



Public Document Pack

Melksham Town Council

Town Hall, Melksham, Wiltshire, SN12 6ES
Tel: (01225) 704187

Town Clerk and RFO Linda Roberts BA(Hons) PGCAP, FHEA,
FLSCC

To: Councillor P Aves (Town Mayor)
Councillor G Mitcham (Deputy Town Mayor)
Councillor S Brown
Councillor V Fiorelli
Councillor J Hubbard
Councillor K Iles
Councillor H Illman
Councillor C Jeffries
Councillor M Pain
Councillor M Sankey
Councillor T Watts
Councillor T Welch
Councillor A Westbrook
Councillor R Wiltshire

22 February 2021

Dear Councillors

In accordance with the Local Government Act (LGA) 1972, Sch 12, paras 10 (2)(b) you are invited to attend the **Full Council** meeting of the Melksham Town Council. The meeting will be held at the Melksham Town Hall on **Monday 1st March 2021** commencing at **7.00 pm**. A period of public participation will take place in accordance with Standing Order 3(F) prior to the formal opening of the meeting. The Press and Public are welcome to attend this meeting.

Yours sincerely

Mrs L A Roberts BA(Hons), PGCAP, FHEA, FSLCC
Town Clerk and RFO

**Full Council
Melksham Town Council**

**Monday 1 March 2021
At 7.00 pm at the Melksham 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.

AGENDA

Melksham Town Council

Minutes of the Full Council meeting held on Wednesday 13th January 2021

PRESENT: Councillor P Aves (Town Mayor)
Councillor G Mitcham (Deputy Town Mayor)
Councillor S Brown
Councillor V Fiorelli
Councillor J Hubbard
Councillor C Jeffries
Councillor M Sankey
Councillor T Welch
Councillor A Westbrook
Councillor R Wiltshire

ALSO IN ATTENDANCE

OFFICERS:	Linda Roberts	Town Clerk
	Christine Hunter	Committee Clerk
	Miriam Zaccarelli	Community Development Officer

PUBLIC PARTICIPATION: 1 member of the public and 1 member of the press were present.

1/21 Apologies

Apologies for absence were received from Councillors Iles, Illman and Watts

2/21 Declarations of Interest

There were no declarations of interest.

3/21 Minutes

The minutes of the Full Council Meetings held on 16 November 2020 and 21 December 2020 will be reviewed at the next Full Council Meeting to be held on 18 January 2021.

4/21 Assembly Hall in Tier 5 Lockdown

It was Proposed by Councillor Aves, seconded by Councillor Westbrook and

UNANIMOUSLY RESOLVED: that in view of the confidential nature of the information to be discussed, concerning the budget for 2021/2022, that the press and public be instructed to withdraw

Councillors reviewed the in depth report and budget prepared by the Town Clerk and the Locum Assistant.

Following discussion it was proposed by Councillor Westbrook and Councillor Hubbard seconded and:

RESOLVED: to hold an additional Council Meeting on 25 January 2021 to further review and approve the budget for 2021-2022.

It was Proposed by Councillor Westbrook and seconded by Councillor Hubbard and:

UNANIMOUSLY RESOLVED: to instruct the Town Clerk to produces 3 further budget calculations.

5/21 Age Friendly Melksham - Community Response

It was Proposed Councillor Westbrook, seconded Councillor Welch and

RESOLVED: that Council would re-deploy two members of staff to cover the 26 hours per week requested by Melksham Community Response.

6/21 Date and Time of Next meeting

18 January 2021 at 7.00 pm.

Meeting Closed at: 9.30 pm

Signed:

Dated:

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Melksham Town Council

Minutes of the Full Council meeting held on Monday 25th January 2021

PRESENT: Councillor P Aves (Town Mayor)
Councillor G Mitcham (Deputy Town Mayor)
Councillor S Brown
Councillor V Fiorelli
Councillor J Hubbard
Councillor K Iles
Councillor C Jeffries
Councillor M Pain
Councillor M Sankey
Councillor T Watts
Councillor T Welch
Councillor A Westbrook
Councillor R Wiltshire

**ALSO IN
ATTENDANCE** Councillor P Alford

OFFICERS:	Jeff Mills	Locum Admin Assistant
	David McKnight	Economic Development Manager
	Patsy Clover	Assistant to the Town Clerk
	Hugh Davies	Amenities Manager
	Christine Hunter	Committee Clerk

PUBLIC PARTICIPATION: Six members of the public and one member of the press were present.

