



Public Document Pack

Melksham Town Council

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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

Please find attached additional evidence documents for Monday. Item 11 Joint Melksham Neighbourhood Plan.

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

11. Joint Melksham Neighbourhood Plan (Pages 1 - 188)

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.

Joint Melksham Neighbourhood Plan- Technical Facilitation

ADDENDUM – June 2024

This addendum to the Green Gap and Green Wedge Assessment carried out by AECOM and Icen Projects, has been added to the assessment to update the evidence base that supports policy 19 of the modified Joint Melksham Neighbourhood Plan (JMNP2).

Policy 19 is a new policy that has been introduced in response to local concern about the balance between development and the protection of landscape, especially where that performs a function to separate settlements.

Following the pre-submission Regulation 14 2023 consultation responses, together with changes in context, the policy is updated and one of the Green Wedges proposed in the Green Gap and Green Wedge Assessment is removed.

Since the 2023 Consultation on JMNP2 (Joint Melksham Neighbourhood Plan 2) 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.

The Berryfield, Bowerhill and Melksham Wedge is therefore removed due to the fact that the context has changed for a large part of the area covered by that wedge and the methodology in the Aecom report (see criterion 2 and 3) is no longer applicable to the Berryfield, Bowerhill and Melksham Wedge.

All other Green Wedges, as identified and evidenced in the Assessment will remain in the Neighbourhood Plan. The policy as proposed in the Assessment has been updated following feedback as part of the Regulation 14 pre-submission consultation in 2023 where concerns were raised that the policy was too restrictive, and should allow for exceptions such as employment development and new community facilities. See JMNP2 and policy 19 for more information.

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Joint Melksham Neighbourhood Plan 2 (JMNP2)

DRAFT B

Draft Modification Proposal Statement

VERSION B

Prepared in accordance with Regulation 14(a)(v) of the Neighbourhood Planning (General) Regulations 2012 (as amended) in respect of the Modification Proposal to the made Joint Melksham Neighbourhood Development Plan.

June 2024

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1. Introduction

- 1.1. As the joint 'Qualifying Bodies', responsible for the Joint Melksham Neighbourhood Development Plan (JMNP), Melksham Town Council and Melksham Without Parish Council propose to modify the 'made' JMNP ("the Made Plan") of July 2021. To satisfy the regulation requirement to have one single qualifying body for administrative purposes, the lead Council is Melksham Town. However, in every other respect the two Councils will jointly lead and share responsibility for the Plan.
- 1.2. This Statement is published as part of the 'Pre-submission' Regulation 14 2024 consultation on the proposed Draft B of the modified Neighbourhood Development Plan – JMNP2 ("the Modified Plan"). In Autumn / Winter of 2023, a Regulation 14 consultation was held on a draft of JMNP2. Significant updates have been made to the pre-submission draft of JMNP2 that was consulted upon in 2023. Therefore, the decision was made to undertake a second pre-submission Regulation 14 consultation on draft B of the JMNP2 in 2024, with revisions or updates to allocations of land for housing made under Policy 7, and Policy 19 - Green Wedges. More information is outlined in the next section.
- 1.3. Following Regulation 14 consultation, the Modified Plan and this Statement will be finalised and submitted for examination alongside a Basic Conditions Statement and a Consultation Statement, in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.4. The Town and Parish Councils consider that the proposals represent material and significant modifications to the Made Plan, and are considered so significant or substantial as to change the nature of the Made Plan. It is therefore considered that modifications change the nature of the plan and require examination and a referendum. Regulation 14v of the amended 2012 Regulations¹ requires:

"in relation to a modification proposal, a statement setting out whether or not the qualifying body considers that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion".
- 1.5. This Statement serves this purpose (at this stage for the draft B of the JMNP2 for Regulation 14 consultation) and notes the following additional requirements in the Planning Practice Guidance (PPG)² this document is therefore setting out the background reason for the modifications, sets out what individual modifications are and sets out the reasons as to why the Town Council and Parish Council believe that this modification of the plan is significant enough as to change the nature of the Made Plan, or not.

¹ <https://www.legislation.gov.uk/ukxi/2012/637/regulation/14>

² <https://www.gov.uk/guidance/neighbourhood-planning--2#updating-neighbourhood-plan> Paragraph: 085 Reference ID: 41-085-20180222

2. Background

- 2.1. The Made Plan covers the period up to 2026. The designated neighbourhood area covers the same area as the Town Council area and the Parish Council area which surrounds the town. On 7th July 2021, Wiltshire Council agreed to 'make' the JMNP following a referendum which took place on Thursday 1st July 2021. The results showed 84% of those who voted were in favour of the plan.
- 2.2. The Made Plan – which is termed Neighbourhood Plan 1, or JMNP1 – focuses on a number of key policy areas relevant to the Plan area as a whole, including an allocation of housing for the large village of Shaw and Whitley that contributed to meeting local housing need.
- 2.3. Through the Local Plan Review process, Wiltshire Council were also set to allocate land for development in Melksham, but no final decision had yet been made on the precise scale or location of any allocation at the time of drafting Neighbourhood Plan 1. It was therefore agreed by the qualifying bodies that Neighbourhood Plan 1 should not reach decisions on, or move to allocate, in any other location.
- 2.4. However, Neighbourhood Plan 1 made a commitment to review the Made Plan, once the draft Local Plan Review reached an appropriately advanced stage, in order to determine how the Neighbourhood Plan should respond to strategic housing numbers and allocations in the Local Plan. JMNP1 also made a commitment to pick up on a number of other more detailed issues in a Modified Plan, such as the designation of Local Green Spaces.
- 2.5. The Town and Parish Council has also been mindful of the housing land supply position in Wiltshire and of how this has led to significant unplanned development proposals being granted planning permission if the weight of the relevant development plan is weakened. As a result, it has examined how a first review of the Made Plan may continue to engage paragraph 14 of the National Planning Policy Framework (NPPF) – essentially to maintain the full weight of its policies for another two years.
- 2.6. The Neighbourhood Plan Steering Group was reconvened in late 2021 by the Parish and Town Council after a brief period following the successful referendum vote role of steering the modifications to Neighbourhood Plan, and in anticipation of the Local Plan Review reaching Regulation 19 Pre-Submission Consultation Stage.
- 2.7. For 7 weeks, between the 13th October and 3rd December 2023, a pre-submission Regulation 14 consultation was held on the draft JMNP2.
- 2.8. Since the 2023 Consultation on JMNP2, and in response to feedback, significant further work has been done to proposed site allocations at Melksham and Whitley. 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. Significant updates were therefore made to the pre-submission draft of JMNP2 that was consulted upon in 2023. Therefore, the decision was made to undertake a second pre-submission Regulation 14 consultation on draft B of the JMNP2 in 2024, with revisions or updates to allocations of land for housing made under Policy 7, and Policy 19 - Green Wedges. Table A in this Statement, sets out modification information for all proposed policies in draft B of JMNP2. In the appendix, Table B sets out the modifications there were proposed as part of the 2023 pre-submission consultation for information.
- 2.9. The Wiltshire Local Plan (also referred to here as 'the Plan') has reached what is known as the publication stage ([Regulation 19](#)) of its preparation, held between Wednesday 27 September to Wednesday 22 November 2023. It is expected to be submitted to the secretary of State for

examination in December 2024.

- 2.10. The Modified Plan runs over an extended plan period to 2038, which aligns with the Local Plan Review period. The proposed modifications are the result of updated evidence base, including local consultation, which will ensure the Modified Plan retains the primacy of an up to date, plan-led development management framework for decision making that represents the community of the neighbourhood area.

3. The Proposed Modifications

- 3.1. The purpose of the Statement is to explain the reasons why the Town and Parish Council considers the proposed modifications to the Made Plan 'changes the nature' of the Plan. It should be read alongside the separate Modified Plan document – JMNP2.
- 3.2. The following table, Table A, provides a summary of the modifications – comprising the modified and new policies – and explains why the Town and Parish Council considers they change the nature of the plan. New or revised policies as part of draft B of the JMNP2 are shown in yellow highlight.
- 3.3. It should also be noted that the Made Plan refers to the Core Strategy, and though this continues to be the current Local Plan until such time that the Local Plan Review has completed all necessary stages, as it has reached the stage of Pre-Submission Consultation, the Modification Plan references the Local Plan as the emerging policy framework for the Neighbourhood Plan.

Table A: Modifications Summary

Policy Title	Summary of Modifications	The Change of Nature of the Plan Test
Policy 1: Sustainable Design and Construction	The policy continues to place the energy hierarchy as a core principle, and has sought to update policy text with the key changes being: The addition of clause (d) which seeks to see that heat and power demands are minimised through energy targets where viable. The addition of clause (g) has also been added existing buildings which may be retrofitted to improve energy efficiency.	The modifications to this policy are simply adding greater detail and clarity, rather than contradicting or changing the principles of the original policy. These modifications are therefore not considered to change the nature of the plan.
Policy 2: Local Renewable and Low Carbon Energy	This policy has been updated to expand its scope beyond energy generation schemes that are led by, or benefit the local community.	The modifications to this policy are expanding the scope, of the original policy, but does not contradict or change the principle. These modifications are therefore not considered to change the nature of the plan.
Policy 3: Flood Risk and Natural Flood Management	This policy has not been updated.	N/A
Policy 4: Ultra Low Emission Vehicle	This policy has not been updated.	N/A
Policy 5: Pre-application Community Engagement	This policy has not been updated.	N/A
Policy 6: Housing in Defined Settlements	This policy has been updated to refer to updated evidence base material (Housing Needs Assessment) and draws on specific aspects to set updated policy parameters for housing types, sizes and tenures.	The modifications to this policy are adding greater detail and clarity, drawing on a technical evidence base rather than contradicting or changing the principles of the original policy. These modifications

		are therefore not considered to change the nature of the plan.
Policy 7.1REV: Land at Cooper Tires	This is a new policy. It allocates a key brownfield site in the town for comprehensive and exemplary mixed-use conservation and development.	As this is a new policy is allocating land for a mixed-use development, it introduces a change to the nature of the plan.
Policy 7.2REV: Land at the Former Melksham Library Site	This is a new policy. It allocates a brownfield site in the town for residential redevelopment to meet local housing needs to accessible and affordable housing for older and/or disabled people.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.
Policy 7.6NEW: Land South of Western Way, Bowerhill	This is a new policy. It allocates a greenfield site in the parish for residential development that was granted outline permission at appeal.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.
Policy 7.3REV: Land at Whitley Farm, Whitley	This is a new policy. It allocates a farm site for residential development in Melksham Without. It contributes to meeting housing targets set by Wiltshire Council through for the next Local plan period up to 2038 for the large villages of Shaw and Whitley.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.
Policy 7.7NEW: Land at Middle Farm	This is a new policy. However, it is an update of an existing allocation in JMNP1. The new policy allocates more houses over a larger area. It contributes to meeting housing targets set by Wiltshire Council through for the next Local plan period up to 2038 for the large villages of Shaw and Whitley.	Whilst the principle for development in this location is already established in the Made Plan, the policy is for the allocation of a new, larger area site It therefore introduces a change to the nature of the plan.
Policy 8: Infrastructure Phasing and Priorities	This policy has not been updated.	N/A
Policy 9: Town Centre	This policy has been updated to refer to updated evidence base material (Town Centre Master Plan Report 2023) and introduces a new clause (a) that references that document and the priority aims set out by it. A final paragraph has also been added and it references an updated map figure (10).	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 10: Employment	This policy has been updated slightly to remove the final sentence of the first paragraph.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.

Policy 11: Sustainable Transport and Active Travel	This policy has not been updated.	N/A
Policy 12: Green Infrastructure	This policy has not been updated.	N/A
Policy 13: Biodiversity	This policy has been slightly modified. It now omits reference to a minimum 10% biodiversity net gain in favour of an expectation of 'measurable biodiversity enhancements'.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 14: Open Spaces	This policy has not been updated.	N/A
Policy 15: Community Facilities	This policy has not been updated.	N/A
Policy 16: Local Green Spaces	This is a new policy. Areas of green space that are considered to meet the criteria for Local Green Space Designation are identified.	As this policy is designating land as Local Green Space, the policy has the potential to change the nature of the Plan.
Policy 17: Trees and Hedgerows <i>(This policy was formerly policy 16 in JMNP1)</i>	This policy has been slightly modified. A sentence has been added to the final paragraph to reflect best practice and guidance updated for tree canopy coverage targets.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 18: Landscape Character <i>(This policy was formerly policy 17 in JMNP1)</i>	This policy has not been updated. It does how no longer reference figure 7 as in the last sentence of the Made Plan.	N/A
Policy 19REV: Green Wedges	This is a new policy. It identifies areas of countryside where any development should not lead to coalescence of separate settlements.	This is a significant policy addition as this policy is identifying areas of land as 'Green Wedges' that will serve a policy purpose of preventing coalescence between settlements. In light of this, the policy has the potential to change the nature of the Plan.
Policy 20: Locally Distinctive, High Quality Design <i>(This policy was formerly policy 18 in JMNP1)</i>	This is an updated policy which links to a major update to the evidence base which has been produced as part of the Modified Plan process - the Melksham Design Guidelines and Codes (2023). The modification text is within the second paragraph of the policy which now references the Code above rather than a Rapid Community Character and Distinctiveness Statement.	The modifications are not considered so significant to change the nature of the plan in respect of this modification specifically.

<p>Policy 21: Local Heritage</p> <p><i>(This policy was formerly policy 19 in JMNP1)</i></p>	<p>This is an updated policy. It now references non-designated heritage assets which have been identified through the Plan Modification preparation process.</p>	<p>The modifications to the original policy are not significant and it is therefore considered do not change the nature of the plan in respect to this modification.</p>
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4. Strategic Environmental Assessment

- 4.1. Wiltshire Council considered that, in relation to the modifications, a Strategic Environmental Assessment (SEA) will be required under the Environmental Assessment of Plans & Programmes Regulations 2004 (as amended). A Draft SEA and Scoping Report therefore accompanies the Modified Plan and this Statement.

5. Conclusion

- 5.1. The analysis set out in Table A indicates that a significant number of modified or new policies have the potential to change the nature of the Made Plan in terms of key spatial or design principles. Whilst the modifications are in conformity with the spirit and stated intentions of the original principles of the Plan and in some cases, this is not so substantial nor so significant to warrant consideration as a change to the nature of the Plan. Overall, the modifications are considered to change the nature of the Plan.
- 5.2. As a result, the Town and Parish Council consider that the modifications are material and significant, and therefore change the nature of the Plan.
- 5.3. In summary the Modified Plan proposes the modification of policies in the Made Plan and the addition of new policies. The Plan period now runs to 2038 to align with the Local Plan Review. The proposed modifications will ensure the Modified Plan retains the primacy of an up to date, plan-led development management framework for decision making in the neighbourhood area. The modifications are material, beneficial and change the nature of the Made Plan.

Appendix: Table B: Modification table from Regulation 14 Pre-submission Consultation October 2023

Policy Title	Summary of Modifications	The Change of Nature of the Plan Test
Policy 1: Sustainable Design and Construction	The policy continues to place the energy hierarchy as a core principle, and has sought to update policy text with the key changes being: The addition of clause (d) which seeks to see that heat and power demands are minimised through energy targets where viable. The addition of clause (g) has also been added existing buildings which may be retrofitted to improve energy efficiency.	The modifications to this policy are simply adding greater detail and clarity, rather than contradicting or changing the principles of the original policy. These modifications are therefore not considered to change the nature of the plan.
Policy 2: Local Renewable and Low Carbon Energy	This policy has been updated to expand its scope beyond energy generation schemes that are led by, or benefit the local community.	The modifications to this policy are expanding the scope, of the original policy, but does not contradict or change the principle. These modifications are therefore not considered to change the nature of the plan.
Policy 3: Flood Risk and Natural Flood Management	This policy has not been updated.	N/A
Policy 4: Ultra Low Emission Vehicle	This policy has not been updated.	N/A
Policy 5: Pre-application Community Engagement	This policy has not been updated.	N/A
Policy 6: Housing in Defined Settlements	This policy has been updated to refer to updated evidence base material (Housing Needs Assessment) and draws on specific aspects to set updated policy parameters for housing types, sizes and tenures.	The modifications to this policy are adding greater detail and clarity, drawing on a technical evidence base rather than contradicting or changing the principles of the original policy. These modifications are therefore not considered to change the nature of the plan.
Policy 7.1: Land at Cooper Tires	This is a new policy. It allocates a key brownfield site in the town for comprehensive and exemplary mixed-use conservation and development.	As this is a new policy is allocating land for a mixed-use development, it introduces a change to the nature of the plan.
Policy 7.2: Land at the Former Melksham Library Site	This is a new policy. It allocates a brownfield site in the town for residential redevelopment to meet local housing needs to accessible and affordable housing for older and/or disabled people.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.

Policy 7.3: Land at Whitley Farm, Whitley	This is a new policy. It allocates a farm site for residential development in Melksham Without. It contributes to meeting housing targets set by Wiltshire Council through for the next Local plan period up to 2038 for the large villages of Shaw and Whitley.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.
Policy 7.4: Land at Middle Farm Plot A	This is not a new policy. However, it has been updated and does link to a new policy which allocates land to the east (Plot B). It contributes to meeting housing targets set by Wiltshire Council through for the next Local plan period up to 2038 for the large villages of Shaw and Whitley.	Whilst the principle for development in this location is already established in the Made Plan, the policy is linked to an extended allocation to the east – Plot B (see below). It therefore introduces a change to the nature of the plan.
Policy 7.5: Land at Middle Farm Plot B	This is a new policy. It allocates the site to the east of Plot A. It contributes to meeting housing targets set by Wiltshire Council through for the next Local plan period up to 2038 for the large villages of Shaw and Whitley.	As this is a new policy that is allocating land for a residential development, it introduces a change to the nature of the plan.
Policy 8: Infrastructure Phasing and Priorities	This policy has not been updated.	N/A
Policy 9: Town Centre	This policy has been updated to refer to updated evidence base material (Town Centre Master Plan Report 2023) and introduces a new clause (a) that references that document and the priority aims set out by it. A final paragraph has also been added and it references an updated map figure (10).	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 10: Employment	This policy has been updated slightly to remove the final sentence of the first paragraph.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 11: Sustainable Transport and Active Travel	This policy has not been updated.	N/A
Policy 12: Green Infrastructure	This policy has not been updated.	N/A
Policy 13: Biodiversity	This policy has not been updated.	N/A

Policy 14: Open Spaces	This policy has not been updated.	N/A
Policy 15: Community Facilities	This policy has not been updated.	N/A
Policy 16: Local Green Spaces	This is a new policy. Areas of green space that are considered to meet the criteria for Local Green Space Designation are identified.	As this policy is designating land as Local Green Space, the policy has the potential to change the nature of the Plan.
Policy 17: Trees and Hedgerows	This policy has been slightly modified. A sentence has been added to the final paragraph to reflect best practice and guidance updated for tree canopy coverage targets.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 18: Landscape Character	This policy has been slightly updated in that it no longer refers to figure 7 as in the last sentence of the Made Plan.	The modifications to the original policy are not significant and it is therefore considered that they do not change the nature of the plan in respect to this modification.
Policy 19: Green Wedges	This is a new policy. It identifies areas of countryside where any development should not lead to coalescence of separate settlements.	This is a significant policy addition as this policy is identifying areas of land as 'Green Wedges' that will serve a policy purpose of preventing coalescence between settlements. In light of this, the policy has the potential to change the nature of the Plan.
Policy 20: Locally Distinctive, High Quality Design	This is an updated policy which links to a major update to the evidence base which has been produced as part of the Modified Plan process - the Melksham Design Guidelines and Codes (2023). The modification text is within the second paragraph of the policy which now references the Code above rather than a Rapid Community Character and Distinctiveness Statement.	The modifications are not considered so significant to change the nature of the plan in respect of this modification specifically.
Policy 21: Local	This is an updated policy. It now references non-designated heritage assets which have been identified through the Plan Modification preparation process.	The modifications to the original policy are not significant and it is therefore considered do not change the nature of the plan in respect to this modification.

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DRAFT WORKING COMMS DOCUMENT (For Melksham News / Social Media Etc)

COMMS1

Thursday 20th June - Thursday 15th August: Tell us what you think of updates to JMNP2

This summer there will be another chance to have your say on the updates to our Neighbourhood Plan. Specifically about allocations for housing and employment, as well as about protecting areas between the town and our villages as 'green wedges'. It's the next stage in the journey of keeping our communities' Neighbourhood Plan bang-up-date and as strong as it can be.

In 2023....

We consulted with you back in October 2023 as part of our first formal public consultation (Pre-Submission Draft, Regulation 14, Consultation) on the 2nd edition of the 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 and updating our Plan as a result. Key messages from our community included:

- ✓ Overall support for what the Neighbourhood Plan proposes
- ✓ Support for the Brown field first allocation approach - Cooper Tires and the former Library
- ✓ Support for Conserving our Local Heritage
- ✓ Support for Protecting the Countryside
- ✓ Support for protecting Green Spaces - the community group Melksham Green Space asked for more to be added
- ? Concerns for jobs and employment areas in the future
- ? Concerns that the infrastructure is in place for the new housing such as health and education facilities
- ? Concerns that new housing is not affordable for local people

In 2024...

Since the 2023 Consultation on JMNP2, we've been busy behind the scenes updating the Plan in response to consultation feedback. Significant new information and further work has been done to proposed site allocations at Melksham and Whitley.

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 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 - Allocations of land for Housing (there are 5 allocations in total), and Policy 19 - Green Wedges.

What happens to the feedback from 2023?

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.

How can I comment on the updates in draft B of the JMNP2?

Online: the draft Plan and evidence base reports will be available to view on the Neighbourhood Plan 2 pages of the Neighbourhood Plan website: www.melkshamneighbourhoodplan.org

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

Please submit your views to us via email: contact@melkshamneighbourhoodplan.org
Or you can drop off any views in writing to the Town Hall or the Parish Council office.

Drop in sessions

Friday 19 th July	4pm - 7pm	Melksham Community Campus
Saturday 20 th July	11am - 2pm	Shaw Village Hall
Tuesday 23 rd July	5pm – 8pm	Bowerhill Village Hall

Tell us what YOU think!

8 week consultation commencing Thursday 20th June Deadline for comments Thursday 15th August

What happens next?

After August 15th, the Steering Group will consider all comments from 2023 and 2024, and prepare a final submission version of the Neighbourhood Plan.

Diagram?

JMNP2 Draft A ↓

→ JMNP2 SUBMISSION VERSION - 6 weeks consultation / exam / referendum

JMNP2 Draft B ↑

COMMS 2

Thursday 20th June - Thursday 15th August: Tell us what you think of updates to JMNP2

This summer there is another chance to have your say on the updates to our Neighbourhood Plan. Specifically, about allocations for housing and employment, as well as about protecting areas between the town and our villages as 'green wedges'. It's the next stage in the journey of keeping our communities' Neighbourhood Plan bang-up-date and as strong as it can be.

In 2023....

We consulted with you back in October 2023 as part of our first formal public consultation (Pre-Submission Draft, Regulation 14, Consultation) on the 2nd edition of the 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 and updating our Plan as a result. Overall people were supportive and generally positive and constructive in their comments.

In 2024...

Since the 2023 Consultation on JMNP2, significant new information and further work has been done to proposed site allocations at Melksham and Whitley.

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 proposes its allocation to make these numbers count, minimise harm the development may cause, and maximise the community benefits it delivers.

SHOW COMMS FIGURE 5 and highlight changes that are being consulted on in the 2024 draft B of JMNP2:

REVISED Policy 7.1 Cooper Tires (Now allocates this site for at least 150 homes to make sure this site is viable to re-development)

REVISED Policy 7.2 Land at the Former Melksham Library, Lowbourne House and Car Park (The updates to this policy provide more detail to enable the development of up to 50 extra-care dwellings)

NEW Policy 7.6 Land South of Western Way, Bowerhill (This policy enables more local influence and input into the detail that still needs to be resolved for 210 dwellings and the 70 bed care home granted outline permission through Appeal)

REVISED Policy 7.3 Land at Whitley Farm (The updates to this allocation provide more detail to enable the sensitive development of about 15 dwellings around the grade II listed Farm barn which will be conserved and re-used).

NEW Policy 7.7 Land at Middle Farm (This new policy combines two previous allocations into one, resulting in a smaller area overall for about 55 dwellings and includes more landscaping to protect the countryside edge)

Green Wedges

Green Wedges are areas that we wish to see protected from development that could lead to separate places joining up.

REVISED Policy 19 – Green Wedges (One area included Land South of Western Way which now has outline planning permission, and so the update to this policy is the removal of a Green Wedge. The policy itself has also been updated to enable more flexibility for when employment development in the Green Wedges could be acceptable).

What happens to the feedback from 2023?

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.

How can I comment on the updates in draft B of the JMNP2?

Online: the draft Plan and evidence base reports will be available to view on the Neighbourhood Plan 2 pages of the Neighbourhood Plan website: www.melkshamneighbourhoodplan.org

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

Please submit your views to us via email: contact@melkshamneighbourhoodplan.org
Or you can drop off any views in writing to the Town Hall or the Parish Council office.

Drop in sessions (remove any that are past?)

Friday 19 th July	4pm - 7pm	Melksham Community Campus
Saturday 20 th July	11am - 2pm	Shaw Village Hall
Tuesday 23 rd July	5pm – 8pm	Bowerhill Village Hall

Tell us what YOU think!

8 week consultation commencing Thursday 20th June Deadline for comments Thursday 15th August

What happens next?

After August 15th, the Steering Group will consider all comments from 2023 and 2024, and prepare a final submission version of the Neighbourhood Plan.

Joint Melksham Neighbourhood Plan 2

Site Allocations Topic Paper

Version: DRAFT June (11.24)

1. Introduction

This topic paper discusses the allocation of development sites within Joint Melksham Neighbourhood Plan 2 (a modification of the 'made' Joint Melksham Neighbourhood Plan – referred to as JMNP1). The Joint Melksham Neighbourhood Plan 2 (JMNP2) is currently a pre-submission draft stage.

This topic paper sets out:

- The strategic context within which JMNP2 allocations were progressed
- The local context and drivers for sites allocation
- The approach and process undertaken by JMNP2 to identify, assess and propose allocations
- Specific evidence relating to addressing flood risk and site selection
- Evidence that supports each proposed allocation site.

2. Strategic Planning Sites Allocation Context

In July 2023 Wiltshire Council published the draft Wiltshire Local Plan (WLP) for consultation¹, known as Regulation 19, as part of this, a draft neighbourhood plan housing requirement for the JMNP2 to plan for in the period up to 2038. This was c200 dwellings at Melksham and Bowerhill and a further c50 dwellings at Shaw and Whitley in addition to land already allocated for c18 dwellings at Middle Farm by JMNP1 and 5 commitments.

Wiltshire Local Plan Sites Assessment

The draft Wiltshire Local Plan identifies a “residual” need for 1120 new homes and c8 hectares of employment land (Wiltshire Employment Land Review 2023²) to be planned for at Melksham and Bowerhill by 2038.

The draft WLP proposes the allocation of three strategic sites with assessed combined capacity for c845 dwellings and 5 hectares of employment land.

This leaves c275 homes and c3 hectares of employment land to be planned for.

Combining the WLP housing allocation and the Neighbourhood Plan housing requirement of c200 at Melksham (845 + 200) leaves a small shortfall of c75 dwellings left to be planned for. In addition, there is a need to address further need for c3 hectares of additional office and industrial space, not allocated by WLP.

Between January and March 2021, Wiltshire Council ran a Local Plan review consultation. This was not consultation on a draft Local Plan, but instead on key components of the Local Plan review and included initial site allocation options. Following this, Wiltshire Council ran a parallel and largely confidential sites allocation process after. During the period between WLP consultations on the Local Plan review, JMNP2 undertook the first three stages of its site assessment process which shortlisted greenfield and brownfield sites that were considered most sustainable and suitable (see below).

The WLP selected sites through a three-stage process:

- Stage 1 excluded sites from further consideration that were known to be unavailable or unsuitable, for example by being entirely within an overriding constrained area such as a flood zone.
- Stage 2 tested remaining sites for high level environmental and heritage impacts and feasibility issues.

¹ The Regulation 19 consultation on the draft Local Plan took place between Wednesday 27 September, to Wednesday 22 November 2023. The draft local plan published as part of this consultation is available for download: <https://www.wiltshire.gov.uk/article/8048/Regulation-19-consultation-autumn-2023>

² https://www.wiltshire.gov.uk/media/12022/Wiltshire-Employment-Land-Review-2023/pdf/Wiltshire_Employment_Land_Review__2023.pdf?m=1695745989410

- Stage 3 then subjected the 17 reasonable alternative sites, that combined SHELAA sites, to a sustainability appraisal.

The methodology and full assessments are published with draft WLP Regulation 19 evidence base³. The greenfield strategic sites proposed for allocation by draft WLP are those assessed to be the least harmful and most sustainable against a range of sustainability assessment criteria.

The proposed draft WLP allocation of site 3692: Land north of Bath Road, and Site 3478; and Land North of A3102, sites 3678 and 3701 combined to assemble WLP site 1, which forms part of draft allocation Policy 18, Land East of Melksham. This excluded them from JMNP2 options.

Wiltshire Council Sustainability Appraisal

The WLP site assessment process has informed the identification of 17 reasonable alternative strategic sites at Melksham that were subject to further assessment through the Wiltshire Council Sustainability Appraisal (SA) methodology⁴.

The SA has identified the likely effects of developing these sites against a range of sustainability criteria. This assessment has informed the selection of preferred site options by Wiltshire Council.

Site assessment scores ranged from -3 to -9. Sites 1 and 9 were the most sustainable sites when assessed against objectives in the SA Framework. In summary:

- Sites 12 and 14 were the least sustainable
- Sites 1 and 9 are considered the most sustainable
 - Site 1 land East of Eastern Way (SHELAA sites 3123, 3525 (Land at Snarlton Farm), 3552, 3678 (East of Eastern Way, 3683, 3692 (East of Eastern Way), 3701, 3704, 3752)
 - Site 9 Land South of Western Way (SHELAA 1025)

Addressing Melksham's Employment Needs

The draft WLP Strategy for Melksham⁵ includes a set of Place-shaping Priorities (PSPs). PSP 2 highlights a key local ambition: *"Reducing out-commuting: Reduce out-commuting through an improved employment offer, including delivery of new employment land to allow existing businesses to expand and to attract inward investment"*.

³ <https://www.wiltshire.gov.uk/article/8048/Regulation-19-consultation-autumn-2023>

⁴ Ibid

⁵ https://www.wiltshire.gov.uk/media/11967/Planning-for-Melksham-September2023/pdf/Planning_for_Melksham_September2023.pdf?m=1695727857577

The Wiltshire Employment Land Review (ELR) 2023 identifies a need to plan for between 0.5ha-1.2ha of office space and 6.9ha of industrial space at Melksham to 2038.

The draft WLP strategy for Melksham states: *“there are very few available sites left in the town for business expansion or inward investment and there is ongoing demand for more employment.”*

As set out above, there remains an assessed shortfall of employment land allocation (c.3 hectares) and there is a need and demand for the optimum use of existing and previously developed employment land including edge of town centre sites to meet need for office space.

3. Joint Melksham Neighbourhood Plan 2 Site Allocations

Approach to Site identification, Assessment and Selection

Melksham Town Council and Melksham Without Parish Councils are Qualifying Bodies (QBs) for JMNP2. The QBs have each endorsed the process, evidence and draft JMNP2 contents including draft site allocations.

QBs appointed the Steering Group (SG) of Councillors and members of the community to progress the JMNP2. The SG has guided, endorsed and made recommendations to the QBs including processes, evidence, engagement and drafting of sites allocations. This work has all been supported by professionals producing technical assessments and information, and by Wiltshire Council officers.

The SG established a specific sites allocations Working Group consisting of SG members and members of the community. The WG led the sites identification, assessment and selection process and made its recommendations to JMNP2 Steering Group.

The sites allocation process, outlined below, followed an open and robust process combining independent assessment, community, stakeholder and owner engagement.

JMNP2 Sites Identification, Assessment and Selection Stages

JMNP2 has undertaken its own sites assembly, assessment, spatial strategy and selection process. It was undertaken before Wiltshire Council was prepared to publish more than the Local Plan Review January – March 2021, Stage 2 assessment of strategic (SHELAA) sites.

Site identification combined sites promoted through Wiltshire Council's SHELAA with additional sites put forward through a local "call for sites" undertaken between 27th April and 5th June 2022. As a result of this, 109 sites promoted through the JMNP2 process have been subject to a five-stage assessment to justify, and inform the criteria and deliverability of proposed allocations.

Stage 1: AECOM Initial Assessment

Excluded:

- Sites under construction or with planning permission *
- Unavailable sites
- Large "strategic" sites that are not within or immediately adjacent to the settlement boundary at Melksham and Shaw and Whitley.

*Assessment of Site 1025 (Land South of Western Way pre-dated granting of outline consent for development of 210 dwellings).

Stage 2: Assessed all remaining sites using a neighbourhood plan site appraisal proforma developed by AECOM based on the Government's National Planning Practice Guidance (PPG) and the Locality Site Assessment Toolkit.

At Melksham and Bowerhill, Stage 2 assessment identified 1 site (for 10 dwellings) appropriate for allocation and 25 sites less or potentially suitable, that may be appropriate for allocation through the Neighbourhood Plan, if certain issues can be resolved or constraints mitigated. This included land being within Flood Zones 2 and 3 or having existing policy restricting residential uses.

At Shaw and Whitley, it identified the site allocated by JMNP1 as suitable and 6 as potentially suitable.

At Melksham and Bowerhill, twelve sites were greenfield land outside of the settlement boundary. NB at the time of assessment, Land South of Western Way (Site 1025) was not considered suitable due to its greenfield status outside of the settlement boundary and its contribution to maintaining separation between Melksham and Bowerhill.

Stages 1 and 2 identified an indicative total potential housing capacity of 2269 – 3093 dwellings.

Stage 3: Engagement with Wiltshire Council to coordinate the JMNP2 allocations strategy with the emerging WLP.

Wiltshire Council's publication of the Regulation 19 draft WLP in July 2023, revealed greenfield sites identified by JMNP2 assessment as potentially suitable had been proposed for allocation by Wiltshire Council Local Plan, including land to the north of the A 3102 and land north of Bath Road, adjacent to Melksham Oak School. These sites and all land that comprises WLP allocation Policy 18, were removed from potential JMNP2 selection, severely restricting JMNP2's allocation opportunities to meet its requirement.

Stage 4: Assessment undertaken by the JMNP2 Working Group and Steering Group with regard to:

- Adopted Wiltshire Plan Policy,
- Adopted and proposed JMNP1 and 2 Objectives and Policies,
- Wiltshire Council Local Plan Housing Requirements and Allocations,
- Stage 1 and 2 sites assessment results,
- Strategic Environmental Assessment alternative strategies,
- Community and stakeholder feedback,
- Flood risk,
- Testing allocation viability,
- New circumstances (consent of land South of Western Way, site 1025).

It identified and further shortlisted remaining available sites, with sufficient capacity to make a significant contribution to meeting the JMNP2 housing requirement of c200 at Melksham and deliver affordable housing.

Sites with existing constraints, including being protected by existing or proposed employment policy / designations or being within viable employment sites protected by Core Strategy policies, e.g. sites 3333, 3334 and 264 (Upside). Emerging JMNP2 designations including Green Gaps and Wedges Policy and Local Green Spaces Policy, including site 1000 (parts of which are nominated as LGS) and sites 728, 1005 and 1006 located within proposed green gaps to protect settlements from coalescence. This ruled them out of being suitable at the Stage 4 assessment.

