings and addressing new streets and a public, habitat rich, riverside space.

4.8.24 In recognition of the site size, complexity and significant flood risk and contamination constraints, the JMNP2 has adopted an evidence-led and realistic approach to its allocation. This is based upon significant engagement with Wiltshire Council and site owners, analysis of site assessment evidence and the review of recent and similar local case studies, including the Wiltshire

Local Plan allocation of Innox Mills at Trowbridge. JMNP2 has also commissioned expert advice in master planning and viability.

4.8.25 It is recognised that regeneration is likely to commence later in the plan period and extend beyond 2038. Initial residential-led phases, generating value on less constrained parts of the site are considered feasible and viable for delivery by 2038. The allocation therefore sets proportionate expectation for development of at least 150 homes up to 2038. But it has responded positively to capacity and viability analysis to support master planning for further dwellings where this enables delivery of viable mixed use regeneration.

4.8.26 As in other brownfield regeneration allocations promoted through the Wiltshire Local Plan, the amount of housing of Affordable Housing provision has been reduced to 10% of the total residential development to achieve a viable allocation.

4.8.27 About 68% of the site is within Flood Risk Zone 3. These parts of the site can be suitable for non-residential uses, open space and sustainable flood mitigation. This area contains the listed Avon House (Grade II) and the oldest parts of the factory.

4.8.28 Development of the site must address site-wide flood mitigation measures, de-contamination and infrastructure to enable viable and comprehensive development that is likely to be brought

forward through the JMNP2 period and potentially beyond 2038. It is therefore vital that development is in accordance with a comprehensive master plan and delivery strategy, approved by Wiltshire Council which address allocation policy requirements.

4.8.29 Because of the complexity associated with this allocation, the evidence base report provides both greater detail on how JMNP2 objectives and policies will be realised in the site regeneration and additional details that underpin the allocation's quantities, mix and disposition. This can be found on the JMNP2 pages of the Plan website (and by clicking here if reading a PDF).

Figure 6: Cooper Tires Redline Plan



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023



### Land at the Former Melksham Library Site

#### **Policy 7.2REV: Land at the Former Melksham Library Site**

Land at the former Melksham Library, Lowbourn House and adjacent public car park shown in figure 7 is allocated for development of up to 50 extra-care dwellings including affordable housing (Class C3) to be restricted to qualifying older people.

Development proposals for the site will:

#### **Heritage**

1. Be supported by a heritage assessment of the existing buildings and the impact of proposed development.
2. Protect or enhance the setting of adjacent listed buildings and the character of Melksham Conservation Area.
3. Investigate the presence and

significance of archaeological remains and avoid areas of 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 that 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 a high quality of design, appearance and materials in conformity with JMNP2 Policies 9 and 20 and demonstrate a positive response to Melksham Town Centre Master Plan Report (2023) and Melksham Design Guide and Codes (2023) and the Wiltshire Design Guide (2024).
8. Protect the amenity of neighbouring uses and residents of Union Street.
9. Provide a high standard of residential amenity and wellbeing by achieving design principles contained within recognised design guidance including the "Design Principles for Extra Care Housing" (Housing Learning and Improvement Network, 2020).

*continued overleaf*

**10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy, re-use of existing built fabric and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.**

### **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 neighbouring land.**

**13. Include measures to ensure the safety of residents, staff and visitors in the event of flooding.**

### **Access and Movement**

**14. Make safe and convenient level walking and 'wheeling' connections within the site and to the public realm.**

**15. Provide vehicular access to the site from Lowbourne, potentially utilising the existing access point.**

**16. Implement resident, visitor and commercial premises parking and servicing in conformity with Wiltshire Council parking standards and include safe parking for resident personal mobility devices.**

**17. Provide ultra-low emission vehicle (ULEV) charging infrastructure in line with JMNP2 policy 4.**

**18. Provide resident and employee travel plans to encourage sustainable travel.**

**Financial Contributions to Infrastructure will make proportionate contributions to:**

**19. Healthcare capacity to meet the needs created by the development.**

**20. Measures to positively support walking and cycling in Melksham town centre.**

**21. Contributions towards town centre public car parking improvements as identified in the Melksham Parking Study (AECOM 2024) to mitigate the loss of public parking within the allocation site.**

### Land at the Former Melksham Library Site

#### The reason for the policy

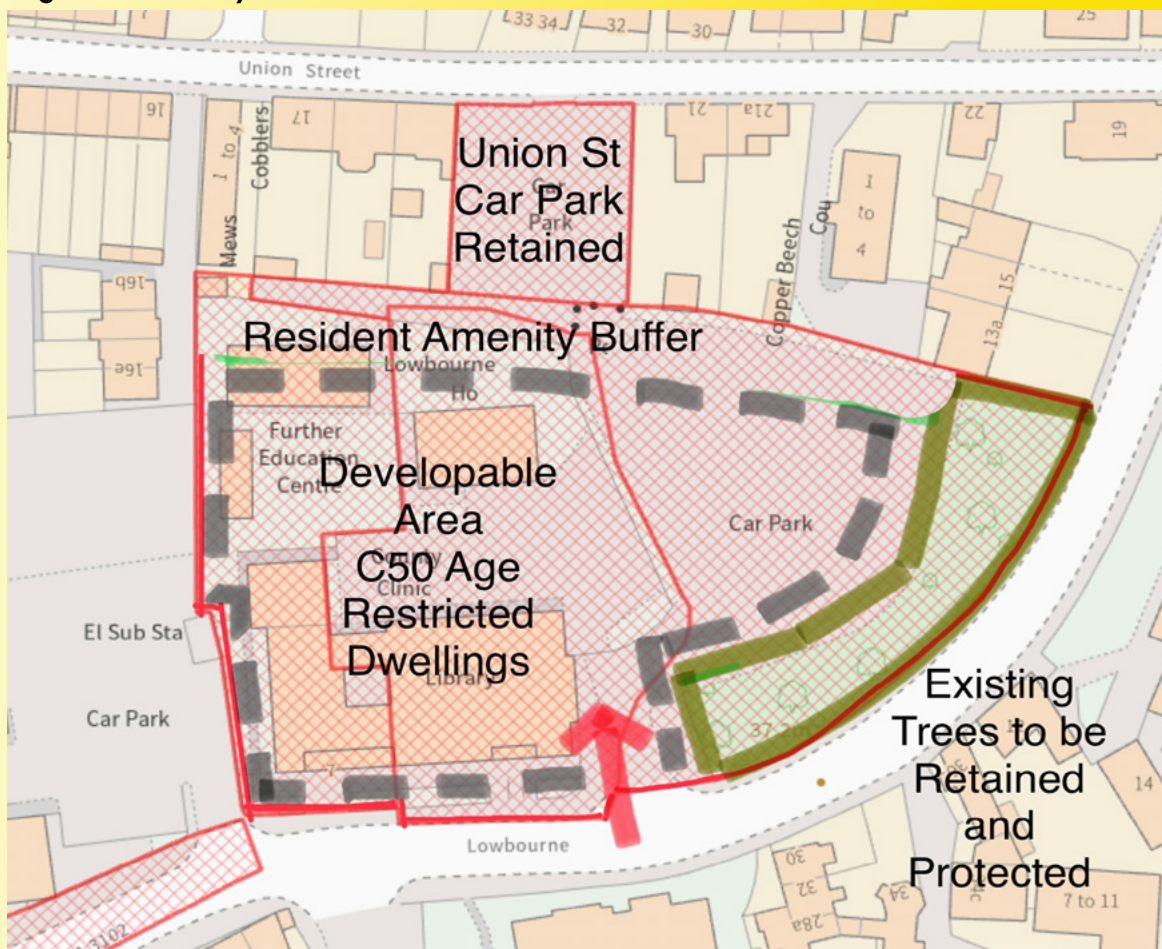
4.8.31 This is an amended draft allocation.

4.8.32 The site is around 0.65 hectares and is previously developed land located on the eastern edge of the town centre, within the Melksham Conservation Area. The whole site is owned by Wiltshire Council and comprises the former and vacant library and attached restaurant building, Lowbourne House, in short lease employment use, and the associated 66 space Lowbourne public car park to the east.

4.8.33 The site has been independently assessed as a suitable allocation and found to be in a highly sustainable location within short and level walking distance of town centre shops and services, the Campus leisure centre and library, King George V Recreation Ground and local bus services.

4.8.34 The existing buildings are not identified as local heritage assets and do not contribute positively to the character of the conservation area. However, mature trees which line the eastern boundary of the car park site contribute to the character of the conservation area and are protected.

Figure 7: Library Site Redline Plan



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data  
© Crown copyright and database right 2023



4.8.35 The existing public car park has been declared surplus to requirements by Wiltshire Council. A car parking study commissioned by JMNP2 observed the 66 space car park to have a 19% occupancy during surveys, the lowest in the town centre. The parking survey and future parking demand analysis showed a surplus of parking within Melksham town centre overall. It may be concluded that the loss of the Lowbourn Car Park will not adversely impact on the vitality of the town centre, but remaining car parks should provide an enhanced standard.

4.8.36 Parts of Lowbourn are subject to flood risk that may impact on access to the site. Emergency access in the event of flooding will be required to safeguard more vulnerable residents.

4.8.37 The site has been made available by the owner for allocation to support the development of extra care apartments for older people (class C3), to be run by Wiltshire Council as Affordable Housing.

4.8.38 The Melksham Housing Needs Assessment (2022) identifies there is no extra care housing in Melksham and a need for housing to meet the needs of the proportion of older (+75) people living within the community that is predicted to rise from 8.8% to 14.7% by 2038. It suggests that the JMNP should consider site allocations to address some of this need. This allocation will contribute to delivery of JMNP2 Housing and Wellbeing Objectives.

4.8.39 Wiltshire Core Strategy Core Policy 46 (Meeting the Needs of Wiltshire's Vulnerable and Older People) supports and encourages the development of accommodation for older people. Core Policy 36 supports regeneration opportunities and aims to maximise the re-use of previously developed land and neighbourhood plans facilitating economic regeneration and the preparation of masterplans for specific sites. National planning policy also supports development on previously developed land.

4.8.40 Place Shaping Priority 1 promoted by the emerging Wiltshire Local Plan "Planning for Melksham" strategy identifies the importance placed on maximising the use of brownfield land in association with town centre regeneration.

4.8.41 Extra-care housing should be within purpose designed blocks with support staff, communal internal and open space and parking. The site owner has provided concept scheme evidence to demonstrate that the site could have capacity for about 50 extra-care dwellings within a three-storey development. However, allocation parameters require these to be provided to a high standard of accommodation meeting use specific design guidance whilst protecting amenity and character.

4.8.42 Independent viability assessment has suggested the extra-care housing should be a mix of open market and affordable housing units. Whilst the owners (Wiltshire Council) aim to provide a 100% affordable scheme, this allocation will provide the tenure flexibility to support a deliverable scheme.

### Land South of Western Way, Bowerhill

Page 100

#### **Policy 7.6 NEW: Land South of Western Way Bowerhill**

Land south of Western Way, Bowerhill, Melksham, as identified in figure 8, is allocated for development of:

- a. Up to 210 dwellings (class C3) including Affordable Housing, to meet identified local housing needs in conformity with JMNP2 Policy 6; and,
- b. a 70-bed residential care home (Class C2).

Any detailed application being submitted for the whole or part of the site must be in accordance with a single comprehensive masterplan, phasing and delivery strategy for the development of the site that has been approved by the local planning authority.

Proposals should be prepared in

early pre-application consultation with the local community.

Development of the site will:

#### **Landscape, Green and Blue Infrastructure and Biodiversity**

1. 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 and adjacent to the site.
2. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that 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.
3. Deliver a minimum 10% net gain in on-site biodiversity.

#### **Design**

4. Include a site layout, built form and scale that minimises visual impacts and safeguards the amenities of existing and new neighbouring residents, education and employment uses.

5. 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).

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

7. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy and sustainable

*continued overleaf*

construction methods in accordance with JMNP2 Policies 1 and 2.

### Flood Risk

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

9. Include sustainable drainage to manage the discharge of surface water to mitigate flood risk within the site and neighbouring land.

10. Integrate measures to protect and enhance watercourses surrounding the site through appropriate buffers to allow for access and maintenance.

### Access and Movement

11. Provide a new vehicular, pedestrian and cycle access from Maitland Place and an internal road network which will incorporate a bus loop.

12. Provide a secondary emergency highway access.

13. Create a pedestrian and cycle only access from Western Way and the Public Right of Way MELW42 to the west of the site boundary and a pedestrian and cycle path network including a spine and orbital pedestrian route connecting with on-site green and blue infrastructure and neighbouring communities, schools and facilities and Bowerhill employment area;

14. Fund provision of a new signal controlled 'Toucan' crossing of Western Way.

15. Create a 2 metre wide footway connection along the southern side of Western Way adjacent to the site boundary.

16. Provide bus stop facilities within less than 5 minutes easy walk of all residents and contributions to provide a viable service.

17. Implement resident and visitor parking and servicing in conformity with Wiltshire Council parking standards.

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

19. Provide resident and employee travel plans to encourage sustainable travel.

Financial Contributions to Infrastructure will make proportionate contributions to:

20. Early years, primary and secondary education.

21. On, or off-site healthcare capacity to meet the needs created by the development.

22. Measures to positively support walking and cycling and public transport use between the site, Melksham town centre and Melksham railway station and linking into existing networks.

23. Contributions towards a Melksham Transport Strategy.



### Land South of Western Way, Bowerhill

#### The reason for the policy

4.8.43 This is a new draft allocation

4.8.44 The 10.25 hectare greenfield site located to the south of Melksham, north-west of Bowerhill and east of Berryfield has been made available for allocation by JMNP2. During the JMNP2 Regulation 14 consultation period last year, outline planning permission was granted on appeal for development of 210 dwellings and a 70 bed nursing home on the site (application reference PL/2022/08504).

4.8.45 The initial Regulation 14 draft of JMNP2 did not propose allocation of the site as it was considered a valued green gap between distinct neighbourhoods. The planning consent however has established the principle and amount of residential development, vehicle access from Maitland Place and broad landscape, layout and density parameters. In doing so it has also removed the ability of JMNP2 to designate the land as a Green Wedge. But further "reserved matter" planning consents will be required to establish the precise layout, housing mix and design of development.

Figure 8: Land South of Western Way Redline Plan



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data  
© Crown copyright and database right 2023

4.8.46 JMNP2 must address these new circumstances to ensure the development of the site is both best managed to protect the amenity of neighbouring residents and employers, but also to secure optimum benefits for the community.

4.8.47 The consented development is contrary to the adopted Core Strategy and was granted permission under NPPF criteria that were changed in December 2023. Nonetheless it now forms part of the housing delivery commitment, which can be counted towards meeting Melksham's Housing Requirement to 2038 through JMNP2 allocations.

4.8.48 The proposed allocation of the site therefore seeks to:

- Regularise the consented housing development within JMNP2 to account for the 210 homes it enables,
- Plan positively to influence and set the layout, design and mix of future detailed housing proposals to meet local needs and expectations,
- Identify on-site and off-site infrastructure and contributions to support wider community.



### Land at Whitley Farm, Whitley

#### **Policy 7.3 REV: Land at Whitley Farm, Whitley**

Land at Whitley Farm, Whitley, as identified in figure 9, is allocated for development of:

- a. Approximately 15 new dwellings to include affordable housing;
- b. Conservation and re-use of the Grade II listed Whitley Farm barn.

Development of the site will:

#### Heritage

1. Be informed by a robust scheme specific heritage assessment approved by Wiltshire Council which addresses the extent, scale and design of residential development and the potential for re-use of the listed barn.

2. Secures the protection or

enhancement of the setting of Whitley Farm House and barn (Grade II), in conformity with adopted Wiltshire Development Plan heritage policy and JMNP2 Policy 2.,

3. Investigates the presence and significance of archaeological remains and avoids high value archaeological 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 and River Avon environment,

5. Provide a scheme of site landscape, green and blue infrastructure and communal outdoor space that protects existing trees, enhances the rural setting, and

contributes positively to resident health and wellbeing. On-site tree canopy cover should be increased 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 sensitive high-quality design, appearance and materials that responds appropriately to the listed farm setting informed by The National Farmstead Assessment Framework (Historic England) and in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023) and Wiltshire Design Guide (2024).

8. Safeguards the amenities of neighbouring residents.

9. Provide a high standard of residential amenity and wellbeing by achieving design principles contained

continued overleaf

within recognised design guidance including “Buildings for a Healthy Life” (Homes England),.