27/21 Zoom Virtual Meeting Access

28/21 Public Participation

Councillor Fiorelli asked questions received from members of the public.

- 1) Union Street – a resident asked about the bollards on the Chicken Hut forecourt. Approximately a year ago Council agreed to provide bollards to stop parking in that area. The resident asked when this would be actioned?

- 2) A resident asked about the SIDS devices particularly relating to the Manor School area. The SIDS were installed and then disappeared. What has happened to the SIDS?

Response from Locum Assistant - the Council has had operational issues with the SIDS devices and are currently in negotiations with the supplier to resolve the situation.

- 3) A resident near to Shurnhold Fields read a published article relating to Shurnhold Fields, regarding the Town Council's equal 50/50 split for admin support with Melksham Without Parish Council. Clarification is required why the Town Council were not upholding their end of the agreement. Is this the case and, if not, will the Town Council be seeking an apology from the chair of Melksham Without Parish Council for comments in the Melksham News?

Response from Assistant Town Clerk – The Town Council had a shortage of staff last year being understaffed and two members of staff suspended. The admin team did not have the admin capacity. Since the start of 2021 the Council has been doing more than their share of admin work for Shurnhold Fields and will seek to maintain at least 50%.

- 4) King George V Park – a bench in the park only has one plank on it. The resident wanted to know if the Town Council would be replacing this shortly or is the bench going to be removed? Councillor Fiorelli to forward photos to the Assistant Town Clerk.

Response from Assistant Town Clerk - once photos had been received the Amenities Manager will organise either a repair or replacement.

A member of the public thanked the Clerk for providing costs regarding Locum workers covering suspended staff. The expenditure was £26,067 including VAT on locum costs. Questions were:

- a) How much would Council have saved if the two members of staff had not been suspended?
- b) This amount does not include additional H.R. advice costs. Could the Council provide the people of Melksham details of this cost?

It is noted that the Locum Assistant is still providing services to the Council. Could the Mayor advise:

- 1) how long will this be for?
- 2) what the projected cost is and tell the people of Melksham why his work cannot be undertaken by current staff?
- 3) Are all admin staff currently employed? There must be administrative capacity available for example within the Assembly Hall team as the hall has been closed for most of the year.

Response: Councillor Westbrook referred to an email dated 19 September 2020, when the Locum Assistant left the employment of Melksham Town Council for at least 10 days. At this time protracted discussions took place between the Town Clerk and the Economic Development Manager to ascertain whether he could return because of the amazing work done. At that time Council had suspended staff, had put 3,000 hours into Covid community response, were falling behind on many projects and nearly lost the ability to pull the East of Melksham Community Centre back. Three members of staff had not been appointed for over a year, and there were two members of staff short. The Locum Assistant staying was not because of suspension sit was because there were a myriad of reasons why the Town Clerk decided that extra support was needed. The work carried out by the Locum Assistant was very technical and specialist work. On 19 September 2020 it was always his intention to leave and he was persuaded to stay by the Clerk and the Economic Development Officer in order to support all the projects needing to be done in Melksham. The Locum Assistant has done a remarkable job and we are still well within the staffing budget. There was a cut-off date for the suspensions from 19 September 2020. Councillor Westbrook stated Council knew staff were exhausted in July there were lots of factors as to why a Locum Assistant was needed since September. Councillor Westbrook asked the member of public to take this on board.