Stage 5: Informal dialogue with the promoters of shortlisted sites re-affirmed availability and secured confirmation of deliverability in accordance with policies and how the site allocation would address constraints and community needs.

4. Strategic Environmental Assessment

Considering Alternative Approaches

JMNP2 has been prepared alongside and informed by an independent Strategic Environmental Assessment (SEA) Report (AECOM 2023). This considered the relative sustainability of brownfield and greenfield land allocation options at Melksham and then assessed options at Shaw and Whitley.

Melksham

To support the choice of a development strategy for the JMNP2, the SEA process has assessed the following options as reasonable alternatives:

- Option A: Meeting housing needs through brownfield site allocations.
- Option B: Meeting housing needs through greenfield site allocations.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through the eight SEA themes which have been scoped into the assessment.

Overall, Option A performs more favourably than Option B, and is ranked the most favourable option with respect to each SEA theme.

Option A: Prioritisation of Use of Brownfield Land at Melksham

The JMNP2 approach to prioritisation of brownfield land allocations is in accordance with nation planning policy and guidance. National Planning Policy Framework (NPPF), paragraph 123 states that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*

Paragraph 124(c) states that planning policies and decisions 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 or unstable land;”

Option B: Greenfield Site Approach at Melksham

It is recognised that greenfield sites at Melksham remain available and assessed as being potentially suitable, outside of flood risk zones 2 and 3.

The majority of promoted greenfield sites are discounted due to Local Plan allocation or conflict with made or emerging JMNP policies notably:

- Policy 16: Local Green Spaces
- Policy 19: Green Gaps and Wedges

Land at Snarlton Farm (Site 3525) is promoted as providing a deliverable alternative site to allocation of brownfield land. Partial allocation of the site could provide capacity to meet housing requirements within a greenfield approach. It was not selected as it is located less sustainably than available brownfield sites. It would not provide a sustainable location for commercial or employment uses including town centre and edge of town centre class E uses. Its allocation would not enable the viable mixed-use regeneration of the available brownfield land or heritage assets at Cooper Tires or the former library site. In addition, the greenfield site is less-well suited to the provision of accessible extra-care housing than the former library site within the town centre area, which Wiltshire Council have promoted and have provided deliverability evidence for. Should overall housing requirements change, it is considered that the large site should be assessed and addressed in relation to existing strategic allocations to the north through a review of the Local Plan. As outlined in the NPPF⁶, the JMNP seeks to allocate small and medium-sized sites.

Land South of Western Way has been proposed for allocation in JMNP2 to respond to changed circumstances as discussed in section 5.

SEA Addendum Report

In response to changed circumstances, additional evidence and initial Regulation 14(A) consultation representations, draft proposed allocations were revised. This included;

- Revision to Policy 7.1; Land at Cooper Tires to support development of at least 150 dwellings.
- A new allocation of Land South of Western Way to enable development of c210 dwellings.
- A new allocation of Land at Middle Farm Whitley for c55 dwellings that consolidates the previously proposed two separate allocations.

The revisions were considered of a significance that required they be subject to a further addendum SEA process.

The addendum report was prepared in June 2024. It concludes that the revised and new allocations maintains a sustainable approach to development allocations, prioritising brownfield land allocations in combination with allocation of the most sustainable greenfield option with potential to meet and exceed JMNP2 housing requirements, supporting viable brownfield regeneration and enabling the delivery of affordable housing to meet local needs at Melksham and Shaw and Whitley

⁶ National Planning Policy Framework, December 2023
https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

5. JMNP2 Allocations Approach

JMNP2 is taking a positive approach to site allocations and is driven by securing the best development outcomes for the community.

This combines enabling the appropriate and balanced regeneration of brownfield land for homes and employment, and ensuring the most sustainable available greenfield site delivers housing that meets local needs to a high standard of connectivity, design and construction. In doing so it is informed by, but not restricted to, meeting the identified housing requirement of c270 dwellings (c200 at Melksham and Berryfield & c70 at Shaw and Whitley), as set out in the draft WLP.

Following the process of site assessment and selection set out in earlier parts of this report, the subsequent stages of allocation progressed into a formal stage of consultation (Regulation 14) on pre-submission draft of the JMNP2. For 7 weeks, between the 13th October and 3rd December 2023, a pre-submission Regulation 14 consultation was held on the draft JMNP2. We received over 980 individual comments.

Since the 2023 Regulation 14 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, and as set out below, to changed circumstances.

JMNP2 Housing Allocations

Whilst the Wiltshire Council housing requirement in the WLP for the JMNP2 area is a draft until adoption of the Local Plan, JMNP2 Steering Group and Qualifying Bodies resolved to plan positively and progress towards allocating land to meet the requirement of c270 dwellings.

In addition, JMNP2 sites allocation approach has responded positively to new circumstances, on which more detail is set out below.

The site allocations approach adheres to requirements in the NPPF and national guidance towards achieving Sustainable Development with allocations based upon consideration of alternatives, engagement, sites assessment, deliverability evidence and infrastructure requirements.

The approach to sites allocation has been screened and assessed through independent strategic environmental assessment and Habitats Regulation processes, which included consideration of the relative sustainability and impacts of alternative approaches to distribution of site allocations.

All promoted sites have been selected through the robust five stage identification and assessment process, including the identification of alternative site options, independent site sustainability and suitability assessment and community, Wiltshire Council, stakeholder and owner engagement.

Consideration has been given to and responses made to national, adopted and emerging strategic policy and made and emerging JMNP objectives and policies.

JMNP2 Employment Allocation

JMNP2 proposes to allocate land at Cooper Tires for mixed employment uses to mitigate loss of employment on the site and enable viable new employment uses to meet unplanned need identified by the Wiltshire Employment Needs Assessment especially where this compliments the allocation of employment land by Wiltshire Local Plan east of Melksham.

Employment uses do not trigger the need for a flood risk sequential test. However, Cooper Tires is the most sustainable site and secures reuse of brownfield land. Flood mitigation and contamination costs have been assessed by land owners and provided to JMNP2. Viability assessment has concluded that viable employment development is only achievable within a mixed-use regeneration that includes value raising housing.

Addressing New Circumstances

New circumstances also affected the availability of sites for allocation by JMNP2.

The draft WLP proposes allocation sites: Site 3692; Land north of Bath Road and Site 3478; Land North of A3102 and sites 3678 with 3701 that combine to assemble part of draft allocation Policy 18, Land East of Melksham.

These are potentially suitable sites which are now excluded from JMNP2 options, removing capacity for c 400-500 dwellings.

In addition, an appeal decision at Western Way granted **outline consent** for development of c210 dwellings and a 70-bed care-home on SHELAA site 1025, Land South of Western Way, Bowerhill. The site was assessed as unsuitable at Stage 1 due to its landscape role of openness and separation of settlements. Whilst full planning resolves all matters relating to the site development, **outline consent** (with all matters other than amount and access reserved) leaves significant matters to be resolved. JMNP2 therefore proposes to include the site as potentially suitable for allocation.

Significant updates were therefore made to the pre-submission draft of JMNP2 that was consulted upon in 2023. Therefore, a second pre-submission Regulation 14 consultation on draft B of the JMNP2 in June 2024, with revisions or updates to allocations of land for housing made under Policy 7, and Policy 19 - Green Wedges is to be held.

Community and Stakeholder Engagement

Feedback obtained from early evidence gathering and informal community, stakeholder and owner engagement during the drafting of JMNP2 has influenced the allocations approach and informed the content of allocations. Formal engagement has also been conducted through the required consultation stage of Regulation 14 on the pre-submission draft of the JMNP2 (as outlined above, this has so far taken place in the autumn / winter of 2023).

Community engagement pointed to a clear desire to see Melksham Town Centre supported by the plan including its promotion of regeneration of both the library and Cooper Tires Sites. This is recorded in the accompanying Consultation Statement to the JMNP2⁷.

Proposed allocations that involve the development of previously developed and brownfield land at Melksham and Whitley have been informed by independent viability assessment. This has established robust evidence that the allocation commitments made by the JMNP2 are reasonably likely to be achievable by 2038.

Effectiveness and Deliverability: Landowner Consultation

Informal and formal consultation has been undertaken with promoters of all sites, including direct dialogue with promoters of proposed sites, to secure confirmation and evidence of intentions to deliver development in accordance with draft allocation parameters.

Viability Assessment

In accordance with NPPF Paragraph 35, proposed allocations enabling the regeneration of brownfield land at Cooper Tires and the former library site, have been subject to independent expert viability assessment which has influenced the site allocation parameters (Bailey Venning 2024). The proposed small-scale allocation of land at Whitley Farm, Whitley has also been assessed to provide confidence that conservation constraints and benefits required by the site and allocation can be addressed.

⁷ <https://www.melkshamneighbourhoodplan.org/np2-evidence-base>

6. Addressing Flood Risk

The Environment Agency highlighted a need to consider flood risk on the Cooper Tires allocation site in more detail as part of the consultation representation (from Pre-Submission Regulation 14 Consultation October to December 2023) received from the public body:

Policy 7.1 - Cooper Tires site allocation

The new allocation for the Cooper Tires site is given its own new policy in the Plan.

This allocation is not unexpected, but the wording of the policy does require some amendment.

The attention given to flood risk is not proportional to the amount of flood risk present at the site. Nearly all the site (not just “significant parts of the site”) is affected by flood zones 2 and 3. The proposal to include residential (more vulnerable - National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK www.gov.uk) as stated in 4.8.48, triggers the need for this allocation to be Sequentially Tested as part of this Neighbourhood Plan. The NPPF/PPG makes it clear that this is expected within the Plan that intends to allocate the site - Flood risk and coastal change- GOV.UK (www.gov.uk)

If the site were to be allocated for ‘less vulnerable’ site uses only, which would mean the level of vulnerability would not change, the Sequential Test would not be required. A) flood risk assessment (FRA) and suitable flood risk mitigation could be dealt with at planning application stage in that scenario.

National Planning Policy Framework / Guidance (NPPF/NPPG)

National Planning Policy Guidance (NPPG) (Flood risk and coastal change⁸) sets out that the aim of the Sequential Test is to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, account should be taken of the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 and 2, should the suitability of sites in Flood Zone 3 be considered. The NPPG also advises that a pragmatic approach should be taken to the consideration of alternative sites.

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) (paragraph 165).

Paragraph 167 states that “all plans should apply a sequential, risk-based approach to the location of development– taking into account all sources of flood risk and the current and

⁸ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.”*

Paragraph 168 of the NPPF highlights that “*the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*”

Land Use Vulnerability and Flood Zone

Table 2 in the Flood risk and coastal change NPPG, classifies different land uses according to their vulnerability to flood risk (Ref ID 7-066-20140306), and Table 3 indicates which land uses it is appropriate to allocate in Flood Zones 2, 3a and 3b, and which categories should not be allocated in those zones, based on their vulnerability classification. For some categories of development Table 3 also prescribes that, before they are allocated in Flood Zone 2 or 3, the second element of the method – the exception test – need not be applied in this circumstance.

Residential use is More Vulnerable. Employment, commercial and leisure uses are Less Vulnerable. Open space and flood mitigation measures are Water Compatible

PPS 25 (Table D3) identifies the compatibility of uses within levels of vulnerability with the

Table 3: Flood risk vulnerability and flood zone ‘compatibility’

Flood risk vulnerability classification (see table 2)		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required	✓
	Zone 3b functional floodplain	Exception Test required	✓	✗	✗	✗

EA Flood Risk zones, 1, 2, 3A and 3B. It also identifies when sequential testing and Exceptions Testing is a requirement in plan making.

NPPG Flood Risk and NDPs

The Flood risk and coastal change NPPG addresses the matter of how a neighbourhood plan can tackle this complex subject:

“How can neighbourhood planning take account of flood risk?”

The overall approach in [paragraph 161 of the National Planning Policy Framework](#) applies to [neighbourhood planning](#).

Where they make provision for development, the qualifying bodies involved in neighbourhood planning will need to:

- ensure that neighbourhood plans (and any neighbourhood development/community right to build orders) are informed by suitable assessment of flood risk from all sources, both now and in the future;
- steer development to areas of lower flood risk as far as possible;
- ensure that any development in an area at risk of flooding would be safe, for its lifetime taking account of climate change impacts;
- be able to demonstrate how flood risk to and from the plan area/ development site(s) will be managed, so that flood risk will not be increased overall, and that opportunities to reduce flood risk, for example, through the use of sustainable drainage systems where appropriate, are included in the plan/order.

Local planning authorities will need to have these aims in mind in providing advice or assistance to qualifying bodies involved in neighbourhood planning. Refer to:

- [What to consider if there is a risk of flooding in the neighbourhood plan area?](#)
- [What to consider if bringing forward a Neighbourhood Development Order/Community Right to Build Order in an area at risk of flooding?](#)

What advice and information on flood risk is available for neighbourhood planning?

Locality, in conjunction with the Environment Agency and other statutory agencies, have created a toolkit which provides advice on [how to consider the environment when producing neighbourhood plans](#). Anyone preparing a neighbourhood plan or order may also find it helpful to [consult the lead local flood authority](#) for the area.

[Strategic Flood Risk Assessments](#) are the primary source of flood risk information in considering which areas covered by a neighbourhood plan may be appropriate for development. If, however, the strategic flood risk assessment is out-of-date or lacks an appropriate detail in this area, it may be necessary for neighbourhood planning bodies to undertake additional work to assess the risk of flooding to development being promoted in a neighbourhood plan or order. Other important sources include the Environment Agency's [Flood Map for Planning](#). Local planning authorities can make available to qualifying bodies any reports or information relating to the Strategic Flood Risk Assessment, and share any other information relevant to flood risk (such as the application of the [Sequential](#) and [Exception Tests](#) to the Local Plan).

What needs to be considered if there is a risk of flooding in the neighbourhood area?

Where the Strategic Flood Risk Assessment, or other available flood risk maps or information, indicates that part or parts of a neighbourhood plan area may be at risk of flooding, the qualifying body should have regard to the National Planning Policy Framework's policies on flood risk. Where they are considering proposing development, they will need to show that this would be consistent with the local planning authority's application of the [Sequential Test](#) and if necessary, the [Exception Test](#) for the plan. If not, these tests will need to be re-visited on a local authority-wide basis.

Where areas under consideration for development are inconsistent with the spatial strategy set out in the relevant plan, it is likely that the qualifying body will need to provide further

information to demonstrate that any development proposed by the neighbourhood plan passes the Sequential Test, and if necessary, the Exception Test.”⁹

Wiltshire Core Strategy

Wiltshire Core Strategy requires the sequential approach to development sites within flood risk areas. It requires development to be steered to reasonably available sites at lowest risk of flooding. The relevant policies within the Development Plan are considered below:

Core Policy 67 (Flood Risk) states that development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice. All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

Joint Melksham Neighbourhood Plan

JMNP1 and JMNP2 include a policy to address the key local issue of flooding. Policy 3: Flood Risk and Natural Flood Management adds local specific detail to addressing localised flood risk associated with surface water flooding and requiring sustainable drainage measures to address them

Applying the Sequential Test

JMNP2 sites assessment and selection has had regard to maximising the potential to allocate land outside of flood risk areas.

JMNP2 is primarily required to allocate land for c200 dwellings at Melksham and c70 dwellings at Shaw and Whitley. This is not a ceiling. JMNP2 may allocate more land for housing or other uses where there is a local need. Informed by the SEA report, JMNP2 aims to prioritise a sustainable brownfield first approach to sites allocation at Melksham. It proposes to optimise the reuse of previously developed brownfield land that benefits local employment and meets local housing needs.

A Sequential Test approach has therefore been undertaken as part of selecting sites for mixed housing and employment development seeking to balance the flood probability and development vulnerability of sites.

⁹ Flood risk and coastal change NPPG. Paragraphs: 015 / 016 / 17 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Material Referenced

- EA Flood Maps for Planning
- Wiltshire Strategic Flood Risk Assessment (2019¹⁰)
- Wiltshire Local Flood Risk Management Strategy (2014)
- Cooper Tires Initial Flood Risk Assessment (WSP 2024)

JMNP2 Sequential Test Scope Areas

JMNP2 has two defined areas within which to plan to meet its housing requirement.

- Melksham and Bowerhill c200
- Shaw and Whitley c70

The approach is limited to allocations at Melksham, where brownfield land is reasonably available and sites are affected by flood risk. It is not necessary to be undertaken at Shaw and Whitley where proposed allocation sites can meet housing requirements are outside Flood Zone 2 and 3.

The stage 1 and 2 sites assessment sets the sequential test scope areas.

This includes land comprising the 26 sites at Melksham (plus consented site 1025) and the 9 shortlisted sites at Shaw and Whitley.

Stages 3-5 assessment criteria applied by the JMNP group including the proposed designation of Local Green Spaces and Green Wedges further considered the reasonableness of allocation of the Stage 2 shortlisted potentially suitable sites. In addition, sites proposed for allocation by Wiltshire Council were excluded. The results of this further sieving identified the available sites that were considered reasonable for allocation.

In assessing reasonable alternative sites for delivery of housing, significant weight is given to allocation at brownfield sites and integration with mixed use and viable regeneration that addresses particular local needs and provides opportunities for diverse economic development and town centre vitality. See Appendix 1.

Method

Stage 1:

Identification and shortlisting of the potentially suitable and available sites within the Melksham JMNP Area, including their capacity, greenfield or brownfield and flood zone

¹⁰<https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=28c00215d87b468a9a0cd79c63d3d270>

designation of each site. This harnesses the AECOM Stage 1 and 2 sites assessment. See AECOM Site Assessment Report (2023)¹¹.

Stage 2:

Review of the planning status and capacity of sites.

Sites initially excluded include:

- Areas within Flood Zones 2 & 3;
- Principle Employment Sites or sites in existing active employment uses;
- Sites designated / or proposed to be designated for alternative uses eg Local Green Spaces & Green Wedges
- SHELAA sites taken forward in Local Plan Review
- Sites with other significant constraints eg access
- Sites with insufficient capacity to contribute meaningfully to meeting JMNP2 housing requirements and affordable housing
- Sites not suitable for sustainable employment uses

This references Stage1-5 of the site assessment process. It also has regard to the SEA report on alternative approaches and JMNP and Wiltshire Core Strategy objectives and policies.




Stage 3:

Provided an assessment and conclusion of any appropriate alternative sites within the Melksham Area for the proposed development, reaching a conclusion on whether there are alternative sites in Flood Zone 1 (i.e. sequentially preferable) that are suitable, available and achievable for development to meet the allocation objectives of JMNP2.

¹¹ <https://www.melkshamneighbourhoodplan.org/np2-evidence-base>

Stage 2 Sequential Assessment of Reasonably Available / Potentially Suitable Promoted Sites

Key

-  Assessed as not reasonably available and suitable for allocation
-  Allocated by Wiltshire Local Plan. Not Available to JMNP2.
-  Assessed as potentially suitable

Sites at Melksham and Bowerhill (Requirement c200 dwellings)

Wiltshire Local Plan Allocations: Excluded

These sites have been proposed for allocation in the Wiltshire Local Plan and are not available to JMNP2.

Site 3478 Land North of A3102: 136 – 184 dwellings

Site 3678 Land east of Eastern Way, Melksham: 40 dwellings

Site 3701 Land to the east of Eastern Way, Melksham: 40 dwellings

Site 3692 Land north of Bath Road: 180 – 240 dwellings

Brownfield Sites

Site 186 Martigny House: 30 dwellings (subject to confirmation of availability)

- Zone 1
- Core Strategy Policy 35 and JMNP Policy 10; Existing and active employment site.
- Small capacity.

Not suitable

Site 264 Upside / Bath Road, Shurnhold: 19 – 112 dwellings and 675 sqm of

employment space

- Zone 1, 2, 3
- Core Strategy Policy 35, Principal Employment Site.
- Planning application

Not suitable

Site 313 541 Outmarsh: 8 – 20 dwellings

- Zone 1
- Core Strategy Policy 35, Principal Employment Site

- Small capacity
- Heritage constraints

Not suitable

Site 3333 Land to North of River Avon (Area 8): 80 dwellings –

- Zone 2/3. Core Strategy Policy 35, Principal Employment Site
- Local Heritage Asset

Not suitable

Site 3334 Land to North of River Avon (Area 9): 40 – 60 dwellings

- Zone 3
- Safeguarded for Principal Employment Land Growth
- Open Space (JMNP2 Policy 14)

Not suitable

MEL02 Site 1 – Blue Pool at Melksham House, Market Place: 10 – 20 dwellings

- Zone 1
- Adjacent to Assembly Rooms Leisure use – residential amenity
- Potential for ongoing community use
- Small capacity

Not suitable

MEL04 Site 3 – Former Christie Miller Sports Centre and golf course:

Employment

- Zone 1
- LGS proposal (Withdrawn at Regulation14B)
- Core Strategy Policy 34 New Employment land. Potential for employment site expansion of PEA.
- Not suitable / available for housing.
- Residential Amenity

Not suitable

MEL05 Former Christie Miller Car Park: Employment

Rejected

- Zone 1
- Employment site
- Not suitable / available for housing

Not suitable

MEL12 The Unicorn Pub, Melksham: 2 – 4 dwellings

- Zone 1
- Listed building
- Potential for viable future community use
- Small capacity

Not suitable.

TC1 Vacant Lloyds Bank Building: 10 dwellings

- Zone 1
- Full planning consent
- Small capacity

Not available

TC3 Vacant NatWest, 34 High Street: 5 dwellings

- Zone 1
- Availability not confirmed
- Main Town centre shopping area location
- Small capacity

Not suitable

TC5 Vacant Marjo Fashion, 8-12 Lowbourn: Promoted for 5 dwellings alongside adjacent plots (subject to confirmation of availability)

- Zone 1
- Full planning consent
- Listed building
- Small capacity

Not suitable

TC7 Vacant Co-op Funeral Care, Church Street: 4 dwellings (subject to confirmation of availability)

- Zone 1
- Availability not confirmed
- Small capacity

Not suitable

Site 3738 Verbena Court, Eastern Way: 10 dwellings

- Zone 1
- Identified for Community Facilities Use
- Small capacity

Not suitable

Site 187 Nortree Motors Ltd: 17 – 26 dwellings

- Zone 1
- Core Strategy Policy 35 and JMNP Policy 10; Existing active employment site (petrol station and takeaway)
- Small capacity

Not suitable

MEL03 & TC4 Site 2 – Library, Lowbourn House, Further Education Centre

and Vacant Chinese Restaurant, Lowbourn: 45 dwellings

- Zone 1
- Unused/surplus community facility (JMNP2 Policy 15)
- Temp employment use (JMNP2 policy 10)
- Town centre location (JMNP2 Policy 9)
- Promoted for allocation of c50 extra care dwellings

Cooper Tires: c100-200 dwellings (FZ1& 2)

- Zones 1/2/3
- Vacant brownfield land (12.8 hectares)
- Site remediation & flood mitigation costs
- Priority for mixed use regeneration
- Edge of town centre location
- Capacities
 - C2 hectares in Flood Zone 1 (capacity 100-120 dwellings)
 - C2 hectares in Flood Zone 2 (potential capacity for c100-120 dwellings)
 - C8.8 hectares in Flood Zone 3 (potential employment/leisure/retail/open space/flood mitigation)

Greenfield Sites

Site 728 Land to the North of Berryfield: 53 dwellings

- Zone 1
- Proposed for Green Wedge JMNP2 Policy 19
- Planning permission refused (appealed)

Not suitable

Site 1000 Land rear of Lowbourne Infants School: 50 – 112 dwellings

- Zone 1
- Heritage – Former W&B Canal route
- Proposed LGS designation (JMNP2 Policy 16) (very large level of support 900)

Not suitable

Site 1005 Land South of Sports Ground:

- Zone 1
- Core Strategy Policy 34; Strategic Employment site expansion potential
- Proposed Green Gap (JMNP2 Policy 19)

Not suitable.

Site 1006 Land South of Falcon Way, Bowerhill: 800 dwellings

- Zone 1
- Core Strategy Policy 34; Principal Employment Land expansion potential
- Green Wedge (JMNP2 Policy 19)

Not Suitable

Site 3107 North West of Woodrow Road: 77 dwellings.

- **Zone 1**
- Access, landscape and connectivity constraints
- Capacity reduced by power lines
- Refused consent for residential

Not Suitable

Site 3525 Land at Snarlton Lane: 450 – 889 dwellings.

- Zone 1/2/3 (Flood Zone 1 land +80% of site.
- Visual impact on open countryside
- Potentially capable of partial allocation (sub-optimal efficient use of land) |
- Adjacent to WLP Site allocation Land East of Melksham; Policy 18)
- Potentially within WLP Broad Location for (future) Growth
- Not sequentially sustainable location of employment (office) or retail
- No direct linked benefit to town centre vitality

New Circumstances*

Site 1025; Land South of Western Way c210 dwelling s

Previously rejected at Stage 1 site assessment.

Appeal decision Nov 2023 establishes outline permission and therefore the principle for acceptable development.

- Zone 1
- Harm; coalescence of settlements (Green Wedge JMPNP Policy 19 unachievable as result of appeal decision)
- Site assessed (by Wiltshire Council Sustainability Assessment) as one of most sustainable greenfield option
- Not available for employment allocation

*Outline consent for 210 dwellings and 70 bed care home granted on appeal Nov 2023.

Suitable Brownfield total residential capacity in Flood Zone 1 = c150-170*

*including Cooper Tires Flood Zone 1 capacity of c100-120 - dwellings.

Suitable Greenfield residential capacity in Flood Zone 1 = c570-1099**

**Sites not available/suitable for employment development

Stage 4

JMNP2 Allocation Strategy

JMNP2 sustainable development strategy is to prioritise allocation of the most sustainable brownfield land to enable development that at leasts meet the identified JMNP housing requirement of c200 dwellings at Melksham and a further c50 dwellings at Shaw and Whitley. It is also to make allocations that maximise their contributions to securing delivery of social, economic and environmental objectives, in particular:

- Protecting and enhancing the vitality of Melksham town centre.
- The retention, regeneration and intensified use of previously developed employment land.

With regard to identified further need for 3 hectares of employment land to supplement the 5 hectares allocated by Wiltshire Council local Plan, and the urgent need to enable viable regeneration of the vacant Cooper Tires site to optimise renewed employment and economic vitality, JMNP2 is also proposing allocation of employment land that provides the flexibility to enable a variety of employment uses in Classes E, B2 and B8. It aims to prioritise sites that compliment existing and allocated employment sites that contribute meeting prioritised objectives.

JMNP2 is required to demonstrate proposed allocations are deliverable and viable. It has been supported by viability assessment of suitable brownfield sites that has informed the

allocation land use mix and balance. At Cooper Tires this is informed by site analysis and risk assessment and conceptual capacity study (AKU Associates¹²).

This Study has established the need to link residential with non-residential development at Cooper Tires to enable viable delivery of new employment uses. It has also established the capacities and location where residential development may be located within the potentially phased delivery of comprehensive regeneration (see Cooper Tires Allocation below).

Residential Capacity

Considering housing alone, at Melksham the suitable brownfield (first) site that is wholly within flood zone 1, the former library site, has capacity for c50 dwellings. C2 hectares of land at Cooper Tires is within Flood Zone 1, with an urban housing capacity for between 100-130 dwellings. Land in Flood Zone 2 may add capacity a further c90-120 dwellings subject to further flood assessments and mitigation measures.

Greenfield sites at Land South of Western Way (that is now included as a result of securing outline planning permission) has capacity for about 210 dwellings with a 70 bed care home. Capacity for between a further 450 – 889 dwellings on land at Snarlton Farm May be achievable. (following the sequential test). On this basis, JMNP2 does not need to allocate land for housing development on flood zone 2 land.

Residential and Employment Land Capacity

JMNP2 is seeking to also promote and enable viable economic regeneration of the Cooper Tires site through a mixed-use allocation. Allocations of all housing to meet JMNP2 requirements on greenfield sites will not enable this.

When JMNP2 brownfield first and mixed-use allocation strategy is taken into account the Cooper Tires site capacity for mixed use regeneration has been assessed (AKU Associates).

Capacity Summary

Allocation site area: 12.88 hectares

Site Flood Risk Areas

- Flood Zone 1: 2.16 hectares
- Flood Zone 2: 1.94 hectares
- Flood Zone 3: 8.78 hectares

Allocation / viability land use zones and capacities

- Conceptual zone for residential development (main) - 3.90 hectares
(FZ1=2.14ha, FZ2=1.96ha)

¹² <https://www.melkshamneighbourhoodplan.org/np2-evidence-base>

● Conceptual zone for residential development (secondary) -	0.07 hectares
<u>Sub Total (more vulnerable use)</u>	<u>3.97 hectares</u>

● Conceptual zone for commercial development -	4.74 hectares
● Conceptual zone around retained buildings -	1.96 hectares
● Conceptual zone for linear park (main) -	1.58 hectares
● Conceptual zone for linear park (secondary) -	0.30 hectares
● Conceptual zone for SuDS infrastructure -	0.31 hectares
● Water around Melksham Gate weir -	0.02 hectares
<u>Sub-total (less vulnerable/water compatible uses)</u>	<u>8.91 ha.</u>

Total **12.88 ha.**

Residential capacity

Density: @49 Dwellings Per Hectare (DPH)

● Houses:	94
● Apartments:	101
<u>Sub total</u>	<u>195</u>

+retained heritage buildings allowance c15

Total **c210**

Residential land/capacity in Flood Zone 1 and 2

● FLOOD ZONE 1:	2.16 hectares - @49 DPH = c107 dwellings
● FLOOD ZONE 2:	1.81 hectares - @49 DPH = c88 dwellings

Sequential Approach Conclusion

JMNP2 Allocations Approach: JMNP2 positive approach to site allocations is driven by securing the best development outcomes for the community. This combines enabling the appropriate and balanced regeneration of brownfield land for homes and employment, together with ensuring the most sustainable available greenfield site delivers housing that meets local needs to a high standard of connectivity, design and construction. In doing so it is informed by, but not restricted to meeting the identified housing requirement of c200 dwellings.

In selecting sites sequentially, it has maximised re-use of brownfield land in Flood Zone 1, and justifies an exception of limited residential development on Flood Zone 2 at Cooper Tires.

It seeks to regularise its development of Land South of Western Way within the development plan and proactively manage future detailed planning of the significant site.

Brownfield Land Capacity: There is capacity for c170 dwellings on brownfield land at the former Library Site (MEL03 &TC4) and at Cooper Tires, within a mixed-use allocation to

include employment and retail. These are the most sustainable locations for meeting 85% of JMNP2 housing requirement at Melksham.

It is also proposed to increase the residential capacity of the Cooper Tires site by a further c90-110 dwellings by supporting residential development within the 1.94 hectares of the site Flood Zone 2 to facilitate the viable regeneration of employment and economic activity on the site, informed by viability assessment of the proposed allocation. The justification for this exception is set out below.

Greenfield Land Capacity: The allowed appeal on Land South of Western Way (Site 1025) has established the principle of residential development of the site and removed the ability of JMNP2 to designate it as a Green Wedge. Having regard to these new circumstances and Wiltshire Council's Sustainability Appraisal of the site the sequential sites selection process identifies the site as the next most sustainable to support delivery of housing.

The justification and precedents for allocation of the site with outline consent, are set out in the following section.

It has not selected land at Snarlton Farm (Site 3525). It does not need to. The site is less favourable, with poorer connections to facilities and with some flood risk constraints. It is also within an area likely to be considered for future strategic Broad Location for Growth, later in the Wiltshire Local Plan period. Allocation of a small portion of the site by JMNP2 risks prejudicing its optimum efficient use of land at this time.

7. Addressing Site Allocations

There is no requirement for neighbourhood plans to allocate development sites. Neighbourhood plans are also empowered to allocate more land than stated requirements where this will deliver development to meet local needs and priorities.

JMNP2 has adopted a positive and evidence led approach to site allocations which respond to and plan ahead in light of community wishes and distinct local circumstances.

At Melksham it has prioritised promoting the regeneration of brownfield land and provided opportunity for ongoing regeneration of Cooper Tires, potentially beyond the plan. It has also responded positively and with pragmatism to regularise and seek to manage the qualities of development granted outline consent at Land South of Western Way.

Melksham site allocations have had regard to:

- National policy in relation to town centres, brownfield land, housing mix and addressing flood risk
- The priority of promoting the right mixed-use regeneration of Cooper Tires
- Providing affordable and extra care housing to meet assessed needs
- The priorities of the Town Centre Master Plan Report and emerging Local Plan Melksham Place Shaping Priority 1
- Community and stakeholder feedback
- Evidence of delivery

JMNP2 is justified in giving significant weight to securing a vibrant town centre and the re-use of the available and vacant brownfield sites at Cooper Tires and the former Library.

Together, the allocation of Cooper Tires and Library sites, provided the capacity to meet housing requirements, local housing needs and enable regeneration within a “brownfield sites first” approach to allocations and strengthen the vitality and sustainability of the town centre in accordance with JMNP2 Policy 9.

In response to the changed circumstances presented by the granting of outline consent at appeal for development of 210 dwellings and care home at Site 1025, South of Western Way, JMNP2 also gives significant weight to safeguarding the future planning of this site in relation to important and unresolved detailed matters including the relationship with existing and planned new neighbouring uses, housing types and tenure mix, connectivity and design.

At Shaw and Whitley, the plan also seeks to meet Local Plan housing requirements, but in doing so deliver affordable and accessible housing and conservation gains that respond to long term local issues and identified future priorities. Regard has been given to feedback received during the 2023 Regulation 14 pre-submission consultation and further

engagement with the owners of sites proposed for allocation to secure significantly revised proposed allocation to minimise landscape impacts at Middle Farm and refined proposals to secure appropriate development at Whitley Farm.

8. Land at Cooper Tires

Land at the Cooper Tires factory site comprises the c12.8 hectare main factory site, with boundaries to the River Avon, Bath Road, Scotland Road and A350. The allocation includes the small “Bakers Yard” car park site to the west side of Bath Road.

The site is entirely vacant. All manufacturing stopped in December 2023. It is estimated by Wiltshire Council that c350 jobs were impacted.

The site is subject to marketing.

Availability: A c2.3 section of the site adjacent to the river (site 3333) was made available by the owners through the Wiltshire Local Plan SHELAA and subsequently made the whole 12.9 hectare site available for assessment and potential allocation within the JMNP (2020-38).

Evidence Base: The evidence base is comprehensive and from a range of sources, as detailed below.

Stage 2 Site Assessment (AECOM): The site has been made partially and wholly available. There are as a result two assessments:

Site 3333

“The site is potentially suitable for allocation for residential or mixed-use development.

The site is previously developed land currently in employment use within the settlement boundary of Melksham. It forms part of the wider operations at Cooper Tires. The site in its current use detracts from the quality of the townscape. Redevelopment of the site provides significant opportunities for enhancing the quality of the public realm at this accessible location, helping to deliver high quality housing and employment provision. The site also offers significant opportunities for further enhancing and opening up the riverside area of this part of Melksham, linking with key existing and proposed green and blue infrastructure networks.

The site is wholly in Flood Zone 3. Change of use of land or buildings are not normally subject to the sequential or exception tests, nevertheless changing from industrial use to residential use will increase the vulnerability classification from 'less' to 'more' vulnerable.

Redevelopment of the site should seek to improve the flood resilience of existing development through sensitive design, such as by limiting more vulnerable uses to upper floors. Other key constraints identified relate to ecology, potential land contamination and potential impacts on designated heritage assets.

The site is currently in employment use. Redevelopment of the site or its buildings must demonstrate that they meet the criteria stated in Core Policy 35 of the adopted Wiltshire Core Strategy with regards to the loss of employment land in Market Towns including Melksham.

Partial residential development of the Cooper Tires site may not be compatible with its existing industrial operations. Appropriate mitigation may be required if Site 3333 is proposed for residential development on its own.