10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.

### Flood Risk

11. Be supported by a 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.

13. Off-site works on land within the landowner’s control to improve

flood management within Whitley.

### Access and Movement

14. Provide vehicular, pedestrian and cycle access from First Lane.

15. Provide safe and convenient walking and wheeling connections to existing pavements in First Lane and the existing public right of way adjacent to the rural boundary of the site.

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

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

Financial Contributions to Infrastructure will make proportionate contributions to:

18. Early years, primary and secondary education.

19. Off-site healthcare capacity to meet the needs created by the development.

20. Measures to positively support walking and cycling and public transport use within Shaw and Whitley.

### Land at Whitley Farm, Whitley

#### The reason for the policy

4.8.49 This is an amended draft allocation.

4.8.50 The 1.6 hectare site is located off First Lane, adjacent to the built up area and settlement boundary of Whitley and in close proximity to local services. The site includes the Grade II listed Whitley Farmhouse and barn adjacent to a farmyard with 20th Century agricultural structures in poor condition that extend back into the neighbouring field. Whilst the structures reflect the agricultural character of the farm, their poor condition does not enhance the setting of the listed buildings and impacts the wider rural and village character. Changes in farming practices has resulted in Whitley Farm buildings being under-used in terms of a working farm.

4.8.51 Subject to further detailed heritage assessment and satisfactory scheme design to protect or enhance the setting of the existing heritage assets, removal of the modern farmyard structures and limited residential development of the farmyard part of the site, will contribute to meeting local housing requirements. It will improve the character of First Lane and the village's rural setting. The appropriate adaptive reuse of the disused barn can also help bring this heritage asset into new productive use to sustain its fabric.

Figure 9: Land at Whitley Farm Redline Plan



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023



4.8.52 Wiltshire Council require any new residential use of the site to be supported by an allocation in JMNP2 and, in accordance with Core Strategy Policy 58 (Ensuring the Conservation of the Historic Environment) that any following scheme proposal is to be informed by a robust heritage assessment that ensures the heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.

4.8.53 The National Farmstead Assessment Framework (Historic England 2015) is guidance to help secure sustainable development and the conservation of traditional farmsteads and their buildings through the planning system. It will be expected that any scheme proposed for the site will demonstrate how it has been informed by this document.

4.8.54 Landscape assessments carried out for the JMNP in 2020 identified the need for any scheme to secure the restoration of damaged boundary hedgerow and removal of redundant structures to conserve and enhance the setting of the elevated farm complex in rural views from public rights of way and the green gap between Shaw and Whitley.

4.8.55 A concept development layout for 18 new dwellings and residential conversion of the listed barn produced by the site promoter was assessed by Wiltshire Council's pre-application process in 2021. The Council considered that: "subject to allocation

in JMNP and further detailed heritage assessment, the design concept had the potential to result in an acceptable scheme." This concept layout forms the basis of this allocation and its design parameters.

### Land at Middle Farm, Corsham Road, Whitley

#### **Policy 7.7 NEW: 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.

A single comprehensive masterplan, phasing and delivery strategy for the development must be prepared, and then approved by the Local Planning Authority in advance of any planning application being submitted for the whole or part of the allocated site. This must take account of the requirements of this policy and the principles shown within the concept plan. Detailed Planning applications must be in accordance with the approved masterplan. Proposals should be prepared with early pre-application

consultation.

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. Investigates the presence and significance of archaeological remains and avoids 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 of design, appearance and materials in conformity with JMNP2 Policy 20 and demonstrating a positive response to the Melksham Design Guide and Codes (2023).**

**10. Be resilient to and/or mitigate climate change and make proportionate contributions to Wiltshire Carbon Neutrality targets including potential significant use of renewable energy and sustainable construction methods in accordance with JMNP2 Policies 1 and 2.**

### Flood Risk

**11. Be supported by a 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.**

**Financial Contributions to Infrastructure will make proportionate contributions to:**

**19. Early years, primary and secondary education.**

**20. Off-site healthcare capacity to meet the needs created by the development.**

**21. Measures to positively support walking, cycling and public transport use.**

### Land at Middle Farm, Corsham Road, Whitley

#### The reason for the policy

4.8.56 This is a new draft allocation.

4.8.57 The first JMNP allocated 1.6 hectares of land at Middle Farm (Plot A) for development of about 18 dwellings. The first Regulation 14 draft JMNP2 also proposed to allocate 5 hectares of land directly to the east of Plot A, (Plot B) for development of about 30 dwellings. Both these allocations are deleted, and replaced with a single new allocation.

4.8.58 The new allocation (Policy 7.7: Land at Middle Farm) creates the new single greenfield allocation site of around 3 hectares to include 1 hectare of buffer landscape and open space. The site is immediately to the north east of Whitley settlement boundary on the eastern-most and level part of a large (approximately 7.5 hectare) Middle Farm field. It has been assessed through two separate, but related site assessments.

4.8.59 The allocation of Plot A in JMNP1, established it as suitable for development.

4.8.60 Assessment of Plot B, found its total development to be likely to have an adverse impact on the setting of Whitley and the openness, tranquillity and visual amenity of the Public Right of Way

Figure 9a: Land at Middle Farm Redline Plan



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023

across the site.

4.8.61 To respond to and minimise the risk of landscape impacts that were given significant weight in the assessment of the site, the new allocation proposes development of up to 3 hectares of land including 1.5 hectares of Plot B. This is the area closest to the settlement boundary and connected to Plot A.

4.8.62 The single allocation enables the development of about 55 dwellings and requires the provision of 1 hectare of landscape buffer to the open countryside. This has been agreed by the site owner. 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.

4.8.63 The sites are linked and well-located to enable walking and cycling to local facilities and public transport stops and utilise a single access point onto Corsham Road, together with providing 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.

4.8.64 The 3 hectare combined site is allocated for the development of about 55, two, three and four bedroom dwellings, plus open space and landscape buffer. This will produce a layout density similar to existing development in Whitley.

4.8.65 In conformity with adopted Wiltshire Development Plan policy, housing will include between 14 to 18 Affordable Homes. Housing types will be required to meet the specific local housing needs of Shaw and Whitley identified in the JMNP2 Local Housing Needs Assessment report (AECOM 2022). In particular it will provide smaller and accessible homes and bungalows. 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.

4.8.66 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.

4.8.67 When assessed alongside available sites at Shaw and Whitley, with regard to environmental factors and JMNP2 objectives and community aspirations, the proposed allocation of around 3 hectares of land at Middle Farm is considered preferable. The site is in a relatively sustainable and accessible location which enables development that meets local housing requirements to 2038, and optimises delivery of affordable housing the use of access and landscape infrastructure already resolved through the former JMNP1 allocation (7.4). Development does not impact rural separation between villages. Landscape impact has been minimised and will add screening of the adjacent electricity sub-station.



### Infrastructure Phasing and Priorities

**This policy helps meet objective 6:** Promoting the delivery of infrastructure to address the needs of the population.

#### Policy 8: Infrastructure Phasing and Priorities

**To ensure the sustainability of housing development, proposals must consider, assess and address their necessary infrastructure requirements and, in so far as they relate to matters within the Applicant's control, plan any related programmes of work in co-ordination with the housing to ensure that infrastructure keeps pace with the needs of the community.**

**Infrastructure requirements, in proportion to their scale and in accordance with prevailing Wiltshire policies, will be delivered through the Community Infrastructure Levy, planning conditions and section 106 agreements.**

#### The reason for the policy

4.8.68 The issues raised by the community echo the elements considered important for Melksham in the Wiltshire Core Strategy (paragraph 5.83) which states that, "residential growth in Melksham should help address the shortfall in affordable housing and contribute towards delivering improved infrastructure".

4.8.69 During preparation of the Plan, residents made it clear that they felt it important that new housing developments should be delivered in Melksham alongside the necessary services and facilities, such as healthcare, education, green spaces and transport infrastructure.

4.8.70 Financial contributions are required as appropriate from developers for the associated infrastructure cost implications of that development. In Wiltshire this includes Community Infrastructure Levy (CIL) contributions and S106 contributions from legal agreements on development. The Local Planning Authority is required to produce annual infrastructure funding statements to set out how much money has been raised through developer contributions (CIL and S106) and how it has been spent<sup>13</sup>.

4.8.71 75% of CIL money is retained by Wiltshire Council and 25% is allocated to the Parish or Town Council where the development takes place as this area has a 'made' or adopted Neighbourhood Plan.



# Shopping, Working and Getting Around



*"The Neighbourhood Plan aims to create a positive environment to encourage retail investment into Melksham delivering diversity and choice and making the town more self reliant"*

## Policies in this section:

- Policy 9: Town Centre
- Policy 10: Employment Sites
- Policy 11: Sustainable Transport and Active Travel



### Town Centre

**This policy helps meet objective 7:** Protecting and enhancing the vitality of Melksham Town Centre.

#### Policy 9: Town Centre

Development proposals within the town centre and primary shopping areas (see Figure 10) will be supported provided:

- a. proposals have regard to Local Plan Policy 68 and demonstrate how they will make a proportionate and positive contribution to achieving the priority aims of the Melksham Town Centre master plan Report 2023;
- b. the proposal is in keeping with the scale and character of the centre of this Market Town and, where appropriate, preserves or enhances the Conservation Area;
- c. access to public transport, walking and cycle routes and car parking is considered and addressed;
- d. where appropriate, a positive contribution is made to conserving and enhancing the appearance and quality of town centre frontages;
- e. development proposals at edge of centre locations which are inter-connected with the Commercial Area will, additional to the above, be required to evidence that there are no suitable and viable sites or buildings within the defined Commercial Area;

- f. where required, planning applications for development or change of use of ground floor frontages within the defined town centre primary shopping area (see Figure 7) where they retain or enhance the continuity of active ground floor shop front uses; and,
- g. greater use is made of upper floors of town centre premises, including for offices, small businesses and residential use with independent access, will be supported where they sustain or enhance the vitality of the host building use and Melksham town centre.

Development proposals for Main Town Centre Uses outside of the defined town centre will be required to demonstrate that there are no suitable and viable sites or buildings within the defined town centre, in conformity with Core Strategy Policy 38 or Local Plan Policy 67 upon its adoption

### The reason for the policy

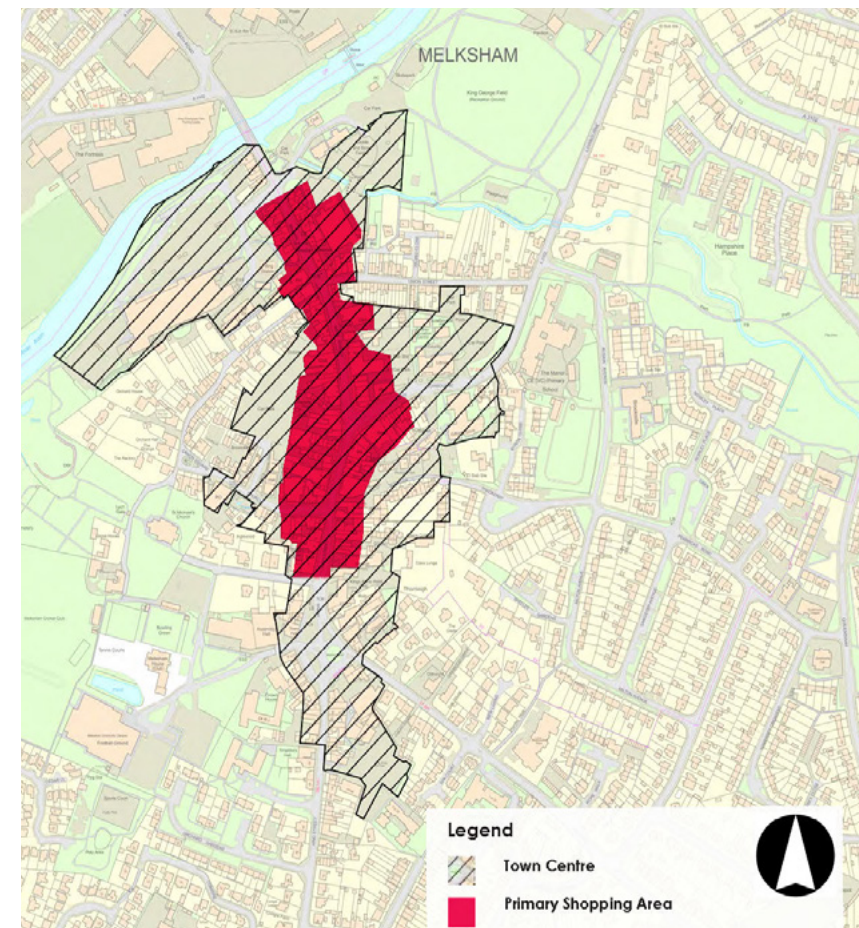
4.9.1 In the rapidly changing national and local context for high streets and market towns, we want to enable our town to change and evolve in response to challenges, changes and opportunities. Most recently, the increase of home-working as a result of coronavirus could provide a boost to local high streets, which means many high streets have the potential to thrive. Town centres are under pressure and, currently, those which can offer enhanced customer experiences and leisure uses to accompany high service retail are in the best position to meet customer needs.

4.9.2 Melksham's priority must be to hold onto, and maintain, the core town centre offer, in order to retain the important sense of place and arrival that this confers. This is becoming even more important in the context of a cost of living crisis.

4.9.3 Use Class E amalgamated nearly all town centre uses in a single class. The updated NPPF requires Local Plans to define a hierarchy of town centres, their boundaries and a Primary Shopping Area; the focus of main town centre uses. Core Strategy retail policy 38 is now out of date. Local Plan Policy 67 (Managing Town Centres) conforms to the NPPF, defining Melksham a transitional market town centre and retaining "sequential testing" requirements of out of centre retail proposals.

4.9.4 There are around 155 businesses operating in the

Figure 10: Town Centre



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023

town centre and a good number of shops comprising a mix of independent traders, supermarkets and national retail brands.

4.9.5 The prime shopping area around the intersection of Church Street and High Street is busy but activity declines down Bank Street toward the river. Consultation feedback linked to the town centre highlighted that people were concerned about the poor retail offer, unattractive 1960s buildings and heavy traffic flows; all issues that were perceived to detract from the shopping experience.

4.9.6 The Melksham Town 2020 – 2036 Scoping Report (Melksham Town Council 2019) reviewed the opportunities, challenges and drivers facing Melksham Town over the period of the next Local Plan. This report highlights that though the climate for retail and customer-facing business in the town is seen as relatively good, in the nine years since Wiltshire Council's 2011 Town Centre and Retail Study noted "...a continued need for further town centre regeneration" there has been improvement to the area in front of the Town Hall but no other recent improvement work.

4.9.7 Competition from other centres and changing retail trends means it is important that the town's vitality and viability is maintained and, where possible improved. It is also important that Melksham town centre remains at the heart of the community of the Plan area, including its wider rural hinterland, as a destination not just for shopping, but also where current and future residents want

to work, socialise and live.

4.9.8 A key part of the town's vitality is night-time activity and economy. Developments that positively enhance the night-time economy of the town would be supported, but care would be needed to ensure the amenity of those living in the town centre was not negatively impacted

4.9.9 As part of the commitment to maintaining and enhancing the town centre, the Town Council has prepared a master plan for the town centre, including areas for potential expansion that will inform future development opportunities. Expansion of the town centre is something that the Town Council will be actively considering, particularly in terms of the future of commercial sites on the edge of the town centre, such as Cooper Tires. See **page 115** and Priority Statement 4: Town Centre Regeneration for more information.

4.9.10 Community consultation on the Town Centre master plan took place between 7th February and 19th March 2023 including community drop-in events, stakeholder events, an exhibition and online consultation. The neighbourhood plan steering group also reached out to Wiltshire Council for their views on the proposed master plan. Feedback received from this engagement has been incorporated and is detailed in part 4 of the master plan document.







### Employment Sites

**This policy helps meet objective 8:** The retention, regeneration and intensified use of previously developed employment land.

**...and objective 7:** Protecting and enhancing the vitality of Melksham Town Centre.

#### Policy 10: Employment Sites

**Proposals for the retention, intensified and reuse of previously developed employment land will be supported in principle, particularly where they will provide space for start-up and small businesses, bringing a range of new employment opportunities. Proposals will be expected to generate the same number, or more, permanent full time equivalent jobs as the existing or former use.**

#### The reason for the policy

4.10.1 The Wiltshire Employment Land and Workspace Review 2017<sup>14</sup> notes that the two largest employment sectors in the Melksham Community Area are manufacturing and wholesale/retail. The employment profile of the Neighbourhood Plan area has moved in recent years from an industrial economy, dominated by several large international employers, to a mixture of industrial, service and retail businesses.