Cooper Tires (Whole Site)

The site is potentially suitable for allocation for residential or mixed-use development.

The site is previously developed land in employment use in Melksham. It was announced in October 2022 that the facility would close at the end of December 2023. The site in its current use detracts from the quality of the townscape. Redevelopment of the site provides significant opportunities for enhancing the quality of the public realm at this accessible location; helping to deliver high quality housing and employment provision. The site also offers significant opportunities for further enhancing and opening up the riverside area of this part of Melksham, linking with key existing and proposed green and blue infrastructure networks. The site is in a highly accessible location in close proximity to Melksham Railway Station and Melksham Town Centre. The regeneration of brownfield sites in Melksham is supported by Core Policy 36 of the adopted Wiltshire Core Strategy.

The site is predominantly in Flood Zone 2 and 3. Change of use of land or buildings are not normally subject to the sequential or exception tests, nevertheless changing from industrial use to residential use will increase the vulnerability classification from 'less' to 'more' vulnerable.

Redevelopment of the site should seek to improve the flood resilience of existing development through sensitive design, such as by limiting more vulnerable uses to upper floors.

The site consists of Grade II listed C19 large house and its associated structures, and is close to a number of listed public houses. Further heritage assessment would be required.

The site is currently in employment use. Redevelopment of the site or its buildings must demonstrate that they meet the criteria stated in Core Policy 35 of the adopted Wiltshire Core Strategy with regards to the loss of employment land in Market Towns including Melksham.

The possibility of land contamination should be investigated and appropriately remediated in accordance with Core Policy 56 of the adopted Wiltshire Core Strategy.

Stage 3-5 Assessment

Stage 3 dialogue with Wiltshire Council and responses to the 2023 Regulation 14 pre-submission consultation did not object to its proposed allocation. However, attention was drawn to the site's constraints and potential impact on delivery of development.

Stage 4 consideration by Steering Group had regard to further technical evidence provided by the site promoter, capacity, land-use mix and distribution analysis undertaken for JMNP2 and 2023 Regulation 14 pre-submission consultation representation made by the landowner.

Stage 5 dialogue with the landowner's agent re-confirmed the site's availability, updated on its future sale and informally agreed a reasonable and deliverable ambient density of c50-60DPH upon which to calculate residential capacity.

Cooper Tires Allocation Evidence Base Schedule (*Provided by Cushman Wakefield on Behalf of Goodyear/Cooper Tires*)

- Cooper Tires and Rubber Company Heritage Asset Survey. Donald Insall Associates, 2020
- Cooper Tires Preliminary Flood Risk Assessment. WSP 2025
- Utilities Report. Hydrock 2020
- Transport Report. Hydrock 2020
- Land Remediation Report. Hydrock 2020
- Ecological Report. Tyler Grange 2020
- Land Remediation Costs Report. Cushman Wakefield 2020
- Illustrative Masterplan. Chapman Taylor 2020

Wiltshire Council

- Level 1 Strategic Flood Risk Assessment (SFRA). JBA Consulting 2019
- Wiltshire employment Land Review (Update) 2023
- Sustainability Assessment (Melksham Sites Assessment
- WLP Melksham Market Town Strategy (2023)
- WLP Trowbridge Market Town Strategy (2023)
- PL/2021/08064. Land at Innox Mills. Trowbridge.

Hybrid (full and outline) planning application descriptions (i) & (ii)

(i) Outline planning application: the erection of up to 243 dwellings, erection of a convenience store (Class E), erection of up to 872 sqm of new commercial floor space (Class E); and associated access, public realm; and landscaping works.

Commissioned or Undertaken by JMNP2

- Town Centre Master Plan Report Report of Stakeholder and Community Engagement 8 February and 19 March 2023
- Sites Assessment (Stage 1 and 2). AECOM 2022
- Concept development specifications AKU Ltd 2024
- Sites Viability Assessment. Bailey Venning 2024
- Sequential sites test for allocation. Flood Risk
- Illustrative Wiltshire Council Methodology, Sustainability Appraisal of Cooper
- Pre-submission Regulation 14 Consultation (Oct – Dec 2023)

Objective: The objective of the allocation is to enable and guide the regeneration of the historic and vacant site. Housing is an important component in achieving a viable mix of future development that will contribute to meeting local housing needs. But the primary aim is to create a new sustainable exemplar development that supports the delivery of mixed-use regeneration to bring new life and diverse employment opportunities to the site as well as support the vitality and offer of Melksham Town Centre.

It is accepted this will most likely be over a period longer than the JMNP2 period and may not begin until later in its life (post c2030). To provide confidence that development of the site is likely to deliver initial phases of mixed-use development, including housing, the allocation is underpinned by significant analysis and viability and delivery evidence

Key JMNP2 Objectives

- Planning for new development that addresses the impact of climate change.
- Enabling and promoting the importance of early community engagement in change and development.
- Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
- Protecting and enhancing the vitality of Melksham town centre.
- The retention, regeneration and intensified use of previously developed employment land.
- Supporting improved transport infrastructure for the increasing Neighbourhood Plan Area population.
- Encouraging cycling and walking and journeys by rail and bus to reduce the need to travel by car.
- Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.
- Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

Policy Context

Flood Risk: (see above)

Wiltshire Core Strategy: The Core Strategy policy 35 (**Employment Sites**) seeks to protect Wiltshire's most sustainable and valued employment areas. Cooper Tires is not identified as a Principal Employment Areas. The emerging Local Plan does not either. However, it seeks to retain existing employment uses outside the Principal Employment Areas to maintain diversity and choice of sites for employers and allow for local business expansion. However, it recognises some older employment areas may no longer be fit for purpose and it may be appropriate to allow for the redevelopment (in whole or part) of existing employment sites for an alternative use, particularly where the site is not required to remain in its current use to support the local economy in the area.

Cooper Tires is vacant. The buildings are specifically formed for the former use, and are redundant. Cooper Tires production has left the UK and relocated to mainland Europe.

The 2017 Employment Workspace Review (Wiltshire Council) assessed the site as being in the bottom 20% of sites against a scoresheet of qualitative criteria. It recommended:

"Site could be redeveloped providing alternative site can be locally sourced for Cooper Tires. Site could be redeveloped as part of the Melksham Link Canal project. However, at the time this did not include residential use."

The study also notes the significant environmental and remediation constraints associated with the site.

Core Strategy Policy 36 supports regeneration opportunities and aims to support and maximise the re-use and provision of economic development on previously developed land including in Market Towns. The Core Strategy policy supports the development of community-led neighbourhood plans to facilitate economic regeneration and the preparation of masterplans for specific sites.

Core Policy 36 (Economic Regeneration) sets out that regeneration of brownfield sites will be supported in the Principal Settlements, Market Towns and Local Service Centres where the proposed uses help to deliver the overall strategy for that settlement, as identified in Core Policy 1 (Settlement Strategy) and in any future community-led plans, including neighbourhood plans, and/or enhance the vitality and viability of the town centre by introducing a range of active uses that complement the existing town centre.

Draft Wiltshire Local Plan: The draft Wiltshire Local Plan Policy 65 continues to protect all employment land and applies development management criteria to establish if a site is no longer suited to current or future business needs and reuse of the site for alternative uses is the only means to deliver wider significant economic, environmental and social benefits to a settlement outweighing the loss of employment land.

Planning for Melksham (2023) identifies a potential future need for c8 hectares of employment land to 2038. It allocates 5 hectares and retains all existing Principal Employment Land including at Avonside, Upside and Bowerhill. Existing and emerging

policies, including in JMNP2, all seek to enable further employment development at the edge of the Bowerhill area to meet business growth needs.

Wiltshire Local Plan does not propose allocation of the Cooper Tires site.

JMNP2 Key Policies

- Policy 1: Sustainable Design and Construction
- Policy 3: Flood Risk and Natural Flood Management
- Policy 4: Ultra Low Emission Vehicle Charging
- Policy 6: Housing in Defined Settlements
- Policy 7.1: Land at Cooper Tires
- Policy 8: Infrastructure Phasing and Priorities
- Policy 9: Town Centre
- Policy 10: Employment Sites
- Policy 11: Sustainable Transport and Active Travel
- Policy 12: Green Infrastructure
- Policy 13: Biodiversity
- Policy 14: Open Spaces
- Policy 17: Trees and Hedgerows
- Policy 20: Locally Distinctive, High Quality Design
- Policy 21: Local Heritage

Justification

Regeneration of Brownfield Land: Cooper Tires is vacant brownfield land in a very sustainable location. Regeneration of the site can help deliver the objectives of JMNP2 and the adopted Wiltshire Development Plan.

The site is assessed as poor quality for renewed employment use and has significant constraints. Viability assessment undertaken by JMNP2 in relation to mixed use development concepts has demonstrated the need for residential development to enable viable delivery of renewed non-residential commercial, leisure, retail and other employment uses (see evidence base reports).

Conservation and Re-use of Heritage Assets: The site has been the focus of industry since the 18th Century and has been producing rubber and tyres since c1890. Avon Rubber and then Cooper Tires grew to become one of Melksham's most important employers and a landmark for the town. Production at the plant decreased during the 21st century and fully ceased at the end of 2023.

Designated Heritage Assets (Wiltshire Core Strategy Conservation and Historic Environment Policy 58)

- Avon House (listed Grade II)
- Unicorn Public House (Grade II) adjacent

- Town Bridge (grade 2) adjacent

Proposed Non-Designated Heritage Assets (JMNP2 Policy 21)

- The former art deco canteen building
- Avonside chimney adjacent

Other potential features of heritage value worthy of retention.

- Buildings 94 and 95 – part of the Victorian corn mill complex;
- Rear of building 2, the only remaining part of the Victorian cloth mill complex;
- Victorian stone arch plinths relating to the corn mill
- Building 7 – a 1920s concrete-framed building
- Building 131 – 13 Beanacre Road, an Edwardian semi-detached house

It is unlikely that other buildings on the site would be considered non-designated heritage assets

Meeting Housing Requirements: Cooper Tires site allocation contributes positively towards meeting the JMNP2 housing requirement for Melksham in a highly sustainable location.

Site capacity assessment (AKU 2024) has advised the site is capable of enabling the delivery of c200 dwellings within the plan period. Up to c100 dwellings would be on land in Flood Zone 2, requiring mitigations identified in the site-specific flood risk assessment (WSP 2024).

Viability assessment has advised that affordable housing requirements should be reduced to 10% of the total housing delivered to support the viable delivery. This will secure c20 affordable homes, the allocation does not secure a further c30, in conformity with adopted Core Strategy thresholds. This is similar to the evidenced case study allocation at Innnox Mills, Trowbridge.

On balance JMNP2 considers significant weight should be given to the priority of securing regeneration of the site to include mixed commercial uses with a range of town centre edge homes that will be likely to contribute to the vitality of the town centre.

Dialogue with Wiltshire Council in relation to allocation of land at the former library site for c50 extra-care homes has provided evidence that the site is highly likely to deliver a 100% affordable housing scheme. This can secure up to an additional c30 affordable units in a type of housing evidenced as in significant need.

Economy: The allocation seeks to maximise the viable regeneration of employment on the site with regard to JMNP2 Policy 10, Core Strategy Policy 35 and 36 and contributing to meeting employment land needs identified in the Wiltshire Employment Land Review.

Capacity analysis has assessed the potential for a range of new commercial and employment uses within the c8 hectares of Flood Zone 3 land of the main factory site. These uses are considered less vulnerable and compatible with this zone (NPPF Technical Guidance 2012

and Wiltshire SFRA). Account has also been given to re-use and protect the setting of Avon House (listed Grade 2) and the former canteen building. An allowance has also been made for flood mitigation measures. Further details can be read in the Cooper Tires conceptual development specifications note (AKU 2024).

The allocation seeks to optimise the balance between enabling renewed employment uses and housing to secure the most viable and deliverable mix of uses, whilst renewing and adding to the range of opportunities for employment space within Melksham in conformity with Wiltshire Core Policies 36 and 37, existing employment land and regeneration.

Flood Risk Areas:

- 2.16 hectares of the site is in Flood Zone 1
- 1.95 hectares of the site is within Flood Zone 2 and
- 8.8 hectares is within Flood Zone 3.

The allocation commits to at least 150 dwellings, and supports further dwellings coming forward by 2038 where this enables viable development.

Local Case Study: The draft Local Plan does not bring forward allocation proposals for the site, similar to that for Innox Mills in Trowbridge. Melksham's community fully support JMNP2 promoting the site for mixed use regeneration. The town cannot wait for the five years of marketing required by WLP policy 65 to establish the site's current obsolescence, before mixed use regeneration can be commenced.

The proposed mixed-use site allocation adopted a very similar approach to that already adopted by Wiltshire Local Plan in its allocation to enable the residential led regeneration of the Innox Mills site (Policy 55, Land at Innox Mills). This site is also constrained by Flood Zones 2 and 3, but is nonetheless proposed for housing development, where there is a plentiful supply of reasonably available land in zone 1, at Trowbridge.

As with the WLP Policy 55 approach to Innox Mills, the JMNP2 allocation requires the approval of a comprehensive master plan and delivery framework that should inform and direct potentially phased delivery of the site's regeneration, that may extend beyond the lifetime of JMNP2.

To enable this, JMNP2 only commits the site to delivery of up to 150 dwellings by 2038, but provides support for up to 300 to support longer term deliverability. Early stages of residential development are evidenced to be deliverable at prudent densities of between 50-60 DPH within flood zone 1 and 2 parts of the site.

Sustainability Appraisal: Wiltshire Council conducted a Sustainability Assessment of all shortlisted strategic allocation sites to resolve the most sustainable locations for allocation. It used a range of sustainability criteria to generate an overall score. (See Reg19 Local Plan Site Sustainability Assessments). At Trowbridge, the case study Innox Mills site scored

highest, achieving a better overall score than other greenfield options due largely to its sustainable location and lower environmental impact.

A similar exercise was undertaken by JMNP2 to test the Cooper Tires site. Whilst it is not claimed to be part of Wiltshire Council's process, its initial conclusions were similar to those for Innox Mills.

Technical Studies: JMNP2 Allocation at Cooper Tires is informed by a suite of due diligence studies by its owner, conceptual use and capacity studies undertaken by a qualified master planning consultant (AKU), working in coordination with viability experts. The allocation also has regard to appropriate planning of more vulnerable residential and less vulnerable non-residential land uses in relation to the existing areas of flood zone 1, 2 and 3 land.

The resulting allocation balances the support for development of up to 300 dwellings, initially and primarily on 4 hectares of flood zone 1 and 2 land. It also requires the delivery of new employment uses that are also appropriate on flood zone 3 parts of the site. Such regeneration will be likely to intensify and diversify economic activity within a remaining (c6-8) hectares of the site, providing opportunities for development of uses most sustainably suited to edge of town centre locations.

The site specific Flood Risk Assessment (WSP 2024) provides guidance to inform how potential residential development within zone 2 can be made safe, without impacting on other parts of the site or neighbouring land. It also addresses how future phases may address achieving some residential development outside of zone 1 and 2.

Conceptual Land-Use Budgets (AKU): Site capacity studies undertaken by Anthony Keown Associates in 2023/24 have assessed realistic land use capacities related to Flood Risk zones identified in the EA Flood Maps for Planning and Wiltshire SFRA and with regard to NPPG land use flood vulnerability categories. Land uses and amounts have also been informed by independent viability assessment (Bailey Venning 2023/24). See Evidence base documents.

Capacity Summary:

Allocation boundary - 12.88 ha.

Allocation / viability land use zones and capacities

● Conceptual zone for residential development (main) -	3.90 ha.
● Conceptual zone for residential development (secondary) -	0.07 ha.
<u>Sub Total (more vulnerable use)</u>	<u>3.97 ha.</u>
● Conceptual zone for commercial development -	4.74 ha.
● Conceptual zone around retained buildings -	1.96 ha.
● Conceptual zone for linear park (main) -	1.58 ha.
● Conceptual zone for linear park (secondary) -	0.30 ha.

● Conceptual zone for SuDS infrastructure -	0.31 ha.
● Water around Melksham Gate weir -	0.02 ha.
<u>Sub-total (less vulnerable/water compatible uses)</u>	<u>8.91 ha.</u>
Total	12.88 ha.

Residential capacity

Density:@49 DPH

- Houses: 94
- Apartments: 101
- Total: 195

+retained heritage buildings allowance c15

Total = c210

Site Flood Risk Areas

Flood Zone 1: 2.16 hectares

Flood Zone 2: 1.94 hectares

Flood Zone 3: 8.78 hectares

Residential land/capacity in Flood Zone 1 and 2

FLOOD ZONE 1: 2.16 hectares - @49 DPH = c107 dwellings

FLOOD ZONE 2: 1.81 hectares - @49 DPH = c88 dwellings

Conclusion

To facilitate the viable phased delivery of the mixed-use regeneration of the Cooper Tires site, the initial development of Flood Zone 1 land will enable at least c110 dwellings. Further residential development within c1.9 hectares of the site within Flood Zone 2 can enable for the development of c90 dwellings.

An average density of c49DPH across the 3.97 hectares will be compatible with the integration of sustainable drainage, flood mitigation and safe escape route measures as outlined in the site-specific Flood Risk Assessment (WSP 2024) which was provided by the site owner as evidence.

If an average density of +70 DPH is applied, which has been assumed by Wiltshire Council for the local case study allocation at Innox Mills (and JMNP2 Stage 2 site assessment), this would produce a site capacity of c280 dwellings across Flood zones 1 and 2 or c140 within just zone 1 land. Whilst, together with the former library site, such a density on just Flood Zone 1 land would nearly meet housing requirements, JMNP2 does not consider such a high density will deliver a range of housing types and sizes to meet local needs.

Conclusion

Allocation of Cooper Tires site is well-supported justified and deliverable.

Evidence gathered has demonstrated that the proposed allocation of the site for mixed use development is in general conformity with national and strategic policies. It adopts a proactive and positive approach to the site's regeneration that is well-supported by the local community and is not addressed by the emerging strategic plan.

The challenges of making an effective and deliverable allocation of this site are addressed by proportionate and robust evidence gathered in a collaboration between JMNP2, site owners and Wiltshire Council.

A cautious allocation of at least 150 dwellings within a mixed use regeneration will support initial development within flood zone 1 and 2 and potential for further residential development to support viable regeneration.

Appendix

Cooper Tires Site

Employing Wiltshire Council Sustainability Assessment Methodology

Compression Assessment

This sustainability assessment framework employs the methodology and sustainable development objectives used by Wiltshire Council in its assessment of the relative sustainability of reasonable alternative potential strategic allocation sites.

This desktop assessment is illustrative. It is not intended to supersede site assessments undertaken as part of JMNP2 sites selection process. It is intended to illustrate that, as with the local case study site at Innox Mills, Trowbridge, the Cooper Tires site also demonstrates levels of sustainable development credentials that would be likely to place it as one of the most sustainable options for site allocations at Melksham, above greenfield alternatives. This includes land south of Western Way (Site 1025) and land at Snarlton Farm (SHELAA Site 3525) which was assessed by WC as part of WLP Site 1. Both were assessed as being one of the most sustainable greenfield strategic site options at Melksham.

SHELAA Site 1025 was not considered suitable for allocation by JMNP2 in the initial sites allocation assessments due to its value as a green gap between settlements. New circumstances remove the ability of JMNP2 Policy 19 (Green Gaps and Wedges) to protect this site from development. SHELAA Site 3525 was assessed by JMNP2 as being potentially suitable, but partially within Flood Zones 2 and 3 along the route of Clackers Brook. It is also significantly larger than is needed to address JMNP2 requirements.

This illustrative assessment was undertaken by Vaughan Thompson who is a chartered town planner (MRTPI) with knowledge of the Cooper Tires site, its context and the Wiltshire Local Plan assessment process.

Cooper Tires	WILTSHIRE LOCAL PLAN SUSTAINABILITY ASSESSMENT CRITERIA
SEA Topic	Response
SA objective 1 – Protect Biodiversity and geological	

features and avoid irreversible losses	
<p>1 Avoid potential adverse impacts of development on local biodiversity & geodiversity</p>	<p>The site is previously developed land with the River Avon bordering at its eastern edge.</p> <p>The River Avon is designated as a County Wildlife Site. It is lined by trees and vegetation being of likely importance to species.</p> <p>Development should avoid removal of trees. A buffer should be provided to this feature that is appropriate in width.</p> <p>Protection, maintenance, and enhancement should be provided for habitats, trees within and along the boundaries of the site</p> <p>A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation provides connectivity to adjacent or nearby habitat areas.</p>
<p>2 Protect and enhance designated and non-designated sites, priority species and habitats and protected species?</p>	<p>Key features on this previously developed site include the River Avon bordering the site on its eastern boundary.</p> <p>The River Avon County Wildlife Site is likely to represent priority habitat while species utilising the tree and vegetation lined corridor may include bats and otter.</p> <p>Development of the site has the potential to increase recreational pressure upon identified protected species, habitats, and designated/non-designated biodiversity features in the local area and this must be assessed and mitigated accordingly. Given no protected sites lie within walking distance of the</p>

	proposed allocation, recreational pressure issues are reduced.
3 Ensure that all new developments protect Local Geological Sites from development?	There are no LGS within or in close proximity to this site.
4 Aid in the delivery of a network of multifunctional Green Infrastructure?	<ul style="list-style-type: none"> The development of the site should conserve and enhance green infrastructure and holds the potential to make suitable provision for buffers at recognised water course/green corridors.
Assessment outcome	Neutral 0
SA objective 2 - Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings Decision-Aiding Questions. Will the development site...	
1. Ensure development maximises the efficient use of land?	<p>It is considered that development of this brown-field site could deliver appropriate densities in line with local planning policy and Melksham Design Guidance (2023).</p> <p>Its central location in close proximity to public transport links, your town centre and local shopping and services, King George V Park and on-site employment create opportunity for lower levels of on-site car parking.</p>
2 Maximise the reuse of Previously Developed Land?	This 12.88 hectare site consists entirely of brownfield land. Developing this site could maximise the reuse of this land.
3 Encourage remediation of contaminated land	<p>This site consists of former industrial land used for the manufacture of rubber. There is contamination on site.</p> <p>A detailed assessment of the site and a remediation and mitigation strategy would be</p>

	required prior to any development coming forward.
4 Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?	No
5 Lead to the sterilisation of viable mineral resources?	No
6 Support the provision of sustainable waste management facilities to help reduce the amount of waste generated	There are no known reasons why sustainable waste management facilities and integrated recycling infrastructure could not be incorporated successfully into the design and layout of this site.
Assessment outcome	Moderate (significant) positive effect 2
SA objective 3 - Use and manage water resources in a sustainable manner Decision-Aiding Questions. Will the development site...	
1 Protect surface, ground and drinking water quantity/quality	This site is not covered by a Source Protection Zone, Drinking Water Protected Area, or Drinking Water Safeguard Zone. Development of this site will need to make suitable provision to protect and, where appropriate, improve local surface and groundwater quality – this includes ensuring that enough buffer zones are located adjacent to the River Avon to ensure runoff does not enter. Consideration should be given to

	Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces.
2 Adequate water supply, foul drainage, sewage treatment facilities and surface water drainage are available	<p>This site falls within the catchment area supplied by Wessex Water.</p> <p>Water supply demands may increase from development occupants. It is likely that moderate off-site infrastructure reinforcement would be required.</p> <p>The area covered by Wessex Water has been classed by the Environment Agency as 'seriously water stressed'. Steps will need to be taken to ensure the efficient use of water through the development and occupation of the site.</p> <p>With regard to foul water network capacity, it is likely that moderate off-site infrastructure reinforcement would be required.</p> <p>Replacing industrial water infrastructure may affect site viability.</p>
Assessment outcome (on balance):	Moderate (significant) adverse effect. -2
SA objective 4 - Improve air quality and reduce all sources of environmental pollution Decision-Aiding Questions. Will the development site	
1 Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration	<p>The site is centrally located close to the A350 and industrial uses at Avonside where noise impacts may arise.</p> <p>A noise impact assessment would be required.</p>
Reduce impacts on and work towards	Melksham does not have an Air Quality Management Area (AQMA). However, new development would feed into

improving and locating sensitive development away from areas likely to experience poorer air quality due to high levels of traffic and poor air dispersal	<p>existing networks of roads that go through the AQMAs of Devizes and Bradford on Avon, potentially further contributing to the elevation of emissions in Melksham and in these AQMAs.</p> <p>Steps would need to be taken to mitigate the impact of new development. If the site is allocated, CIL/S106 contributions would be required to enable the council to put in place funding to enable actions to be taken to reduce emissions. Impacts on local air quality are most likely to arise from an increase in vehicle usage on existing roads and from any new highway infrastructure needed to serve the development. However, this is a centrally located site close to many of the town centre's amenities, so the adverse effects may be less severe than greenfield sites on the periphery due to walkability to services and facilities. This site on its own is unlikely to have significant adverse effects on air quality. However, potential cumulative effects of a number of different allocations would need to be considered in terms of the context of the town and location of services for any allocations.</p> <p>A proportionate Air Quality Assessment for this site would be required.</p>
2 Lie within a consultation risk zone for a major hazard site or hazardous installation	No
Assessment outcome	Minor adverse effect. -1
SA objective 5 - Minimise our impacts on climate change (mitigation) and	

<p>reduce our vulnerability to future climate change effects (adaptation)</p> <p>Decision-Aiding Questions.</p>	
<p>1 Maximise the creation and utilisation of renewable energy opportunities, including low carbon community infrastructure such as district heating</p>	<p>Emissions from new uses should be compared with those from the former industrial processes. It is considered that fewer emissions would be produced during the construction and occupation of the site. Mitigation measures can still be applied within this objective and across the whole framework to reduce emissions. Some examples include building energy efficient buildings, generating on site renewable energy and delivering sustainable transport in line with JMNP policies 1 and 2.</p> <p>It would be possible for a development of this scale to include renewable energy generation; however, this would mainly be within buildings rather than areas of open space.</p> <p>There is no existing district heating network for this site to link into.</p> <p>To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that maximises the potential for suitable development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.</p>
<p>2 Be located within</p>	<p>c80% of the site is within flood zones 2 and 3.</p>

<p>Flood Zones 2 or 3? If so, are there alternative sites in the area within Flood Zone 1 that can be allocated in preference to developing land in Flood Zones 2 or 3?</p>	<p>The site is within an existing employment use, protected by Core Strategy Policy 35 and JMNP Policy 7.1.</p> <p>It is not considered possible for replacement employment development to be located on other sites within Flood Zone 1.</p> <p>Site analysis and an Initial Site Flood Risk Assessment has identified potential for medium risk employment and protected residential development on flood flood zone 2 land with mitigation and management measures.</p> <p>Due to being too high risk, subject to the exception test.</p> <p>Flood zone 3 land should include water compatible and low vulnerability uses. A buffer zone should be left adjacent to the River Avon with significant biodiversity enhancement and Green Infrastructure. This would result in the loss of developable land.</p> <p>Consideration should be given to sequentially planning the development of the site to ensure that the risk of flooding is alleviated.</p>
<p>3 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere</p>	<p>There is moderate to significant flood risk to the majority of the site associated with both fluvial flooding, which may be exacerbated by climate change.</p> <p>It is thought to be unlikely that development could avoid these areas and could worsen the flood risk elsewhere if surface water isn't managed sustainably.</p> <p>A detailed Flood Risk Assessment and Surface Water Drainage Strategy would be required to</p>

	identify and mitigate flood risk and to ensure flood risk isn't worsened elsewhere.
4 Promote and deliver resilient development that is capable of adapting to the predicted effects of climate change, including increasing temperatures and rainfall, through design e.g. rainwater harvesting, Sustainable Drainage Systems, permeable paving etc?	<p>Plans for developing this site should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. It is considered that any future development of this site would need to incorporate appropriate measures to adapt to the predicted future impacts of climate change. The location, layout and design of any new development should be planned through a site framework master plan, to avoid increased vulnerability to the range of impacts predicted to arise from climate change, including flood risk, water supply and changes to biodiversity and landscape.</p> <p>This site is located less than 200m from the town centre, open spaces, station and local supermarkets, which could enable active travel to the town centre and ease of access to public transport.</p> <p>Development would need to include adaptation measures such as designing to prevent overheating, heat resistant landscaping, more resilient foundations, drought resistant planting and for generally more resilient buildings and spaces (general design and robust materials). Enough land would need to be set aside for robust surface water management, to include comprehensive surface water drainage measures (including SuDS).</p>
Assessment outcome	Moderate (significant) adverse effect -2
SA objective 6 - Increase the proportion of energy generated by renewable and low	

carbon sources of energy.	
1 Support the development of renewable and low carbon sources of energy?	<p>As this is an urban regeneration site, there may be less open space available for opportunities to support energy generation from renewable and low carbon sources. There may still be opportunities for renewable energy generation on a smaller scale, for example, solar panels on roofs. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources from developers, that:</p> <ul style="list-style-type: none"> • maximises the potential for suitable development. • considers identifying suitable areas and options for renewable and low carbon energy sources; and • identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
2 Be capable of connecting to the local Grid without the need for further investment	<p>The electricity infrastructure is constrained across much of Wiltshire. The Grid Supply Points in Wiltshire, located in Minety and Melksham are both constrained. The Bulk Supply Points across Wiltshire are also constrained.</p> <p>Due to the uptake of low carbon technology, and the move towards net zero, the Climate Change Committee have estimated that energy demand could almost treble by 2050. This increased pressure on the system is something SSEN, as Distribution Systems Operator, is working on in order to manage new system capacity. Solutions may include flexible connections, renewable energy, and further investment to reinforce the current infrastructure. Early engagement with SSEN</p>

	may be required to discuss connections issues and new solutions may be required.
3 Create economic and employment opportunities in sustainable green technologies?	There may be parts of the site that could be suitable for renewable and low carbon energy sources and supporting infrastructure including the River and weir. However, it is likely that most of the site will be used for development to improve viability. With less renewable energy generation on site there are fewer possibilities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems onsite and for co-locating potential heat customers and suppliers.
4 Deliver high-quality development that maximises the use of sustainable construction materials?	Development of this site would be able to deliver a high-quality development that makes maximum use of re-purposed fabric and sustainable construction materials throughout the development.
5 Deliver energy efficient development that exceeds the minimum requirements set by Building Regulations?	New development should also consider incorporating EV charging points into site design and also into individual dwelling design, where possible. However, this will need to be factored into the increased demand the site will have on the existing infrastructure.
Assessment outcome (on balance):	Minor positive effect +1
SA objective 7 - Protect, maintain and enhance the historic environment.	
1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, the	Development at this site would have an impact on the Grade II Listed Avon House and non designated heritage asset, former canteen building. There would be a requirement to include uses for Listed Buildings and heritage assets and to respect their setting and

<p>character and appearance of Conservation Areas, Historic Parks & Gardens, sites of archaeological interest and, where appropriate, undesignated heritage assets and their settings?</p>	<p>settlement pattern, character and appearance of the town. There is a potential for enhancement.</p> <p>Brownfield site has been subject to development, archaeological remains may survive but are also likely to have been disturbed.</p> <p>Further investigation is likely needed during a planning application process to identify the presence and significance of as yet unknown archaeological remains across the site.</p> <p>Mitigation strategy could include preservation by record where relevant.</p> <p>The site is located within an industrial and extractive landscape and within a built-up area therefore there is no historic landscape sensitivity. No mitigation strategy is identified at this stage. The potential for significant adverse historic landscape effects is low.</p>
<p>2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account, where necessary, the management objectives of Conservation Areas?</p>	<p>In accordance with national policy/local policy, the development of the site for housing and employment uses could maintain and enhances the distinctiveness of settlements through high quality design. No details of any potential future development scheme or design and layout are currently known. Development of the site would have the potential to appropriately protect and enhance designated and non-designated heritage assets according to their significance. The site is not adjacent to a conservation area but is adjacent to listed buildings. It is considered that development has the potential for appropriate mitigation measures to safeguard the historic environment of the site and its immediate surroundings.</p>
<p>Assessment outcome (on balance):</p>	<p>Minor adverse effect -1</p>

<p>SA objective 8 - Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.</p>	
<p>1 Minimise impact on and, where appropriate, conserve and enhance nationally designated landscapes e.g. National Parks and AONBs and their settings?</p>	<p>Significant impacts on nationally designated landscapes from development are not anticipated.</p>
<p>2 Minimise impact on, and enhance, locally valued landscapes through high quality, inclusive design of buildings and the public realm?</p>	<p>The site is located to the immediate north-west of Melksham town centre and within c500m of the railway station.</p> <p>The site comprises a substantial area of hardstanding. The heritage assessment (Install 2023) has identified a small number of historic former factory buildings and features remaining on the the site, particularly grouped adjacent to the listed building.</p> <p>Mature trees line the bank of the River Avon linking into the countryside.</p> <p>Within the site there are mature trees within the Bath Road frontage car parking and at the south-western corner of the site.</p> <p>This is an undesignated urban landscape that is in generally poorer condition but has significant landscape value because of its contribution to the riverside or its landmark status within the factory environment.</p>

	<p>The former factory buildings and mature trees within the site and along the river corridor contribute to a local sense of place and local value</p> <p>Overall, the site is of generally low landscape sensitivity to development and generally high capacity to accommodate development.</p> <p>Potential for significant adverse effects include the following:</p> <ul style="list-style-type: none"> • Potential for new built form to be conspicuous and break the existing roofline in views from within the conservation area. • Potential for new built form to erode the industrial character of the townscape and be out of keeping, particularly considering the distinctive former factory buildings. • Potential loss of riverside tree boundaries and landmark trees that would alter the sense of place and remove vegetation links through the urban area. <p>Scope for mitigation include the following:</p> <ul style="list-style-type: none"> • Limit development heights in order to keep development within the existing roofline levels of the surrounding townscape. • Avoid development that is uncharacteristic of the industrial scale, pattern and vernacular. • Retain and manage trees as part of a mature landscape framework.
3 Protect and enhance rights of way, public open space and common land?	There is no public open space or common land within this site. There are opportunities to increase connectivity to surrounding destinations, including the town centre and train station.
Assessment outcome (on balance):	Major (significant) positive effect +3

<p>SA objective 9 - Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures</p> <p>Decision-Aiding Questions. Will the development site...</p>	
<p>1 Provide an appropriate supply of affordable housing?</p>	<p>House building rates have been lower than what was anticipated by the WCS although there have been reasonable levels of affordable housing delivery. Notwithstanding any mitigation that may be required which results in a reduced developable area, the development range for this site means that it has potential to deliver a small number of affordable homes.</p>
<p>2 Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?</p>	<p>Should this 12.88 hectare site be developed for residential and mixed uses, notwithstanding any mitigation that may be required which results in a reduced developable area, it has the potential to provide for a range of housing types and tenures addressing local needs, with potential to deliver a range of high-quality, sustainable homes.</p>
<p>Assessment outcome (on balance):</p>	<p>Minor positive effect. +1</p>
<p>SA objective 10 - Reduce poverty and deprivation and promote more inclusive communities with better services and facilities</p>	

<p>1 Maximise opportunities for affordable homes and job creation within the most deprived areas?</p>	<p>Melksham is subject to areas of deprivation, therefore while directing development towards this location could have some benefits, it is unlikely that the site would result in maximising opportunities to direct affordable homes and jobs towards the most deprived areas.</p> <p>The site could deliver c300 homes and could lead to new affordable house types and tenures.</p> <p>There would be benefits for the Melksham area through housing provision, short-term construction jobs and a larger workforce for local businesses.</p>
<p>2 Be accessible to educational, health, amenity greenspace, community and town centre facilities which are able to cope with the additional demand?</p>	<p>The site adjoins Melksham town centre and benefits from access to services, facilities and public transport connections in the area. The River Avon presents an opportunity for onsite amenity greenspace.</p> <p>Housing development at this site would be expected to provide proportionate support for education.</p> <p>Early years places could be supported through the expansion of existing local provision, primary places could be provided through the expansion existing schools or through the creation of additional places at the new school on Ashton Park. Financial contributions would be required to supply new secondary school places off-site.</p> <p>To increase capacity in existing or new facilities financial contributions would be required.</p> <p>There is a possibility that the residential development of the site will adversely affect the delivery of health services. Financial contributions are to be sought through development to ensure new residents</p>

	have access to healthcare facilities, resulting in negative impacts on health provision.
3 Promote/create public spaces and community facilities that support public health, civic, cultural, recreational and community functions?	The site is bounded by the existing community on Scotland Road, the A350 and "The City", along Bath Road. Any new facilities, homes and sustainable transport connections in this area would serve Melksham predominately. The site would make no contribution to the reduction of rural social isolation.
Assessment outcome (on balance):	Moderate (significant) positive effect +2
SA objective 11 - Reduce the need to travel and promote more sustainable transport choices.	
1 Promote mixed-use developments, in accessible locations, that reduce the need to travel and reduce reliance on the private car	<p>The site is located in a highly sustainable location, with all necessary infrastructure and service demands within the preferred maximum walking distance.</p> <p>However, traffic congestion on A350 and in the town centre is an existing issue (prior to delivery of proposed Melksham by-pass). The capability of local infrastructure to accommodate additional all mode movements should be addressed directly by any scheme brought forward.</p> <p>In conformity with Development Plan policy, development should optimise the number of diverse jobs within the employment element of the scheme, but potentially within a mixed use master planned approach that includes residential development where appropriate.</p> <p>The second aim of the development should seek to maximise connectivity with the town centre and other employment centres in a sustainable way and thereafter accommodate any local highway capacity concerns by mode.</p>

	<p>Local Constraints</p> <p>Local pedestrian and cycling connections to the site are fair, but there is capacity within the highway network and the sites for their significant improvement connected to enhancements prioritised for the town centre.</p> <p>Whilst Cooper Tires has previously generated significant employee and servicing movements, the mix of employment, commercial and residential units can present conflicts. The planning of employment units needs to be directly considered against the potential servicing implications and impacts upon adjacent existing and any planned new residential development. Such consideration will include direct servicing provision, impact upon commercial and residential parking, the design of streets and the potential need to apply Traffic Regulation Orders to control local on-street parking within the development.</p>
2 Provide suitable access and not significantly exacerbate issues of local transport capacity?	Development can provide access points to Bath Road and Scotland Road. The quantum and mix will be supported by a transport assessment.
3. Make efficient use of existing transport infrastructure and promote investment in sustainable transport options, including Active Travel?	The site is well-connected to existing highway, public and pedestrian transport infrastructure within easy and level (5 mins) walk of all parts of the site. It provides a strong incentive to minimise the use of cars for local trips to the town centre and convenience shopping and for leisure.
Assessment outcome (on balance):	Minor positive effect 1
SA objective 12 - Encourage a vibrant and diversified	

economy and provide for long-term sustainable economic growth.	
Support the vitality and viability of town centres (proximity to town centres, built up areas, station hub)?	The 12.88 hectare site adjoins the town centre and is within 400m of Melksham Station. The site is within a built-up area and is in close proximity to Avonside Enterprise Park Principal Employment Area. The site would therefore be able to make an excellent contribution towards supporting the regeneration of the town centre, town centre vitality and associated facilities.
Provide a variety of employment land to meet all needs, including those for higher skilled employment uses that are (or can be made) easily accessible by sustainable transport including active travel?	The 12.88 hectare site is now un-used in the built-up area of Melksham. Through regeneration it would be likely to support an element of mixed-use development, Including regenerated employment to meet local and regional needs and demands to compliment Melksham's employment land offer at Bowerhill and through allocation of 5 hectares of employment land east of Melksham. Access to the railway line and A350 suggests this site may be attractive for higher skilled employment and could help to provide different types of employment land to meet a range of needs.
3. Contribute to the provision of infrastructure that will help to promote economic growth, including opportunities to maximise the generation and use of renewable energy and low-carbon sources of energy?	The site benefits from excellent access to the train line and existing transport network. Master plan led development including new linking routes could help improve connectivity around the site and to the train station. New employment and other uses at this site could support the viability of enhanced rail services or increased frequencies. To help to increase the use and supply of renewable and low carbon energy and heat from this site, there will need to be a positive strategy for energy from these sources that maximises the potential for suitable

	development, considers identifying suitable areas for renewable and low carbon energy sources and identifies opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.
4 Promote a balance between residential and employment development to help reduce travel to work distances?	The existing site is wholly within employment use, but is not a Principal Employment site, close to existing commercial uses, the town centre and public spaces. A residential, employment or mixed-use development at this site could be complementary to Melksham town centre, significantly reducing the need to travel for employees and residents of the site.
Assessment outcome (on balance):	Major (significant) positive effect. +3
Assessment Total	

MEL 01 and TC4. Former Library and Lowbourn House

The Site

The 0.65 hectare promoted site is owned by Wiltshire Council. It is promoted for the development of c50 affordable extra-care dwellings for qualifying older people. The library and car park were declared surplus to requirements by Wiltshire Council. The site is being actively progressed by Wiltshire Council which intends to manage the accommodation. It has declared all public uses on the site surplus to requirements.

The site includes;

- The former Melksham Library formerly a community facility protected by Core Strategy Policy 49 and JMNP1 Policy 15.
- Lowbourn House, a mid 20th century former office (in short term class E use). Employment uses are protected by Core policy 35 and JMNP1 Policy 10.
- A neighbouring vacant take-away restaurant (class E), protected by JMNP1 Policy 9 (Town Centre).
- A 66 space public car park that predominantly served the library.
- The site is within Melksham Town Centre, Melksham Conservation Area and contains protected trees.

Availability

Wiltshire Council is owner of the whole proposed allocation site.

It has promoted the site specifically for the development of 100% affordable extra care housing to be managed by the authority. Ongoing dialogue (3 May 2024) confirms the site is still available for allocation and plans for its development are being progressed.

Site Assessment

Stage 1 and 2 site assessment of the site found the site to be potentially suitable but identified constraints and policy challenges.

'The site is previously developed land located in the town centre of Melksham, well located for key services.

The site includes a former library, Lowbourn House, which is currently in employment use and associated surface car parking. A new library is provided as part of the Melksham Community Campus located in Melksham Town Centre. The loss of community facilities and potential loss of employment space should be justified in relation to the range of criteria set out in Core Policy 35 and 59 of the adopted Wiltshire Core

Strategy and Policy 15 of the Joint Melksham Neighbourhood Plan. Core Policy 36 of the adopted Wiltshire Core Strategy supports the regeneration of brownfield sites in Melksham

where the proposed uses help deliver the overall strategy for that settlement and/or enhance the vitality and viability of the town centre by introducing a range of active uses that complement the existing town centre.

The site has limited environmental constraints and has existing access to support the proposed development. The site includes a Sycamore tree protected under the Tree Preservation Order which should be retained.

The site is located within the Conservation Area and in close proximity to a significant number of designated heritage assets. Further heritage assessment would be required to understand the potential impacts of development and identify appropriate mitigation. The redevelopment of brownfield sites in the Town Centre is generally supported by Policy 9 Town Centre of the Joint Melksham Neighbourhood Plan and Core Policy 36 of the adopted Wiltshire Core Strategy.

The site is promoted by the landowner and available for development, however, its development timeframe may be impacted by the lease at Lowbourne House.” No significant issues were raised.

Stage 3-5 Assessment

Stage 3 dialogue with Wiltshire Council (and responses to Reg 14(A) consultation did not object to its proposed allocation.

Stage 4 consideration by Steering Group had regard to further technical evidence provided by the site promoter, capacity, land-use. Wiltshire Council provided initial sketch capacity assessments that give early indication that the site is capable of accommodating c50 extra-care apartments, aligning with baseline capacity estimates by the Stage 2 assessment.

Stage 5 dialogue with the landowner’s agent re-confirmed the site’s availability, updated on its future sale and informally agreed a reasonable and deliverable ambient density of c50-60DPH upon which to calculate residential capacity. Wiltshire Council, confirmed in an email dated 2 May 2024, that it was assembling its team to progress a scheme design.

Key JMNP2 Objectives

- Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
- Protecting and enhancing the vitality of Melksham town centre.
- Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.
- Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.
- Encouraging cycling and walking and journeys by rail and bus to reduce the need to travel by car.

- Planning for new development that addresses the impact of climate change.

Policy Context

NPPF

Brownfield Land; As above

NPPF Paragraph 66 (b) directs planning policies to provide housing to meet community needs including “specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly.)

It is recognised that such housing should be provided in the most sustainable locations to maximise the quality of life for older residents and minimise the need for car journeys by residents and staff.

Wiltshire Core Strategy

Wiltshire Core Policy 49 seeks to protect existing community facilities and community facilities uses on a site. Melksham has a new Community Campus facility which provides enhanced and increased library, sports, swimming and civic facilities with a high quality public car park close to the town centre and in close proximity to the Assembly Hall and Town Hall. This provides a much enhanced and highly accessible multi-functional consolidation of community facilities for the town.

The associated public car park is protected by Core Strategy Policy 64. Its use has been assessed by a 2024 Melksham Town Centre Car Parking Study (AECOM) It has a very low level of use, set within the context of an overall surplus of car parking within the town centre. Its loss will not lead to a shortage of public parking.

Lowbourne House occupies part of the rear of the site. The employment uses it hosts will be lost with redevelopment of the site, contrary to JMNP policy. However, this should be balanced with long-term employment that will be generated by the proposed extra-care facility. JMNP2 is also proposing the enabling of regenerated employment floorspace at the Cooper Tires site alongside Wiltshire Council’s ongoing protection of Avonside Enterprise Park as a Principal Employment Site.

The former restaurant use is vacant. It is located at the periphery of the town centre and outside of the Primary Shopping Area. NPPF Para 90(f) recognises “that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”

JMNP2

JMNP1 Policy 6 supports residential development that meets the needs of an increasing population of older and disabled people and proposals for age restricted housing, extra-care

communities and nursing homes ... only in the most sustainable locations, closely linked to local services and public transport.

Whilst recognising that loss of community, employment and car parking on the site conflicts with other adopted Development Plan policies, evidence identifies that the greater benefits in enabling the development that meets specific identified need for increased specialist residential accommodation on this highly sustainable and accessible site. In addition, alternative and improved community facilities are already provided, car parking is recorded as not being an efficient use of the site and alternative space for employment is available and promoted within and adjacent to the town centre.

Key Policies

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

Policy 5: Pre-application Community Engagement

Policy 6: Housing in Defined Settlements

Policy 7.1: Land at Cooper Tires

Policy 7.2: Land at the Former Melksham Library Site

Policy 7.3: Land at Whitley Farm, Whitley

Policy 7.4: Land at Middle Farm Plot A

Policy 7.5: Land at Middle Farm Plot B

Policy 8: Infrastructure Phasing and Priorities

Policy 9: Town Centre

Policy 10: Employment Sites

Policy 11: Sustainable Transport and Active Travel

Policy 12: Green Infrastructure

Policy 13: Biodiversity

Policy 14: Open Spaces

Policy 15: Community Facilities

Policy 16: Local Green Spaces

Policy 17: Trees and Hedgerows

Policy 18: Landscape Character

Policy 19: Green Wedges

Policy 20: Locally Distinctive, High Quality Design

Policy 21: Local Heritage

Justification

Meeting Specialist Local Housing Needs in the Most Sustainable Location

JMNP2 Housing Needs Assessment (2022) found the existing stock of specialist older persons housing in Melksham & Melksham Without consists entirely of retirement housing, with no provision for extra-care. The proportion of those aged 75+ in the local population is projected to rise from 8.6% to 14.5% by the end of the plan period, an increase of 1768 people in the JMNP2 area. It estimates a future need in Melksham & Melksham Without for a range of 444 to 616 specialist accommodation units during the Plan period.

Sustainable Development of Brownfield Land

See Cooper Tires above.

The site combines vacated buildings and underused parking and office facilities. Issues of loss of community facilities are addressed below.

Stage 2 assessment acknowledges the site is extremely sustainably located in its relationship to town centre retail, service, leisure and public transport facilities.

Protecting or Enhancing the Conservation Area

The existing vacant buildings do not contribute positively to the character of the conservation area or adjacent heritage assets. Regeneration of the site to an appropriate scale and design can enhance the character and setting for heritage assets.

Capacity studies indicate c50 dwellings may be capable of providing this.

Evidence

Capacity

The allocation for 50 extra-care dwellings is based upon capacity and scheme concepts provided by Wiltshire Council that illustrate that such capacity can be achieved within a three storey development. This scale of development is compatible with the ambient scale of this part of the Conservation area. The layout indicates that protected trees will not be

impacted. However, final capacity will be resolved through assessment of detailed design, which is enabled through flexibility within the allocation.

Effectiveness and Deliverability

Site Capacity

Stage 2 Site assessment estimated the site to have a capacity for c 45 dwellings, at c70 DPH. Wiltshire Council is actively progressing the promoted development and provided early concepts and information to demonstrate its deliverable capacity for c50 extra-care dwellings and intended programme.

Viability

The draft allocation has been subject to an initial viability check (Bailey Venning 2024). Whilst Wiltshire Council is proposing to deliver a 100% affordable housing scheme, viability assessment of the allocation suggests that a more flexible approach will secure long term viability of the extra-care development. This is reflected in the allocation and does not prejudice Wiltshire Council's intention

Flood Risk

The site is not within Flood Risk Zone 2 or 3. However there is a risk of flooding of Lowbourn adjacent to Clackers Brook. This will not affect the site delivery. However, alternative emergency exit may be achieved via Union Street Car Park, which is owned by Wiltshire Council.

Conclusion

Evidence has demonstrated that this brownfield site no longer serves its former purposes and is assembled by a single public sector land owner to provide specialist housing that is forecast to be in greater need in a highly sustainable location, which is compatible with Melksham town centre. The loss of community facilities is more than addressed by the new campus facility. There is an oversupply of car parking and lost employment space is being replaced by new employment within the site and through the allocation of housing.

The site is shown to be capable of accommodating c50 extra-care dwellings in a form of development that is likely to be compatible with its conservation area setting.

Wiltshire Council, the site owner and intended development manager, is actively progressing the scheme establishing its likely deliverability.

Land South of Western Way (Site 1025)

The Site

The 12.2 hectare greenfield site is located south of Western Way, east of the A350 and west of new residential development and proposed primary school at Pathfinder Way, and is available for allocation. Outline planning consent for 210 dwellings and a 70 bed care home was granted on appeal in November 2023. Wiltshire Council area also in the early planning stages for a strategic central depot on the former golf course land and temporary highway depot to the south of the site.

The outline consent reserves all matters other than the use and access, although layout, height, landscape and access plans are included within approached plans. The consent establishes the principle of housing development on the site (within the conditions of the permission) and is a significant change in circumstances which JMNP2 should have regard to.

Assessment of the site was not identified as suitable, JMNP2 has taken a positive and flexible approach by promoting its allocation, recognising the likelihood of its future development, but seeking to inform the detailed planning process. Allocation also provides a greater level of confidence that JMNP2 can meet housing requirements, thus reducing pressure on Cooper Tires regeneration and removing the quantitative need to consider other greenfield less favourable sites.

New Circumstance- Outline Planning Consent

Matters Fixed

- Site Location Plan
- Access strategy
- Access parameters plan
- Land use parameters plan
- Scale parameters plan
- Density parameters
- Landscape parameters plan

21 Conditions

The scheme is also to provide a new footway and Toucan crossing of Western Way.

Detailed Reserved Matters for Future Application

- Scale of development
- Layout of development
- External Appearance
- Landscape
- Details of access roads and footpaths

All reserved matters must be submitted for approval within three years of November 2023 and development completed within two years of the final detailed approval.

Availability

The site was promoted for allocation through the Local Plan SHeLAA and then JMNP2 Call for Sites. Engagement with site promoters in April 2024, re-confirmed the availability of the site for allocation, subject to alignment with outline consent parameters.

Site Assessment

Stage 1 Assessment

The site is greenfield located between Melksham and Bowerhill. It is adjacent to residential development at Site 267 and 266 currently under construction. Development of the site would erode the last remaining buffer between Melksham and Bowerhill, and significantly increase the risk of coalescence of Berryfield and Bowerhill, contrary to Policy 16 of the Joint Melksham Neighbourhood Plan. The site falls under the recommended Green Wedge between Berryfield, Bowerhill and Melksham (Location 7) of the JMNP Green Gap and Green Wedge Assessment 2023.

Other key constraints identified relate to the potential loss of the Best and Most Versatile Agricultural Land. The site is adjacent to an employment area to the south which may have implications in relation to access, noise, odour and air pollution.

The site was considered Not Suitable and did not progress to further assessment.

NB Assessment was undertaken prior to appeal decision, granting outline consent for development of the site for 210 dwellings and 70 bed care home. “

Draft Local Plan Sites Assessment.

Due to the stage 1 assessment outcome and proposed designation of the site within a Green Wedge, JMNP2 sites assessment process did not consider it further. However, due to the appeal decision, it will not be possible for JMNP2 to make this designation. The primary reason for the Stage 1 site assessment outcome has been superseded by these new circumstances.

Site Number and SHeLAA ref(s): Site 9 (SHeLAA site 1025)

Site name: Land south of Western Way

Site size: 10.22ha Site capacity: approximate range 255 - 358 dwellings

Site description: A small site located to the south of Melksham. The site is greenfield and in agricultural use. The site boundaries extend north to Western Way, east to land with an approved planning application 16/01123/OUT for 235 dwellings, south to Bowerhill

Industrial Estate and west to a narrow strip of land adjacent to the A350. Footpath MELW42 runs along part of the western site boundary.

The Wiltshire Council Sustainability Appraisal process conducted on all reasonable alternative sites found Site 1025 / Site 9 Land South of Western Way, to be the most sustainable alternative site relative to others tested. However, it was not progressed to allocation by WLP due to the lodged planning application.

Whilst JMNP2 sites assessment of the site has not been reviewed, it can be seen that the parallel strategic site assessment process undertaken by Wiltshire Council found the site suitable.

Objective

Response to New Circumstances

The consent removes the ability of JMNP2 to designate the land as a protected green wedge. It establishes the principle and amount of residential development and associated contributions and parameters. Development is not within any strategy for housing growth at Melksham (WLP did not allocate it due to planning application),

Development is required to be delivered within the JMNP2 period by conditions of the consent. It is likely to take three years to complete (ref to engagement with owner's agent).

Matters of detail remain to be resolved including the detailed layout. This includes the precise types and mix of housing.

Allocation plans positively and recognises the principle established by the consent for development. It seeks to regularise and take account of its housing delivery numbers up to 2038 as contribution to meeting local housing requirements set by Wiltshire Council.

Reinforcing Development Parameters

Appeal decision PL/2022/08504 consented development with 21 planning conditions that should govern the content, form, further application process, timescale for delivery and construction management of the development. Allocation seeks to recognise and reinforce the requirements within the development plan.

Addressing Detailed Matters

Detailed matters for further approval are identified by the appeal decision. The allocation seeks to proactively apply JMNP2 objectives and policies in site specifically and through engagement with the community to provide greater levels of clarity to future developers and certainty to existing and future neighbouring residents and employers and optimise how the detailed mix, layout, connectivity and appearance of the scheme will optimise community well-being and minimise harm.

Key JMNP2 Objectives

- Planning for new development that addresses the impact of climate change.
- Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
- Promoting the delivery of infrastructure to address the needs of the population.
- Supporting improved transport infrastructure for the increasing Neighbourhood Plan Area population.
- Encouraging cycling and walking and journeys by rail and bus to reduce the need to travel by car.
- Protecting, connecting and increasing our network of green spaces.
- Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.
- A locally distinctive and high quality built and natural environment through:
- Conserving and enhancing the quality of the natural landscape.
- Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.

Policy Context

Wiltshire Core Strategy

Outline planning consent **PL/2022/08504** was granted on appeal in November 2023. The development is not in conformity with the adopted Core Policy 1 or the 15, the spatial strategy for Melksham. The site was granted consent (uncontested) as a result of Wiltshire Council being unable to demonstrate a five year supply of developable land and failing the requirements of the previous NPPF (Paragraph 11; tilted balance).

Wiltshire Council Local Plan does not propose allocation of the site, nor does it account for the permission in reduction of the residual housing requirement and associated strategic and JMNP2 requirement.

JMNP2

In principle development of this site, which is outside of the settlement boundary and part of the countryside, is contrary to Policy 6: Housing in Defined Settlements. Whilst allocation would not alter the settlement boundary, it would regularise the site in principle and enable its detailed matters to be addressed by JMNP2 within a positive plan led approach.

Key JMNP2 Policies

Policy 1: Sustainable Design and Construction

Policy 4: Ultra Low Emission Vehicle Charging

Policy 5: Pre-application Community Engagement

Policy 6: Housing in Defined Settlements

Policy 7.6 Land South of Western Way

Policy 8: Infrastructure Phasing and Priorities

Policy 11: Sustainable Transport and Active Travel

Policy 12: Green Infrastructure

Policy 13: Biodiversity

Policy 14: Open Spaces

Policy 15: Community Facilities

Policy 17: Trees and Hedgerows

Policy 18: Landscape Character

Policy 20: Locally Distinctive, High Quality Design

Justification

Engagement

Land owner engagement has been undertaken in April 2024 to confirm the ongoing availability of the site for allocation.

Wiltshire Council has confirmed that allocation of Land South of Western Way by JMNP2 is reasonable and meets basic conditions. Case studies within Wiltshire have established precedents that allocation of sites with outline consent are sound (Calne Neighbourhood Plan 2016 - 2026).

Previous Regulation 14A consultation on JMNP2 did not address the new circumstances of the appeal decision. Members of the community supported designation of *the site as a Green Wedge*.

Community feedback to follow from Re14B community consultation. See consultation statement.

Effectiveness and Deliverability

Owner engagement has confirmed the intention to progress detailed reserved matters planning applications and the ongoing availability of the site.

The site is greenfield and assessed to be a reasonable alternative by Wiltshire Council's Reg19 Draft Local Plan sites assessment evidence base.

Access to the site and high level capacity and landscape parameters have been established through the outline planning application process.

Conclusion

The site was previously proposed as a Green Wedge (JMNP2 Policy 19). Appeal decision on outline application PL/2022/08504 removes this ability and establishes the principle for residential development of the site for 210 dwellings and a 70 bed care home. Important matters of detail remain to be resolved.

Allocation seeks to regularise and take account of the delivery of the housing inside the JMNP2 period and proactively guide the quality of the detailed scheme to optimise its conformity with JMNP2 objectives and policies.

The approach has been found reasonable and sound by previous Made NDPs and will contribute to sustainable development.

Shaw and Whitley

Land at Whitley Farm

The Site

The approximately 1.2 hectare site is located within the south western area of the village of Whitley. Whitley Farm is located to the south of First Lane and lies adjacent to Plane Tree Close.

There are three Listed Buildings within the locality of the site; a Grade II listed mounting block to the right of the farm entrance, the Tithe Barn (Grade II) and Whitley Farmhouse (Grade II). The site is not the subject of any landscape designations that would result in additional constraints to development proposals, and the site is located outside of a flood zone.

It is currently under-used for agricultural purposes, and comprises a cluster of agricultural buildings and a significant area of hardstanding. Modern agricultural buildings are in poor repair, which have varying heights rising to a maximum of circa 3.5m to the tallest ridge.

Vehicle access is provided along the north western boundary of the site from First Lane, and there is ad hoc parking surrounding the agricultural buildings. There is a significant amount of extraneous agricultural deadstock and material dispersed throughout the site. The site is traversed by an access road which runs from the north to southern boundary of the site.

The farm is set within its rural landscape, including the rural gap between Shaw and Whitley. Farm structures, unused equipment and detritus have spread into the rural edge of the site and damaged hedges and walls.

In terms of the surrounding area, adjacent to the northern boundary of the site is residential development on First Lane, Plane Tree Close and Springfield Gardens. The majority of these dwellings are single storey or dormer bungalows, and there are no windows overlooking the site directly. The site is within close proximity a number of village amenities, including Pear Tree Inn and Daisy Chain pre-school.

Availability

Whitley Farm (the site) remains available, and the owner is supportive of an allocation of the site in the Joint Melksham Neighbourhood Plan 2 (JMNP2).

Assessment

Stage 1 and 2 Assessment

“The site is potentially suitable for allocation for residential development.

The site predominantly consists of modern agricultural outbuildings and three Grade II listed structures including Whitley Farm (proposed for conversion) and Whitley Farmhouse

(proposed for conservation). It is adjacent to the built up area and settlement boundary of Whitley and is in close proximity to local services along First Lane.

The submitted information notes that the deteriorating farm complex is no longer required for agricultural use as the current road layout is unsuitable for accommodating agricultural machinery and the condition or layout of the buildings is no longer appropriate for modern agricultural requirements.

There are three Grade II listed buildings or structures within the locality of the site. Residential development of the site has the potential to enhance the setting of the existing heritage assets and better reveal significance through high quality design and demolition of the modern agricultural buildings, subject to further consultation with Historic England and the Wiltshire Council's heritage officers, as well as heritage assessment. The adaptive reuse of disused agricultural buildings also helps bring heritage assets into productive use.

The site currently plays a supporting role in the rural transition of Whitley to the open countryside and has some indivisibility with the wider landscape area. However, owing to the scale of the existing agricultural outbuildings and built structures, the change introduced by its redevelopment and conversion of the site would be limited and could be further mitigated through sensitive design and the introduction of an appropriate landscape buffer. This should take into account views to and from the

Public Rights of Way along the southern edge of the site and retain and enhance existing semi-mature trees on site. Development of the site provides an opportunity to help soften the settlement edge.

Other key constraints identified include the potential loss of Grade 3 Agricultural Land and surface water flood risk which would need to be further investigated and/or mitigated."

JMNP1 Allocation Process

Whitley Farm was promoted for allocation to enable the development of c22 dwellings across the existing farmyard. Engagement with Wiltshire Council and Historic England and an independent heritage assessment undertaken by JMNP2 concluded this was harmful over development. The allocation could not be made.

Engagement

Landowner and Wiltshire Council (Heritage)

Landowner discussions continued with Wiltshire Council officers through 2021. In light of those comments:

- Redesign the scheme to reflect a courtyard layout – it was considered that the proposal needed to adopt a more sympathetic approach to the significance of the

listed buildings on site, as well as the layout and historic use of the complex as a whole.

- Minimise the extent of the layout by reducing the amount that it protrudes to the south west, and to consider the transition between the site and the wider agricultural land.

A revised and reduced pre-app scheme was submitted to Wiltshire Council in November 2020, seeking feedback on the acceptability of the layout of the proposals and design concepts.

Regard was given to the guidance in the Farmstead Assessment, the design approach sought to reflect the conversion of a historic farm yard. The dwellings could, in principle, reflect and respond to the rural character of the existing heritage farm buildings, but also include elements of materials found in modern agricultural buildings. A variety of building heights and scales would enable a response that is considered entirely appropriate for the site's edge of settlement location.

Following initial discussions it was agreed that a minimum of 10 dwellings can be delivered on the site. A further illustrative concept scheme for 21 dwelling (18 new build and 3 through conversion) was assessed by WC. Pre-application response dated 1 Feb 2021 confirmed *'the scheme now shown does include a more typical farmyard layout with a multi yard approach, varying building heights and mixture of retention of historic buildings with new build 'conversions' of traditional farm buildings and more modern farm buildings in terms of style. This mix has the potential to result in an acceptable scheme with more detailed development of the plans.'* However, it was stressed this was restricted to the design and that the principle of residential development of the farm site was not addressed or agreed. Minutes of pre-application discussions consider that allocation by JMNP2 could enable the change of use.

JMNP2 – Wiltshire Council

JMNP2 has progressed consideration of this site in discussion with Wiltshire Council. However, representations made by WC to the draft allocation within JMNP2 during the initial Reg14A consultation in Autumn 2023, raised an in principle objection to its allocation for residential development.

'Conservation/Heritage (summary) Conclusion:

In our opinion the draft plan fails to demonstrate that a housing allocation (which necessarily commits the LPA to a specific quantum and type of development) on this site will be compatible with the statutory duties placed on the Council under Sections 16 and 66 of the Planning (Listed buildings and Conservation Areas) Act 1990 or with the aspirations set out in the Council's own policies set out in the Core Strategy and, in due course, the Local Plan. Officers object to the inclusion of this policy.'

Key Objectives

- Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
- Protecting settlements' rural setting and countryside gaps between Melksham, Bowerhill and surrounding villages.
- The retention, regeneration and intensified use of previously developed employment land.
- Conserving and enhancing the quality of the natural landscape.
- Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.
- Promoting the delivery of infrastructure to address the needs of the population.
- Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.

Policy Context

JMNP2

In principle development of this site, which is outside of the settlement boundary and part of the countryside, is contrary to Policy 6: Housing in Defined Settlements. However, delivery of the site as an allocation enables local housing need to be addressed and a number of JMNP2 objectives to be achieved.

Key JMNP2 Policies

Policy 1: Sustainable Design and Construction

Policy 4: Ultra Low Emission Vehicle Charging

Policy 5: Pre-application Community Engagement

Policy 6: Housing in Defined Settlements

Policy 7.3: Land at Whitley Farm, Whitley

Policy 8: Infrastructure Phasing and Priorities

Policy 11: Sustainable Transport and Active Travel

Policy 12: Green Infrastructure

Policy 13: Biodiversity

Policy 15: Community Facilities

Policy 17: Trees and Hedgerows

Policy 18: Landscape Character

Policy 20: Locally Distinctive, High Quality Design

Wiltshire Council Core Strategy

Core Policy 1 recognises Whitley, together with neighbouring Shaw, as a Large Village.

Core Policy 48 deals with development proposals outside the limits of development of Large Villages and supporting rural life, which reads:

“Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where it satisfies the following criteria:

The building(s) is / are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building;

and

ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas; and

iii. The building can be served by adequate access and infrastructure; and

iv. The site has reasonable access to local services or

v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding”

In terms of use the Policy offers some flexibility to the strict application of the above, noting that *“Where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria.”*

Core Policy 57 requires development proposals to be carefully planned to ensure valuable features and characteristics are protected and enhanced. Applications for new development will be expected to make a positive contribution to the character of Wiltshire through, for example, being sympathetic to and conserving historic buildings and historic landscapes and making efficient use of land.

Core Policy 58 relates to ensuring the conservation of the historic environment. It states that the designation of a listed building does not preclude the possibility of new development and the council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern living aspirations.

Wiltshire Local Plan

WLP identifies a housing requirement for a further c50 dwellings to be planned for at Shaw and Whitley.

Justification

The site is in poor condition. It is under used, if not completely unused. It adversely impacts on the setting of the village and does not contribute positively to the on-site listed buildings. It is not efficiently used. It has potential to contribute to meeting local housing needs.

The allocation seeks to enable the replacement of a number of existing farm buildings at Whitley Farm, Whitley, with the erection of dwellings that will contribute to meeting local housing needs and enhance the setting of the listed buildings and surrounding countryside setting. The allocation also seeks to enable the potential sensitive conversion of the Grade II Listed Tithe Barn

The proposed allocation of c15 dwellings has been informed by conceptual designs provided by the site promoter. These have been the subject of pre-application consultation with Wiltshire Council with regard to Heritage England's Farmstead Assessment and initial Heritage Statement of the significance of heritage buildings at Whitley Farm.

Effectiveness and Deliverability

The site has been subject of an independent viability assessment that concludes that the amount of development is viably capable of delivering allocation parameters and contributions. The owner is actively progressing proposals to secure its development

Conclusion

The allocation of the site provides a deliverable and sustainable basis upon which to contribute to meeting local housing requirements and protect and enhance the character of Whitley and the setting of the farm listed buildings and rural setting.

Concerns raised in relation to potential excessive development and harm to the listed buildings have been addressed through a reduced development area and conceptual designs that respond to heritage assessments provided by the owner and undertaken as part of JMNP1 site assessments. This has been accepted by Wiltshire Council Heritage Service via pre-application advice.

Land at Middle Farm, Whitley

The Site

The 3 hectare site is formed from 1.6 ha of land previously allocated for residential development in the first JMNP and a further 1.5 ha immediately to its east. The site is currently greenfield in agricultural use outside of, but adjacent to the settlement boundary.

Availability

The owner has re-confirmed the availability of the revised site.

Initial pre-application engagement with Melksham Without Parish Council commenced in June 2024, demonstrating the progress towards delivery of development

Assessment

Stage 1 and 2 assessments were carried out for

Land at Middle Farm, Whitley two separate sites;

- Plot A (SHELAA Site 3148). 1.6 ha Land already allocated by JMNP1
The site is suitable for allocation of residential development. The site is allocated for residential development in the made Joint Melksham Neighbourhood Plan 2020-2026 for approximately 18 dwellings (Policy 7), which establishes the principle of residential development at this location. The site has been confirmed as available in October 2022 and a planning application is currently being prepared. No more recent or additional information available changes the suitability, availability and achievability of the site.

- Plot B (MEL 07). Land at Middle Farm to the rear of Plot B

The site is unsuitable for allocation for residential development. The site is a greenfield outside but adjacent to the defined settlement boundary of Whitley. It is currently removed from the built up area but adjacent to Site 3148 allocated for residential development in the made Joint Melksham Neighbourhood Plan. The site strongly relates to the rural character of Whitley. Development of the site would constitute a substantial expansion of Whitley to the open countryside disproportionate to its scale, settlement function and service levels.

The site plays a critical role in providing a rural setting to Whitley to the east as a buffer between the settlement and the electricity substation. Its change of use would be contrary to the Management Strategy for this Landscape Character Area, which seeks to maintain and conserve the peaceful rural nature of the area with the villages set in their surroundings of arable and pastoral farmland. This change is likely to

have a direct adverse impact on the openness, tranquillity and visual amenity of the rural transition experienced by users of the Public Rights of Way across the northern boundary of the site.

The site is not currently connected to the adopted Highways Network although potential vehicular, pedestrian and cycle access could be created through Site 3148 in the same land ownership.

Other key constraints identified include potential impacts on the indicative Green Infrastructure Corridor, loss of Grade 3 Agricultural Land, potential impacts on designated heritage assets and proximity to the electricity substation

Stage 3-5 Assessment

Continuation of the pre-existing site allocation was agreed.

The Stage 3-5 assessment considered all potentially suitable sites with regard to existing and proposed land designations and following closer analysis of each site capacity and context.

Sites were excluded where they were within or adversely impacted on the proposed Green Wedges that;

- (a) protected Shaw from coalescence with Melksham and
- (b) protect the distinctiveness and gap between Shaw and Whitley

They were also not taken forward where it was judged that they were poorly related to the existing settlements, requiring significant new highway connections or caused visual impact upon the rural setting of the villages.

A record of these assessments are available below.

As a result of stage 3 assessments there was insufficient suitable site capacity to meet housing requirements for the large village. The Working Group revisited sites found to be unsuitable at Stage 1 that had the capacity to contribute to meeting housing needs efficiently and with potential for mitigation.

Following this process, linked sites at Middle Farm were proposed. The initial proposed allocation of Plot B for c40 dwellings allocated the entire 5 hectare plot, with requirements for significant landscape buffering and a public open space. The developable area of c3 hectares enabled a low density development.

Following the review of Reg14A representations, further consideration of sites was undertaken to resolve a positive response and justified sound allocation at Whitley or Shaw.

Key Objectives

- Planning for new development that addresses the impact of climate change.