4.10.2 The level of out-commuting to neighbouring towns and to jobs along the M4 corridor is high, and community engagement confirms that people want to work closer to their homes. Expansion of new employment opportunities within the Plan area is considered desirable to reduce the amount of out-commuting to deliver sustainable travel movements.

4.10.3 Wiltshire Core Strategy Core Policies 35 (Existing Employment Sites) defines Principal Employment Land and seeks to retain these and other employment land within similar employment levels in use classes B1 (office), B2 (general industrial) and B8 (Storage and distribution).

4.10.4 Through Wiltshire Core Strategy Core Policy 34 (Additional employment land), Wiltshire Council sets out support for proposals for employment development (use classes B1, B2 or B8) within the Principal Settlements, Market Towns and Local Service Centres. In addition to the employment land allocated in the Core Strategy, a number of sites within Melksham were assessed within the Wiltshire Employment Land and Workspace Review.

4.10.5 Core Strategy Policy 36 (Economic Regeneration) supports Neighbourhood Plans and the preparation of master plans including for appropriate sites to support and facilitate economic regeneration. The Neighbourhood Plan Review has produced a town centre master plan report and is proposing the master plan led regeneration of the Cooper Tires site to stimulate the vitality and regeneration of these two key areas of employment and the local economy.

4.10.6 The creation of use class E and MA has affected the delivery of Core Strategy Policies 34 and 35. The Local Plan seeks to reinforce and increase employment land at Melksham in conformity with new legislation and the NPPF. Policy 63 (existing Employment Land) seeks ongoing retention of employment land at Bowerhill, south of Berryfield, adjacent to Melksham Station and Avonside Enterprise Park. But it enables the potential for some sites to change use. This may include consideration of new uses at the Cooper Tires site.

4.10.7 Policy 64 (Additional Employment Land) sets out the updated employment land strategy to balance employment and economic growth. It proposes 5 hectares of new employment land within the strategic allocation on land east of Melksham.

4.10.8 Local Plan Policy 68 (Managing Town Centres) supports neighbourhood plans in producing local strategies and appropriate site allocations within and on the edge of town centres that would support the viability of the town centre. Neighbourhood plan proposed allocations at Cooper Tires and the former library site, together with the Town Centre Master Plan Report (2023) seek to address the delivery of this policy and enable new employment opportunities.

### Sustainable Transport and Active Travel

**This policy helps meet objective 9:** Supporting improved transport infrastructure for the increasing Melksham population.

**...and objective 10:** Encouraging journeys by rail and bus together with improving cycle and walking routes to reduce the need to travel by car.

#### **Policy 11: Sustainable Transport and Active Travel**

**All developments must be planned in line with the Sustainable Transport Hierarchy. Applications for major development must demonstrate through an effective Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.**

**As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station will be supported. Improvements to the quality of the public realm around the station will also be supported.**

#### **The reason for the policy**

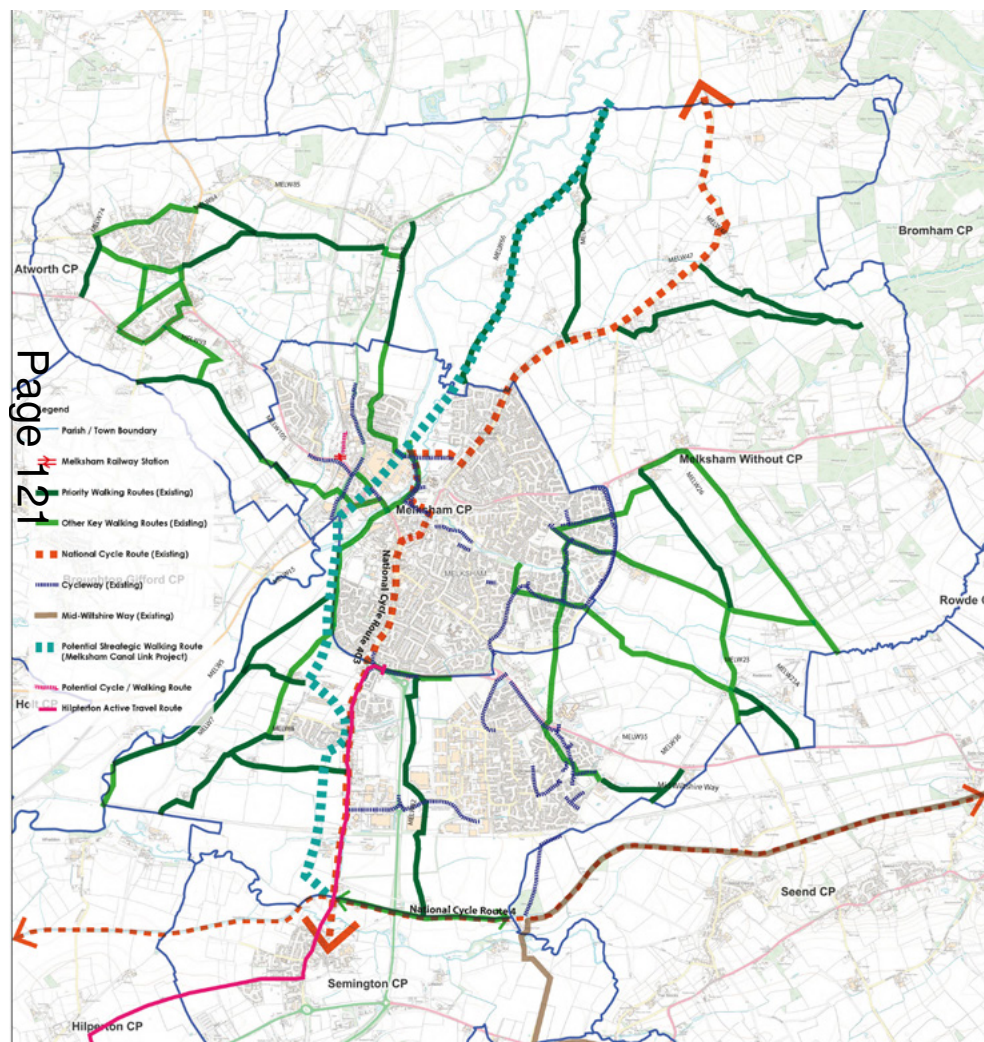
4.11.1 We want to see more opportunities to get around the town and the parish without using a private vehicle. Accessible, safe and attractive infrastructure that promotes and enables walking, cycling and public transport choices for local journeys through the town and parish to key locations such as schools, health and community facilities, green spaces and employment are important. The needs of disabled travellers should also be considered and provided for. Access to public transport for journeys outside the JNP area for business, commuting and leisure purposes complements this. Consideration will be given to the spending of Town and Parish Council CIL receipts on improvements to the sustainable travel network, and public realm.

4.11.2 Increased levels of walking and cycling were seen across the UK during the pandemic. In May 2020 a £2 billion package to increase cycling and walking was introduced by the government.

4.11.3 Extensive networks of high quality routes that enable people to walk and cycle safely and conveniently should reflect five core design principles of:

- coherence
- directness
- safety
- comfort
- attractiveness

Figure 11: Key Routes for Walking and Cycling



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

## Sustainable transport hierarchy

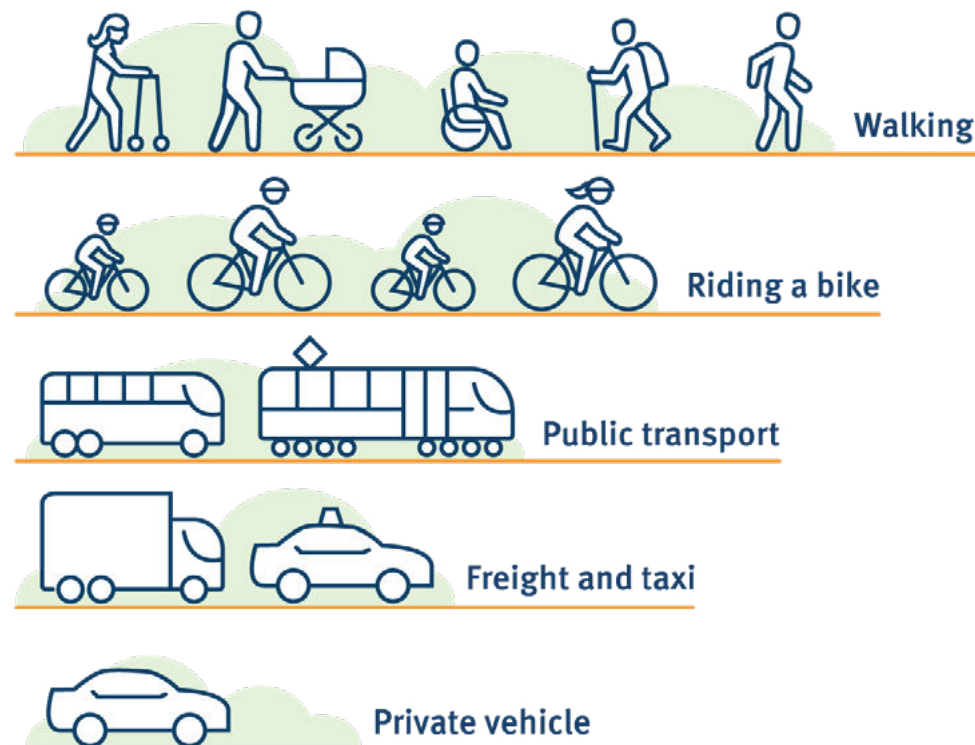


Image sourced from kindpng.com





### Public Transport

Melksham railway station, located in the north west of the town, was closed and demolished in 1966 after 118 years, but the line, although made single track, remained open for freight and diverted passenger trains. It was reopened in 1985.

In 2013 an improved service was introduced which quickly became the fastest growing of GWR's routes. In 2018 the platform was lengthened to allow longer trains to call.

A successful campaign by the Wiltshire based TransWilts Community Rail Partnership (a Community Interest Company) and the Melksham based Transport User Group has resulted in improvements in local rail service providing a two-hourly service in each direction, each day between Westbury and Swindon. Small incremental improvements are also being gained, such as late evening services from Swindon.

It is desirable for these services to operate every hour in each direction, and we support the infrastructure and rolling stock changes to achieve this. Extension of the service at each end of the existing route, namely to Didcot, Oxford and beyond in the Southern direction, Salisbury, Southampton town and airport are also seen as critical to encourage modal shift to public transport for longer journeys. In the shorter term reliable and convenient connections to other locations such as Bath and London are required.

Working with GWR and Wiltshire Council, TransWilts CRP has developed an ambitious and detailed master plan for the Melksham station site using the results of consultation with local residents.

Specified in this master plan, several major improvements have been achieved:

- a station café and toilet have been provided by conversion of existing buildings, and although currently

closed, are key requirements to encourage train usage.

- Active train service information displays have been provided.
- Sufficient car parking and electric car charging for the next few years.

Further enhancements are planned/ desirable summarised as:

- Reconfiguration of carriageway/ footpath in order to add a bus stop, and rerouting of local and regional bus services through the station;
- Shared use pathway, pedestrian and cycle route to Foundry Close, providing convenient access to the east of Melksham via Scotland Road and Murray Walk;
- Stepped station access from Bath Road providing more convenient access to the west of Melksham, especially the Roundponds and George Ward Gardens areas.

The Melksham Transport User Group and other related organisations have put

forward proposals for improvements to bus services in the Plan area. Key to these are:

- Routing services through the station forecourt
- Later evening services on all routes, but particularly the Chippenham/Trowbridge service which can provide a backup service if trains are disrupted
- More efficient scheduling of the town internal services. A trial of electric bus services for this purpose was held in 2022, and well received.





# Community Well-being and Nature



"I like wild areas – they are great for playing hide and seek in. I also enjoy playing with my brother and friends since none of us have big enough gardens to play in."

## Policies in this section:

- Policy 12: Green Infrastructure
- Policy 13: Biodiversity
- Policy 14: Open Spaces
- Policy 15: Community Facilities
- Policy 16: Designation of Local Green Spaces



### Green Infrastructure

**This policy helps meet objective 11:** Preserving and increasing our network of green spaces.

**...and objective 12:** Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.

#### Policy 12: Green Infrastructure

Page 125  
1. Development that will result in the creation of new Green Infrastructure (GI) and/or contribute to the protection, management, enhancement and connectivity of existing GI will be supported; the potential for GI within the Neighbourhood Area is illustrated diagrammatically in Figure 12.

#### 2. Proposals for major developments must:

- a. identify the existing GI within and around the development site, and
- b. demonstrate how GI has been incorporated into the proposal, and
- c. assess and address how the proposal will benefit the function and connectivity of GI through the site and beyond.

#### The reason for the policy

4.12.1 The aim of this policy is to protect, enhance and manage the integrity, multi-functionality, quality and connectivity of the Green Infrastructure (GI) network in our Plan area.

4.12.2 GI is a term that covers the network of green spaces, and other green features such as woodlands and verges, together with water courses that give us a wide range of environmental and quality of life benefits for local communities and wildlife.

4.12.3 A diagrammatic representation of GI assets and their connectivity potential is shown in figure 12 as identified in the GI Evidence Base Report<sup>16</sup>. The report identifies local elements of GI with the aim of linking local sites and delivering connectivity of assets between and within different parts of the Plan area.

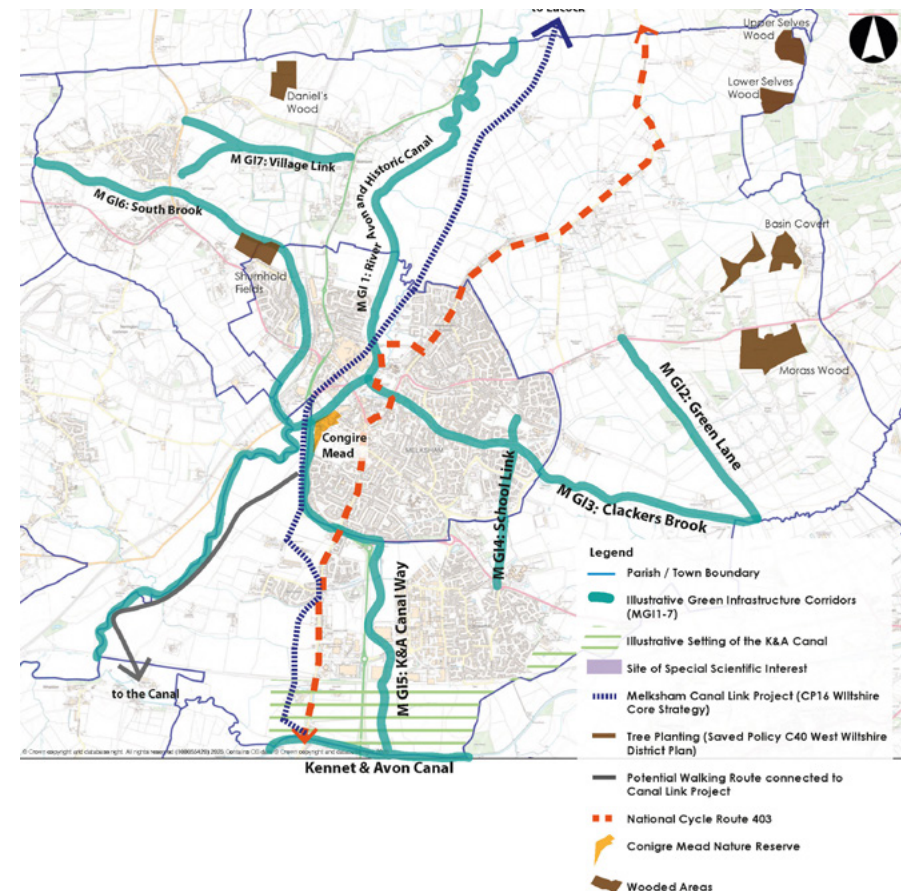
4.12.4 The GI network has many and varied benefits for the environment, biodiversity and residents; it can contribute to the health and wellbeing of communities and local wildlife, and is an important part of our distinct local identity and part of what makes Melksham a good place to live.



4.12.5 As GI is a priority, particularly as part of a proactive approach to mitigating and adapting to climate change, the Parish and Town Councils encourage developers to seek to achieve a Building with Nature accreditation ([www.buildingwithnature.org.uk](http://www.buildingwithnature.org.uk)).