- Supporting sustainable development of new housing and associated facilities within settlements, and adjacent to settlements.
- Conserving and enhancing the quality of the natural landscape.
- Protecting settlements' rural setting and countryside gaps between Melksham, Bowerhill and surrounding villages.
- Ensuring that new development is sympathetic to our built heritage and the character of the area, with high standards of design.
- Promoting opportunities for people to lead healthier lifestyles with a greater sense of well-being.
- Promoting the delivery of infrastructure to address the needs of the population.
- Encouraging cycling and walking and journeys by rail and bus to reduce the need to travel by car.
- Protecting, connecting and increasing our network of green spaces.

Key Policy Context

Policy 1: Sustainable Design and Construction

Policy 3: Flood Risk and Natural Flood Management

Policy 6: Housing in Defined Settlements

Policy 7.4: Land at Middle Farm Plot A

Policy 7.5: Land at Middle Farm Plot B

Policy 12: Green Infrastructure

Policy 17: Trees and Hedgerows

Policy 18: Landscape Character

Policy 20: Locally Distinctive, High Quality Design

Policy 21: Local Heritage

Engagement

Regulation 14A

The Regulation 14A version of JMNP2 included two separate but related proposed allocations;

7.3 Plot A, rolling the pre-existing 1.6ha allocation for 18 dwellings forward.

7.4 Plot B, proposing allocation of a further c40 dwellings.

Justification

Regulation 14A representations considered the allocation of the whole site unjustified and contrary to assessment advice, whereas potentially suitable land at Folly Lane (MEL 11) had not been selected. This was considered unsound.

Assessment Conclusions

Regulation 14 Representations submitted concept design material that supported the allocation or partial allocation of the site. This helped further assessment of the relative merits of the site in comparison with the proposed allocation at Middle Farm.

Stage 2 assessment identified that;

The site plays a critical role in providing a rural setting and separation between Whitley and Shaw. Development of the site in its entirety would result in the direct coalescence between Shaw and Whitley,

It is recognised that proposed development at Folly Lane (MEL 11) could be divided into separate allocations which;

may offer opportunities to retain the physical, visual and perceived separation

Regulation 14 representations provided further detail about how this may be achieved.

To achieve an allocation to meet further housing requirements (in addition to that proposed at Middle Farm Plot A and Whitley Farm) only requires allocation of land to enable development c40 dwellings.

JMNP2 assessment concluded the partial and entire allocation would erode and cause visual impact on the highly valued rural gap between villages and views between Shaw and Whitley. This is considered more harmful than the potential impacts caused at Middle Farm.

In addition, whilst both proposed sites were relatively similar in their level of connectivity to local services, land at Middle Farm Plot B could be accessed using an access already allocated for Plot A and the site enables the delivery of enhanced pedestrian crossing facilities on Corsham Road, connecting communities to education and sports facilities. Achieving access to land at Folly Lane would necessitate further highway access points and road infrastructure causing harm to existing rural lane hedgerow and “suburbanisation”.

Both Folly Lane and Middle Farm sites have potential impacts on the setting of heritage assets. However, those relating to Middle Farm have been accepted and mitigated through the pre-existing allocation (7.4) and are less direct than impacts on the rural setting of Whitley Farm.

Nonetheless JMNP2 Steering Group recognise the need to minimise visual impact caused by allocation of additional land at Middle Farm. In a positive response to this reasonable objection. With the written agreement of the site owner, JMNP2 has reviewed and significantly revised the approach to the allocation of Land at Middle Farm with the aim of

significantly reducing the extent and visual impact of development and making more efficient use of a smaller and combined single new allocation.

The revised allocation consolidates the development of c50 dwellings into a single 3 hectare site that combines Plot A and c2 hectares of Plot B, leaving c3 hectares in agricultural use. The combined site enables residential development at under 30DPH, which reflects 20th century densities in Whitley. It also provides 1 hectare of land reserved for buffer green infrastructure and amenity space. This further reduces the visual presence of proposed housing and reinforces the buffer separation between the village and intrusive electricity sub-station.

Conclusion

With proposed amendments to the allocation, it is concluded that the revised allocation at Middle Farm is the most efficient, least intrusive and deliverable option for meeting housing requirements.

Appendices

[Click on this link](#) to access appended material in support of the topic paper and the site allocations.

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JOINT MELKSHAM AREA NEIGHBOURHOOD PLAN

Draft Consultation Statement **WORKING COPY**

**Pre-submission Regulation 14(B) Consultation
June 2024**



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INTRODUCTION

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012¹ in respect of the review of the Melksham Neighbourhood Plan (JMNP2). Section 15(2) of part 5 of the regulations requires that a Consultation Statement should:

- Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Plan.
- Explain how they were consulted.
- Summarise the main issues and concerns raised by the persons consulted and
- Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

Section 1 (Pre-Regulation 14 Consultation) gives an overview of the various consultation events and activities held to date, that have led to the production of the Draft Reviewed Melksham Neighbourhood Plan (JMNP2) and the policies contained within it.

Supporting information relating to this Statement is available on the Melksham Neighbourhood Plan website: <https://www.melkshamneighbourhoodplan.org/>

Section 2 (Regulation 14 overview) Gives an overview and description of the pre-submission consultation, known as Regulation 14, that has been undertaken on the pre-submission draft of JMNP2. The Regulation 14 Consultation took place over a seven week period, between the 13th October and 3rd December 2023, a pre-submission Regulation 14 consultation was held on the draft JMNP2. We received over 980 individual comments. These comments have been very helpful to use 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.

Significant updates were therefore made to the pre-submission draft of JMNP2 that was consulted upon in 2023. Therefore, the decision was made to undertake a second pre-submission Regulation 14 consultation on draft B of the JMNP2 in 2024, with revisions or updates to allocations of land for housing made under Policy 7, 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 Regulation 14 Consultation are still valid, and are being taken into consideration. There is no need to submit these comments to us again.

¹ Localism Act 2011

In the second pre-submission consultation on draft B of the JMNP2, updated areas will be indicated by a yellow strip at the side of the page, and an Updated symbol. You can see which sections have changed in the contents page too, as well as reading the updated Modification Statement (Draft June 2024).

The purpose of Regulation 14 consultation is to ensure that those who live and work in the Parish and Town plus stakeholders and other interested parties had an opportunity to comment on a pre-submission draft of the NDP.

The comments and issues raised as part of both the 2023 pre-submission regulation 14 consultation and the pre-submission Regulation 14(B) Consultation of June/July 2024 will be included in a final, submission version of this Statement report, together with the Steering Group's responses to those comments. Changes made to the plan following consideration of consultation responses will be outlined.

SECTION 1 PRE-REGULATION 14 CONSULTATION

2. Approach to Consultation

2.1 Throughout the preparation stages of the Reviewed Melksham Neighbourhood Plan (JMNP2), the Steering Group has worked hard to engage with residents and stakeholders on the progress of the Neighbourhood Plan.

2.2 The Steering Group is made up of 11 permanent voting members as follows:

- Two representatives each from the Town and Parish Council
- One representative from Melksham Area Board (Wiltshire Council)
- One representative from the Melksham Community Area Partnership
- One representative for environmental and climate change interests
- One representative from the community (BRAG: Bowerhill Residents Action Group)
- Two representatives for Transport
- One representative for Business

In addition, officers from both councils support the Steering Group and attend meetings and when necessary are supported by a Spatial Planning Link Office from Wiltshire Council.

Steering Group meetings:



Hybrid meetings when appropriate:



2.3 Neighbourhood Plan #1 was brought into force on 1 July 2021 following a yes vote at Referendum. In September 2021, the Steering Group started a review of the plan and sought additional members, particularly from those groups representing heritage, health, seniors, as well as youth sectors, however, despite the best efforts, no representatives came forward from these groups.

2.4 The following task groups were formed, which included representatives of the Steering Group, Melksham Town Council, Melksham Without Parish Council, as well as those with a particular interest in the topic from members of the public and local community groups.

- Housing
- Local Green Spaces
- Heritage Assets
- Town Centre
- Climate Issues
- A350 Bypass
- Wilts & Berks Canal Link
- Design Guide
- Green Gap/Wedge



Back-to-back workshops for the numerous task groups covering housing, environmental topics, climate issues and strategic projects on 25 May 2022.

2.5 Meetings of the Steering Group were held monthly and open to members of the public with a hybrid option for steering group members and the public to attend via remote link (Zoom). Recordings of the meetings are published on YouTube by the parish council, and removed once the minutes are approved as they are then the accurate record of the meeting. **Go to YouTube and search Melksham Without Parish Council or follow this link**
<https://www.youtube.com/channel/UCAIGcoeNCJEtN8kADUcNqWg>

Agendas and minutes are published on the Neighbourhood Plan and Melksham Without Parish Council websites. Melksham Town Council have a link to the Neighbourhood Plan website for residents to access agendas and minutes. Agendas were also posted on noticeboards throughout the Neighbourhood Plan area, as well as via social media.



Pathfinder Place, Bowerhill

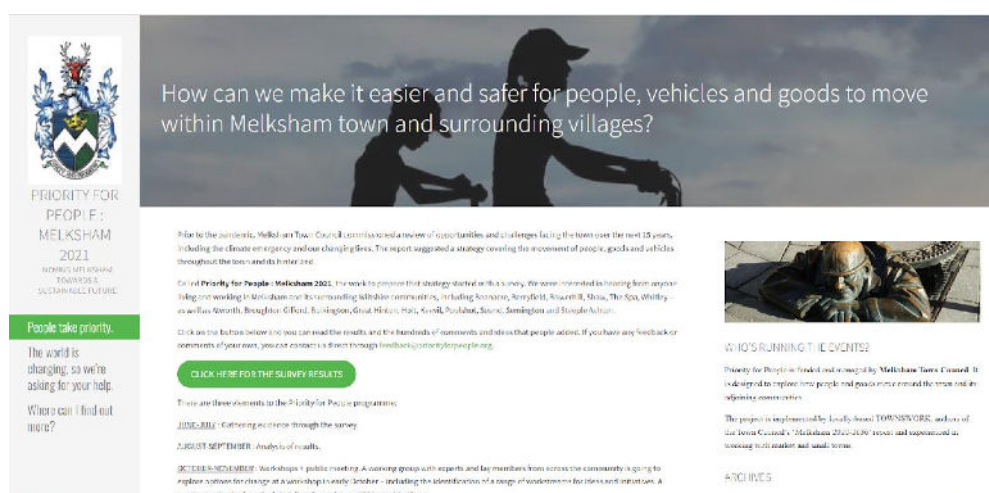


Outside Shaw Village Hall

Both the Town and Parish Council received the minutes of all Steering Group meetings at their respective Planning/Economic Development Committee meetings. Regular updates were provided by Council representatives of the Steering Group or by the Clerks at Full Council meetings.

Consultation Activities

- 3.1 A Website was created to keep residents up to date with progress and events promoting the various stages of the plan, including consultations: (<https://www.melkshamneighbourhoodplan.org/>) with a section entitled “Get Involved” <https://www.melkshamneighbourhoodplan.org/get-involved> . During consultation periods a “pop up” message with a link to the consultations appeared for ease of use. Both councils have links to the Neighbourhood Plan website on their own websites.
- 3.2 A Priority for People survey (available online, as well as in hard copy) was conducted in June/July 2021 by Townswork appointed by the Town Council to help inform a Town Centre Masterplan.



- 3.3 A Priority for People Workshop was held in October 2021 at Melksham Town Hall, with representatives from the following in attendance:

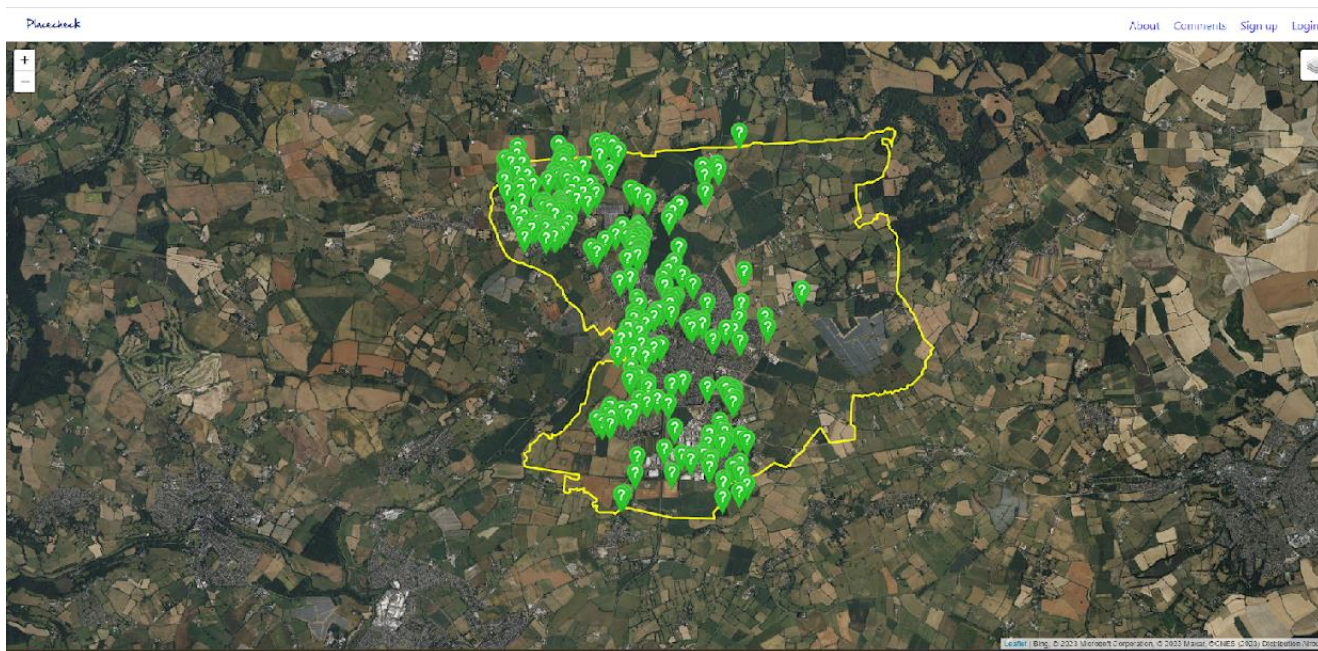
- Melksham Town Council
- Melksham Without Parish Council
- Wiltshire Council, including Highways, Spatial Planning, Economic Regeneration & Senior Climate Officer
- Transwilt
- Business Community
- Vision for West of England
- Local Parish Councils
- Age UK
- Place, Neighbourhood Plan Consultants

The objectives for the day were to:

- Feedback on results of the Priority for People survey and discuss the challenges for changes in the way people move around and through the Melksham Community area, in response to the climate emergency, population growth and economic change.
- How to look afresh at the way the town centre functions, how it is presented and looked after and how it can be made to work better for everyone.
- What can be done now and what can be planned for tomorrow.
- What workstreams should be explored to further development and action?

- 3.4 Community consultations took place during Spring 2022, seeking nominations for Local Green Spaces which residents valued, in order they could be included in the Neighbourhood Plan. Over 200 nominations were received and subsequently shortlisted by the Local Green Space Task Group, using a set criterion. Similarly, nominations were sought for Non-Designated Heritage Assets, which were reviewed by the Heritage Task Group, in order these could be included in the Neighbourhood Plan. These were done via an online mapping survey, with alternative ways provided for those not online.
<https://www.placecheck.info/app2/maps/melksham>

Local Green Space nominations:



Locally valued Heritage Assets:

Nominate Locally Valued Heritage Assets

Through our Neighbourhood Plan, we can also identify buildings, structures and sites that don't already have listed status (Grade I/II etc) but are worth preserving because of their quality, style or local historical importance.

online heritage assets map

Tell us about the heritage assets you value using our online map or by emailing office@melkshamwithout.co.uk

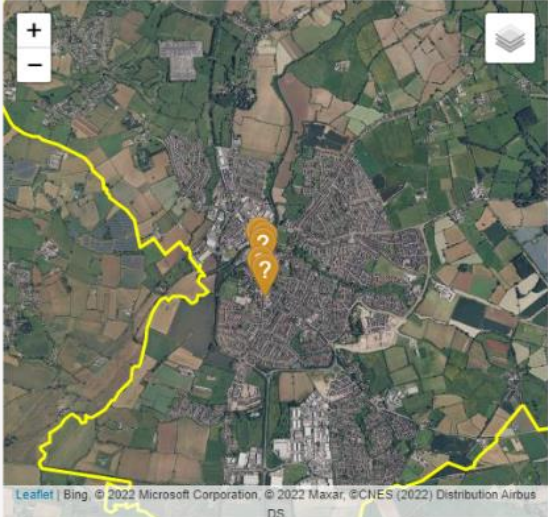
You can nominate Locally Valued Heritage Assets on the online map by adding a pin with a short description and a photo (if you have one). You can also support nominations already made (there are thumbs up and down buttons) or add your own thoughts about a nomination.

The criteria for what might qualify as a local heritage asset is long and varied. But as a first vital step, the Steering Group need your suggestions to be able to identify the local features that meet these criteria.

Buildings that are already listed do not need to be identified. If you are unsure if an asset is already listed you can view the full map of listed buildings [here](#).

NOTE: Landowners will only be contacted once local heritage assets have been assessed and only if they are considered to meet the criteria following this stage of nomination.

Placecheck About Comments Sign up Login



Leaflet | Bing, © 2022 Microsoft Corporation, © 2022 Maxar, © CNES (2022) Distribution Airbus DS

- 3.5 A Housing Needs Survey to find out the housing needs for the community also took place in Summer 2022, with 136 people responding to the survey. This fed into the Housing Needs Assessment work undertaken by AECOM as part of a Technical Support package.


Homes and Housing Need Survey

Melksham Town and Melksham Without Parish Councils are committed to the sustainable development of our area, protecting and enhancing the local places we value and working to deliver housing, jobs and facilities that meets the needs of the community.

Wiltshire Council has a responsibility to plan for housing growth across the County. It is currently undertaking a review of its Local Plan policy framework. It will include information about the level of growth for Melksham and Melksham Without until 2036 which will be likely to include allocations of land for new market and affordable housing.

The review of the Joint Melksham and Melksham Without Neighbourhood Plan brings a new opportunity for local policy to have a key role in shaping the type, tenure and design of new housing development in our area. It can help ensure that new homes meet the changing needs of our community whilst protecting what we value about our neighbourhoods and villages and linking housing development to the delivery of the facilities communities need.

Please complete the survey through this website. If you have any problems please get in touch with us. Paper copies can be made available.



Joint Melksham Neighbourhood Plan Review | Homes and Housing Need Survey

1. Introduction

Progress 0%

Please help us to understand the community's views on housing and current and future housing by completing this survey by 30th June!

Instructions

- Please answer questions to the best of your knowledge and as an individual or representative of your household.
- Please answer Part 1 first.
- Please complete the optional Part 2 and Part 3 to provide the detail of your housing needs to maximise the Neighbourhood Plan's effectiveness.

- 3.6 During Spring 2022 (27th April and 5th June 2022) a Call for Sites exercise was undertaken. The Steering Group contacted all local landowners on Wiltshire

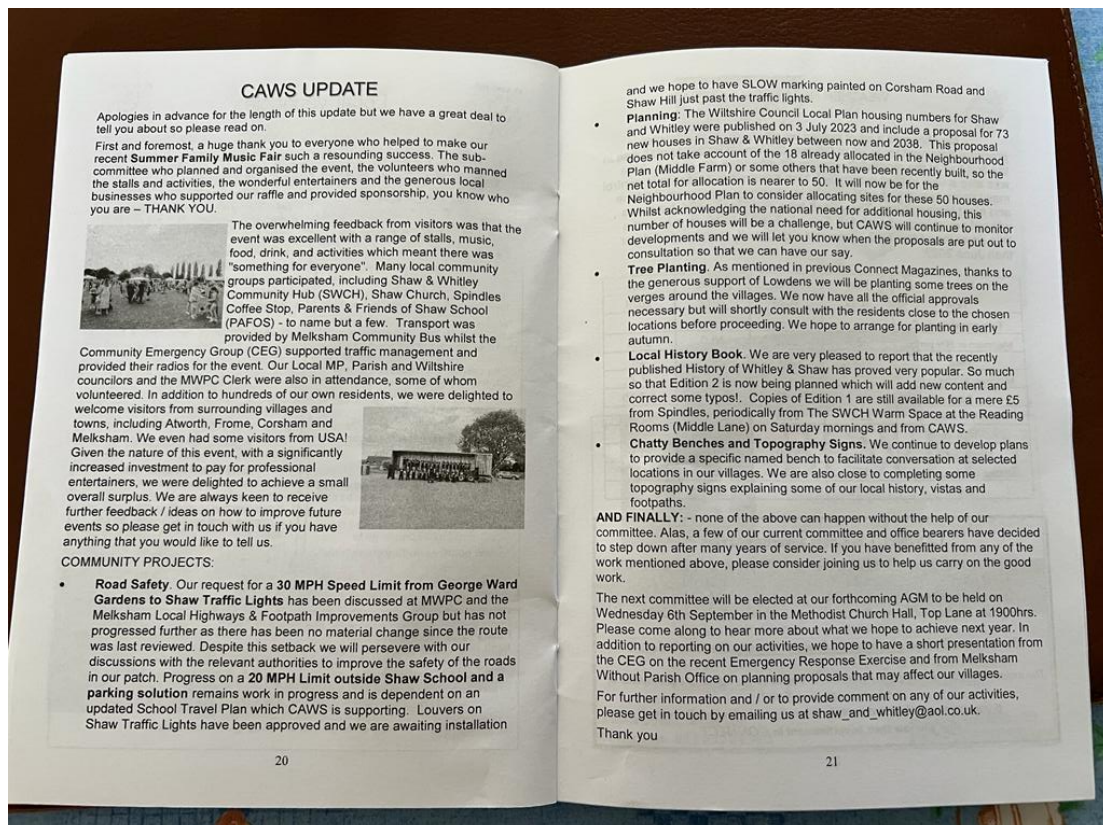
Council's (Strategic Housing and Employment Land Availability Assessment (SHELAA) register) as well as every contact from events and consultations during the JMNP1 process. The Steering Group also advertised in the local press for landowners to come forward if they wished their sites to be considered for possible inclusion in the Neighbourhood Plan and made contact with landowners of vacant town centre regeneration opportunity sites. If landowners did not respond from the email correspondence from the SHELAA list, then officers undertook a due diligence check on the Land Registry for the owner details and contacted them via letter.

- 3.7 During February & March 2023 consultations took place on the Town Centre Master Plan which looked at what residents treasured about the town centre and wanted to protect; listing priorities for improvements and rating design principles for regeneration opportunities. At the same time, consultation took place on the draft Design Code and the shortlist of heritage and local green space sites. Over 200 responses (both online and hard copies) were received. See Appendix 1 for the report on the consultations, a summary of feedback on the key topics, suggested refinements to the Town Centre Masterplan and the next steps and actions. The report was considered by the Steering Group at their 3rd May 2023 meeting.
- 3.8 Both councils also kept residents up-to-date on progress throughout the time of plan preparation via social media (Facebook, Twitter and Instagram) and newsletters. There is also a separate Neighbourhood Plan Facebook group. Facebook posts were always made into local Facebook groups too, so not just those of the councils and steering group, to gain the maximum exposure. These range from those set up for new housing developments, and business growth groups to more general "Spotted Melksham", and targeted posts in Historic Melksham groups for heritage assets and Rewilding and Recreation groups for the Local Green Spaces.

Local Newspapers and Magazines

- 3.9 Information on consultation events, as well as various articles on the Neighbourhood Plan were also published in the local Paper, Melksham Independent News which is circulated to over 13,700+ dwellings every two weeks, free of charge. A launch press release on the review of the Neighbourhood Plan was issued on 30 March 2022. (Appendix 2)
- 3.10 An update was provided on the Neighbourhood Plan Review in October 2022, which noted the Steering Group had undertaken a 'Call for Sites' exercise earlier in the Spring that year, with regard to potential site(s) to include in JMNP2.
- 3.11 Updates were also provided via regular quarterly council Newsletters of both the Town Council and Parish Council and published in Melksham News throughout the whole Neighbourhood Plan Review process and on social media. (Appendix 3).

- 3.12 Information was provided in several community magazines, such as, Shaw/Whitley "Connect" village magazine and "Our Community Matters", a weekly email mailing update via the Melksham Area Board (Wiltshire Council).



Extract from Connect Magazine, August-September 2023 which includes update from Community Action Whitley & Shaw (CAWS) on Melksham's Neighbourhood Plan Review (NHP#2)

October/November 2023 Edition of Connect below includes editorial from
Melksham Without Parish Council:

Melksham Neighbourhood Plan

Neighbourhood planning was introduced in the Localism Act 2011. It is an important and powerful tool that gives communities statutory powers to shape how their communities develop. It's written by the local community, the people who know and love the area, to ensure the community gets the right types of development, in the right place.



Joint Melksham Neighbourhood Plan 2

2020 - 2038

Pre-Submission Consultation Draft October 2023



The Melksham Neighbourhood Plan is a joint project covering the parishes of Melksham Town and Melksham Without. Its current Plan#1 was adopted in July 2021 with an immediate review started to ensure that the Plan remains current. Plan#2 will be out for consultation (at Regulation 14 stage) in the Autumn. The revised plan will refresh current policies, and include new policies relating to Local Green Spaces, designated Heritage Assets, Town Centre Master Plan, Design Guide and site allocations for housing. As identified in the draft Local Plan, it will be looking to allocate sites for housing to complement the strategic allocations in the Local Plan, and will take responsibility for the whole Shaw & Whitley housing site allocation.

You can read more on the dedicated Melksham Neighbourhood Plan website
<https://www.melkshamneighbourhoodplan.org/>

Melksham Without Parish Council will widely publicise the consultations on both these plans in the Autumn, so check in on social media, the website, posters in the local noticeboards and in articles and adverts in the Melksham News.

There will be public drop-in sessions on the draft Melksham Neighbourhood Plan and all are welcome to attend and ask questions.

- Thursday 26th October from 4 to 7pm at Melksham Community Campus
- Friday 10th November from 4 to 7pm at Shaw Village Hall
- Saturday 11th November from 10am to 2pm at Melksham Community Campus

If you are not online there will still be plenty of opportunities to get involved, and we invite anyone who needs support to access documentation to get in touch with us at the parish council. The office is open Mon – Thurs 10am to 12 and 2 to 4pm on the first floor of the Melksham Community Campus.



This week's news, events and community information for the Melksham area

Nominate your much-loved public green space in Melksham for protection

Do you have a favourite green space in the Melksham area that you think should be protected from development? Then the team behind Melksham's Neighbourhood Plan want to hear from you. Through the Melksham Neighbourhood Plan, an area of green space that is "demonstrably special to a local community" can be protected through a scheme [...]

Community Matters Issued 29 April 2022



This week's news, events and community information for the Melksham area



Have you had your say on the future of development in Melksham and Melksham Without?

The plan to review and update the Melksham Neighbourhood Plan continues with several consultations still live and awaiting the community to give their input. The most important one is to give your views on current housing needs in the Melksham area. What type of housing is required? Flats? Starter homes? Specialist accommodation for elderly residents? [...]



Community Matters Article issued in June 2022

Consultation Events

- 3.13 A number of drop-in events were held. Consultation also took place at various community events, such as the Christmas Lights Switch On. (See Table 1 below of the various events held)
- 3.14 Consultation events involved residents being able to comment on various 'information boards' provided on various aspects of NHP#2, with post-it notes being provided in order to post on the various information boards and maps. The consultation boards can be viewed here
<https://www.melkshamneighbourhoodplan.org/tcmpconsultationfebmar>



3.16 Community Consultation events took place on Thursday, 9, Friday 10 & Saturday 11 February 2023 at various times of the day at Melksham Community Campus. Residents were asked what they treasured about the town centre and wanted to protect, what were the priorities for improvements, thoughts on regeneration opportunities, what green spaces should be protected, what should new housing look like and what heritage assets should be protected. The events were held at the brand-new Community Campus building (a Wiltshire Council building that houses the Library, Sports Centre, Community Meeting Rooms) to capture a new audience by attracting casual passersby, this was successful with many gym and library users popping in and the chance for those running the consultation to chat to those in the café area who were waiting during swimming lessons for example. There were lots of A boards and arrows from the Town Hall on the High Street through to the Campus and the exhibition space to entice footfall from the town centre.



A special stakeholder event was held on Tuesday 7 February with town centre businesses, focusing on the Town Centre Masterplan. 500 hand delivered invitations to the event, from the Town Mayor, were put through the doors of Town Centre businesses and stakeholders. Discussions were also held with the Melksham Business Growth Group, who promoted the event to their members and encouraged attendance.

During these events there was a champagne draw, for anyone that left their contact details for future updates:

Social media post about Champagne Draw



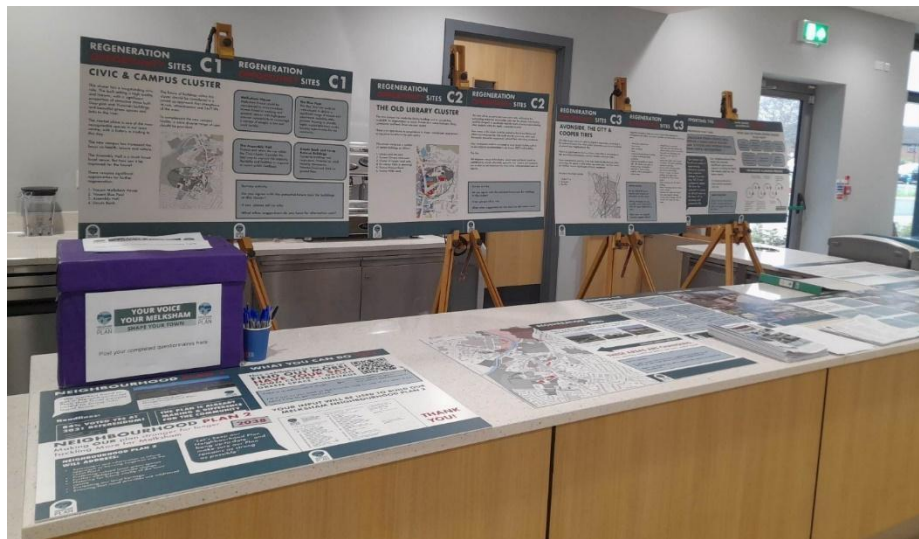
Individual Photos of the event featured in the montage below:

<https://adobe.ly/3Rf5bN8>

Photo Credits: Joe McCann, Melksham Independent News



- 3.17 Following the consultation events in February 2023, the information boards were made available for a period of time at Melksham Town Hall and The Campus for people to provide comments and fill in a questionnaire. During this period, the staff at the parish council based in the Campus, and the town council based in the Town Hall were available for questions, comments and online access. The library staff were also on hand to assist any member of the public with online access from free to use computers in the library. A QR code linking to the online survey and hard copy questionnaires were produced for the events so that members of the public could look at the information boards and fill in the survey on their mobile phone, or by paper copy, as they walked around the consultation event.



- 3.18 Both the Parish and Town Clerks gave an update on the Melksham Neighbourhood Plan and what it means to local residents on two episodes of the “Celebrate Melksham” Podcast
<https://open.spotify.com/episode/56i4TM7xmRZdD3oOU5MYdT>



- 3.19 In order to engage with different age groups, the Steering Group used Instagram to engage with the younger generation. Students at Melksham Oak Secondary School were also invited to take part in the Town Centre Masterplan consultation; particularly the Geography students who studied the town centre as part of GCSE and A Level projects. In order to engage with the older generation, flyers were also produced, as less likely to be online but used publication through the Melksham Seniors groups, village hall posters and specific Facebook groups too.
- 3.20 A Place Shaping Meeting of Melksham Area Board was held on 8 March 2023, which included workshops looking at the Neighbourhood Plan, the Town Centre Masterplan and exploring the identity of the community area. Details and minutes of the meeting here:
<https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=166&MId=14325&Ver=4>

Melksham Area Board

You are warmly invited along to the next Melksham Area Board public meeting

Wednesday 8th March 2023

7pm to 9pm

Library, Melksham Community Campus, Market Pl, Melksham SN12 6ES

With a focus on the place shaping of Melksham and the surrounding area

- Take part in a workshop looking at the joint Melksham Neighbourhood Plan, the Melksham Town Centre Master Plan and exploring the identity of the community area
- Discover some of the exciting new projects happening
- Ask questions, have your say and meet other residents, councillors and organisations.

For more information please
Email: richard.rogers@wilt
Tel: 01225 718628





Wiltshire Council

Area Board Meeting Poster

THERE IS STILL TIME TO HAVE YOUR SAY ON THE FUTURE OF MELKSHAM

THERE is still time to submit your comments to the town centre consultation currently taking place.

You can find the questionnaire and the exhibition boards in the town hall, in the café area of the Melksham Campus and online - just google Melksham Neighbourhood Plan and there is a pop up with a link straight to the consultation page www.melkshamneighbourhoodplan.org

"A draft Town Centre Master Plan has been produced, but the input from local residents, businesses and community groups has a direct impact on what the priorities will be moving forward in the plan," said Melksham Without Parish Council clerk, Teresa Strange said. "So far, the top three things that you have said you want to keep in the town centre are: • Walkable town centre (74.47%) • Trees and green spaces (72.34%) • Attractive and safe to walk around (69.15%)

And the top three priorities for improvement are: • The quality of the town centre retail and service offer (69.79%) • Conserve and re-use buildings (65.63%) • Protect and increase green space (60.42%)

"Do you agree? What do you think of the regeneration site opportunities at the key gateway locations at either end of town? How can they best contribute to our town centre future? Do you agree with the potential future uses of the buildings in the Campus and civic quarter and the old library site, and the most important principles for the future regeneration of Avonside/The City/Cooper Tires?"

"In addition, there are other aspects of the Neighbourhood Plan that questions are being asked about, ranging from protecting local green spaces, heritage assets and a design code which sets out what future planning applications should adhere to, ranging from local identity and character, access and movement, and guidelines for shop fronts, street furniture, building heights, materials and architectural details. Please take a look and see if you agree, or if there is anything that has been missed."

The deadline for comments is Sunday 19th March (Mother's Day). If you have any queries, please contact either Melksham Town Council or Melksham Without Parish Council.



A consultation workshop at the Area Board meeting on 8th March

Melksham Independent News – Article on Area Board Meeting 8 March 2023

Summary of Events and Activities

Table 1

Date	Location	Activity/Event
Tuesday, 29 March 2022 at 7.00pm	Bowerhill Village Hall	Melksham Without Parish Council, Annual Parish Meeting. Update on progress of NHP#2. *Link below to YouTube recording
Wednesday, 22 June 2022 at 7.00pm	Melksham Assembly Hall	Melksham Area Board Meeting. Update on progress of NHP#2
Wednesday, 21 September 2022 at 7.00pm	Berryfield Village Hall	Melksham Area Board Meeting. Update on progress of NHP#2
Saturday, 3, December 2022, 1.00pm to 7.00pm	Melksham Market Place/Assembly Hall	Melksham Christmas Lights Switch on and Christmas Fayre. Neighbourhood Plan Stall providing information on NPH#2 and upcoming consultation events. Leaflets handed to residents and the chance to chat about the Plan and its use and progress
Tuesday, 7 February 2023	Melksham Community Campus	Consultation on the Town Centre Masterplan with town centre businesses
Thursday, 9 February 2023, 4.00pm-7.00pm	Melksham Community Campus	Consultation on Neighbourhood Plan and Town Centre Masterplan
Friday, 10 February	Melksham Community Campus	

2023, 11.00am- 5.00pm		Consultation on Neighbourhood Plan and Town Centre Masterplan
Saturday, 11 February 2023, 10.00am-12 noon	Melksham Community Campus	Consultation on Neighbourhood Plan and Town Centre Masterplan
Wednesday, 8 March 2023 at 7.00pm	The Library, Melksham Community Campus	Consultation on the Neighbourhood Plan. Various workshops held, including on the Town Centre Masterplan at the Melksham Area Board
Monday, 13 March 2023 at 7.00pm	Melksham Town Hall	Update provided at Melksham Town Council Annual Town Meeting
Monday, 3 April 2023, 7.00pm	Berryfield Village Hall	Update provided at Annual Parish Meeting of Melksham Without Parish Council. **Link to Neighbourhood Plan presentation below

***Podcast Links:**

Part 1: <https://open.spotify.com/episode/56i4TM7xmRZdD3oOU5MYdT>

Part 2: <https://open.spotify.com/episode/5fHjENgJyEWGQ06BVvFKzP>

**Link to Neighbourhood Plan Presentation at Annual Parish Meeting

<https://youtu.be/NdB88j8q59g?feature=shared>

Community Events

- 3.21 The Steering Group had a stall at the Christmas Lights Switch on event, held on Saturday, 3 December 2022. This event is extremely popular with 1000+ people of various age groups attending, making it a good opportunity for Steering Group members to keep people up to date on the progress of the plan and to seek peoples' views.

A 4-page leaflet was handed out at the event, which had a newspaper style and size, and had input and design work from the local newspaper as to how to grab the attention of residents, and layout aspects. This included information on the following:

- Melksham specific policies to address/identified needs
- What a Neighbourhood Plan does and what would happen if Melksham did not have a Neighbourhood Plan.
- What has it done for us so far?
- How can you influence it?
- How to keep in touch

A rotating display board was installed in the Market Place, which provided information on upcoming consultation events and how people could keep in touch with progress of NHP#2.



**Changing Display Board at
Christmas Lights Switch
on/Fayre Saturday,
3 December 2022**



Display Tables and Leaflet distribution in the Market Place at the Christmas Fayre, 3 December 2022



Public Meetings

- 3.22 Several updates were provided on the progress of the Neighbourhood Plan at several Melksham Community Area Board Meetings as listed in Table 1 above.
- 3.23 Local community group, Community Action Whitley & Shaw (CAWS) also kept residents of Shaw & Whitley updated on the progress of the plan at their monthly meetings.

7. **Other community Events:**
- 7.1. **Plant a tree initiative:** Peter had met with MWPC and council officials. The proposal is for 4 mature trees to be planted in the autumn, locations to be determined by a walk around the village shortly. Further sapling planting would be undertaken but before this could be agreed it would be necessary to determine ownership of potential sites such as Whitley Common. **Action – Peter R**
- 7.2. **Neighbourhood Plan:** Wiltshire Council were currently undertaking a review of the plan, over a 2-year period. This included the identification of areas that residents would like to be retained as ‘open spaces’. Peter urged everyone to access and annotate the interactive map which can be found at: <https://www.melkshamneighbourhoodplan.org/local-green-spaces> **Action – All Committee Members**
- 7.3. **Melksham Bypass:** The committee recognised that there is renewed pressure, including from Michelle Donelan MP, to amend (or cancel) the route of the bypass. It was agreed that Peter R would write to Wilts Council and our MP on behalf of CAWS to the effect that we are still of the view that the proposed option is the best. All members of the committee were encouraged to do likewise. **Action – Peter R / All**
- 7.4. **Top Lane Hedge Cutting:** The committee expressed concern regarding the removal of hedges along Top Lane. This issue has been reported to Wiltshire Council for review.

Extract from Community Action Whitley & Shaw (CAWS) minutes of 4 April 2022

Planning Update

Public Consultation on the next iteration of the Neighbourhood Plan will start shortly (see handout – “Your Voice, Your Melksham, Shape your Town”). We should plan on CAWS making a contribution to this but we should encourage individual responses too.

No further news on the Local Plan (95 new houses), the Melksham Bypass, or the Middle Farm/Corsham Road development.

There do not appear to be any extant planning consultations in our area at this time.

Extract from CAWS Chair Report January 2023

Neighbourhood Plan:

Peter then provided a brief explanation of the Neighbourhood Plan for Melksham Town and Without Parish Council. This plan endeavours to protect green spaces, protect individual village identities, protect local heritage, and consider the impact of climate change and the Canal Link Project. Importantly the updated Neighbourhood Plan will also allocate development sites for the housing proposed in the Local Plan (see above). The updated plan should be open for consultation soon, and Peter noted that the Neighbourhood Plan Steering Group had committed to hold a consultation event in either Shaw or Whitley. He stressed that it is important that CAWS and individuals participate in the consultation and that once this was complete the plan would be subject to a

Extract from CAWS AGM Minutes 6 September 2023

Neighbourhood Plan 2 - 2026 - 2038

Approach

- Assessment and information to inform approach to housing (together with the Local Plan)
- Allocation of sites for the development to meet proposals set out in the Local Plan
- Protecting valued local green spaces
- Further addressing climate change
- Planning for future vitality of the town centre
- Protecting our local heritage
- Ensuring that local priorities are addressed as the bypass project is developed
- The Steering Group will also explore how to appropriately address the Canal Link project

Key Points

- The plan will propose sites for the 73 new houses proposed in the draft Local Plan for Shaw & Whitley (this is approx. 50 new houses taking into account the 18 houses already allocated in NP1 and buildings already completed)
- Consultation on the plan will commence in Autumn 2023
- A consultation event will be held in either Shaw or Whitley, probably in October, which will be organised by the NP Steering Group and will be supported by their advisers
- Suggested points to look out for and comment on:
 - Where are the proposed development sites and are they the most suitable locations?
 - What community benefits do you want to see from any potential development
 - How will our green spaces be protected?
 - Are there any additional heritage assets that we would like to be reflected in the plan?
 - Do we support the general direction of the plan?
- Once consultation is complete and all inputs have been considered, the plan will be subject to a referendum (TBC but possibly late 2024/early 2025)

Extract from presentation at CAWS AGM on 6 September 2023

Mailing List

- 3.24 A mailing list of those wishing to be kept updated on progress of NHP#2 was collated and included developers, landowners and members of the public. There are over 200 people on the mailing list.
- 3.25 The mailing list was used to keep people updated on progress of the plan, as well as make people aware of consultation events and invite them to take part in online consultations.

SECTION 2 REGULATION 14 PRE-SUBMISSION CONSULTATION

4 Overview

More on this section is to come after Regulation 14(B) consultation

- 4.1 The Neighbourhood Planning (General) Regulations 2012 states that before submitting a plan proposal to the local planning authority, a qualifying body (Melksham Town and Melksham Without Parish Council) must:
- publicise in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area
 - details of the proposals for a neighbourhood development plan
 - details of where and when the proposals for a neighbourhood development plan may be inspected
 - details of how to make representations and
 - the date by which those representations must be received, being not less than 6 weeks

- from the date on which the draft proposal is first publicised
- consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood plan and
- send a copy of the proposals for a neighbourhood development plan to the local planning authority

4.2 This section of the Consultation Statement will therefore outline the approach taken by the Planning Group to consult on the Draft NDP at the Regulation 14 stage of the process. This will cover the 2023 Regulation 14 pre-submission consultation, and the 2024 Regulation 14(B) pre-submission consultation on the updated draft JMNP2. Regulation 14(B) consultation is scheduled to begin on 20th June 2024 for 8 weeks.

Appendices

Appendix 1 - Report following consultation in Feb/March 23

Appendix 2 - Updates/Articles in the Melksham News

Appendix 3 - Newsletters

Appendix 4 - Facebook Posts

Appendix 1

Report of Town Centre Master Plan Consultation (TCMP)

1 May 2023 to the Melksham NHP Steering Group meeting 3 May 23

Background and Purpose

The Made Joint Melksham Neighbourhood Plan (JMNP) commits Melksham Town Council to progressing a Town Centre Master Plan to direct and guide the future planning and investment of the town centre. This is supported by Town Centre Policy 9 in the made plan. The JMNP2 process and Locality Technical Support has enabled and resourced the progression of Town Centre Master Planning.

A DRAFT Melksham Town Centre Master Plan Report (2023) was produced for the Joint Melksham Neighbourhood Plan Review by consultations AECOM through Locality Technical Support. AECOM undertook the work as a technical exercise in consultation with JMNP2 representatives and Place Studio.

This is a summary note of stakeholder and community consultation that was undertaken in relation to the Consultation on the draft report. It was undertaken by the JMNP2 Steering Group with input from Place Studio.

The purpose of the consultation was to:

- Ensure businesses and other key town centre stakeholders were aware of the master planning process and had an initial opportunity to engage in its production.
- Enable members of the wider community to contribute to the draft report
- Enable Wiltshire Council and other land owners an opportunity to engage in land-use planning for potentially available town centre development sites

- Build the knowledge and priorities of stakeholders and the community into a final document
- Provide community led priorities to inform forward action planning in delivering priority objectives and projects.

Consultation also addressed engagement on emerging evidence related to other areas of JMNP2 policy.

- Local Green Space Designation
- Local Non-designated Heritage List
- Production of a Local Design Guide and Code (By AECOM)
- A communications update on progression of Housing site allocations

Feedback on these matters is recorded separately related to each policy topic.

Summary of Process

Town Centre stakeholder and wider community engagement on the draft town centre master plan report was undertaken by the Neighbourhood Plan Steering Group between 8 February and 19 March 2023. It combined a series of engagement opportunities.

- One invited stakeholder three-hour event on 7 February
- Three open community drop-in events were held at The Campus on 8, 10 and 11 February.
- These were followed by further period of exhibition at Melksham Campus and Town Hall until 19 March.
- This was accompanied by online consultation including opportunity to complete the questionnaire.

In addition to drop-in and online engagement, Steering Group representatives reached out to Wiltshire Council as owners of key regeneration sites and as planning authority to ensure its views and intentions were as clearly understood as the Council was prepared to be.

Full records of material exhibited and feedback received have been made and can be made available as part of the TCMP and JMNP2 evidence base.

Engagement Content

Engagement included information boards as well as opportunities to provide feedback and suggestions. This was broken into sections.

The Whole Town Centre

- Views on the principle of undertaking a master plan
- Qualities about the Town Centre that are valued and to protect
- Issues that should be priorities for action and change

Three Regeneration Focus Areas

- Views on if these were the right areas
- Comments on report suggestions for future uses and design
- Open opportunities to make further suggestions

To a significant extent the scope of topics identified in AECOM's report shaped engagement themes and prompts for input.

Attendance

- Stakeholder Event
- Drop in Events
- Questionnaire Returns
- Number of Comments

A record of attendance is contained within the collated event raw data.

Summary of Feedback Received

General Comments

- General strong support for the masterplan and many commenters excited with the potential regeneration of the Cooper Tires area Cluster 3.
- The majority of comments were in-sync' with AECOM's key topics
- Two areas of feedback highlighted apparent emphasis and lack of priority;
 - A significant number of comments identified green spaces and the river as primary assets
 - There was very little response to matters relating directly to sustainability and carbon reduction
- Many commenters expressed that regeneration should be focussed on leisure retail and community facilities.
- Generally, there were concerns about more residential development.
- However, creating smaller and affordable homes in apartments was also suggested.
- 92.52% Agree with the identified regeneration clusters.
- Specific ideas for various sites were expressed.

Comments on TCMP Priority Topics

The following themes attracted the most interest and suggestions;

- Town Centre Vitality and Offer
- Walking including for health and wellbeing & Car Parking
- Heritage and the Appearance of the Town
- Greenery and Green Spaces
- The Riverside and Water

A lack of feedback indicated less direct engagement with Sustainability and Climate

Summary of Key Topics Feedback

Economy and Vitality

Shopping;

- A broad range of local independent and national chain shops. Eg Devises

Things To Do;

- Improved leisure and hospitality offer
- Family focused including cinema, bowling places to eat
- Places to socialise day and evening; cafes, bars, restaurants.
- A place to dance!
- A permanent Melksham museum

Community Facilities;

- Re-opened public toilets
- Facilities for families and young people

Town Centre Business;

- A local business hub
- Access to banking

Heritage and Distinctiveness

Conservation and Enhancement;

- Protection of historic high street buildings
- Conservation of key historic buildings
- Eg Unicorn Public House
- Improvement of shopfronts

Regeneration;

- Removal and regeneration of 1960's infill eg High St/Lowbourne
- Smartening of pedestrian precinct

Streets and Public Realm

Appearance and Image;

- Cleanliness and upkeep of streets and furniture, including on town centre gateways
- Opportunities to "dress" the town centre eg Southgate Bath butterflies.
- Street scene design to compliment heritage buildings
- More street planting and flowers

Town Centre Management;

- Address traffic speed and noise
- Street management to enable "café culture" for outside hospitality
- Improved public seating eg Market Place benches

Green Space and Water

Making Connections;

- Make the most of high quality of existing green spaces

- Creation of linking “green walks” through the town centre linking to green spaces and the station

Wildlife and Nature;

- Increasing town centre nature
- Increasing ecology richness within parks and green spaces

Riverside Access;

- Linking into and enhancing riverside walk

River activity;

- Encourage kayaking and boats

Riverside Development Sites;

- Develop to create increased riverside vitality.

Still Water;

- Create a (or make more of the existing) lake!

Movement Connectivity and Accessibility

Walking and Cycling

- Walking and Cycling Connections;
- Wayfinding
- Good and safe connections to the town centre including from the station
- Signed walking and cycling connections linking town centre to green spaces and the countryside

A Healthy Town Centre;

- Signed walking, dog walking and running routes linking green spaces, riverside and park Safety;
- Safe pavements for pedestrians and lanes for cyclists
- Improved pedestrian crossings eg Bank Street/Lowbourne and entrance to campus.

Pedestrianisation;

- Partial pedestrianisation from church St to Lowbourne
- Pedestrianize the Town Bridge

Buses;

- improved links between station and town centre

Car Parking Management;

- Improved management of existing car parking including;
- Conservation area resident parking
- Increased free disabled permit parking
- Free local business parking and Campus car park management
- Parking controls near take-aways

Public Car Parks Capacity;

- Optimising capacity including decking at Kings St.

Feedback on Regeneration Clusters

Cluster 1 The Civic and Campus Quarter

73% Support

Suggested Uses

Leisure and Culture

- Adventure centre, like The Arc in Chippenham
- Ice rink Skate Park, BMX track
- Entertainment; cinema/bowling/laser tag
- Drama Club and Theatre

Housing and Community Facilities

- Subsidised community/cultural space
- Doctors Surgery
- Housing on the old Blue Pool and Lloyds Bank

Business

- Small business spaces,

Blue Pool

- Retirement flats are not suitable at the Blue Pool due to the noise from the Assembly Hall.
- Make the old swimming pool a bowling alley.

Assembly Hall

- Assembly hall should remain a music venue/use for leisure
- theatre, opera, lectures and cinema use
- Assembly Hall is too big, old and expensive and occupies a valuable site.
- Build a new hall which attracts new acts and bands and which could be used for wedding receptions etc
- Redevelop into homes and cafe/bars

Melksham House

- Melksham house should be a public building
- Arts quarter with sculptures in ground
- The library into Melksham House,
- Melksham museum
- Transfer Assembly Hall use into Melksham House for smaller events and a new hall built at the back of the old library.

Lloyds Bank

- public amenities, cinema, exhibition space, reading rooms, a museum.

Campus Access;

- Entrance to Campus should be off A350, use the same entrance as cemetery to make both safer.

- Market Place entrance reserved for foot and pedal traffic,

Cluster 2 Former Library, Restaurant and Car Park

72% Support

Suggested uses:

- Flats and affordable housing with active ground floors supported
- Leisure cultural facilities in this area
- Nursery
- Local hospital, GPs, nurses, care hubs
- Community project space in the library.
- Retail
- Nightlife, a cinema / bowling alley

Cluster 3 Avonside, Cooper Tires and The City

94% support

Regeneration principles:

Most popular

- | | |
|---|--------|
| • Accessible river path, to use and enjoy the riverside: | 77.88% |
| • Walk & cycle links between the station and town centre: | 67.26% |
| • Cultural and entertainment facilities | 60.18% |

Least Popular:

- | | |
|--|--------|
| • Re-establish the historic street pattern | 27.43% |
| • Reflect interesting features within a modern context | 30.97% |
| • New homes | 31.86% |

Suggested Uses

- Extension to the centre of Melksham
- Mixture of housing/flats, leisure looking onto the river
- Supplemented with the Kennet & Avon canal link as proposed by Wilts/Berks Canal Trust. Marina and mooring points (linked to canal)
- Riverside open space and sports pitches

Conservation;

- Conserve the main old house. Potential museum,
- Repurpose the 1930's old Cooper tire canteen.
- Keep Coopers entry sign,

Wider Cluster Area

- Avonside converted to riverside apartments.

- More consideration to area around train station

Suggested Refinements and Changes to the Draft Town Centre Master Plan Report

Purpose of the TCMP Report and Scope for Changes

The AECOM Town Centre Master Plan Report is an independent technical report and evidence base of the Neighbourhood Plan.

It informs and influences policy and strategy. It provides a strong national context to Town Centre planning.

Studies into key themes are high level and illustrative. They raise town centre principles and illustrate how could be applied with inspirational examples. The report is not intended to set out a detailed master plan or a strategy for its delivery.

It is however, important that the report identifies themes, assets and principles that have the input from engagement undertaken by the Steering Group.

AECOM will therefore be asked to refine the report to reflect this. However, feedback will also inform the setting of more detailed projects, land-use criteria and priorities set out in a delivery framework. See C below.

Changes to the AECOM evidence base report will also need to be mindful of the limitations on the Locality Technical Support package that funded it.

As a result, requested amendments will be high level and relatively small. The feedback from the engagement will more significantly inform the strategy and delivery framework.

Proposed Amendments

Section 4 Engagement

The Steering Group will provide narrative to summarise engagement undertaken. This will closely follow narrative provided in this briefing.

Section 6 Development Principles

Updating of the section will focus on the analysis “today” sections to more closely represent the values and issues identified through engagement.

Changes will seek a larger specific section on green and blue infrastructure. More is needed in relation to the existing and valued green space and the river. Some of the Sustainability and Climate section provides inspiration for greening the Town Centre. More is needed in relation to inspiring green connections and waterside environments.

Whilst the sustainability and climate section did not generate significant feedback, it is a central plank of the JMNP and a contributor to the 2030 carbon neutrality target. The section should be retained.

Section 7 Regeneration Clusters

Land use ideas from the feedback should be cross referenced with the AECOM report. This will result in the removal of some suggestions that will not be feasible or popular. It will add suggestions in where they enrich ideas made by AECOM. Again, more references to green space and the river will be sought in relation to each cluster.

Section 8 Next Steps

The first next step should be to receive and sign off a revised final TCMP Report as an evidence base to the JMNP2. It may then be published.

NEXT Steps and Actions

The TCMP report sets out potential next steps. It is suggested these are refined. Refinements should reflect the approach to advancing JMNP2 and the parallel but distinct approach of advancing the TCMP.

JMNP2

The AECOM TCMP report will become part of the evidence base supporting the review of Town Centre policy 9.

TCMP

The approach could broadly follow the four stages outlined by Place Studio and validated by the Town Council at its January meeting.

Stage 1; Delivery Strategy and Process Plan

- Strategy Development
- Resourcing Analysis
- Schedule for Incremental Projects
- Securing grant funding for quick win projects (Town Council)

Stage 2; Helping secure a Melksham Community Led Partnership

- Joint Meeting/Workshop Facilitation
- Design and Facilitation of Stakeholder Dialogue and Engagement
- Design and Delivery of Community Consultation

Stage 3; Progressing the Master Projects

- Brief Agreement
- Analysis and Survey Coordination
- Scheme Concept Design to Specification
- Engagement Process
- Resourcing

Stage 4; Planning Application Dialogue/Review

- Development Proposal Assessment
- Pre-application Dialogue
- Town Council Application Consultation Response

Updating JMNP2 Draft Town Centre Policy 9

Parallel to completing the TCMP report, Steering Group will receive and be asked to validate revisions to Policy 9 to reference the need for development to respond to delivery of the TCMP priorities. The validated AECOM report outlines these.

Reporting Engagement

Engagement has closed. It has produced feedback that has informed;

- The town centre master plan report
- Local green Space Designations
- Local Non-designated Heritage Listing
- The Melksham Design Code

Feedback has now been collated. Reports of feedback produced.

It is now possible to make material available to stakeholders and the public.

The following methods are proposed;

General Communication.

- Thanks to all who attended and involved.
- Background
- Summary of what was consulted on, when and how.
- Potential link to material
- What events and methods were employed
- Attendance and who attended

Feedback

- Headlines on each topic
- NB using summaries produced.
- Links to full summary reports

Next Steps

- Summary for JMNP2 and
- TCMP (as above)

Wider Update (Optional)

JMNP2 General Update

- Updating on housing and other topics eg green gaps.
- A forward programme for JMNP2 consultations

JMNP1 Performance

- Highlighting recent planning decisions relating to speculative development
- refused quoting JMNP1.

External factors;

- NPPF changes to Paragraph 14 protection period
- Local Plan Publication

Circulation

- Emails providing thanks and links to updates and reports to;
 - JMNP2 Mailing List
 - Town Centre Invited Stakeholders
 - Key Partners
- Website News Update with links
- Social Media Links
- Melksham News Update
- Potential Town and Parish Council briefings.

Programming of Communications

Feedback related solely to the consultation can be dispatched during May.

If communications are to include forward programming it will be prudent to wait until we know about the NPPF and both Councils have agreed any resulting programme changes.

Recommended

Consultation feedback is provided in May. It contains a notice to watch for further updates.

Feedback communications and content is agreed informally by email with SG members before the next meeting.

A full programme and process update is provided later in the summer following receipt of information and decisions.

APPENDIX 2 – Updates/Articles in Melksham News



Help Make the Joint Melksham Neighbourhood Plan Even Stronger for Longer!



YOUR VOTE COUNTED

The Neighbourhood Plan, which was voted into force in July last year, gives the communities of Melksham town and Melksham Without real local planning power in guiding the conservation and development of our area until 2036. The Steering Group, made of local people and councillors from both

the town and Parish worked on behalf of the two councils and the communities of the area to get the Plan in place. The Steering Group are really pleased to report that the Plan is being used successfully to make sure development is planned and more closely aligned to what local people want.



LOOKING AHEAD TO 2036

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 2036. 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 2036. The current Neighbourhood Plan will be updated and added to in order to make sure it remains up-to-date, forward looking and strong. A refreshed website has been launched as part of this: www.melkshamneighbourhoodplan.org On this website you can find out about how the Joint Melksham Neighbourhood Plan is already making a positive difference, and about how to get involved in shaping Melksham and Melksham Without's future up to 2036.



**COUNCILLOR
JOHN GLOVER
SAYS**

This is your chance to ensure that Melksham remains a great place to live. We worked hard to get a Neighbourhood Plan that local people voted to bring into legal force last summer. Let's keep our Neighbourhood Plan bang up-to-date; this is a living document and we need to respond to a changing context and make sure that our Plan remains as strong as possible.

HAVE YOUR SAY AND FIND OUT MORE ON THE WEBSITE



**Use the website to nominate
valued green spaces
for protection from
future development**



Let us know using the online green spaces map

Find out more www.melkshamneighbourhoodplan.org

Stay up-to-date, get involved and have your say by signing up for updates on the Neighbourhood Plan by emailing office@melkshamwithout.co.uk

Melksham Town Council
townhall@melksham-tc.gov.uk • Tel: 01225 704187

Melksham Without Parish Council
clerk@melkshamwithout.co.uk • Tel: 01225 705700

**Melksham Independent News - 30 March 2022
(also circulated to mailing list)**

NOMINATE YOUR MUCH-LOVED PUBLIC GREEN SPACE FOR PROTECTION



DO you have a favourite green space in the Melksham area that you think should be protected from development? Then the team behind Melksham's Neighbourhood Plan want to hear from you.

Through the Melksham Neighbourhood Plan, an area of green space that is "demonstrably special to a local community" can be protected through a scheme called 'Local Green Spaces'.

"This could be because of its beauty; historic significance; recreational value (including as a playing field); tranquillity; or richness of its wildlife," explains the Neighbourhood Plan steering group.

"We want to hear from you! Tell us about the green spaces you use and value."

All nominations received will then be assessed by the steering group to see if they meet the criteria for designation as a 'Local Green Space'.

Nominations can be made via the website on an online map: www.melkshamneighbourhoodplan.org/local-green-spaces; or by emailing: office@melkshamwithout.co.uk

shamwithout.co.uk

Via the website you can also support green space nominations already made and make comments.

The neighbourhood plan steering group will also be contacting all local landowners on Wiltshire Council's possible housing sites list (called the Strategic Housing and Employment Land Availability Assessment or SHELAA), to confirm if they wish their land to be considered for potential allocation in the Neighbourhood Plan and explain what their sites can provide to support the community's housing and infrastructure needs.

Melksham's Neighbourhood Plan, which is a joint project by Melksham Town Council and Melksham Without Parish Council, sets out where a community would prefer to see housing built and how the area should be developed and is used by Wiltshire Council to determine local planning applications.

Picture: A double rainbow over one of Melksham's much-loved green spaces, Shurnhold Fields. Photo by Steve Harvey.

**Melksham Independent
News Article
27 April 2022**



Updating Melksham's Joint Neighbourhood Plan



Our first Melksham Town and Melksham Without Joint Neighbourhood Plan is being used by Wiltshire Council to determine local planning applications to help manage development and deliver our community's wishes and needs. But our plan needs to be kept up to date and its life extended to ensure it continues to provide strong local powers after 2026, when the current plan period ends. To help ensure this happens the Steering Group has already started work on our updated Neighbourhood Plan 2.

The next version of the plan can tackle big and new local issues like climate change, protecting our valued green spaces and heritage, ensuring new homes meet local people's changing needs and support community facilities and planning for our town centre's vitality. It will also need to respond to and coordinate with Wiltshire's new Local Plan, which will probably be adopted in 2024. It will set high level strategic policies for our community area until at least 2036 including allocation of land to meet Wiltshire's share of Government housing targets.

Representing the Community

It's imperative that the updated Neighbourhood Plan continues to represent the community's wishes, so throughout the process there will be plenty of opportunities to **Have Your Say** and help us shape our next Neighbourhood Plan. We have a new website where you can find out more and get involved: www.melkshamneighbourhoodplan.org

Help us Shape the Plan Get Involved and Have Your Say!

Throughout the spring and summer, the Neighbourhood Plan Steering Group will be launching a series of community consultations on key local community issues. We need to gather your suggestions and priorities to shape the new Neighbourhood Plan's policies and priorities. Please help us protect and shape our area to meet your needs! Visit the website and sign up to get involved! www.melkshamneighbourhoodplan.org

UPCOMING CONSULTATION OPPORTUNITIES

Protecting Local Green Spaces

SURVEY IS LIVE

The Neighbourhood Plan can protect qualifying green spaces through a designation called Local Green Spaces. But we need to know which ones to protect!

We need to know which green spaces you value the most and why they are special to you and your community. This could be because of:

- Its beauty;
- Its historic significance;
- Its recreational value (including as a playing field);
- Its tranquillity; or
- Richness of its wildlife.

The Steering Group can then assess all the nominations received to see if they meet the qualifying criteria for Local Green Space designation.

This survey is already live. It will stay open until 5th June. So don't miss your chance to protect your local green space!



Building a Local Heritage List

SURVEY IN MAY

Melksham's heritage is a key part of our distinct character. It is partly protected by the Melksham conservation area and numerous listed buildings of national heritage importance. But that excludes other historic buildings and features in our area that are locally important.

There is now a way to help address that in our Neighbourhood Plan by adding a list of locally valued historic buildings and features to our existing Neighbourhood Plan heritage policy. This would mean locally listed buildings and features would have to be considered if a planning application came forward that affected one or more of them.

The criteria for what might qualify as a Locally Valued Heritage Asset are long and varied. But as a first vital step the Steering Group need your suggestions to be able to identify the local features that meet these criteria.

The Steering Group will be launching this consultation online in May, so don't miss out!



PLANNING FOR HOMES AND FACILITIES TO MEET OUR COMMUNITY'S NEEDS

People love to live in Melksham and Melksham Without and we have seen it grow significantly as a result. But it is essential that housing growth is managed by an up-to-date Plan and not through speculative development.

With the Wiltshire Core Strategy out of date and developers continuing to submit proposals for housing, our made Neighbourhood Plan is working hard to maintain plan led development for our area now, and aims to continue to help maintain this into the future.

The new Wiltshire Local Plan is likely to plan for Melksham to continue to grow in the years up to 2036. Working alongside the Local Plan, our updated Neighbourhood Plan can continue to ensure we get the right homes to meet our needs. It is vital that any new housing firstly provides affordable opportunities for our community and secondly homes that meet changing needs through life's journey. This can include starter homes to rent or buy, homes for a growing



family, smaller and accessible homes for downsizers, and older local people, to enable us all to continue to live active lives within our community.

To successfully influence the delivery of the right types of local housing and community benefits, our Plan for local homes must be built on solid local evidence. It can take the lead in allocating smaller sustainable housing and mixed use sites to provide diverse local housing and community benefit opportunities more responsively than the Local Plan can.

A New Community Housing Survey

SURVEY IN MAY

To set the agenda, most importantly, the Steering Group needs to understand what our precise local housing needs are. In May it will be launching a special Local Housing Needs survey to ask you about your existing housing and what existing or changing future housing needs you may have. We'll be supplementing this survey with our own highly detailed technical assessment of local housing needs based upon analysis of our community profile.

Talking to Local Landowners

CONTACT US NOW

Alongside the survey to ascertain local needs, the Steering Group is contacting all the local landowners on Wiltshire Council's possible housing sites list (called the Strategic Housing and Employment Land Availability Assessment "SHELA") and is also once again calling upon local landowners to confirm if they wish their land to be considered for potential allocation in the Neighbourhood Plan and explain what their sites can provide to support our community housing and facility needs. If landowners or interested parties would like a site to be considered then please contact: Teresa Strange clerk@melkshamwithout.co.uk **Deadline for call for sites is Sunday 5th June.**

Fill out the Housing Survey!

SURVEY IN MAY

This is an extremely important survey. It will help us plan for the right type and location of new homes to provide opportunities for our community through both the Neighbourhood Plan policies and potential allocations.

So please, please take part! The Steering Group will be launching this survey in May.

STAY IN TOUCH, HAVE YOUR SAY AND FIND OUT MORE ABOUT OUR NEIGHBOURHOOD PLAN 2

Visit our new Neighbourhood Plan website at www.melkshamneighbourhoodplan.org and sign up for updates to take part at every stage of the journey!

IF YOU ARE NOT ONLINE AND UNABLE TO ACCESS THE WEBSITE THEN PLEASE GET IN TOUCH SO THAT WE CAN ARRANGE ALTERNATIVE WAYS OF ENGAGEMENT.

Melksham Town Council
townhall@melksham-tc.gov.uk • Tel: 01225 704187

Melksham Without Parish Council
clerk@melkshamwithout.co.uk • Tel: 01225 705700

**Melksham Independent News - 28 April 2022
(also circulated to mailing list)**

Survey asks what your housing needs are now and in the future

A NEW SURVEY is being launched next week to find out what the housing needs for the community are.

“The Melksham Neighbourhood Plan Steering Group need to understand what the community’s precise local housing needs are,” explains a spokesperson for the steering group. “On Monday 16th May it will be launching a special Local Housing Needs survey to ask you about your existing housing and what existing or changing future housing needs you may have.

“We will be supplementing this survey with our own highly detailed technical assessment of local housing needs based upon analysis of our community profile.

“The new Wiltshire Council Local Plan is likely to plan for Melksham to continue to grow in the years up to 2036. Working alongside the Local Plan, the updated Neighbourhood Plan can continue to ensure we get the right homes to meet our needs.

“It is vital that any new housing firstly provides affordable opportunities for our community to find homes that meet changing needs through life’s journey. This can include starter homes to rent or buy, homes for a growing family, smaller and accessible homes for downsizers and older local people, to enable us all to continue to live active lives within our community.

“To successfully influence the delivery of the right types of local hous-

ing and community benefits delivery, our plan for local homes must be built on solid local evidence. It can take the lead in allocating smaller sustainable housing and mixed use sites to provide diverse local housing and community benefit opportunities more responsively than the Local Plan can.”

The Housing Needs Survey will go live on Monday 16th May, and you can access it from the dedicated website: www.melkshamneighbourhoodplan.org/get-involved

The deadline for responses is Sunday 5th June. If you are not online, please contact Melksham Town Council on 01225 704187 or Melksham Without Parish Council on 01225 705700 to make alternative arrangements.

Article in Melksham Independent News 11 May 2022



Get Involved in Melksham's Joint Neighbourhood Plan



Our first Melksham Town and Melksham Without Joint Neighbourhood Plan is being used by Wiltshire Council to determine local planning applications to help manage development and deliver our community's wishes and needs. But our plan needs to be kept up to date and its life extended to ensure it continues to provide strong local powers after 2026, when the current plan period ends. To help ensure this happens the Steering Group has already started work on our updated Neighbourhood Plan 2.

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It's imperative that the updated Neighbourhood Plan continues to represent the community's wishes, so throughout the process there are plenty of opportunities to **Have Your Say** and help us shape our next Neighbourhood Plan. We have a new website where you can find out more and get involved: www.melkshamneighbourhoodplan.org

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You can also visit our dedicated Facebook page: 'Melksham Neighbourhood Plan'

CURRENT CONSULTATION OPPORTUNITIES

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- Its beauty;
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The Steering Group will then assess all the nominations received to see if they meet the qualifying criteria for Local Green Space designation.

This survey is live. It will stay open until Sunday 5th June. So don't miss your chance to protect your local green space!



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The criteria for what might qualify as a Locally Valued Heritage Asset are long and varied. But as a first vital step the Steering Group need your suggestions to be able to identify the local features that meet these criteria.

This survey is live. It will stay open until Monday 13th June. So don't miss your chance to protect local heritage assets.



PLANNING FOR HOMES AND FACILITIES TO MEET OUR COMMUNITY'S NEEDS

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To set the agenda, most importantly, the Steering Group needs to understand what our precise local housing needs are. A special Local Housing Needs survey has been launched to ask you about your existing housing and what existing or changing future housing needs you may have. We'll be supplementing this survey with our own highly detailed technical assessment of local housing needs based upon analysis of our community profile.

This is an extremely important survey. It will help us plan for the right type and location of new homes to provide opportunities for our community through both the Neighbourhood Plan policies and potential allocations.

So please, please take part! This survey is now live and will stay open until Thursday 30th June.

Talking to Local Landowners

CONTACT US NOW

Alongside the survey to ascertain local needs, the Steering Group is contacting all the local landowners on Wiltshire Council's possible housing sites list (called the Strategic Housing and Employment Land Availability Assessment "SHELA") and is also once again calling upon local landowners to confirm if they wish their land to be considered for potential allocation in the Neighbourhood Plan and explain what their sites can provide to support our community housing and facility needs.

If landowners or interested parties would like a site to be considered then please contact: Teresa Strange clerk@melkshamwithout.co.uk

Deadline for call for sites is Sunday 5th June.

STAY IN TOUCH, HAVE YOUR SAY AND FIND OUT MORE ABOUT OUR NEIGHBOURHOOD PLAN 2

Visit our new Neighbourhood Plan website and take part in the consultations NOW!

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IF YOU ARE NOT ONLINE AND UNABLE TO ACCESS THE WEBSITE THEN PLEASE GET IN TOUCH SO THAT WE CAN ARRANGE ALTERNATIVE WAYS FOR YOU TO TAKE PART.

Melksham Town Council
townhall@melksham-tc.gov.uk • Tel: 01225 704187

Melksham Without Parish Council
clerk@melkshamwithout.co.uk • Tel: 01225 705700

Melksham Independent News - 26 May 2022
(also sent to mailing list)

Have you had your say on future development in Melksham and Melksham Without?