4.12.6 Building with Nature is a new framework of standards for delivering GI. It is divided into three core themes: wellbeing, water and wildlife. The aim is to enable the delivery of high quality green infrastructure at each stage of the development process, from planning and design, through to long-term management and maintenance.

Figure 12: Diagrammatic Illustration of the Potential for Green Infrastructure (Source: Neighbourhood Plan Green Infrastructure Report V7)



© Crown copyright and database right. All rights reserved (100055420) 2023, Contains OS data © Crown copyright and database right 2023

### Biodiversity

**This policy also helps meet objective 11:** Preserving and increasing our network of green spaces.

**... and objective 12:** Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.

#### Policy 13: Biodiversity

**Development proposals, including those for field based solar farms, will be expected to deliver a measurable biodiversity enhancements within and, where appropriate, beyond the site, in order to deliver tangible benefits for biodiversity, including specific attention for protected species.**

**Protection and enhancement of statutory and non-statutory nature conservation sites (as shown on Figure 13) is a priority for the Neighbourhood Area and development proposals must demonstrate sensitive responses to these sites where necessary, such as accommodating a buffer zone.**

#### The reason for the policy

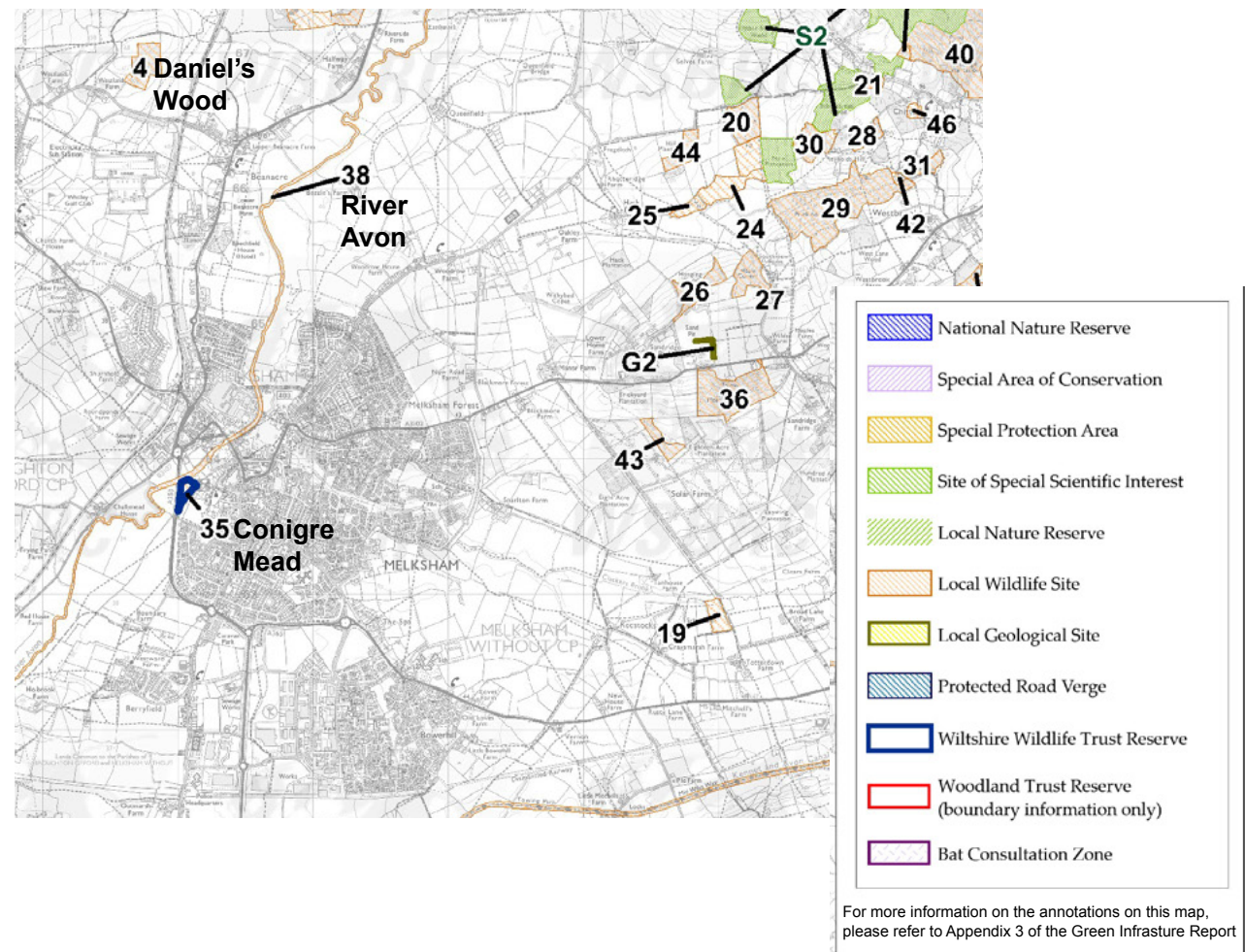
4.13.1 The Neighbourhood plan area is host to a range of wildlife sites and features which support the overall wildlife network and contribute to the well-being of wildlife and residents alike.

4.13.2 A full record of habitats and biodiversity information has been obtained from Wiltshire and Swindon Biological Records Centre, assembled using a mixture of field survey data and aerial photographic interpretation to compile a habitat inventory. This is available in full in the evidence base, and is summarised in the Green Infrastructure Report<sup>16</sup>, which adds Neighbourhood Plan level information to the biodiversity data. The map on the next page shows wildlife sites within the Neighbourhood Plan area.

4.13.3 Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites, will have to deliver at least 10% Biodiversity Net Gain (BNG) from a delayed start date of January 2024 . BNG will be required for small sites from April 2024. The Wiltshire Council Local Plan review through policy 89 (Biodiversity Net Gain) sets higher ambitions with a minimum of 20% BNG or higher.

Figure 13: Wildlife Sites (Note: the numbered sites on the map, produced by the Wiltshire and Swindon Biological Records Centre can be found listed in appendix 3a of the Green Infrastructure evidence base report available on the website: [melkshamneighbourhoodplan.org](http://melkshamneighbourhoodplan.org))

4.13.4 Net gain is an approach that uses the planning process to leave biodiversity in a better state than it was before the development started, securing wider benefits for people and the environment, and is directly linked to the Government's aim in its 25 Year Environment Plan to "leave the environment in a better state than we found it".





### Melksham Canal Link Project

Page 129

A key priority for the Plan area GI is the Melksham Link Project. The Wiltshire Core Strategy safeguards the route of the Melksham Link Canal in Core Policy 16. This policy safeguards the identified route (see Figure 12) for developing a canal link to the south west of the town between the Kennet & Avon Canal and the River Avon, and to the north east of the town between the River Avon and the historic alignment of the Wilts & Berks Canal.

The project is an opportunity to improve the GI network both within the Plan area and the wider Melksham Community Area, with associated benefits such as increased walking and cycling routes and linked to this is the opportunity to promote tourism within the town, and to generate renewable energy, harnessing energy from the river.

In 2012, a planning application for the Melksham Link was submitted, but this has not yet been determined, due to outstanding environmental concerns raised by the Environment Agency.

The scheme comprises: A junction with the Kennet & Avon canal at Semington / Around 3km of new canal to the west of Semington Rd, through Berryfield, with a lock and an aqueduct over Berryfield Brook. / New access roads and bridges at Berryfield. / Two further locks dropping down to a junction with the River Avon just west of the A350 Challymead road bridge. / A new weir across the River just downstream of this junction. / Re-profiling the river bed from this junction upstream under the Town Bridge to Melksham Gate weir. / A lock, adjacent to the weir with a hydro-electric generator on the island formed between the weir and the lock. / Towpath and footbridges to maintain existing footpaths and provide new pedestrian/cycle connection from the Kennet & Avon to the town and from the northern end to Lacock. / Mooring facilities for canal boats along the new canal and on the river near Town Bridge.

The project is being co-ordinated by the Wilts & Berks Canal Trust<sup>17</sup> in collaboration with funders who envisage how the canal will be delivered. The Town and Parish Councils would wish any associated development to be appropriate and in accordance with the vision and policies of this Plan.



### Open Spaces

**This policy also helps meet objective 12:** Preserving and increasing our network of green spaces.

**... and objective 13:** Protecting, improving and expanding existing services and facilities to promote health, education and social needs.

#### Policy 14: Open Spaces

**Development proposals that involve the whole or partial loss of an existing open space (other than designated Local Green Spaces) must demonstrate:**

- 130
- a. from an assessment of open space provision, using the quantity and access standards for open space as set out by Wiltshire Council, that there is a surplus in the catchment area of open space beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs; or
  - b. that a replacement open space (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality and accessibility of the open space including by walking and cycling.

#### The reason for the policy

4.14.1 As the NPPF makes clear, access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

4.14.2 A distinctive characteristic of the town is the open spaces which punctuate the built environment, meaning that most residents are within walking distance of some open space. This key positive feature contributes to community well-being. The pandemic has highlighted what the evidence already demonstrated – the closer people live to accessible green space, the happier and healthier people are.

4.14.3 The Green Space Index is Fields in Trust's annual barometer of publicly accessible local park and green space provision ([experience.arcgis.com](https://experience.arcgis.com)). Other than Bowerhill, information from the Green Space Index in 2023 shows that our area does not meet the minimum standards of green space provision, though it also shows that there is generally good standard of access, with many people being within ten minutes walking distance of green

spaces across the area including King George V Park, Conigre Mead Nature Area, together with many other parks and recreation grounds and play areas.

4.14.4 We also know that populations in our area will grow and this may negatively impact on the quantity of green space available to communities, unless provision is increased. Parks and green spaces are not a statutory service, meaning local councils have no obligation to provide them for their residents (though the provision is taken seriously by the town and parish council).

4.14.5 It should also be noted here, that a number of open spaces have been identified as meeting the tests for designation and protection against inappropriate development as Local Green Space (see pages 93-95). Educational open spaces are an example of an open space that cannot be designated as a Local Green Space, but are covered under this policy.

### Community Facilities

**This policy also helps meet objective 13:** Protecting, improving and expanding existing services and community facilities to promote health, education and social needs.

#### Policy 15: Community Facilities

- Page 132
- 1. Development proposals that involve the loss, in whole or part, of a community facility (as identified in Figure 14a, b & c, and detailed in the Community Facilities Report<sup>19</sup>) must demonstrate that:**
    - a. adequate alternative provision exists or will be provided in an equally accessible or more accessible location, including by walking and cycling, within the catchment area of the facility; or**
    - b. it would not be economically viable, feasible or practicable to retain the building or site for use as a community facility; redevelopment for non-community use will only be considered as a last resort and where all other options have been exhausted.**
  - 2. Proposals for new community facilities in the Plan area will be supported where the applicant can demonstrate the need and benefits of the proposed facility, or where replacement or enhanced facilities are proposed as mitigation against the loss of any community facilities within the Plan area.**
  - 3. New or replacement community facilities should be located where there is a choice of travel options and should be accessible to all members of the community.**

#### The reason for the policy

4.15.1 Community facilities are defined by Wiltshire Council as those that serve settlements and include health, education and cultural infrastructure including uses such as local shops, meeting places, sports venues, public houses and places of worship<sup>18</sup>.

4.15.2 The community facilities in the Plan area cover both rural and town areas. The existing community facilities in the Plan area as detailed in the Community Facilities Report<sup>19</sup> compiled by the Plan Steering Group are wide-ranging and can include community centres, public houses, cultural centres and venues, places of worship, education establishments and training centres and childcare facilities, health and social care facilities, sport and recreation facilities and civic and administrative facilities. However, the list and maps produced for the

Neighbourhood Plan cannot be said to be exhaustive (there are almost certainly more facilities than those included on the maps).

4.15.3 In August 2022 the new Community Campus opened. The Campus is a hub for community services, and provides a new library, swimming pool, sports hall, gym, dance studio and meeting rooms, amongst other facilities.

4.15.4 The primary function of some facilities is commercial (including pubs – a key facility in rural areas) but they also perform a clear role for the community in terms of sport, recreation and leisure provision.

4.15.5 This policy supplements the Wiltshire Local Plan by identifying the key local facilities and services, with the aim of retaining them unless it can be demonstrated that there is no longer a need or where alternative provision is made. In practice there are sometimes permitted development rights that allow changes of use without planning permission, however, this policy applies where planning permission is needed.

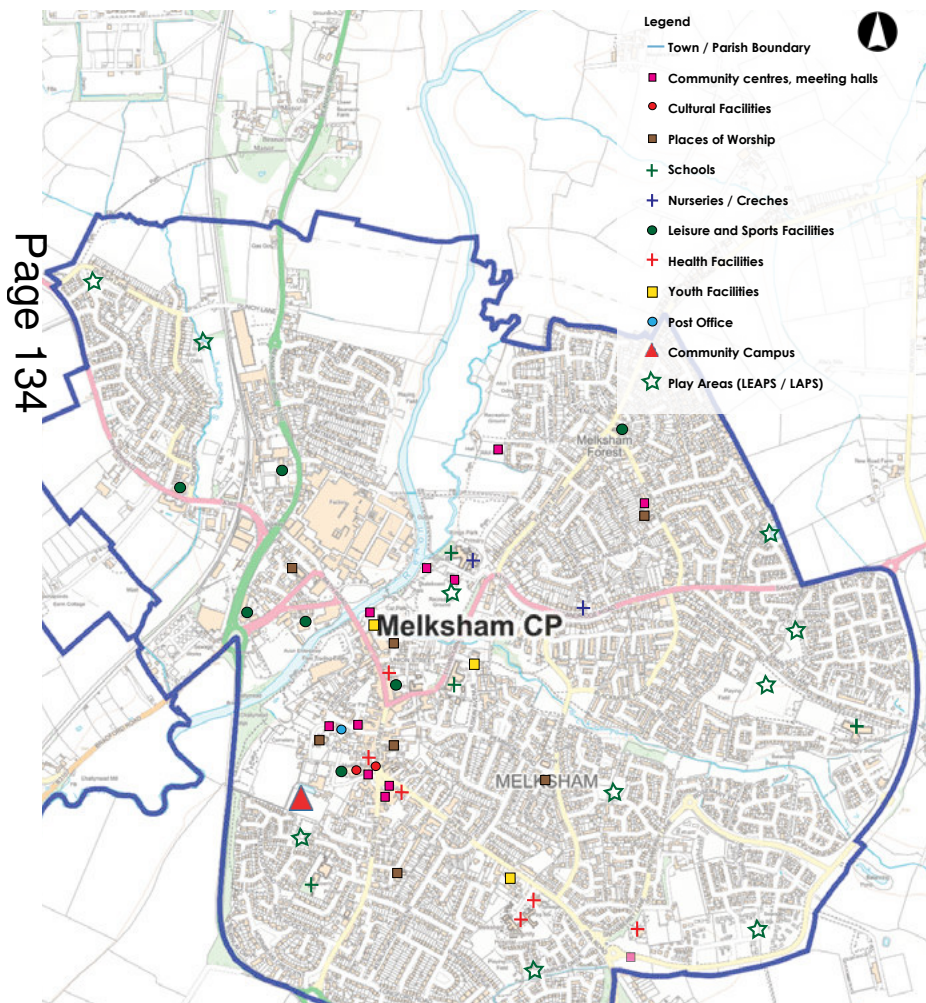
4.15.6 Consultation illustrated how important community, health and leisure facilities are for the health and wellbeing of the people of Melksham and its wider community.

4.15.7 The Community Facilities Evidence Base Report<sup>19</sup> sets out in





Figure 14a: Melksham Town Community Facilities  
(Source: Neighbourhood Plan Community Facilities Report V5)



detail the facilities in the Plan area. It is important that facilities for people of all ages are made available to support a diverse and healthy local population, and that these facilities are accessible to residents, as far as possible using sustainable modes of transport.

4.15.8 Proposals for partnership working with national or local agencies to develop strategic community facilities to meet the identified needs for the people living in and around the Plan area will continue.

© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

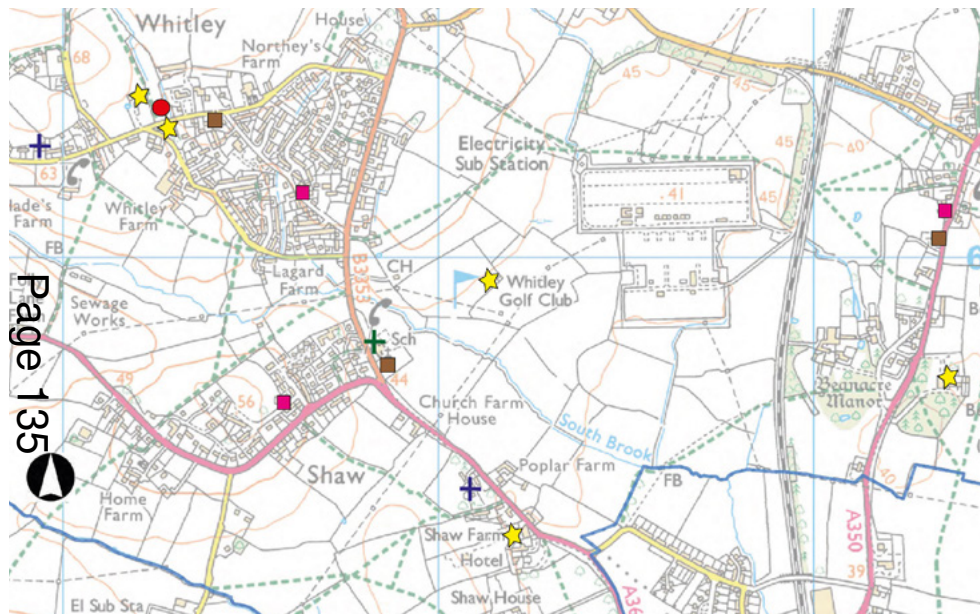


Figure 14b: Whitley, Shaw and Beanacre Community Facilities  
(Source: Neighbourhood Plan Community Facilities Report V5)

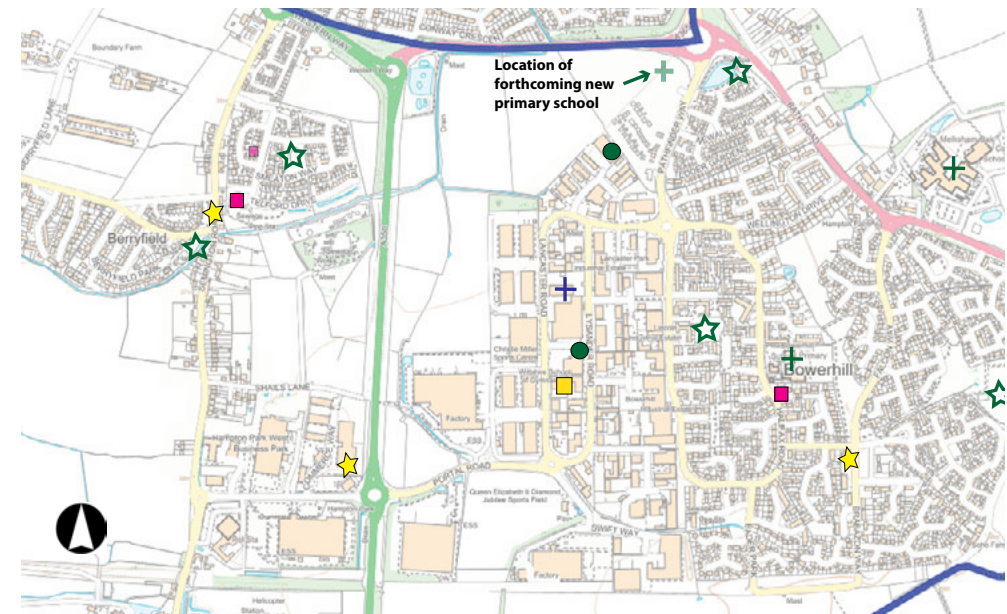


Figure 14c: Bowerhill and Berryfield Community Facilities  
(Source: Neighbourhood Plan Community Facilities Report V5)

Figures 14a, 14b and 14c not to scale, please refer to map on previous page for key and Community Facilities Report<sup>19</sup> for further information on facilities. One additional type of facility is noted in the rural areas – pubs denoted by a star ★



### Local Green Spaces

**This policy also helps meet objective 11:** Protecting, connecting and increasing our network of green spaces.

**... and objective 12:** Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.

#### **Policy 16: Designation of Local Green Spaces**

**The sites shown on figure 15, and listed on page 95 are designated as Local Green Spaces, and will be protected from inappropriate development in a manner consistent with the protection of land within the Green Belt.**

**These spaces will be protected from built development, except in very special circumstances and where the proposals enhance the existing use of the space, particularly regarding the characteristics that underpin designation as Local Green Space.**

#### **The reason for the policy**

4.16.1 The NPPF sets out the context for Local Green Space (LGS) designation which provides special protection against development for green areas of importance to communities. Paragraph 102 of the NPPF sets clear criteria that the designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty,

historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and  
c) where the green area is local in character and is not an extensive tract of land.

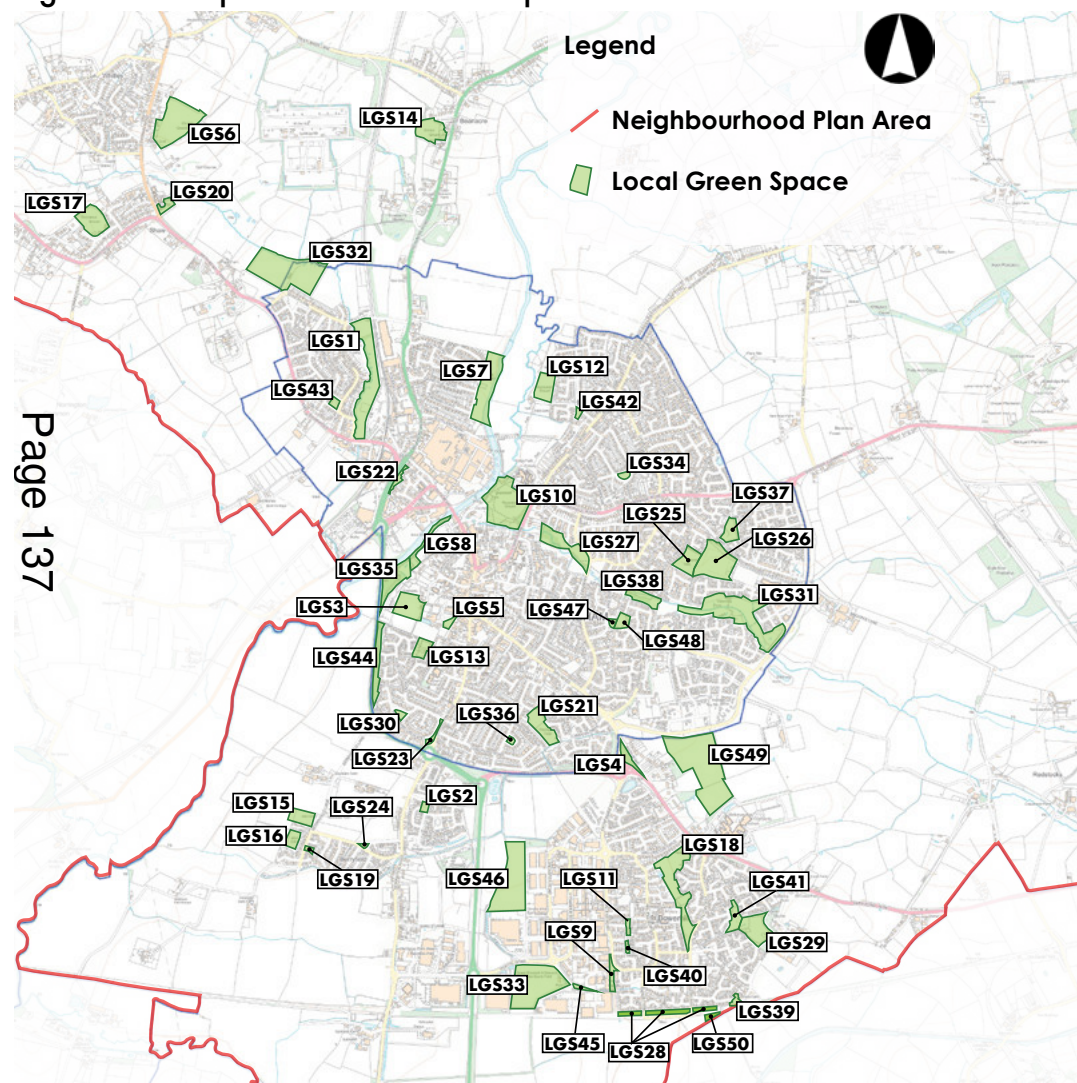
4.16.2 Interactive online community outreach to identify potential LGS nominations was undertaken during May and June 2022. This was supplemented by an opportunity to validate or add nominations at community drop-in events and online consultation during February and March 2023.

4.16.3 Where sites met the NPPF criteria, and were assessed in line with planning practice guidance<sup>20</sup> including whether there were site allocations or planning permissions which would prevent designations, all owners of the shortlisted sites were contacted to secure their early input into the designation process.

4.16.4 From 250 suggestions from the first community consultation, a working group assessed potential sites to finally arrive at 50 sites proposed for LGS designation.

4.16.5 A full explanation of the methodology, evidence and justification to support the designations, along with maps of each LGS can be found in the Local Green Spaces Evidence Base Report 2023.

Figure 15: Proposed Local Green Spaces



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023



Individual site maps can be seen in the Local Green Space Report



### Proposed Local Green Spaces

1. Land along Roundponds following South Brook
2. Bowood View
3. Recreational ground and cricket field to rear of The Campus
4. Copse area in The Spa
5. Approach to Melksham House
6. Cricket and field – community area, Whitley
7. Riverside Drive Green/Woodland Areas
8. Natural woodland area near Sainsburys
9. Land between Duxford Close and the boundary of the industrial estate
10. King George V Playing Fields and recreation area
11. Beverley Close Greenspace
12. Forest Community Centre playing field/sports pitches
13. Hazelwood Road Play Area (Brunswick Park)
14. St Barnabas Church, Cricket Field
15. Berryfield Allotments North (Briansfield Allotments)
16. Berryfield Allotments South (Berryfield Allotments)
17. Shaw Playing Fields “The Beeches”
18. Rear of Grasmere and Wellington Drive
19. Green in Berryfield Lane
20. Shaw Churchyard
21. Field/Old Sports Pitch (to rear of Melksham Hospital & Champion Drive)
22. Weavers Crofts
23. Hornbeam Crescent/Semington Road
24. Berryfield Green triangle
25. Foresters Park Road playing fields

26. Cranesbill Road playing fields
27. Clackers Brook (Queensway)
28. Brabazon Way
29. Hornchurch Road Public Open Space
30. Hornbeam Crescent green
31. East of Melksham (Clackers Brook)
32. Shurnhold Fields
33. Bowerhill Sports Field
34. The Crays
35. Conigre Nature Reserve
36. Sarum Avenue
37. Skylark Green
38. Primrose Nature Reserve
39. Locking Close
40. Beaufort Close to Kestrel Court
41. Harvard Close
42. Awdry Avenue
43. Roundponds
44. Walkway parallel to A350 (rear of Hornbeam Crescent)
45. Verge with stream and trees (Swift Way, Bowerhill)
46. Fields/old golf course (behind Christie Miller)
47. Dorset Crescent play area/green
48. Primrose Drive play area/green
49. Dog Walking Area to the Rear of The Spa
50. Locking Close Allotments



# Natural and Built Environment



"We have the beautiful river Avon, meandering through the town with its riverside walks, stretching along fields through King George V Park and onto the wildlife reserve at Conigre Mead"

## Policies in this section:

- Policy 17: Trees and Hedgerows
- Policy 18: Landscape Character
- Policy 19: Green Wedges
- Policy 20: Locally Distinctive, High Quality Design
- Policy 21: Local Heritage



### Trees and Hedgerows

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

#### **Policy 17: Trees and Hedgerows**

##### **Ancient and Veteran Trees:**

To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 16) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. A minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

##### **Other Existing Trees and Hedgerows:**

To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where

there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

##### **New Trees:**

New tree planting in development proposals and throughout the built and natural environments of the Plan area will be supported in principle. Development proposals are encouraged to aim for 20% tree canopy coverage on site where possible – in gardens and in streets.

### The reason for the policy

4.17.1 As set out in the Green Infrastructure Evidence Base Report<sup>16</sup>, trees are a key asset of the Plan area and there is an ambition to increase tree coverage across the community. Overall tree canopy coverage in the area is estimated to be an average of just over 12% which has been mapped using the i-tree canopy tool<sup>21</sup>. The Urban Forestry and Woodland Advisory Committee Network recommends 'a minimum standard for tree canopy cover is set for a local area, with evidence showing that 20% is a good aspiration'<sup>22</sup>. As part of a local response to climate change, place making and achieving local distinctiveness: In Shurnhold Fields, 200 trees planted for WW1 commemoration along with a native rare species orchard, and most recently the community in Shaw and Whitley to plan to plant their own trees. In Melksham town, another intensive residents tree planting scheme will be carried out in November 2023 in the town.

4.17.2 There are a number of areas of ancient woodland across the Plan area, including Daniel's Wood, Morass Wood and Hanging Wood (ancient replanted). This is significant as ancient woodlands now cover just 2.4% of the UK. Standing Advice from Natural England and the Forestry Commission guide planning decisions that relate to ancient and veteran trees.

4.17.3 Both greenfield and previously developed sites are likely to



### The Importance of Trees

- Trees naturally absorb CO<sub>2</sub>, a key greenhouse gas removing 4 million tonnes of it from the atmosphere every year.
- Local air quality is improved as trees cut the level of airborne particulates and absorb nitrogen dioxide, sulphur dioxide and ozone
- Nearby trees and reenspaces can increase property value of 15 – 18%. The larger the trees the greater their proportional value.
- Tree cover across England is 12.8%, of which 10% is woodland.
- The Woodland Trust recommend an increase in UK woodland as part of the way to tackle biodiversity and climate crises.
- Existing tree cover is being mapped as part of the approach to increasing tree cover. Friends of the Earth also advocate that planting more street trees, forests and hedgerows one of the best solutions to protect our environment and achieve net zero. See their [website for an "opportunity map" of areas in England that may be suitable for creating woodlands](#) – this includes areas in Melksham and Melksham Without.



contain trees and hedgerows that, if retained, can make a positive contribution to the character of new development. Retaining key trees can influence both the design and layout of the development, and arrangements for their protection should be made during the construction phase

4.17.4 The design should also take account of the long term setting for important trees and how they will relate to the use of the area in the future. It is important to note here that a Neighbourhood Plan in itself cannot protect a tree from being felled, unless it is protected by a Tree Preservation Order or is within a Conservation Area.