THE plan to review and update the Melksham Neighbourhood Plan continues, with several consultations still live and awaiting the community to give their input.

A spokesperson for the Joint Melksham Neighbourhood Plan committee says, "The most important one is to give your views on current housing needs in the Melksham area. What type of housing is required? Flats? Starter homes? Specialist accommodation for elderly residents? Family homes? And are you looking for rental properties, shared ownership or market value properties to buy?"

"The answers you give are vital evidence in shaping the future mix of the housing development in the Melksham area in the coming years. The deadline for this survey is 30th June.

"There is also still time

to nominate a local heritage asset for potential protection. Is there something historic that you value in the community, but is not a listed building or in the conservation area? Deadline for this survey is 13th June.

"The 'Call for Sites', and nominations for 'Local Green Spaces' has now closed, and the task groups of the Neighbourhood Plan, all made up from local residents and councillors, will now be reviewing the requests made."

To get involved, then go to the website www.melkshamneighbourhoodplan.org and take part in the consultations.

If you are unable to access the website, please contact Melksham Town Council (01225 407187) or Melksham Without Parish Council (01225 705700) and alternative arrangements can be made.

Melksham Independent News Article - 7 June 2022



Melksham Neighbourhood Plan Update



Thank you to everyone who took part in the consultations and evidence gathering exercises that have taken place over the summer months as part of the Melksham Neighbourhood Plan review.

We are taking the opportunity to feedback to you here on what happened next, and to let you know that the next round of community engagement will start on Saturday 3rd December and run to the end of the year.

Housing: Assessment and Information to inform

The steering group undertook a Call for Sites exercise in the Spring, advertising widely locally, with several page adverts in the Melksham News, a social media presence, we also contacted everyone who has ever been in contact in previous consultations or visited an event.

In addition, land owners who have their land registered as available with Wiltshire Council have all been contacted. This produced a list of some 90 sites that land owners have put forward to be considered for housing allocation in the next version of the Melksham Neighbourhood Plan. National independent company AECOM are now sifting and assessing the individual sites, with a report to follow at the end of the year which will then lead to the site allocation work by the Housing Task Group who will be shortlisting sites before engaging with land owners. There will be the opportunity for some

informal community engagement on the shortlist of sites. The next version of the Plan will include housing site allocations for small and medium sites, whereas the Local Plan being produced by Wiltshire Council will be allocating large, strategic sites.

Running alongside this work, a Housing Needs Assessment has also been undertaken by AECOM for the Neighbourhood Plan area of Melksham Town and Melksham Without; this incorporates the local Housing Needs Survey that was undertaken by ourselves and advertised in the Melksham News. This looks at the type and tenure of the housing mix requirements in the area, and is the evidence for housing mix policy in the reviewed Plan; ensuring that future housing meets the needs of local people. Thankyou to the 136 local residents who responded to the Local Housing Needs survey in May and June; the results of this have now been published.

SEE www.melkshamneighbourhoodplan.org

Protecting Values Local Green Space

There is the opportunity through the Plan to give a Local Green Space planning designation to protect spaces that are important to the local community.

Thank you to those of you that put forward local green spaces that were important due to their historic significance, their beauty, their recreational value, their richness in wildlife or their tranquillity. This designation can only apply to small, local spaces and not large tracts of land. The volunteer task group is now working through the 50+ sites that the public put forward to ensure that they meet the necessary criteria and eligibility to produce a shortlist, we are currently making contact with the local landowners. You can view the sites put forward on the Neighbourhood Plan website.

Green Gaps Designation

As you may be aware, there has been a recent Appeal Hearing upheld for a site on Semington Road, behind Townsend Farm, for 50 affordable dwellings.

One of the things highlighted by the Planning Inspector was the lack of a policy on green gaps, to prevent the coalescence of villages to the town and other villages, and this is being addressed in the review of the Neighbourhood Plan. We are working to secure the appropriate technical support to aid this piece of work, with the aim of consulting the community on this during the assessment period over the next few months.

Addressing Climate Change

A separate task group is working on the broad topic of Climate Issues, including analysis of other Neighbourhood Plans that have recently been examined and adopted to see if there are further policies that can be included in the next version of the Plan, as this is a rapidly changing topic.

Policy updates have been drafted with background information to be revised next. The group working on this brief are closely aligned with the Town Council's Environment & Climate Working Group.

Planning for the future vitality of the town centre

AECOM have also been appointed to look at the Town Centre Master Plan work, and will be taking a holistic, independent approach at the Town Centre, looking at its Economy and Vitality, its Culture and Distinctiveness, its Connections and Accessibility, the quality of its Public Realm, and its Heritage and Townscape; all set against the pressing agenda of Sustainability and Climate Change.

There is also the possibility of some Town Centre Regeneration Site opportunities with vacant sites in the

town centre, including those recently vacated as part of the Campus project; they may provide identified/allocated housing to meet local needs. This is a fantastic opportunity for some revised town centre policies in the revised Plan, and for a Master Plan evidence document to sit alongside the Neighbourhood Plan as a practical separate stand-alone document. AECOM have been fully briefed by the Neighbourhood Plan team and are working with the Town Council and Wiltshire Council on the publicly owned assets aspects.

Protecting our Local Heritage

Whilst not giving as much protection as the Local Green Spaces, there is still the opportunity to list in the Neighbourhood Plan heritage assets that don't have Listed status but still have an important historical value to the local community.

Again, thank you to those of you who responded to this survey. A small group of volunteers is looking at the evidence for these sites, it's a short list but valuable nevertheless, and the next step is to contact landowners. You can view the list of those sites put forward on the Neighbourhood Plan website.

Strengthening locally distinctive design

For new housing, and other development, it's not just about where it is, and whether its two or three bedrooms, or rented or for purchase; it's about what it looks like and this is where the Design Codes come in.

AECOM have been appointed to do this work, and are looking at what "good design" looks like for the Melksham Plan area and all future planning applications will have to adhere to the Code when the Plan is adopted. From designing out anti-social behaviour, to brick colours, to solar panels, this is all covered in the Design Code. It covers local identity and character, access and movement incorporating the Priority for People work, green and blue infrastructure (eg. trees/fields and rivers/floodplains), sustainability and energy efficiency and the built form. There will be some community engagement on this piece of work as we seek your views.

Ensuring that Local Priorities are addressed

As the proposed Bypass and Melksham Link Canal projects progress

The Neighbourhood Plan is all about planning policy, and to be referred and adhered to when planning applications are considered.

There are a couple of proposed large infrastructure projects that are in the Melksham Neighbourhood Plan area and there are separate task groups looking into these projects to ensure that the Plan is reviewed in line with the latest updates on these projects. The Plan will have Priority Statements on these projects, but they will be light touch as the Neighbourhood Plan is not the place for decision making on these projects; and therefore cannot have policies relating to them. Volunteer task groups have met with the project teams on these separate projects to review the current statement with them.

Who is working on this project?

The Melksham Neighbourhood Plan is a joint project of Melksham Town Council and Melksham Without Parish Council but is community led, and the Steering Group and Task Groups are made up from a wide range of volunteers from the community.

Planning expertise is provided by Place Studio, who guide us through the process. The group has been successful in obtaining grant funding from the Government to contribute to the costs, and some technical support from AECOM who are also provided by Locality, directly funded by central Government.

How do I get involved?

Information on the progress on the review of the Melksham Neighbourhood Plan can be viewed on the dedicated website

<https://www.melkshamneighbourhoodplan.org/> and dedicated facebook page. You can sign up to the mailing list by contacting any officer at the Town or Parish Council or by clicking the link on the website. If you are not online, please contact either of the councils who can provide written updates. Look out for further consultation and engagement opportunities advertised in the Melksham News too.

Look out for the Neighbourhood Plan stall at the Christmas Market on Saturday 3rd December

To find out details of the new opportunities to help shape your local community.

Melksham Town Council
townhall@melksham-tc.gov.uk • Tel: 01225 704187

Melksham Without Parish Council
clerk@melkshamwithout-pc.gov.uk • Tel: 01225 705700

Melksham Independent News - 24 November 2022
(also sent to mailing list)



YOUR VOICE YOUR MELKSHAM SHAPE YOUR TOWN

**SAVE THE
DATE!**
HAVE YOUR SAY

WHAT NEXT FOR THE TOWN CENTRE?



A draft Town Centre Master Plan has been produced by consultants who have taken an holistic, independent approach. They have examined the town's Economy and Vitality, its Culture and Distinctiveness, its Connections and Accessibility, the quality of its Public Realm, and its Her-

itage and Townscape; all set against the pressing agenda of Sustainability and Climate Change. There is also the possibility of some Town Centre Regeneration Site opportunities with vacant sites in the town centre, including those recently vacated as part of

the Campus project; they may provide identified/ allocated housing to meet local needs. We are seeking your views on the draft plan with a special event planned for town centre businesses to start the process, closely followed by community consultation.

PROTECTING VALUED LOCAL GREEN SPACE



There is the opportunity through the Plan to give a Local Green Space planning designation to protect spaces that are important to the local community. Thank you to those of you that put forward local green spaces that were important due to their historic significance, their beauty, their recreational value, their richness in wildlife or their tranquillity. This designation can only apply to small, local spaces and not large tracts of land. The volunteer task group is now working through the 50+ sites that the public put forward to ensure that they meet the necessary criteria and eligibility to produce a shortlist, we are currently making contact with the local landowners. You can view the sites put forward on the Neighbourhood Plan website or at the public consultation events and we will be seeking your views on the shortlist.

HOUSING SITE ALLOCATIONS LED BY THE COMMUNITY

The next version of the Plan will include housing site allocations for small and medium sites, whereas the Local Plan being produced by Wiltshire Council will be allocating large, strategic sites. The Plan's housing allocation means that future development is Plan led and not speculative development in isolated green fields. This is your opportunity to comment on where these smaller sites should be. Some 90+ sites have been put forward by local landowners, and are currently being assessed for suitability by independent consultants. We are asking your views on these sites, and the community benefits that they could bring.



Cllr David Pafford
Steering Committee Chair

"We worked hard to get a Neighbourhood Plan that local people voted to bring into legal force. Let's keep our Neighbourhood Plan bang up-to-date; this is a living document and we need to respond to a changing context and make sure that our Plan remains as strong as possible"

STRENGTHENING LOCALLY DISTINCTIVE DESIGN

We are forecast to accommodate a further approx. 2,500 houses up to 2036.

For new housing, and other development, it's not just about where it is, and whether it's two or three bedrooms, or rented or for purchase; it's about what it looks like and this is where the Design Codes come in. Consultants have been appointed to do this work, and are looking at what "good design" looks like for the Melksham area and all future planning applications will have to adhere to the Code when the Plan is adopted. From designing out anti-social behaviour, to brick colours, to solar panels, this is all covered in the Design Code. It covers local identity and character, access and movement incorporating the Priority for People work, green and blue infrastructure, sustainability and energy efficiency and the built form. There will be some community engagement on this piece of work over the coming weeks.

PROTECTING MELKSHAM'S HERITAGE



The Neighbourhood Plan will list heritage assets that don't have Listed status but still have an important historical value to the local community.

Thank you to those of you who responded to this survey. A small group of volunteers is looking at the evidence for these sites; it's a short list but, valuable nevertheless, we are currently making contact with the local landowners. You can view the sites put forward on the Neighbourhood Plan website or at the public consultation events and we will be seeking your views on these heritage assets.



PUBLIC CONSULTATION EVENTS COMMUNITY CONSULTATION

Come to the Melksham Community Campus for an exhibition of display boards with a chance to chat in-person

THURSDAY 9TH FEBRUARY 4-7pm • FRIDAY 10TH FEBRUARY 11am-5pm • SATURDAY 11TH FEBRUARY 10am-12 noon

Consultation boards will then be on display in the campus and town hall from early February to early March
Where you will be able to comment directly on proposals

STAKEHOLDER EVENT

Tuesday 7th February. For town centre businesses focusing on the town centre masterplan
Register your interest at linda.roberts@melksham-tc.gov.uk 01225 704187

KEEP IN TOUCH

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- Sign up for the mailing list
- Visit the website which is regularly updated
www.melkshamneighbourhoodplan.org
- Follow the Facebook page
MelkshamNeighbourhoodPlan
- Attend future consultation events
- Read regular updates in the Melksham News

IN PERSON

Melksham Town Council
Market Place SN12 6ES
linda.roberts@melksham-tc.gov.uk
Tel: 01225 704187

Melksham Without Parish Council
First Floor, Melksham Campus SN12 6ES
clerk@melkshamwithout-pc.gov.uk
Tel: 01225 705700

Melksham Independent News - 19 January 2023
(also sent to mailing list)

What next for the future of Melksham town centre? A chance to have your say

A PUBLIC consultation, giving residents and local businesses the chance to have their say about future plans for Melksham town centre, is being held this month at Melksham Community Campus.

Questions posed in the consultation include what the next steps should be for the former Blue Pool and library sites, now that Melksham Campus has been built and what does the future hold for the Cooper Tires site after the company closes its tyre factory.

Melksham Town Council clerk, Linda Roberts said, "This is your chance to have your say on the future plans for Melksham's town centre. There are exciting opportunities ahead for the town centre, so do not miss out on the chance to get involved and influence how the town centre develops."

Master plan

The town centre master plan is part of Melksham Neighbourhood Plan, which is a joint initiative by Melksham Town and Melksham Without councils.

"A draft for the town centre master plan has now been put together by consultants who have taken a holistic, independent approach," said the team behind the Neighbourhood Plan. "They have examined the town's economy, vitality, its culture and distinctiveness, connections, accessibility,

quality of the public spaces, heritage, and townscape, with a focus on climate change and the town's sustainability.

"The plan includes protecting valued local green space, housing site allocations led by the community, strengthening locally distinctive design and protecting Melksham's heritage.

"The next stage is community consultation so that planners can find out local people's views."

Public consultation

The public consultation will take place at Melksham Community Campus on; Thursday 9th February 4pm-7pm; Friday 10th February 11am-5pm and Saturday 11th February 10am-12pm. At the events, there will be an exhibition of display boards, with a chance to chat about the proposals.

On Tuesday 7th February there is also an opportunity for town centre businesses to have

their say. To register your interest in this event, contact linda.roberts@melksham-tc.gov.uk or tel. 01225 704187.

From early February to early March, consultation boards will be on display in the campus and town hall, where people will still be able to comment on the proposals.

The Joint Melksham Neighbourhood Plan gives the councils local planning power in guiding the development and conservation of our area.

Plan 1, which was given the go-ahead by a vote by local people in 2020, is now being used. Plan 2 is also considering long term aims such as tackling climate change and providing affordable homes in the right places. More details about the Neighbourhood Plan can be found on the councils' websites.

**FOR MORE
DETAILS -
SEE PAGE 4**



Melksham Without clerk, Teresa Strange; Melksham Without vice chair David Pafford; and Melksham Town Council clerk, Linda Roberts

Melksham Independent News Article - 31 January 2023



YOUR VOICE YOUR MELKSHAM SHAPE YOUR TOWN



**ANOTHER CHANCE TO CHAT IN PERSON AT THE COMMUNITY CAMPUS
WEDNESDAY 8TH MARCH, 7PM - AREA BOARD**

DON'T MISS THE PUBLIC CONSULTATION DISPLAY BOARDS

**On display in the cafe area at
Melksham Community Campus
and Melksham Town Hall**

Learn more about the proposals and
comment directly on them.

**RESPOND TO
QUESTIONS
THAT MATTER**

How should town centre sites be regenerated?
What green spaces should be protected?
What should new housing look like?
What heritage sites should we protect?



**THIS IS A VITAL
OPPORTUNITY
TO HAVE
YOUR SAY!**



**TAKE PART IN THE CONSULTATION NOW
DEADLINE: SUNDAY 19TH MARCH**

HEAR MORE ABOUT THE PLAN IN THE PODCAST 'CELEBRATE MELKSHAM'

LISTEN ON **ANCHOR** | **SPOTIFY** | **APPLE MUSIC**

VIEW THE CONSULTATION BOARDS ONLINE AT

www.melkshamneighbourhoodplan.org/tcmpconsultationfebmar



OR VISIT IN PERSON AT THE TOWN HALL AND COMMUNITY CAMPUS

**Let us know what you treasure and want to protect in
the town centre and what your priorities for change are.**

**Hard copy surveys are available and you can also
get support to be online at the library.**



WHAT IS IT ABOUT - HERITAGE • TOWN CENTRE • GREEN SPACES • DESIGN

KEEP IN TOUCH

Information on the progress on the review of the Melksham Neighbourhood Plan can be viewed on the dedicated website www.melkshamneighbourhoodplan.org and dedicated Facebook page. You can sign up to the mailing list by contacting any officer at the Town or Parish Council or by clicking the link on the website. If you are not online, please contact either of the councils who can provide written updates. Look out for further consultation and engagement opportunities advertised in the Melksham News regularly.

- Sign up for the mailing list
- Visit the website which is regularly updated www.melkshamneighbourhoodplan.org
- Follow the Facebook page [MelkshamNeighbourhoodPlan](https://www.facebook.com/MelkshamNeighbourhoodPlan)
- Attend future consultation events
- Read regular updates in the Melksham News

IN PERSON

Melksham Town Council
Market Place SN12 4ES
linda.roberts@melksham-tc.gov.uk
Tel: 01225 704187

Melksham Without Parish Council
First Floor, Melksham Campus SN12 6ES
clerk@melkshamwithout-pc.gov.uk
Tel: 01225 705700

**Melksham Independent News - 2 March 2023
(also sent to mailing list)**



**MELKSHAM
NEIGHBOURHOOD
PLAN**

YOUR VOICE YOUR MELKSHAM

SHAPE YOUR TOWN



**MELKSHAM
NEIGHBOURHOOD
PLAN**

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LISTEN ON ANCHOR | SPOTIFY | APPLE MUSIC

**ANOTHER CHANCE TO CHAT IN
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AREA BOARD

VIEW THE CONSULTATION BOARDS ONLINE AT

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**OR VISIT IN PERSON AT THE TOWN HALL
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- Attend future consultation events
- Read regular updates in the Melksham News

IN PERSON

Melksham Town Council
Market Place SN12 6ES
Email: info@melksham.gov.uk
Tel: 01225 706187

Melksham Without Parish Council
Red Fox, Melksham Campus SN12 6ES
Email: clerk@melkshamwithout-pc.gov.uk
Tel: 01225 706790

Melksham Independent News – March 2023
 (also sent to mailing list)

Help shape the future of Melksham

THE community is invited to attend the Melksham Area Board public meeting to learn more about shaping Melksham and the surrounding areas.

The meeting is on Wednesday 8th March, at Melksham Library in the Campus, 7pm to 9pm.

Melksham Without Parish Council clerk Teresa Strange explained, "There is some exciting work going on to improve the physical space in and around Melksham and you are invited to join us to hear more about it and have your say.

"Melksham Area Board will be focussing upon shaping our local town and the surrounding area. This will include a workshop jointly led

by Melksham Without Parish Council and Melksham Town Council that will consider three different pieces of work.

"The first will be looking at the 'Town Centre Master Plan' that looks at how the heritage, economy, accessibility and public realm can be developed. This is currently out for consultation, and you will be able to find out what feedback has been received so far and have a final opportunity to get involved and influence it.

"The second will highlight the importance and current state of the 'Joint Neighbourhood Plan' that is vital to plan and protect our town, surrounding area and countryside.

"The third will introduce some

of the other projects around the natural and built environment and raise the important question of what the identity of the Melksham area is and should be moving forward.

"At the meeting, we will also hear the latest news on highways schemes, the work going on at Spa Road roundabout, the transfer of Wiltshire Council assets to the local community and much more.

"There will be plenty of opportunity to have your say and get involved in shaping the community area to be an even better place to live work and enjoy. We hope you can join us."

For more information contact richard.rogers@wiltshire.gov.uk or telephone 01225 718628.

Melksham Independent News Article - 2 March 2023

APPENDIX 3 – COUNCIL NEWSLETTERS



Summer Newsletter

clerk@melkshamwithout.co.uk

MELKSHAM WITHOUT PARISH COUNCIL

Sports Pavilion, Westinghouse Way, Bowerhill, Melksham, SN1 2 6TL • 01225 705700



Clerk Teresa Strange & Chair John Glover

MELKSHAM NEIGHBOURHOOD PLAN

The parish council are actively involved in the review of the current joint Neighbourhood Plan with the Town Council and members of the community on the Steering Group and new Task Groups.

There are lots of ways to get involved as the local community, please see the separate page on the Neighbourhood Plan in this issue which details all the current consultations. Local community members are on the individual task groups who will be reviewing the

evidence gathered from these surveys, and on other topics, and if you would like to get involved with this work in more detail, then please get in touch. Its your community, we need to hear from you on how to shape it for future generations!

- Housing
- Environment – Green Space, Heritage Assets, Design Guides
- Sustainability & Climate
- Strategic Projects – Town Centre, Implications of proposed Bypass & Canal Link

26 May 2022 Edition of
Melksham News



Winter Newsletter

clerk@melkshamwithout-pc.gov.uk

MELKSHAM WITHOUT PARISH COUNCIL

First Floor, Melksham Community Campus, Market Place, SN12 6ES • 01225 705700



Clerk Teresa Strange & Chair John Glover

BUDGET & PRECEPT FOR 2023/24

Melksham Without Parish Council agreed their Budget for 2023/24 at the Full Council meeting held on Monday 23rd January 2023.

The Council unanimously agreed to set its Precept – the proportion of Council Tax paid to the Parish Council – at £245,271.03 for the 2023/24 financial year, which is an increase of £9,581.98 (4.1%) on last year's Precept. However, due to the additional number of houses that have been

built and occupied in the parish, there are more residents contributing to the Precept. This means that the average Band D household will contribute £84.71 to Melksham Without Parish Council, a zero rise on last year. (Band D properties are used as a measure of the national average).

The parish council have strived to maintain services without increasing the burden on residents, against the backdrop of the current cost of living crisis.

MELKSHAM NEIGHBOURHOOD PLAN

The parish council are working hard on the revision of the Melksham Neighbourhood Plan.

This is a joint project with the Town Council and members of the steering group from various organisations in the community. Now it's time for you to have your say on how to shape the town, and to say what's important to you.

Public consultation events are being run in the Campus next week on the Town Centre Master Plan and local green spaces, design guides for local development and local heritage assets. Come along and have a chat and find out more about it. Its interactive, lots of displays, maps, and the chance to give your opinion on the changing face of high streets and what that looks like in your town.



PUBLIC CONSULTATION EVENTS

COMMUNITY CONSULTATION

Come to the Melksham Community Campus for an exhibition of display boards with a chance to chat in-person

THURSDAY 9TH FEBRUARY
4pm-7pm

FRIDAY 10TH FEBRUARY
11am-5pm

SATURDAY 11TH FEBRUARY
10am-12 noon

Following all the events there will still be plenty of time to send in your comments, the boards will remain up at the Campus and you will be able to fill in a questionnaire or respond online.

There is a separate event for town centre businesses on Tuesday 7th Feb, please get in touch to register your interest for an invitation to that dedicated evening.

BERRYFIELD VILLAGE HALL

The opening event on Saturday 21st January was a great way to top off the culmination of several year's work to provide a new community space in Berryfield that was fit for purpose.

The committee that has formed to run the hall on behalf of the parish council has now been formally recognised as a charitable trust, the lease will be signed shortly and the different areas let to local groups and organisations. The ribbon was cut by the Deputy Lieutenant AVM David Couzens and the hall was full of local residents, both from the new Bowood View development and the older parts of Berryfield, Semington Road and the mobile home park next door – enjoying tea and cake, and listening to music provided by Strings Incognito. Thankyou to the local businesses that provided refreshments; Asda, Co-op, Waitrose and Newmans



Butchers. Look out for lots of exciting things to do in the new hall from organisations that have already booked regular slots. To make contact with any enquiry or booking then please contact via BerryfieldVillagehall@outlook.com until the phone and online booking system is up and running.

NEW CO-OPTED COUNCILLOR

A very warm welcome to a new Councillor Peter Richardson.

Melksham Without Parish Council met on Monday evening, and one of the first order of business was to co-opt a new councillor to fill the vacancy in the Beanacre, Shaw, Whitley and Blackmore ward following the resignation of Councillor Mary Pile. Candidates had submitted their application in writing, and were invited to say a few words and answer questions on the night; before councillors voted. It was a close run thing and the council are delighted to welcome a new councillor who lives in the ward and already has



a proven track record of representing the interests of local residents as Chair of CAWS (Community Action: Whitley & Shaw).

VILLAGE HALLS WEEK

Village Halls Week

2023

Warm, welcoming and inclusive spaces
#VillageHallsWeek

Last week was "Village Halls Week", a national campaign shining the spotlight on the contribution England's 10,000+ village halls make to rural communities.

There is plenty to celebrate in the parish, with five warm, welcoming and inclusive community spaces. Just taking a snapshot of last week, there was a newspaper service available daily from Whitley Reading

Rooms, the community dining lunch at Bowerhill Village Hall, pre-school at Shaw Village Hall and table tennis in the school room at St Barnabas Church in Beanacre. The week commenced with the opening of the brand new village hall at Berryfield. All of these wonderful spaces are run by volunteers, and supported with grant funding by the parish council.



OLD AND NEW



WHO IS MY COUNCILLOR?

BERRYFIELD WARD	
	Shona Holt shona.holt@melkshamwithout-pc.gov.uk
	Richard Wood richard.wood@melkshamwithout-pc.gov.uk
BEANACRE, SHAW, WHITLEY AND BLACKMORE WARD	
	Terry Chivers terry.chivers@melkshamwithout-pc.gov.uk
	John Doel john.doel@melkshamwithout-pc.gov.uk
	Stefano Patacchiola JP stefano.patacchiola@melkshamwithout-pc.gov.uk
	Peter Richardson peter.richardson@melkshamwithout-pc.gov.uk
BOWERHILL WARD	
	Alan Baines alan.baines@melkshamwithout-pc.gov.uk
	John Glover (Council Chair) john.glover@melkshamwithout-pc.gov.uk
	Mark Harris mark.harris@melkshamwithout-pc.gov.uk
	Rob Hoyle rob.hoyle@melkshamwithout-pc.gov.uk
	David Pafford (Council Vice Chair) david.pafford@melkshamwithout-pc.gov.uk
	Andy Russell andy.russell@melkshamwithout-pc.gov.uk
	Robert Shea-Simonds robert.shea-simonds@melkshamwithout-pc.gov.uk

WANT TO KEEP IN TOUCH?

on twitter @melkshamwithout
on Instagram melkshamwithoutpc
on Facebook Melksham Without Parish Council


or visit our website
www.melkshamwithout-pc.gov.uk

NEIGHBOURHOOD PLAN – HAVE YOUR SAY!

SIMPLY VISIT THE LINK BELOW TO OUR NEIGHBOURHOOD PLANNING WEBSITE WHERE YOU CAN GET INVOLVED

<https://www.melkshamneighbourhoodplan.org/local-green-spaces>

DEADLINE 5TH JUNE



The neighbourhood plan can protect qualifying green spaces through a designation called Local Green Spaces. But we need your help to choose which ones to protect!

We need to know which green spaces you value the most and why they are special to you and your community. This could be because of:

- Its Beauty;
- Its Historic Significance;
- Its Recreational Value;
- Its Tranquillity or Richness of its Wildlife.

WHAT IS THE NEIGHBOURHOOD PLAN?

Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. (Gov.uk)

HOW TO USE THE NEIGHBOURHOOD PLANNING WEBSITE:


Create an account with Placecheck

Simply explore the interactive map and chose an area in which you have an interest.

Click on that area and a text box such as the one on the right will pop up.

You then have the option to either agree with a thumbs up, or disagree with a thumbs down as to whether you believe this area should be protected.

The best part is there is no limit, so you can have your say all over Melksham!




NO COMPUTER? NO PROBLEM!

Feel free to jot down your nominations and submit them to Melksham Town Hall in person or by telephone us on 01225 704187

Melksham Town Council Newsletter in 11 May 2022 Edition of Melksham News

APPENDIX 4 – FACEBOOK POSTS



Melksham Town Council
Published by Melksham TC Staff
21 March 2022

Launch of the Melksham Neighbourhood Plan Review, new website
<https://www.melkshamneighbourhoodplan.org/>
and the opportunity to nominate green spaces for protection from future development
<https://www.melkshamneighbourhoodplan.org/local-green-spaces>

Edit

3 1

Like Comment Share

Write a comment...

Melksham Town Council Facebook Post - 21 March 2022



Melksham Town Council Facebook Post 21 February 2023



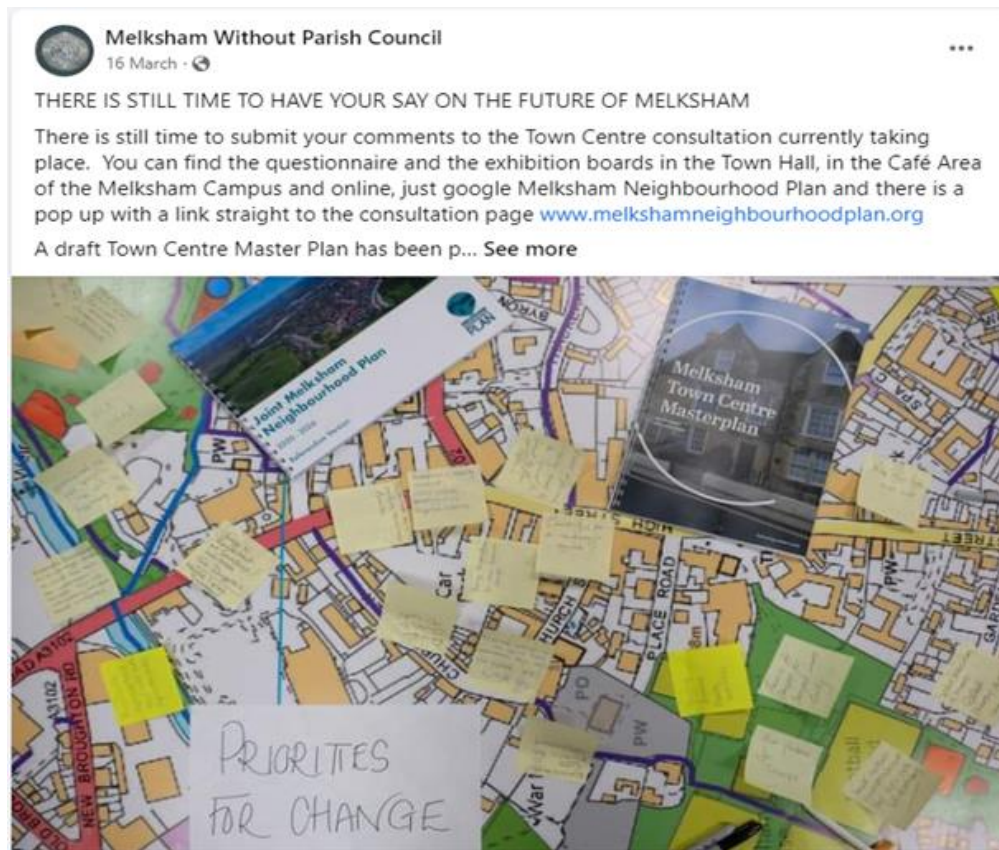
Melksham Town Council Facebook Post 9 February 2023



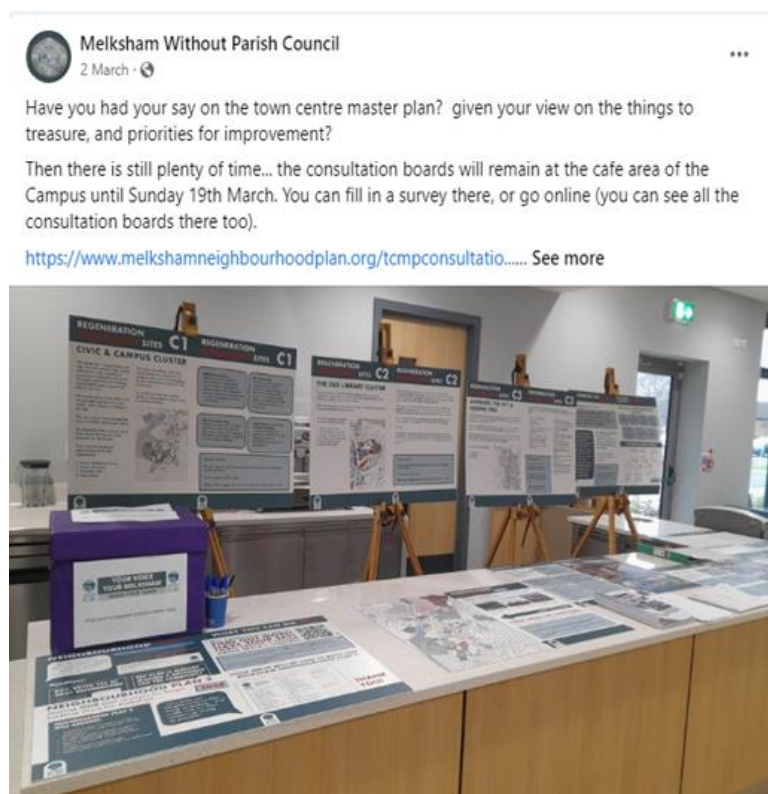
Melksham Town Council Facebook Post 3 February 2023



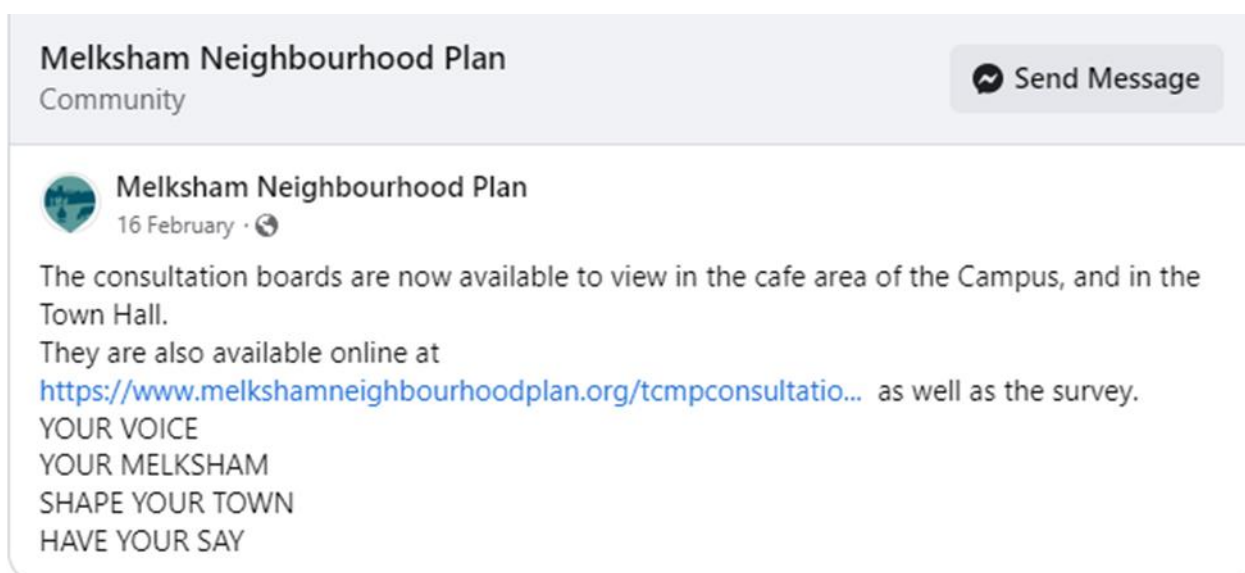
Melksham Town Council Facebook Post – 24 November 2022



Melksham Without Facebook Post 16 March 2023



Melksham Without Parish Council Facebook Post 2 March 2023



Melksham Neighbourhood Plan Post – 16 February 2023



Melksham Neighbourhood Plan

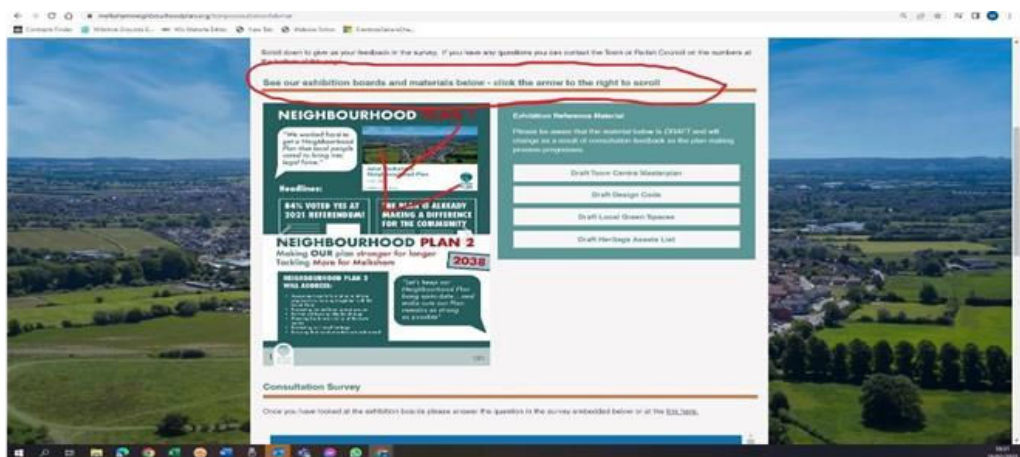
16 February · 🌐

Want to view the Melksham Neighbourhood Plan consultation boards but can't get into town to view at the Campus or the Town Hall?

They are on the website, see the bit ringed in red below, and then you can arrow right to work through the 10 boards one by one - you will need to view the boards to answer some of the survey questions.

To access the consultation online - the boards, the questionnaire and the draft evidence documents that use this link

<https://www.melkshamneighbourhoodplan.org/tcmpconsultatio...> or go to the home page and there is a pop up link



Melksham Neighbourhood Plan Facebook Post – 16 February 2023



Melksham Without Parish Council

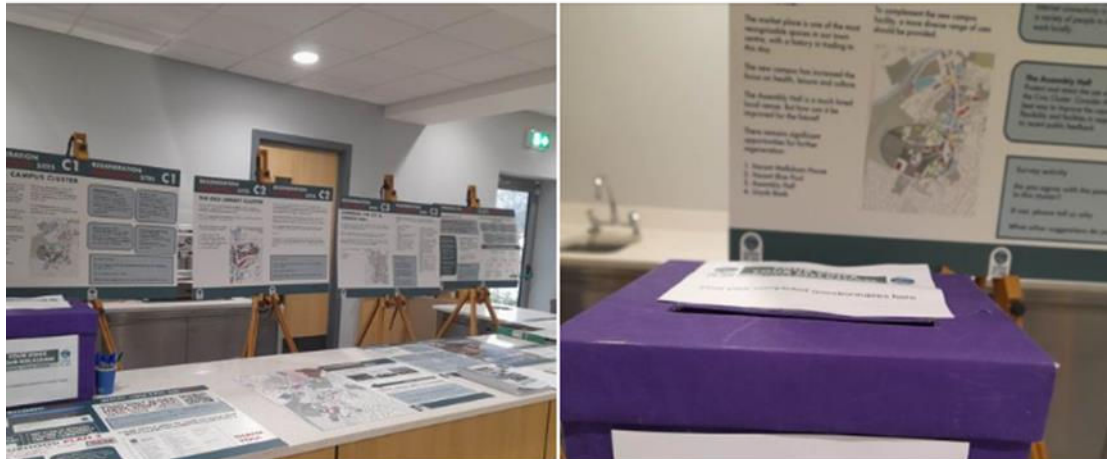
11 February · 🌐

...

Thank you to everyone who attended the consultation events this week. We are thrilled it generated so much interest; with a steady stream of people who came to find out more and leave their views.

The information boards and questionnaires will be available at the Campus and Town Hall now, so there is still time to have your say; right up until 19th March.

Or you can go online <https://www.melkshamneighbourhoodplan.org/tcmpconsultatio.....> See more



Melksham Without Facebook Post – 11 February 2023



Melksham Without Parish Council

11 February · 🌐

...

On today - Saturday - 10 to 12noon



Melksham Without Parish Council

10 February · 🌐

Consultation Reminder

Public consultation event on TODAY at the Melksham Community Campus for the Melksham Neighbourhood Plan - the Town Centre Master Plan, Design Guides, Local Green Spaces, Local Heritage assets.

The Town Centre Master Plan Exhibition is open to the public for two more days this week.

Do you want to influence what happens to your town centre?

What should be protected?

What can be changed ?

Come to the Melksham Community Campus (through the café area) for an exhibition of display boards, maps and a chance to chat in person on :

FRIDAY 10TH FEBRUARY 11AM - 5PM

SATURDAY 11TH FEB 10AM - 12 NOON

Consultation boards will be then be on display in the campus and town hall until early March where you will be able to comment directly on proposals.

[#melkshamneighbourhoodplan](https://www.melkshamneighbourhoodplan.org)

www.melkshamneighbourhoodplan.org

Melksham Without Facebook Post – 10 February 2023



Melksham Without Parish Council

8 February · 🌐

...

STARTING TOMORROW - THURSDAY 9TH FEB

Public consultation events this week for the Melksham Neighbourhood Plan - the Town Centre Master Plan, Design Guides, Local Green Spaces, Local Heritage assets.

A special event for town centre businesses launched the consultation period last night.

Come and have your say and shape where you live.

In the Campus, through the cafe area.

Thursday 4 - 7pm

Friday 11am to 5pm

Saturday 10am to 12

Melksham Without Facebook Post – 8 February 2023



Melksham Without Parish Council

1 February · 🌐

...



OPEN.SPOTIFY.COM

#8 Melksham Neighbourhood Plan Pt 2 - Shape Your Town

Listen to this episode from Celebrate Melksham on Spotify. In Celebrate Melksham's first two part we interview Linda Roberts (Melksham Town Council Clerk) and Teresa Strange...

i

Save

Melksham Without Facebook Post – 1 February 2023



Melksham Without Parish Council

31 January · 🌐

...

Public consultation events next week for the Melksham Neighbourhood Plan - the Town Centre Master Plan, Design Guides, Local Green Spaces, Local Heritage assets. Come and have your say and shape where you live.

****Special event for town centre businesses next Tuesday evening - PLEASE REGISTER****



MELKSHAM

NEIGHBOURHOOD

PLAN

YOUR VOICE

YOUR MELKSHAM

SHAPE YOUR TOWN



MELKSHAM

NEIGHBOURHOOD

PLAN

REMINDER - CONSULTATION STARTS SOON



PUBLIC CONSULTATION

EVENTS

COMMUNITY CONSULTATION

Come to the Melksham Community Campus for an exhibition of display boards with a chance to chat in-person

THURSDAY 9TH FEBRUARY 4pm-7pm

FRIDAY 10TH FEBRUARY 11am-5pm

SATURDAY 11TH FEBRUARY 10am-12 noon

Consultation boards will then be on display in the campus and town hall from early February to early March.

Where you will be able to comment directly on proposals.

STAKEHOLDER EVENT

Tuesday 7th February. For town centre businesses focusing on the town centre masterplan

Register your interest at linda.roberts@melksham-tc.gov.uk 01225 704187

HEAR MORE ABOUT THE PLAN IN THE

CELEBRATE MELKSHAM PODCAST


Melksham Without Parish Council Facebook Post – 31 January 2023

Page 166

Page 60 of 62



Melksham Neighbourhood Plan
Community

 Send Message



Melksham Neighbourhood Plan

26 January · 

Last night's Steering Group meeting, looking at everything that is forming part of the upcoming community consultations..... lots of volunteers working hard to shape the town and villages that they live in.

Come and have your say - consultation at the Campus on Thurs 9th, Friday 10th and Sat 11th Feb at different times. See details in the Melksham News this week.

Melksham Neighbourhood Plan Facebook Post – 26 January 2023



Melksham Town Council Facebook Post – 8 February 2023

**Strategic Environmental Assessment for the Joint
Melksham Neighbourhood Plan**

**Addendum Environmental Report to accompany the
Regulation 14B version of the Neighbourhood Plan**

Neighbourhood Plan Steering Group

June 2024

Place Studio Ltd

Vaughan BB Thompson BA Hons, MA, MRTPI

Contents

Introduction

Background

Significant New Circumstances

Scope of Addendum

- Land South of Western Way
- Land at Cooper Tires
- Land at Middle Farm, Whitley

SEA Addendum Methodology

Addendum SEA Non-Technical Summary

SEA Framework Overall Effect of Revisions to Allocation

Conclusions

1 Introduction

This is an addendum to the Strategic Environmental Assessment report for the second Joint Melksham Neighbourhood Plan (JMNP2). It has been produced to assess proposed revisions to the site allocations in the Regulation 14B Draft of the Joint Melksham Neighbourhood Plan (JMNP2).

The initial main report was prepared in October 2023 to accompany a Regulation 14 pre-submission consultation of the draft JMNP2. The SEA report was provided by consultants AECOM as part of the Locality Technical Support programme provided to JMNP2 during financial year 2023-24.

2 Significant Changes to the Draft JMNP2

As a result of significant new circumstances within the JMNP2 area, additional evidence and responses to the 2023 Regulation 14 consultation representations, revisions have been made to the draft JMNP2 site allocations.

In consultation with Wiltshire Council and AECOM, it is considered that the revisions are of a significance to require:

- (a) An addendum to the SEA and report
- (b) A second period of Regulation 14 consultation in 2024 on what will be termed 'pre-submission draft B JMNP2'.

3 Scope of Revisions for Addendum Assessment

Three significant revisions to the draft JMNP2 have been proposed.

I. Policy 7.1REV: Land at Cooper Tires

In response to additional capacity and viability evidence, a proposed revised allocation supports development of in-excess of 150 dwellings where this addresses flood risks and supports viable mixed-use re-development.

II. Policy 7.6 NEW: Land South of Western Way, Bowerhill

A proposed new allocation of Land South of Western Way regularises the principle of residential development of this greenfield site that has been established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. In doing so, JMNP2 is required to account for the environmental and sustainable development implications of this proposed allocation.

III. Policy 7.7 NEW: Land at Middle Farm, Whitley.

This new allocation is proposed in response to further land-owner information and Regulation 14A representations. It is proposed to consolidate previously proposed site allocations 7.3 and 7.4 into a single proposed allocation with a significantly reduced overall allocation area than the combined area of the two separate sites.

4 SEA Addendum Methodology

This SEA report addendum appraises the environmental implications of the proposed amended JMNP2 allocations strategy. It does so with regard to the assessment of site allocation alternative approach options A (Brownfield) and B (Greenfield) that were assessed as part of the full SEA process and report.

The addendum assessment is undertaken using the SEA framework and sustainability themes:

- Air Quality
- Biodiversity and Geodiversity
- Climate Change and Flood Risk
- Community Wellbeing
- Historic Environment
- Land, Soil, and Water Resources
- Landscape; and
- Transportation and Movement.

The appraisal has drawn upon evidence gathered in the JMNP2 sites assessment process, including independent site suitability assessments of all promoted sites undertaken by AECOM. In relation to site 1025, Land South of Western Way, it has also had regard to the Sustainability Appraisal undertaken by Wiltshire Council as part of its assessment of SHELAA sites in selecting proposed Local Plan allocation sites at Melksham.

The addendum SEA has been undertaken by Vaughan Thompson MRTPI, of Place Studio Ltd, who is a chartered town planner with more than 20 years experience in policy drafting and significant knowledge of Melksham and JMNP2.

5. SEA Addendum Assessment of Revised Allocation Policies - Non-technical Summary

I. Policy 7.1REV Land at Cooper Tires

Regulation14A Policy 7.1 proposed the allocation of the 12.88 hectare brownfield site for the development of about 150 dwellings within a mixed use regeneration of the former factory site.

Reason for Revision

Viability assessment evidence supporting the proposed allocation has identified a viable mixed-use development of the site requires enabling development of in excess of 150 dwellings.

Capacity and case study analysis has identified capacities for between 100-130 dwellings on Flood Zones 1 and c80-120 on land in Flood Zone 2. The allocation commits to delivery of at least 150 dwellings in the JMNP2 period to 2028 within a phased master planned approach. But it is supportive of development of c300 dwellings across the site, subject to addressing flood risk issues. This increases the overall potential residential content by c150 above previously tested allocation.

The allocation retains the brownfield land regeneration approach that has been found to be most allocation sustainable option.

Air Quality

Increased residential development may lead to increased emissions, balanced against reduced employment development. However, the site is highly sustainably located to enable sustainable transport and low car use.

Biodiversity and Geodiversity

The site has very low levels of biodiversity except for the riverside. Increased residential development will not effect the requirement to deliver 10% net gain in biodiversity.

Climate Change and Flood Risk

The site location is highly sustainable. Increased housing on the site will minimise the production of greenhouse gases from residents when compared with provision on greenfield land.

Two hectares of land within Flood Zones 1 is capable of enabling residential development outside of flood risk. Additional housing to support viability, will need to be developed in at least zone 2 and potentially zone 3. This will be subject to further flood assessment, exceptions testing or measures to make safe or reduce the areas of higher flood risk as described in the site-wide Flood Assessment report (WSP 2024). Subject to resolving flood mitigation issues, the site is assessed to be the most sustainable location for housing and employment development.

Landscape

Additional residential development will have no material impact on the effect of development of the Cooper Tires site on nationally designated landscapes.

Wellbeing

Residential development of the site is well-connected to local facilities and open space and mixed uses and services within the developed site. Whilst a further c150 dwellings will increase demands, it would be expected to make proportionate contributions to support increased provisions.

Viability assessment and case study analysis has demonstrated that affordable housing provision may need to be reduced to 10%. Increased housing will increase the number of affordable homes delivered.

Heritage

Additional residential development will have no material harmful impact on the effect of development of the Cooper Tires site on nationally designated heritage assets or locally designated assets. Residential conversions of heritage assets may create greater opportunities for their re-use.

Land, Soil and Water

Development of the site will necessitate remediation of contaminated land. Residential development will provide value to enable this a.

Transport

Residential development will increase vehicle movements on the local highway network and greenhouse gas emissions. However, the site location maximises the viability of active and sustainable travel choices when compared with development of greenfield sites.

Conclusion

The increase of housing provision of c150 across the site is likely to *moderately* increase the sustainable development outcomes of the site.

II. New Policy 7.6NEW: Land South of Western Way

Proposed allocation of the 10.24 hectare greenfield site is additional to the allocation of brownfield sites at Melksham.

The site was excluded after JMNP2 sites assessment stage 1 as it was considered to contribute to the separation of Melksham, Bowerhill and Berryfield. But it was also assessed by Wiltshire Council's Sustainability Appraisal as the most sustainable potential allocation site.

Due to the granting of outline consent for development of 210 dwellings and a 70-bed residential care home in November 2023, during the JMNP2 Reg14 period, the significant change in circumstances has required changes to the JMNP2 approach. This combines;

- I. Deletion of the proposed Policy 19 Green Wedge.
- II. Allocation of the site for residential development

Reasons for Allocation

JMNP2 has a duty to plan positively within the constraints and realities of the context of Melksham. This must include these new circumstances.

The aims of the proposed allocation are'

- To regularise and account for the principle of development of housing and Affordable Housing within the JMNP2 period.
- To proactively manage the content and design of housing and infrastructure that are significant detailed matters still to be resolved.

Air Quality

Greenfield development is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues.

There is no AQMA in Melksham. Increased traffic feeding into the network of roads causing additional air quality pressure. As such, steps would need to be taken to mitigate the additional impact of any development.

The site is within 900m of the town centre. Walking, cycling and public transport use is viable. The site has potential to support active and sustainable transport infrastructure.

All electric housing with ULEV charging can help mitigate greenhouse gas emissions.

Whilst greenfield development may result in higher emissions, the site's location and size maximises the potential for low carbon emissions through sustainable construction, electrification and active and sustainable travel.

Biodiversity and Geodiversity

Greenfield development through Option B has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that proposals through Option B would still be required to deliver biodiversity net gains and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Option A is ranked more favourably than Option B.

The site comprises two small, arable fields, bound by a combination of hedgerows and narrow tree belts while also containing mature trees. It is bound to the north, south and west by two small watercourses. It is within a wider area which supports great crested newts (GCN). The hedgerows provide good connectivity around the site while the small copse off site to the southern boundary and open space to the south provide good newt terrestrial habitat. Development could result in the loss of the habitat.

Protection, maintenance of existing landscape and habitats has potential to mitigate to impact on site ecology. A minimum of 10% net gain for biodiversity is required within individual sites (as per latest biodiversity metric) and the overall layout and design of this site should ensure that habitat creation

Green buffers should protect any ecologically valuable features while the provision of biodiverse open space should provide opportunities for biodiversity enhancement.

Development is likely to be moderately harmful. However, it has the potential to mitigate impacts through application of JMNP2 landscape policies and delivery of 10% biodiversity net gain.

Climate Change and Flood Risk

Greenfield development has potential to deliver more coordinated infrastructure, due to the larger size of available sites, including green energy and active travel infrastructure, to contribute to reduction in operational emissions. However, it is also likely to lead to a higher dependency on the private car use producing greenhouse gases.

The site is in Flood Zone 1 and there is minimal fluvial, pluvial or groundwater flood risk.

This is a smaller site which should produce fewer emissions than a larger one. It is considered that there are opportunities to support resilient development, which supplies energy

efficient buildings and provides investment in renewable energy. It is possible for new development to be in Flood Zone The minor adverse effect of development may be mitigated by:

- Sustainable construction and all-electric dwellings
- Small-scale renewable energy generation
- Connectivity to sustainable transport

The site has no significant flood risk. It is a well-located and sufficiently large greenfield site to enable implementation of a range of carbon results on and climate change resilience measures.

Landscape

Impact landscape character by reducing the amount of open countryside surrounding the town and between settlements, which contribute to the setting and feel of the town. Issues are likely to be more pronounced given the in-combination and cumulative effects resulting from the strategic greenfield site allocations which are proposed through the emerging Local Plan.

The site is locally valued as rural separation between Melksham, Bowerhill and Berryfield. Its development will be considered harmful in principle. However, there are no visible relationship with designated national landscape. The landscape is not designated and judged of moderate landscape value. Greatest values internal trees and boundary hedgerow.

Mitigations:

- Protection of existing trees and hedgerow
- Enhancement of trees canopy cover towards 20% target.
- Retention of areas of public open space could increase publicly accessible green space and GBI connections

The development of the site will erode separation between settlements. But protection and enhancement of valued landscape features and creation of linked GBI can increase public access to the site.

Well-being

Rural open space will be lost to development impacting existing residents. Development will put additional demands on existing community facilities

Greenfield development of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes and potential to generate significant contributions for community infrastructure enhancements,

Development at the settlement edge provides easier access to the surrounding countryside, with positive impacts on the health and wellbeing of residents.

The site would support a range of types and tenures of homes to meet local needs including care home facilities. These would viably meet 30/40% affordable housing thresholds.

Contributions to support education and community infrastructure will mitigate strain on facilities

Provision of sustainable transport connections are viable to local facilities and town centre. Potential for on-site open space/play facilities and leisure walking routes

On-site community benefits delivered through a range of market and affordable housing, open space and viable active travel connections mitigate for the loss of agricultural land

Heritage

Greenfield development is more likely to locate development away from Melksham Conservation Area and listed buildings and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area and listed buildings.

There are no setting or on-site relationships with listed buildings or JMNP2 non-designated heritage assets or known archaeological remains.

Site development not likely to be harmful to heritage. Archaeological investigation can establish need for protection

Land and Soil and Water

Development will lead to the permanent loss of greenfield land, including agricultural land which cannot be mitigated.

The site is Grade 3 Good Quality agricultural land. Development will require significant new water and drainage infrastructure. Surrounding water courses could be adversely effected by development of site

Perimeter boundary buffer landscape and SUDS May mitigate impacts on existing water courses

The site will result in the loss of valued agricultural land. However, landscape and GBI protection and enhancement may reduce the impact and introduce alternative benefits,

Transport

Greenfield development would be likely to lead to higher levels of car use. Larger scale sites can integrate active and sustainable travel infrastructure and link to public transport to local facilities.

The site is within 900m of town centre. Walking and cycling is viable. It is well-related to local services.

Western Way obstruction of pedestrian cycle connections. Constrained vehicle and pedestrian access. Not viable from A roads. Impact on amenity of residents of Maitland Place.

Mitigation:

- Controlled Toucan crossing of Western Way + new pedestrian footways.
- Potential for pedestrian / cycle connections to schools, facilities, employment at Bowerhill
- On-site active and sustainable travel infrastructure
- Residential ULEV charging

The site has the best potential to minimise car use by location and potential to include a range of sustainable transport infrastructure measures.

Conclusion

Allocation Policy 7.6 is proposed in response to the new circumstances of the outline consent establishing the principle of development for c210 dwellings and extinguishing the opportunity for JMNP2 to designate the site as a Green Wedge (reflected in JMNP2 Policy 19R).

JMNP2 retains its priority of allocation of brownfield land, considered the most sustainable SEA alternative Option A. Adding the greenfield site is aligned with less sustainable SEA alternative Option B. This has potential to result in moderate levels of additional harm, particularly to biodiversity, landscape and land soils and water and well-being of some neighbouring residents.

However, the site location is capable of enabling viable active and sustainable transport connections to facilities. Its size enables protection of valued GBI and community access to open space. The site also delivers potential for the site to enable early delivery of a range of affordable, specialist and market homes that will probably precede and compliment delivery of housing at Cooper Tires. These minor benefits to wellbeing and GBI can be weighed against potential moderate harm caused by allocation.

III. Policy 7.7 NEW: Land at Middle Farm

Revisions to the draft plan consolidate previously proposed allocations 7.3: Land at Middle Farm (Plot A) and Policy 7.4: Land at Middle Farm (Plot B) into a new single site allocation. The new allocation for c55 dwellings combines the total housing delivery of the two sites. However, through a more efficient use of the land, the allocation of c3 hectares is c3.5 hectares smaller, significantly reducing the development area and retaining land in agricultural use.

The revised allocation therefore provides a more sustainable and less impactful outcome in the following SEA Framework topics;

Air Quality

No impact

Biodiversity and Geodiversity

Reduction of the site area by c3,5 hectares reduces the impact on existing habitats. The site retains the capacity to enable protection of hedgerow and buffer zones.

Climate Change and Flooding

Reduced impact from development of greenfield land. No increased flood risk.

Landscape

Significant reduction in landscape and visual impact. The reduced site reduces the extension of residential development in longer views of the setting of Whitley.

Potential for landscape buffering to mitigate visual impacts and create visual buffer to electricity sub-station.

Wellbeing

No change

Heritage

Increased density of development to c30DPH may have an increased potential for harm to the setting of Whitley House (listed Grade 2). Heritage assessment to identify potential issues and mitigations.

Land, Soil and Water

C50% reduction in removal of valuable agricultural land.

Transport

No change

Conclusion

Revised allocation 7.7 retains the allocation amount and approach tested by the main SEA report. It results in moderate reduction to potential harm to landscape, biodiversity and land, soil and water by reducing the total area of allocated land from c6.5 hectares to c3 hectares.

6. Effect of Revisions on Alternative Development Scenarios

The full SEA report assessed two alternative approaches to sites allocation by JMNP2 to identify the least environmentally impactful and most sustainable approach.

It tested:

- Option A: Brownfield First Approach
- Option B: Greenfield Approach

It concluded that overall Option A performed better. But recorded that in some instances greenfield allocations provided alternative opportunities that were less viable on brownfield land.

JMNP2 has adopted a brownfield first approach to site allocations at Melksham. New circumstances and evidence have informed the proposed revision of allocation of the Cooper Tires site (Policy 7.1REV) and the new allocation of a greenfield site, South of Western Way (Policy 7.6 NEW)

At Whitley new evidence and in response to Regulation 14A representations, a significant change is proposed to allocation of land at Middle Farm (Policy 7.7 NEW).

These revisions and addition have been considered with regard to the SEA Framework and alternative approaches to ensure their implications are taken into account.

Air Quality	
Option A <ul style="list-style-type: none">• Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to public and active travel networks• Potential to incorporate green infrastructure into development with positive impacts on air quality within the built-up area	7.1REV: Cooper Tires – <ul style="list-style-type: none">• Increased use of most sustainable site. Neutral
Option B <ul style="list-style-type: none">• Potential to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues.• Delivery of new homes at further distance from services and facilities and public transport networks, which may increase the reliance on private vehicles to access the town. This may increase traffic levels on key routes, with associated air quality impacts	7.6NEW: South of Western Way – <ul style="list-style-type: none">• Most sustainable reasonably available greenfield site.• Potential to mitigate loss of GBI & minimise carbon emissions Minor additional harm 7.7NEW: Land at Middle Farm –

	<ul style="list-style-type: none"> • Reduced loss of GBI Moderate benefit
Biodiversity & Geodiversity	
<p>Option A</p> <ul style="list-style-type: none"> • Supports the efficient use of land through the reuse of existing structures whilst rejuvenating and remediating areas of previously developed land. • Greater potential for ground contamination and remediation works prior to development, reducing the viability of development. 	<p>7.1REV: Cooper Tires –</p> <ul style="list-style-type: none"> • Increased viability to address ground contamination. Minor benefit
<p>Option B</p> <ul style="list-style-type: none"> • Likely to lead to the loss of greenfield land, including potential areas of best and most versatile land for agricultural purposes, which cannot be mitigated. • Cumulative and in-combination effects likely from the strategic allocations proposed in the wider Melksham area through the emerging Local Plan. • Reduces the amount of open countryside which is potentially contributing to the setting of the existing town by maintaining green gaps and framing views. 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • Outline consent establishes principle of development. • Allocation will contribute to cumulative loss. • 10% biodiversity net gain Moderate additional harm <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Reduced site area-reduced loss. 10% biodiversity net gain Moderate benefit
Climate Change and Flooding	
<p>Option A</p> <ul style="list-style-type: none"> • Provides opportunities for enhancing the resilience of the existing built-up area to the effects of climate change (e.g., via green infrastructure enhancements). • Development within proximity to the town centre (i.e., locations within the neighbourhood area with the widest range of services and facilities) will, to an extent, help limit greenhouse gas emissions from transport through encouraging new development in locations with proximity to the town's amenities and public transport networks. 	<p>7.1REV: Cooper Tires –</p> <ul style="list-style-type: none"> • Increased delivery and support of GBI viability. Minor benefit
<p>Option B</p> <ul style="list-style-type: none"> • Potential to deliver coordinated infrastructure, including decentralised energy networks contributing to climate change mitigation efforts. 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • No scope for CHP. • No flood risk. • SUDS potential.

<ul style="list-style-type: none"> • Greenfield site allocations are likely to increase areas of hardstanding and potentially increase the surface water flood risks to surrounding locations. This may adversely impact the water quality of the River Avon (and its tributaries). 	<p>Minor additional harm</p> <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Reduced site area. <p>Minor benefit</p>
Community Wellbeing	
<p>Option A</p> <ul style="list-style-type: none"> • Development on these sites would likely be in areas that can more readily provide easy access to community infrastructure, including employment opportunities. • Potential to enhance the quality of the public realm (as many of the available brownfield sites are likely to contain underutilised structures of varying quality which may detract from the character of the town) and improve the satisfaction of residents with their neighbourhoods as a place to live. • Higher likelihood of integration with existing communities within the existing built-up area of the town. • Recognition that many potential brownfield site options within the town are likely to be relatively small sites which limits the potential to deliver a significant number of new homes at these locations. This may reduce the potential to deliver affordable homes and homes of varying types and tenures. • Complexities of brownfield site options may reduce the viability of bringing them forward for redevelopment (e.g., multiple land ownership issues, or ground contamination concerns associated with former uses). 	<p>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • Increased housing delivery at most sustainable and connected location. • Increased viability to support facilities. <p>Minor benefit</p>
<p>Option B</p> <ul style="list-style-type: none"> • Potential to deliver a wide range of types and tenures due to sites being typically larger in comparison to the available brownfield options. • Potential to deliver green and blue infrastructure enhancements through scheme design, linking with existing corridors and improving connectivity. • Potential to generate developer contributions for community infrastructure enhancements, supporting community wellbeing. • Less potential to deliver more homes in the most accessible locations in the neighbourhood area. • Greater potential (i.e., viability) to deliver additional community and employment uses through mixed-use developments on larger greenfield site options. • Potential impact to local green spaces, green wedges / buffers, many of which are located outside of the town in the open countryside. • Potential cumulative and in-combination effects through taking forward greenfield sites within the JMNP2, given the number of 	<p>7.6NEW: South of Western Way –</p> <ul style="list-style-type: none"> • Loss of Green Wedge designation. • Cumulative impact of greenfield loss. • Most sustainable greenfield site. • Delivery of POS and GBI. • Contributions to facilities and services <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Smaller site. • Unchanged amount of housing

strategic greenfield site allocations likely to come forward through the emerging Local Plan.	Minor benefit
Historic Environment	
<p>Option A</p> <ul style="list-style-type: none"> • Potential to directly impact the significance and setting of heritage assets and areas, including listed buildings and Melksham Conservation Area. • Potential to positively impact the setting of heritage assets within the existing built-up area through the regeneration of redundant and underutilised land. 	<p>7.7NEW: Land at Middle Farm –</p> <ul style="list-style-type: none"> • Potential residential re-purposing of on-site heritage assets <p>Neutral</p>
<p>Option B</p> <ul style="list-style-type: none"> • Delivery of new homes at further distance from nationally designated listed buildings within the town centre. • Potential to indirectly impact the significance and setting of Melksham Conservation Area, including views into / out of the designation. • Impact to locally important heritage assets, given that most of the available greenfield site options are located in Melksham Without Parish, which contains over 400 non-designated (and locally valued) heritage assets. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • No direct relationships of site. <p>Neutral</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • No additional impact. <p>Neutral</p>
Land Soil and Water Resources	
<p>Option A</p> <ul style="list-style-type: none"> • Supports the efficient use of land through the reuse of existing structures whilst rejuvenating and remediating areas of previously developed land. • Greater potential for ground contamination and remediation works prior to development, reducing the viability of development. 	<p>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • Intensified mixed use of brownfield land. Added viability to support decontamination. <p>Minor benefit</p>
<p>Option B</p> <ul style="list-style-type: none"> • Likely to lead to the loss of greenfield land, including potential areas of best and most versatile land for agricultural purposes, which cannot be mitigated. • Cumulative and in-combination effects likely from the strategic allocations proposed in the wider Melksham area through the emerging Local Plan. • Reduces the amount of open countryside which is potentially contributing to the setting of the existing town by maintaining green gaps and framing views. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • Increases loss of rural agricultural land. • Site not part of rural setting of settlement. <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • C 3 hectare reduction in development site area and retention of agricultural land. <p>Moderate benefit</p>
Landscape	

<p>Option A</p> <ul style="list-style-type: none"> • Protects the open countryside and landscape character by focusing development away from areas with a higher landscape sensitivity. • Prevents urban sprawl effects by allocating sites which are already located within the built-up area. • Provides opportunities to enhance townscape character and visual amenity in the built-up area. • Opportunities to enhance the public realm through regenerating underutilised sites which may detract from the character of the built environment. 	<p>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • No impacts on designated landscapes. • Residential use adds vitality to new public spaces across currently private site. <p>Minor benefit</p>
<p>Option B</p> <ul style="list-style-type: none"> • Potential impacts on proposed green gaps in the neighbourhood area could lead to urban sprawl effects and settlement coalescence / loss of identity. • Greater potential to negatively impact on local landscape character by allocating undeveloped sites on the border of / in the countryside. • Proposals for larger greenfield sites have the potential to positively contribute to wider landscape objectives through sensitive design. For example, delivering net gains in biodiversity and green infrastructure enhancements have the potential to help conserve and enhance landscape and village character, including its special qualities and sense of place. • Larger greenfield sites have the potential to incorporate a landscaping scheme which enhances green and blue infrastructure networks. For example, enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. 	<p>7.6NEW: South of Western Way -</p> <ul style="list-style-type: none"> • Loss of potential for Green Wedge. • Localised impacts on settling separation. • No impacts on designated landscapes. • Potential for retention of key landscape features and provision of communal open space. <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • Reduced landscape impact. <p>Moderate benefit</p>
Transport	
<p>Option A</p> <ul style="list-style-type: none"> • Promotes the use of sustainable transport by delivering development in the built-up area of the town, within proximity to existing public transport and active travel networks. • Encourages a strategy which would reduce the need to access travel to services, facilities, and amenities. • Potential to readily connect with pedestrian routes and the local road network, with many brownfield sites benefiting from existing access. 	<p>7.1REV: Cooper Tires -</p> <ul style="list-style-type: none"> • No significant change <p>Neutral</p>
<p>Option B</p> <ul style="list-style-type: none"> • Potential to increase the use of private vehicle usage in the neighbourhood 	<p>7.6NEW: South of Western Way -</p>

<p>area through developing land outside the existing built-up area of the town.</p> <ul style="list-style-type: none"> • Potential to deliver new footpaths, cycleways and potentially bus services as a result of larger-scale development through greenfield site options. • The proposed A350 Melksham bypass project is likely to connect the south of Bowerhill to Lacock, with intersecting junctions at the A365 and the A3102. In this respect, taking forward greenfield sites for residential uses at locations to the south of the town might undermine the potential for the bypass. 	<ul style="list-style-type: none"> • Potential for additional vehicle trips and emissions • Site 900m from town centre. Walking and cycling trips viable/ Opportunities for integration of active and sustainable travel infrastructure. • Pedestrian/cycle access to town centre severed by Western Way. Need for new crossing. • Potential for connection to primary school. <p>Minor harm</p> <p>7.7NEW: Land at Middle Farm -</p> <ul style="list-style-type: none"> • No change resulting. <p>Neutral</p>
Overall Effect of Revised Allocations	
Option A	<p>7.1REV: Cooper Tires -</p> <p>Moderate benefit</p>
Option B	<p>7.6NEW: South of Western Way -</p> <p>Moderate harm</p> <p>7.7NEW: Land at Middle Farm -</p> <p>Moderate benefit</p>

7. SEA Addendum Report Conclusions

The enabling of additional residential development over the total area of the Cooper Tires site increases sustainable development outcomes of the regeneration of this brownfield site and is consistent with JMNP2 SEA Option A “brownfield first” approach to site allocations at Melksham.

Allocation of Land South of Western Way regularises the principle of residential development of this greenfield site established by the November 2023 appeal decision to grant outline consent for 210 dwellings and 70 bed care home. Allocation would result in the

loss of agricultural land and soil and remove open greenfield landscape from a valued gap between settlements. However, the site is assessed as a more sustainable reasonably available greenfield site that is capable of enabling the early and viable delivery of a type and tenure of market and affordable housing within 900m of the town centre with capacity for landscape and biodiversity benefits that partially mitigate the impacts. Affordable housing delivery at 30-40% will help ensure JMNP2's contribution to meeting community wellbeing needs are secured, where viability challenges at Cooper Tires is likely to require a lower level of provision.

JMNP2 has proposed the allocation of all reasonably available brownfield land first. Allocation of greenfield Land South of Western Way helps ensure the delivery of the identified housing requirement on the most sustainable sites, in a sequential approach.

At Whitley, the revised new allocation site at Middle Farm continues to enable the delivery of c55 market and Affordable homes and open space, but significantly reduces the amount of allocated land reducing impacts on land and soil, landscape and biodiversity. However, it retains the core objectives tested in the main SEA report.

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