### Below: Tree Replacement Standard Methodology

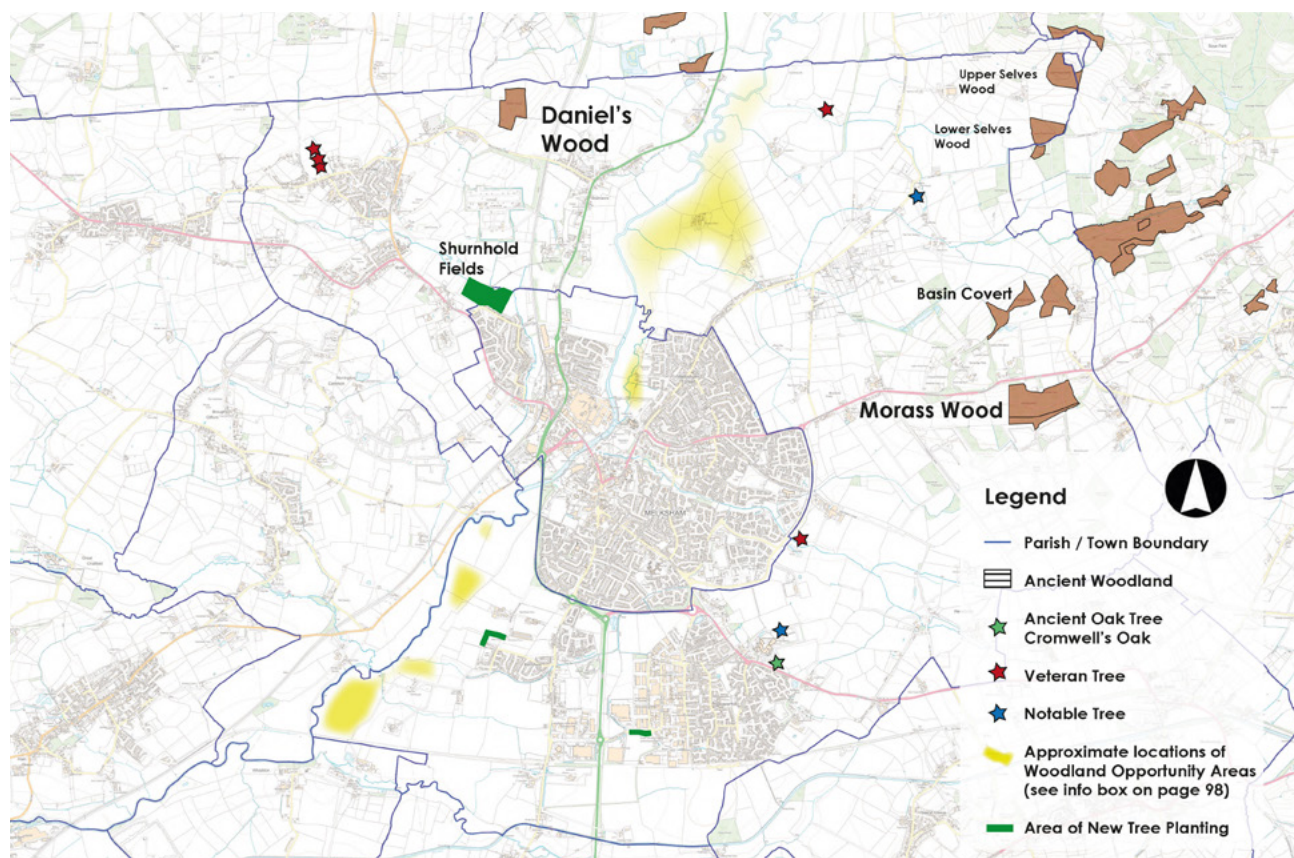
Trunk Diameter of Tree lost to development (cm measured at 1.5 metres above ground level)	Number of Replacement Trees
Less than 15	0 - 1
15 - 19.9	1
20 - 29.9	2
30 - 39.9	3
40 - 49.9	4
50 - 59.9	5
60 - 69.9	6
70 - 79.9	7
80 +	8

4.17.5 Hedgerows, like trees, can make an important contribution to the character and can also be important historically as indications of land use and previous ownership. They also contribute significantly to biodiversity and amenity value of the natural and, in places, built environment. Trees will also help with adaptation to the effects of climate change.

4.17.6 Where tree loss is unavoidable, the Tree Replacement Standard can be used to inform the number of replacement trees. Whilst a particular site or design approach to trees will inform the number and approach to tree planting, the Standard is a established methodology used by Bristol City Council<sup>23</sup>.



Figure 16: Ancient Trees, Ancient Woodland and Areas of New Tree Planting (Source: Neighbourhood Plan Green Infrastructure Report)



© Crown copyright and database right. All rights reserved (100055420)  
2023, Contains OS data © Crown copyright and database right 2023

### Landscape Character

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

#### Policy 18: Landscape Character

**Development proposals will be expected to:**

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

#### The reason for the policy

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

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



Bridge across the River Avon



of openness, to areas that are much more enclosed with lines of trees along the river Avon. As the land rises to the north east there is an area that was once designated in the West Wiltshire Local Plan as a 'Special Landscape Area'.

4.18.3 Key characteristics of the landscape of the Plan area are detailed in the Green Infrastructure Report<sup>16</sup> and the Local Landscape Character Evidence Base Report<sup>24</sup> which supplements the Landscape Character Assessment work done by Wiltshire Council with local detail. Some key points are:

The landscape around the river Avon forms a wedge of landscape into Melksham town running in between areas of housing (Riverside Drive to the west and Forest to the east) and from the south as far as the town bridge taking in the Conigre Mead nature reserve from where it spreads out again into the Melksham Without Parish towards the edges of Berryfield.

- Houses from Methuen Avenue, in the Forest area, on the east of this character area, and houses from Riverside Drive on the west, front out onto accessible greenspace (allotments from Methuen Avenue), providing an active frontage and connection to the landscape of the river Avon.
- Brooks and stream corridors are scattered across the landscape, for example Clackers Brook which, like the river Avon, forms a key area of natural green space and landscape, also making a link and connection with the built environment of the town.

South Brook to the north west, meanders through agricultural fields between the two villages of Shaw and Whitley, contributing to the separate identity and character of the two villages and to local amenity, with a number of footpaths criss-crossing the area.

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

4.18.5 A number of views across the landscape have been included in the Landscape Character Report<sup>24</sup> to illustrate the different characteristics and features across the Plan area. From many places expansive views of the wide open landscape can be appreciated.



### Landscape Green Gaps and Wedges **UPDATED!**

**This policy helps meet objective 15:** Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

#### **Policy 19REV: Green Wedges**

The Green Wedges (mapped in figure 17) are identified in order to:

- a. provide long-term protection against coalescence;
- b. protect the setting and separate identity of settlements; and
- c. retain the existing settlement pattern by maintaining the openness of land.

**Any development proposals within defined green wedges must not (individually or cumulatively) lead to the coalescence of settlements.**

**Where there are exceptional circumstances that demonstrate that no suitable alternative sustainable employment land location within Melksham or Bowerhill or on land outside of defined green wedges is available, proposals for development of employment uses in classes, B2, B8 or E(i-iii) will be supported where they conform to other policies in the adopted development plan. Proposals should minimise urbanising effects, such as artificial lighting and traffic movements, and where possible retain and increase screening trees and hedgerows as edge features to minimise impact on the rural landscape.**

#### **The reason for the policy**

4.19.1 When places merge together that were once separate it is known as 'coalescence'. Green wedges (or buffers) have been successfully used in local and neighbourhood plans to prevent the coalescence of villages/towns, and to protect local character and identity. Green wedges are also of multi-functional benefit as spaces for flood protection, climate change mitigation, agriculture, biodiversity and recreation etc.

4.19.2 In recent years, extensive new housing development has been approved across the Neighbourhood Area. Some of this development has had the effect of increasing the perceived or actual coalescence between formerly free-standing settlements, each with their own history, character, and identity. Such development was in some cases permitted contrary to relevant policy in the Wiltshire Core Strategy because the Council was unable to demonstrate a five-year supply of deliverable housing sites, meaning the Core Strategy policies carried less weight, in line with the presumption in favour of sustainable development in NPPF paragraph 14.

4.19.3 Wiltshire Council, through the Strategic Housing and Economic Land Availability Assessment (SHELAA) provides

### UPDATED!

information on a range of potential housing sites and sites for other uses, which gives an indication of how development requirements could potentially be met on the ground. The SHELAA and a separate Call for Sites carried out by the Steering Group of the Neighbourhood Plan to inform this update of the Plan, clearly indicate that land continues to be promoted for development in locations where coalescence could result if an application were consented.

4.19.4 As more development is accommodated in the Plan area, Green Wedges can help prevent (further) erosion of local character and identity that can happen. The protection of certain areas of countryside outside settlement boundaries as green wedges can help prevent (further) erosion of local character and identity arising from 'coalescence' or the merging together of places that were once separate. Developments can contribute to coalescence both individually and cumulatively.

4.19.6 A Green Gap and Wedge Study (2023) undertaken as part of the evidence base to JMNP2, sets out landscape evidence to illustrate that Shaw, Whitley, Beanacre, Bowerhill, Berryfield and Melksham town each retain a unique character, history and sense of place derived from their landscape settings as recognisably distinct built-up areas, distinguishable from other neighbouring settlements by intervening countryside.

4.19.5 The Green Gap and Wedge Study illustrates that the 6 areas designated as green wedges have been assessed as meeting clear criteria.

4.19.7 In December 2023, after the publication of the first pre-submission, Regulation 14 consultation period on the draft JMNP2 had ended, consent was granted on appeal for 210 dwellings and a care home on land south of Western Way at Bowerhill. This significant new circumstance of outline planning permission results in this seventh possible Green Wedge, as assessed in the Green Gap and Wedge Study, as no longer fulfilling designation criteria, and it has therefore been removed from the this draft B of the pre-submission version of the JMNP2.



### What is the SHELAA?

The Strategic Housing and Economic Land Availability Assessment (SHELAA) provides information on a range of potential housing sites and sites for other uses, which gives an indication of how Wiltshire's development requirements could potentially be met on the ground. The SHELAA is required by national policy.



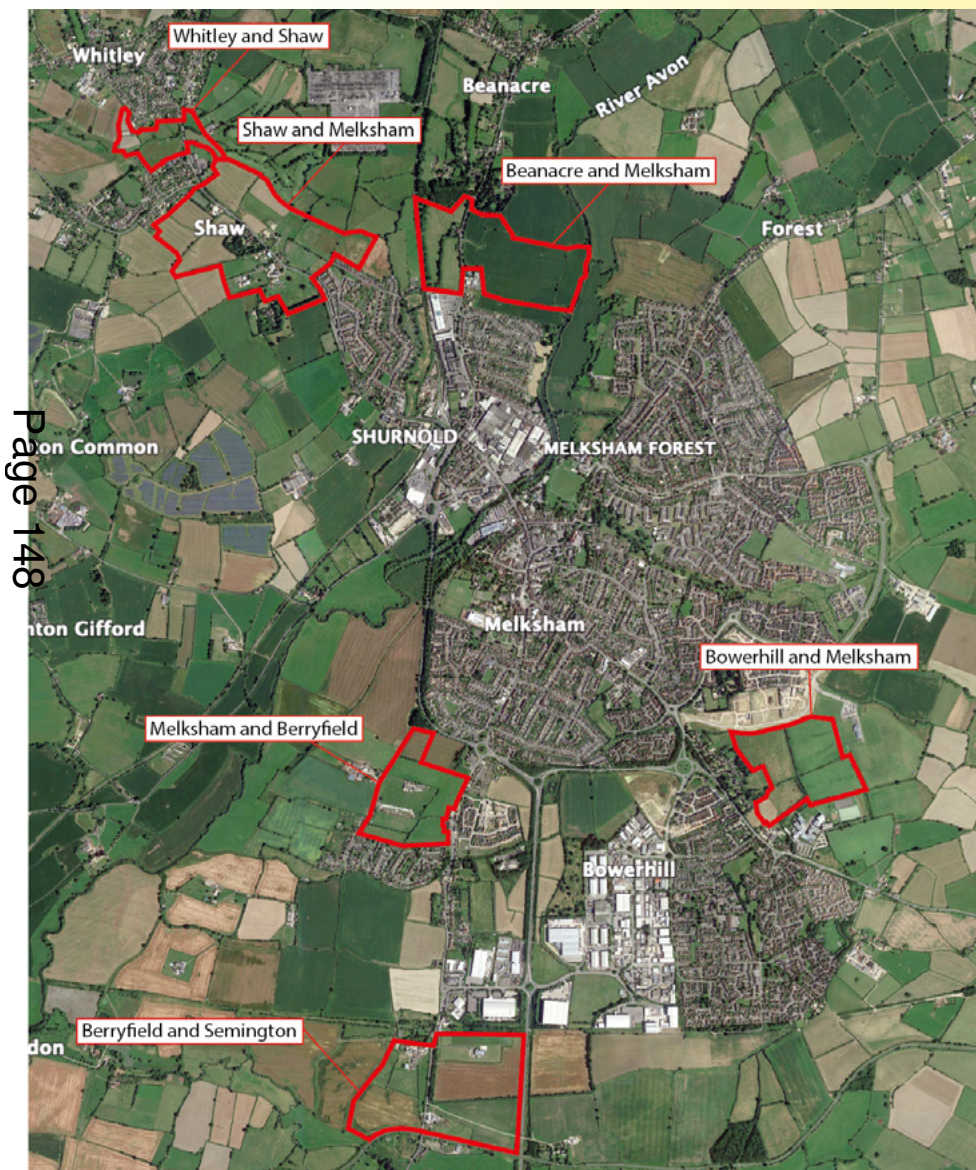


Figure 17: Green Wedges

**UPDATED!**

4.19.8 One of the 6 wedges, is the Berryfield and Semington Wedge. The Green Gap and Wedge Study found that Bowerhill and the village of Semington in the neighbouring Parish to the south, exhibit distinct characters (satisfying criterion 1 and 2 of the Green Gap and Wedge study). The existing land between them is open, prevents their coalescence and the area is considered to provide the function of a green wedge. The southern extent of the boundary follows a clear landscape feature of high sensitivity – the Kennet & Avon Canal (criterion 2 sets out that the boundary should be drawn up using physical features identifiable on the ground) , which is also the Parish boundary between Melksham Without and Semington. The boundary of the Green Wedge therefore is the Canal, rather than the village of Semington, as this Neighbourhood Plan can only include land within the approved Plan (and Parish) boundary, rather than the full extent of the functional green wedge, which the appendix of the Study explains extends into Semington parish. However, co-ordinated work has taken place between Semington Neighbourhood Plan and the JMNP as neighbouring parishes, as this area of landscape is identified as important in both, and covered through policies. As the Canal is not simply an administrative boundary, but also an important landscape and physical feature of both Melksham Without and Semington, both Neighbourhood Plans aim to protect the highly sensitive<sup>25</sup> and valued landscape around the canal, therefore the JMNP proposes to also include this area as a Green Wedge within policy 19.

Map credit: JMNP Green Gap and Wedge Study 2023 (as amended) Imagery © 2023 Google Maps Airbus, Getmapping plc, infoterra Ltd & Bluesky, Maxar Technologies, Map data 2023

### Locally Distinctive, High Quality Design

**This policy helps meet objective 15:** Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

#### **Policy 20: Locally Distinctive, High Quality Design**

**Development proposals that contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of Melksham and Melksham Without will be supported.**

**In addition to having regard to the National Design Guidance and Wiltshire Council design policy, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes (2023), therefore how they have responded positively to the history and character of the area in which the site is located.**

**Proposals for major development must demonstrate through a master plan how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.**

#### **The reason for the policy**

4.20.1 The character and quality of Melksham's environment is defined by its heritage, landscape and green and blue infrastructure and accessibility, as much as by the design of its buildings.

4.20.2 This policy addresses matters of development layout, form, materials and detailing. Design proposals should address all other Neighbourhood Plan policies, in particular those relating to Sustainable Design (Policy 1), G.I (Policy 12), landscape (Policy 17) and local heritage (Policy 21) to achieve a responsive and successful proposal.

4.20.3 Melksham Town Council and Melksham Without Parish Council recognise the importance of design quality to local distinctiveness and quality of life. In addition to expecting development proposals to respond positively to national design guidance and be in conformity with Wiltshire Core Strategy/ Local Plan design policy, the Neighbourhood Plan aims to ensure development in the Plan area is designed to complement and strengthen local quality of place, character and distinctiveness.



4.20.4 The second Neighbourhood Plan is therefore now supported by Melksham Design Guidelines and Codes Document (AECOM 2023). Those proposing or assessing any development should use this resource to inform the design of schemes or assessment feedback. Figure 19 illustrates the different character areas found in the Plan area, and detailed in the Document.

4.20.6 Part 12 of NPPF sets out importance of design in the planning and development process and sets out the role of communities in achieving 'good design': "Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics".

4.20.7 The NPPF also underscores the importance of high quality design: "the creation of high quality, beautiful and sustainable buildings and places is fundamental

to what the planning and development process should achieve.

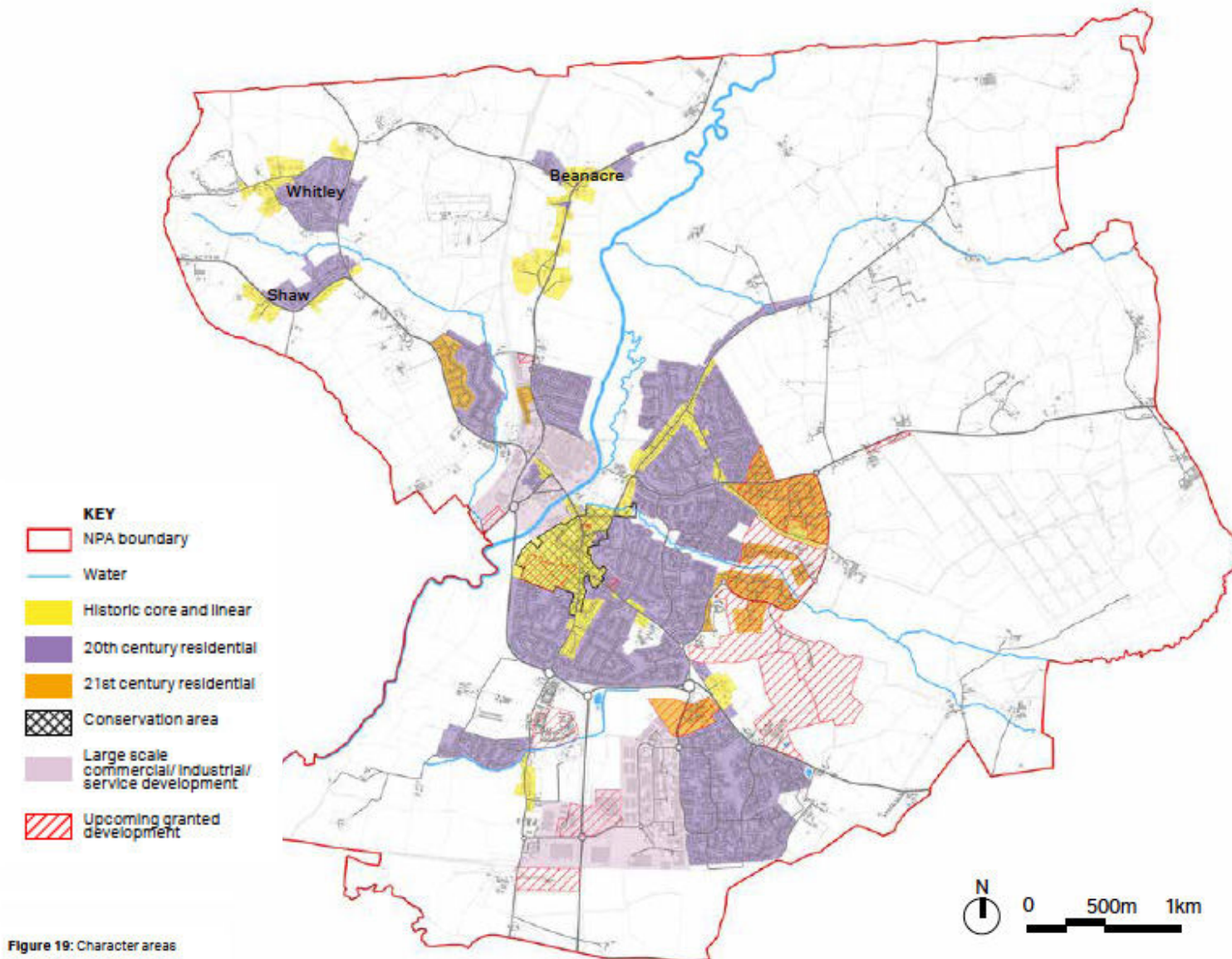
4.20.8 In 2019 the Government published a 'National Design Guide' which highlights the importance of understanding and responding to local character (in many senses). Figure 18 illustrates the 10 components of good design as set out in the National Design Guide<sup>26</sup>. The importance of design is also underscored

by the summer of 2020 update of Building for Life<sup>1227</sup>, an industry standard for well-designed homes and neighbourhoods: Building for a Healthy Life (BHL).



Figure 18: 10 components of good design (MHCLG 2019)

Figure 19: Character Areas  
(source: Melksham Design Guidelines and



### Local Heritage

**This policy helps meet objective 15:** Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

#### Policy 21: Local Heritage

**Proposals for development within the Melksham Conservation Area and those that may affect listed buildings or structures within the Neighbourhood Plan area, must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.**

**For other areas of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets mapped on Figure 20 (including notable buildings as shown on Figure 21) development proposals should demonstrate that appropriate consideration has been given to:**

- a. the significance of the heritage asset;**
- b. its most distinctive and important features;**
- c. the elements of its setting and immediate surrounds that contribute to its significance, and**
- d. the contribution the asset and its setting makes to the character of the local area (whether in a Conservation Area or not).**

#### The reason for the policy

4.21.1 There are over 70 listed buildings in the parish, 19 in Whitley, 16 in Shaw and 19 in Beanacre. There are over 150 in the town, the majority of the latter being in the Melksham Town Conservation Area. There is, however, no Conservation Area Assessment or Management Plan to guide and inform conservation, future development and investment. Town Centre masterplanning work has however identified important heritage features, including 'noteworthy' buildings – these are historic buildings that contribute to the character of the area.

4.21.2 Outside of the town centre conservation area there are two key areas of heritage importance – The City and The Spa.

4.21.3 The Spa is about 1 mile from the town centre on the A365 Devizes Road. Its name originated from the discovery of saline springs on the Devizes road out of Melksham in 1813. Shortly afterwards the Melksham Spa Company was formed which led to the building of a pump room and a crescent of three pairs of Georgian buildings. These are highly distinctive, Grade II listed buildings.

4.21.4 The area of housing for industrial workers known as 'The City' is likely to date from the 17th Century when the town expanded to the north of the river for the first time. A few buildings

still survive in this area, including a Grade II listed former pub (The Red Lion), now vacant, and a row of attached cottages built in early 18th century of rubblestone, with a stone slate roof. It is a fragmented area of heritage that survives alongside the Cooper Tires site, recent housing developments and the A350 bypass (that pedestrians and cyclists cross by an underpass).

4.22.5 The Parish of Melksham Without is rich in archaeological remains. The northern parish boundary follows the route of the former Roman road between Mildenhall and Bath, while a small Roman town and substantial Iron Age settlement have been discovered to the north west of Beanacre. Most of the Parish is covered with the remains of prehistoric, Roman and medieval settlements, with earthwork remains from former medieval and post-medieval field systems particularly prominent.

4.22.5 Alongside listed buildings and structures, which are nationally protected historic 'assets', there are also other historic features that contribute to the local character, and the unique history of Melksham and the wider parish. Through the Neighbourhood Plan, locally important heritage assets can be listed in order that the significance of any building or site on the list can be better taken into account in planning applications affecting the building or site or its setting.

Planning protections for non-designated heritage assets are not

as strong as those for designated heritage assets, but they are still important. Inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets, to the benefit of good planning for the area and of owners, developers and others wishing to understand local context fully.

4.21.6 Community outreach to identify potential non-designated local heritage asset nominations was undertaken during May and June 2022. This was supplemented by an opportunity to validate or add nominations at community drop-in events and online consultation during February and March 2023, together with Steering Group research.

4.21.7 Nominations that were put forward were assessed using Historic England criteria set out in Advice Note 7 Local Heritage Listing: Identifying and Conserving Local Heritage.

4.21.8 The Historic Environment Record was accessed as part of the evidence base for the plan and has been drawn on in the preparation of this Policy.



## Locally Valued Non-Designated Heritage Assets Draft List

1. Avon Rubber Company Canteen
2. Whitley Reading Rooms
3. Gospel St John 316 Graveyard
4. The Bear Public House
5. Liberal Club (originally: Melksham Liberal Working Men's Club and Institute)
6. Old HSBC bank building
7. Lloyds Bank Building
8. New Hall
9. Kelly's Lamp
10. WW2 Air Raid Shelter
11. 18-26 Bath Road
12. Remains of Well and pump in Market Place
13. High Pavement, Bank Street
14. RAF Melksham
15. Pathfinder Way Public Art
16. RAF Commemorative Stones
17. Old Ex RAF Lamppost
18. Avonside Chimney and distinctive roofline
19. Parts of former Wilts & Berks Canal
20. Wilts & Berks Canal bridge parapet

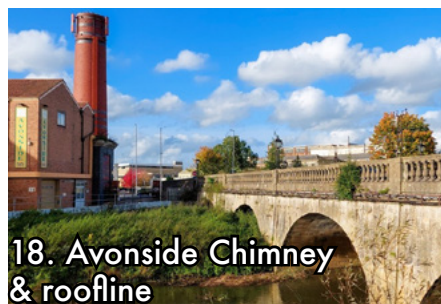


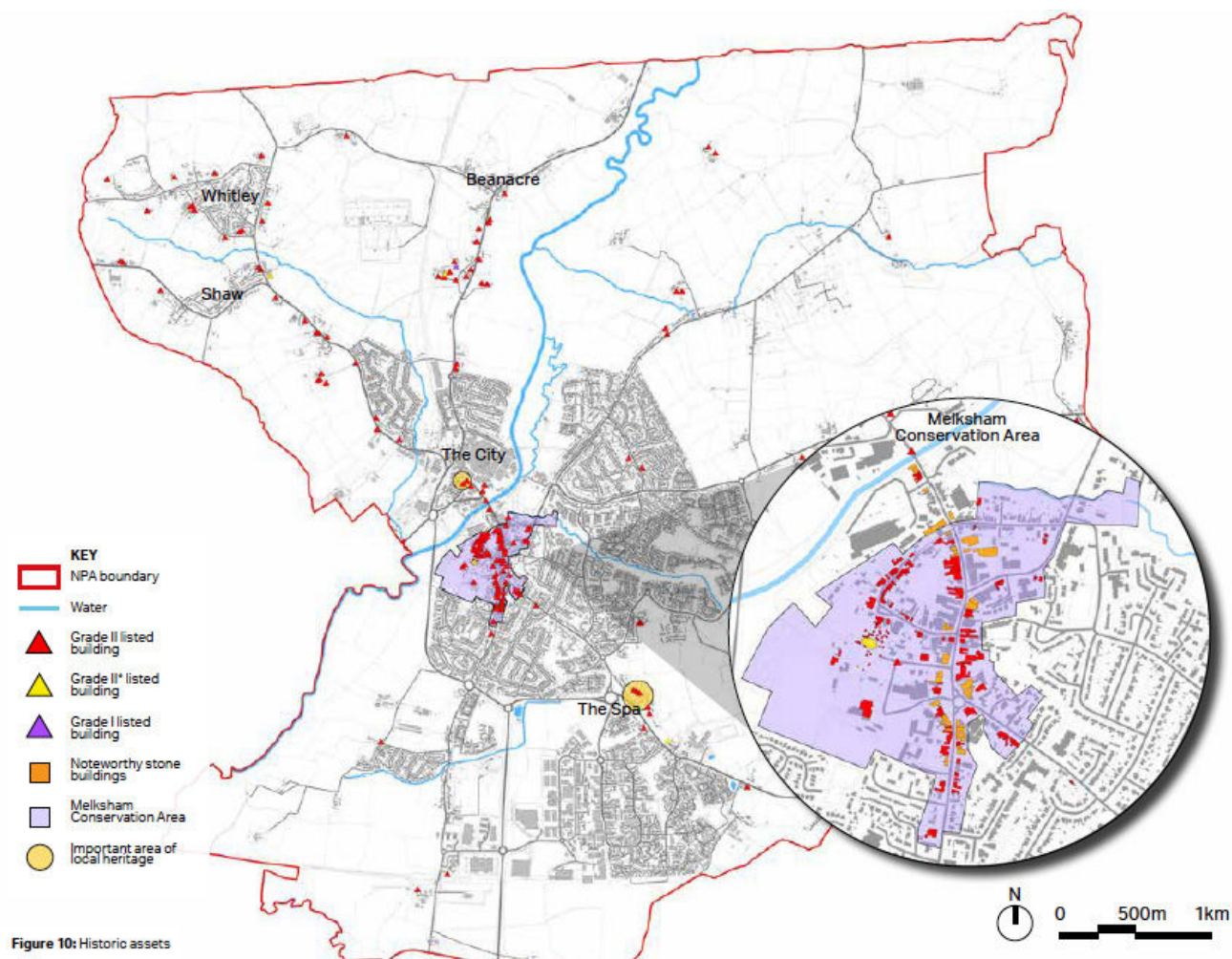
Figure 20: Locally Valued Non-Designated Heritage Assets



Map credit: Imagery © 2023 Google Maps Airbus, Getmapping plc, infoterra Ltd & Bluesky, Maxar Technologies, Map data 2023



Figure 21: Conservation Area, Listed Buildings, Notable Buildings and Important Areas of Local Heritage  
(source: Melksham Design Guidelines and Codes)



# 5 Priority Statements



Priority statements illustrate the commitment of the two Councils to bring their influence to bear on matters outside the remit and scope of this Neighbourhood Plan either because they are strategic in nature or address issues beyond this Neighbourhood Plan time period. These 'statements' are not presented in any order of priority.

Page 156

## Priority Statement 1: Transport Infrastructure Bypass

The potential Melksham bypass is a strategic transportation project, an issue outside of the Neighbourhood Plan scope. It is included in this section as a priority statement due to its local importance.

The Melksham scheme would bypass the town centre and in turn resolve a critical pinch-point on the A350, improving North to South connectivity throughout the Western Gateway. It could be a part of a package of road improvement measures that will improve the Northern section of this North-South route.

It has the potential to improve the efficiency of the A350 as well

as improve the local economy and quality of the environment within Melksham and Beanacre and assist in meeting Neighbourhood Plan objectives.

The Town and Parish Councils will support efforts by Wiltshire Council to progress the delivery of a bypass, although it must be noted central Government and Wiltshire Council's commitment to, and route of, a bypass is unresolved at the time of making of this plan. Support for the progression of the project does not assume the support of both the Town council and/or the Parish Council will be given to any final proposed scheme.

## Priority Statement 2 : Levels of Growth and Infrastructure

Wiltshire Council and the Local Plan is responsible for the allocation of strategic housing and employment sites within the Neighbourhood Plan area and development management processes associated with proposals for their development.

The Town and Parish Councils are seriously concerned that housing developments recently consented and delivered within the JMNP2 area have not been accompanied by adequate infrastructure. Both Councils will continue to seek to ensure that new large scale development is accompanied by the provision of sufficient, integrated community and sustainable development infrastructure, including healthcare facilities, schools and highways and sustainable transport infrastructure and open space, which have come under increasing demand.

Both the Parish and Town Council advocate a holistic approach to future education provision, rather than piecemeal funding, with sufficient primary and secondary school places provided in sustainable locations to meet the needs of existing and all new housing development.

The Neighbourhood Plan cannot direct how Community Infrastructure Levy (CIL) raised through housing development and held by Wiltshire Council are spent. However the community infrastructure levy receipts passed to either Melksham Town Council or Melksham Without Parish Council will be used to address the increased demands that new development places on the civic infrastructure, for the benefit of the Joint Neighbourhood Plan area, focusing on the facilities/infrastructure and communities most impacted by the new development.

### Memorandum of Agreement

A Memorandum of Agreement is in place between Melksham Without Parish Council and Melksham Town Council setting out the terms for the sharing of CIL funds, or any replacement funding system. The Memorandum of Agreement will include a Statement of Priorities for infrastructure needs and civic amenity projects which will be reviewed annually and agreed jointly between the Town and Parish Councils. Interdependence can therefore follow through into the appropriate distribution of CIL monies.



### Priority Statement 3: Wilts & Berks Canal Restoration

The Town and Parish Council continue to support the safeguarding of the future route for the restoration of the Wilts & Berks canal and its connection to the Kennet & Avon canal and the national canal network.

The opening of a fully restored waterway will provide significant economic, environmental and social benefits to Melksham

Both Councils will continue to engage openly and constructively with the canal restoration project sponsors towards the aim of resolving a viable and acceptable scheme.

### Priority Statement 4: Progressing Town Centre Master Plan Area Regeneration

The Joint Melksham Neighbourhood Plan sites assessment and allocation process identified a number of town centre and edge of centre sites that were made available sites that have not been allocated. These include The former Blue Pool, Avonside Enterprise Park, Unicorn Public House and the former Lloyds Bank building. The Town Centre Master Plan Report also identified opportunity sites that were not made available for allocation within the three regeneration "cluster" areas:

- Cluster 1 The Campus and Market Place Civic and Cultural Quarter
- Cluster 2 The Old Library, Labour Club and Lowbourne area
- Cluster 3 Avon Riverside, Cooper Tires, The City and the

#### Railway Station

Melksham Town Council will continue to work with stakeholders and the community to progress the delivery of prioritised town centre and edge of centre regeneration and enhancement initiatives identified in the Town Centre Master Plan Report (2023).

Where proposals will contribute positively towards delivering Neighbourhood Plan objectives and the vitality and attractiveness of the town centre, it will give support to proposals for enhancement or regeneration of town centre and edge of town centre sites including those not specifically allocated by the JMNP or made available for allocation.

# Glossary

**Ancient Woodland:** Land that has had continuous woodland cover since 1600AD as designated by Natural England.

**Ancient or veteran tree:** A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

**Biodiversity net gain:** Net gain is an approach that uses the planning process to leave biodiversity in a better state than it was before the development started, securing wider benefits for people and the environment.

**Brownfield land:** See previously developed land

**Conservation Area:** Conservation Areas exist to manage and protect the special architectural and historic interest of a place – in other words, the features that make it unique.

**Core Strategy:** The Wiltshire Core Strategy which forms part of the Development Plan, setting out the spatial vision and strategic objectives of the planning framework for Wiltshire.

**CP (Core Policy):** Reference for Core Policies included in the

Wiltshire Core Strategy (adopted in 2015).

**Development plan:** This includes adopted Local Plans and Neighbourhood Plans and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

**Economic development:** Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

**Ecological networks:** These link sites of biodiversity importance.

**Edge of centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

**Green infrastructure:** A network of multi-functional green space,

urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Historic environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Inclusive design:** Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.

**International, national and locally designated sites of importance for biodiversity:** All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including County or Local Wildlife Sites.

**NPPF:** National Planning Policy Framework.

The overall planning policy produced by the Government to inform the making of Development Plans including Neighbourhood Plans and decision making on planning applications.

**NPPG or PPG:** Planning Practice Guidance.

The overall national planning practice guidance and advice produced by the Government to inform the making of Development Plans including Neighbourhood Plans and decision making on planning applications.

**Local Plan:** The plan for the future development of the local area, in this case Wiltshire – drawn up by the local planning authority in consultation with the community and statutory bodies. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.

**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres) leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development

(including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Market Housing:** Private housing for rent or sale where the price is set in the open market.

**Neighbourhood Plan:** A plan prepared by a Town or Parish Council or Neighbourhood Forum for a particular Neighbourhood Area (made under the Planning and Compulsory Purchase Act 2004).

**Open space:** All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. This can include privately owned open spaces such as playing fields.

**Previously developed land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill.

**Reserved Matters Application:** An application which deals

with some or all of the outstanding details of the outline application proposal, including:

- appearance – aspects of a building or place which affect the way it looks, including the exterior of the development
  - means of access – covers accessibility for all routes to and within the site
  - landscaping – the improvement or protection of the amenities of the site and the area and the surrounding area, this could include planting trees or hedges as a screen
  - layout – includes buildings, routes and open spaces within the development and the way they are laid out in relation to buildings and spaces outside the development
  - scale – includes information on the size of the development, including the height, width and length of each proposed building.
- The details of the reserved matters application must be in line with the outline approval.

**Sequential Test (Town Centre):** The Sequential Test ensures that a sequential approach is followed to steer new development to areas in the most sustainable location. This requires that applications for main town centre uses (e.g. shops) should be located in town centre locations. If that is not possible, then they should be located in edge of centre locations, and only if suitable sites are not available should out of centre sites be considered.

**SHELAA:** The Strategic Housing and Economic Land Availability



Assessment (SHELAA) is a process that we carry out to find possible land for development.

**WCS:** Wiltshire Core Strategy. A key document in the Wiltshire Development Plan.

**Wheeling:** A term to cover various modes of travel (non car) that use wheels, such as scooters, or bicycles.

**WWDP: West Wiltshire District Plan.** A number of policies from the West Wiltshire District Plan are saved and form part of the Wiltshire Development Plan.

## Footnotes



- <sup>1</sup> <https://www.wiltshireintelligence.org.uk/topics/census/> accessed July 2023
- <sup>2</sup> [https://lichfields.uk/media/5115/lichfields-insight-focus\\_solutions-to-an-age-old-problem-in-the-south-west.pdf](https://lichfields.uk/media/5115/lichfields-insight-focus_solutions-to-an-age-old-problem-in-the-south-west.pdf)
- <sup>3</sup> Wiltshire Council Employment Land Review 2018
- <sup>4</sup> Wiltshire Local Plan Sustainability Appraisal Scoping Report, February 2019
- <sup>5</sup> IPCC, 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels
- <sup>6</sup> Committee on Climate Change (Feb 2019). UK housing: Fit for the future? [www.theccc.org.uk/wp-content/uploads/2019/02/UKhousing-Fit-for-the-future-CCC-2019.pdf](http://www.theccc.org.uk/wp-content/uploads/2019/02/UKhousing-Fit-for-the-future-CCC-2019.pdf)
- <sup>7</sup> Schaller, N. et al. (2016) Human influence on climate in the 2014 southern England winter floods and their impacts. Nature Climate Change, 6(6), p.627.
- <sup>8</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change>
- <sup>9</sup> <https://www.local.gov.uk/consulting-ending-sale-new-petrol-diesel-and-hybrid-cars-and-vans>
- <sup>10</sup> Department for Transport, 2018: The Road to Zero Next steps towards cleaner roads transport and delivering our Industrial Strategy
- <sup>11</sup> Appendix 6 of the 2020 Housing Land Supply Statement (Wiltshire Council, 2020) which shows the position at April 2019
- <sup>12</sup> Additional Rural Site Assessments 2020, part of the evidence base produced for the Neighbourhood Plan, available at Melksham Neighbourhood Plan website <https://www.melkshamneighbourhoodplan.org/>
- <sup>13</sup> The priorities for CIL spending by Wiltshire Council are specified in the 'Regulation 123 List (2016)'. It sets out priorities for CIL funding in the Melksham area: Improvements to Melksham railway station/ Installation of intermediate signals on the single track rail line through Melksham/Expansion of existing cemetery in Melksham
- <sup>14</sup> <http://www.wiltshire.gov.uk/wilts-elr-report-final.pdf>, <http://www.wiltshire.gov.uk/wilts-elr-appendix-7-site-review-summaryspreadsheets-final.pdf> (see sites 68-79), <http://www.wiltshire.gov.uk/wilts-elr-appendix-9-site-reviews.pdf> (sites throughout).
- <sup>15</sup> [https://ec.europa.eu/transport/sites/transport/files/cyclingguidance/sustrans\\_handbook\\_for\\_cycle-friendly\\_design.pdf](https://ec.europa.eu/transport/sites/transport/files/cyclingguidance/sustrans_handbook_for_cycle-friendly_design.pdf)
- <sup>16</sup> Green Infrastructure Evidence Base Report V7, part of the evidence produced for the Neighbourhood Plan, available at Melksham Neighbourhood Plan website <https://www.melkshamneighbourhoodplan.org/>
- <sup>17</sup> Wilts and Berks Canal Trust Melksham Canal Link <https://www.wbct.org.uk/mcc-projects/melksham-link>
- <sup>18</sup> <https://storymaps.arcgis.com/collections/f8442ee21e894fb2a31912499ebfa37f?item=6>
- <sup>19</sup> Community Facilities Evidence Base Report, 2020, part of the evidence base produced for the Neighbourhood Plan, available at Melksham Neighbourhood Plan website <https://www.melkshamneighbourhoodplan.org/>
- <sup>20</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>
- <sup>21</sup> <https://www.forestresearch.gov.uk/research/i-tree-eco/uk-urban-canopy-cover/>
- <sup>22</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/709464/FR\\_FC\\_TreeCanopyData\\_leaflet.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/709464/FR_FC_TreeCanopyData_leaflet.pdf)
- <sup>23</sup> Guidance on the Bristol Tree Replacement Standard can be found on this page <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/supplementary-planning-documents-practice-notes-and-other-planning-guidance>
- <sup>24</sup> Local Landscape Character Evidence Base Report 2020, part of the evidence base produced for the Neighbourhood Plan, available at Melksham Neighbourhood Plan website <https://www.melkshamneighbourhoodplan.org/>
- <sup>25</sup> Semington Landscape and Visual Sensitivity Report (2022) part of the evidence base produced for the Semington Neighbourhood Plan. Available on the Plan website <https://www.semington.org.uk/neighbourhood-plan/>
- <sup>26</sup> National Design Guide 2019 <https://www.gov.uk/government/publications/national-design-guide>
- <sup>27</sup> Building for a Healthy life <https://www.designforhomes.org/wp-content/uploads/2020/07/14JULY20-BFL-2020-Brochure.pdf>

## List of Figures

- Figure 1: Joint Melksham Neighbourhood Area
- Figure 2: Rail and Key Roads Routes
- Figure 3: Neighbourhood Area Settlements and Neighbourhoods
- Figure 4: Major planning permissions granted during the Wiltshire Core Strategy (Adopted 2015) period (at August 2023)
- Figure 5: Strategy Overview
- Figure 6: Cooper Tires Redline Plan
- Figure 7: Library Site Redline Plan
- Figure 8: Land at Whitley Farm Redline Plan
- Figure 9: Land at Middle Farm Redline Plan
- Figure 10: Town Centre
- Figure 11: Key Routes for Walking and Cycling
- Figure 12: Diagrammatic Illustration of the Potential for Green Infrastructure
- Figure 13: Wildlife Sites within the Neighbourhood Area
- Figure 14a: Melksham Town Community Facilities
- Figure 14b: Whitley, Shaw and Beanacre Community Facilities
- Figure 14c: Bowerhill and Berryfield Community Facilities
- Figure 15: Local Green Spaces
- Figure 16: Ancient Trees, Woodland and Areas of New Tree Planting
- Figure 17: Green Wedges
- Figure 19: Character Areas
- Figure 20: Locally Valued Non-Designated Heritage Assets
- Figure 21: Conservation Area, Listed Buildings and Important Areas of Local Heritage

# Appendix 1

## Community Engagement Protocol



### Introduction

The prime aim of this Protocol is to do all possible to ensure that new development in the Neighbourhood Plan area delivers good quality places to live and work. Its use will also contribute to improved outcomes for the current and future communities, as well as assisting applicants to make applications that accord with this plan and with those of Wiltshire Council. It is crucial for success with these aims for the community engagement to start very early in the preparation of applications, working with the communities of Melksham via the Town and Parish Councils.

**Use of this Protocol is without prejudice to the eventual judgement of either the Town or Parish Council on the merits of any final application, even if a good engagement process has been agreed and followed.**

Pre-application community engagement is considered to be especially important in relation to any strategic site allocations made by Wiltshire Council, particularly with regard to any associated requirements for development briefs and master plans that are to be approved by Wiltshire.

### Context

#### National

National Planning Practice Guidance and the National Planning Policy Framework (NPPF) make several mentions of the considerable value of pre-application involvement, for example, in NPPF paragraph 39:

“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

The “10 Commitments for Effective Pre-application Engagement” (Local Government Association, 2014) published nationally by a group representing planning, industry and community groups, states that:

“Early, collaborative discussions between developers, public sector agencies and the communities affected by a new development can help to shape better quality, more accepted schemes and ensure improved outcomes for the community. These discussions also avoid wasted effort and costs.”



## Wiltshire

Wiltshire Council's Statement of Community Involvement (SCI) 2020 states that it encourages:

*"developers and applicants to engage with local people and communities including Town and Parish Councils and with neighbours, when appropriate, before submission of a planning application. ... The government have stated that such engagement is discretionary, but it is strongly encouraged by the Council prior to the submission of applications for ten or more houses, or other large developments on sites of 1 hectare or more."*

The SCI outlines in detail how communities can be involved in planning applications. It is acknowledged that whilst in the early stages of considering a development proposal, applicants may wish for any discussions with Wiltshire Council to be confidential, involvement of the local community can and should happen at the earliest possible stage.

## Process

Whilst there is an emphasis on early and positive pre-application engagement in major development proposals, the approach should also apply to smaller developments in the plan area because these can have at least as much impact as larger ones. Melksham Town Council and Melksham Without Parish Council will play

their appropriate role in delivering high quality pre-application engagement with themselves and with the wider community in the early stage of proposals that come forward.

Melksham Without Parish almost entirely surrounds Melksham Town. For development that takes place on the periphery of one or other Council area, and within other places in Melksham Without that are of high importance to the town (such as the commercial areas located at Bowerhill and Hampton Park etc.), both Councils will play a role.

Therefore, in respect of development proposals affecting the commercial areas, or residential sites on the periphery of Melksham Town, both Councils should be consulted in pre-application engagement.

Drawing from the 10 Commitments and other guidance on best practice, potential applicants should work with Melksham Town Council and Melksham Without Parish Council to fulfil the following principles:

- **'Day One' contact:** By far the best results for all emerge when contact is made with the relevant Council, and through us with our local community, at the earliest possible point in the process; consulting people late with already prepared schemes is not productive. See the end of this Protocol for contact details

for the Town and Parish Council. Wiltshire Council are also asked by the Town and Parish Council to pass on contact details to applicants.

- **Agreed Process:** A key aim of this early contact is to discuss and agree the nature, scope, timetable, information and so forth of the engagement – i.e. the process to be followed. This should have particular regard to if and how both Councils should be involved in the process as noted above. For major development applications this will include Wiltshire Council.

#### 167 **Applicant Leadership but Shared Responsibility:**

- Although it is the applicant's role to lead and fund engagement, the Town and/or Parish Council will offer as much support as possible to any agreed process; for example by providing local information, contact details for local groups, advice on meeting places, access to newsletters and so forth.
- **Openness and Transparency:** Building trust between all and ensuring an agreed outcome depend heavily on having a process that is as open as possible on all sides, though the Town and/or Parish Council will respect any issues of clear commercial confidentiality.
- **Agreed Community:** A project may have an impact on a limited number of people or on all of the Town and/or Parish as appropriate. The details of those to be involved will need to be discussed and agreed for any project, as will the potential ways to contact and engage them.
- **Agreed Scope:** There will also need to be agreement about

the scope of the engagement, i.e. what is and is not open to change (e.g. layout, quantum of development, design etc.).

- **Proportionality:** The nature and scale of engagement will be balanced in appropriate proportion to the scale and likely impact of any proposals, for example small householder applications are very unlikely to need to undertake more than neighbour consultations.
- **Statement of Community Consultation:** For major development proposals applications, a statement of community consultation should be submitted. This should describe and summarise the outcomes of the engagement, demonstrating how the proposals have (or have not) responded to results. If they have not, a short note should be included to explain this. If the process has been followed fully, the Parish Council will endorse this report; if not they may submit their own evaluation of it\*. For smaller development proposals, a short statement describing and summarising the outcomes of the engagement is encouraged.

#### **Contact Details**

Initial contact should be made at the very outset with the Town and/

or Parish Councils:

**townhall@melksham-tc.gov.uk**

**clerk@melkshamwithout-pc.gov.uk**

The Town and/or Parish Council commits to doing all possible to arrange an initial meeting as soon as possible following contact.

## Additional Notes

Melksham Without Parish Council will only consider taking on ownership and management of equipped play areas from developers, such as LEAPs (Local Equipped Area for Play) and NEAPs (Neighbourhood Equipped Area for Play) and not LAPs (Local Landscaped Area for Play).

\*As in the opening proviso, endorsement of an engagement process and results does not necessarily mean support for the resulting proposals.

# Appendix 2 Evidence Base Summary



## Neighbourhood Area Level Evidence

### Prepared for the Neighbourhood Plan

Melksham Design Guide and Code (2023 Aecom)  
Local Green Space Report (2023)  
Green Gap & Wedge Study (2023 Aecom/Iceni Projects)  
Locally Valued Heritage Assets (2023)  
Town Centre Masterplan (2023 Aecom)  
Housing Needs Assessment (2023 Aecom)  
Community Facilities Evidence Base Report (2020/Minor update 2023)  
Green Infrastructure Evidence Base Report (2020/Minor Update 2023)  
Local Landscape Character Evidence Base Report (2020)  
Housing Need Assessment (AECOM, 2022)  
Site Options and Assessment Report (AECOM, 2023)  
Points of the Compass Appraisal (AECOM, 2017)  
Heritage Assessment (Policy 7.3 Allocation of Land at Whitley Farm) (John Davey, 2020)  
Town and Parish Pre-application Protocol (see Appendix 1)

### Pre-existing Reports

Melksham Town 2020-2036 (Townswork, 2019)

### Relevant Wiltshire Council (and others) Evidence

Wiltshire Council Local Plan and Evidence Base.  
<https://www.wiltshire.gov.uk/article/8038/Wiltshire-s-Local-Plan>

National Character Area Profile: 117 Avon Vales (NE522) (Natural England, 2014). Available at: <https://publications.naturalengland.org.uk/publication/4822288767647744#:~:text=This%20record%20was%20published%20by%20Natural%20England%20on%2031%20January%202014.&text=This%20is%20an%20undulating%2C%20low,and%20east%20by%20higher%20land.>

Residential Development and Trees – a Guide for Planners and Developers (Woodland Trust, 2019). Available at: <https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/>

Severn River Basin District River Basin Management Plan (Environment Agency, Updated 2015). Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718336/Severn\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718336/Severn_RBD_Part_1_river_basin_management_plan.pdf)