Councillor Fiorelli responded to the question regarding additional HR costs, confirming the Council have spent approximately £12,000 this year on HR costs which is comparable to last year, and considerably less than employing a H.R. business partner at approximately £50,000 per year.

Councillor Hubbard made a correction to the 3,000 hours Councillor Westbrook reported being carried out by council staff. The majority of the work was carried out in their own time as volunteers. This needs to be recognised and Council needs to be grateful to them.

Councillor Fiorelli stated with regard to the issues last year the staff are trying very desperately to come together, move forward and to heal. It is almost like an open wound at the moment and if we keep on picking at this wound it will never heal. It is really important that our staff are given the opportunity to allow themselves as a group to move forward. Councillor Fiorelli asked what Council needs to do to give the message to the public to allow the staff to heal and not consistently bring up the same issue.

Councillor Aves confirmed the questions will formally be answered in full.

29/21 Apologies

An apology for absence was received from Councillor Illman.

30/21 Declarations of Interest

There were no declarations of interest.

31/21 Budget Update from Wiltshire Council

Councillor Alford provided an update on Wiltshire Council's 2021-2022 budget which proposes a 2% increase on a band D property and a 3% increase on the Social Care levy.

32/21 Minutes

The minutes of the meeting held on 18 January 2021 having previously been circulated, were agreed as a correct record, subject to councillor Hubbard's request to include the friendly amendment with the original resolution under agenda item 18/21. It was agreed that the minutes would be signed by the Town Mayor, Councillor Aves at a later date.

33/21 Budget Proposal

Councillors Reviewed the budget proposal for 2021-2022.

The following options to reduce budget expenditure further and so reduce the precept increase were proposed:

- The sports roadshow – remove at a saving of £3,000
- Market Place toilets – reduce expenditure by £3,000 to £17,000
- Arts Project – reduce expenditure by £2,000 to £1,000
- Equipment – reduce expenditure by £3,200 to £21,000
- Use of the £21,000 projected budget surplus for the current financial year to offset the proposed expenditure on equipment for the Amenities Team

A staffing review of the Assembly Hall Team and the Amenities Team was proposed by Councillor Hubbard and the viability of some staff roles within the council questioned. The possibility of redundancies through staffing rationalisation was also raised. However, Councillor Welch was anxious to emphasise that staff were the Council's most important resource.

Concerns over the viability of the Assembly Hall as a venue in the long-term were also raised in view of the impact of Covid 19 and the subsidies being provided by the Council already.

Councillor Hubbard highlighted the dangers of using the major projects reserve, general reserve and the precept support fund to prop up the budget for the coming year.

Councillor Wiltshire expressed his preference for a budget with zero increase to the precept. It was pointed out that the percentage increases being proposed resulted in very small annual monetary increases.

The creation of a separate Business Review Working Group to review all staffing costs through a series of exercises, with an aim of making a saving of £100,000 in 2021-2022, was considered.

It was proposed by Councillor Aves and seconded by Councillor Pain to accept the current 2021-2022 budget proposal. However, Councillor Hubbard proposed an amendment to Councillor Aves proposal.

It was proposed by Councillor Hubbard, seconded by Councillor Wiltshire, with a request for the vote to be recorded, that Melksham Town Council amalgamate the Facilities and Amenities Teams and look to find a rationalisation saving of £100,000 on the 2021-2022 budget. The vote was as follows:

Councillor	For	Against	Abstain
Pat Aves		X	
Sue Brown	X		
Vanessa Fiorelli		X	
Jon Hubbard	X		
Kathy Iles		X	
Clive Jeffries		X	
Geoff Mitcham		X	
Martin Pain		X	
Mike Sankey	X		
Tony Watts		X	
Terri Welch		X	
Adrienne Westbrook		X	
Richard Wiltshire	X		
TOTALS	4	9	

The Assistant to the Town Clerk confirmed the motion had fallen.

The proposed amendments to the budget totaled £32,200 reducing the budget expenditure to £1,043,750, resulting in a Band D precept increase of 2.26%.

34/21 2021-2022 Budget

It was proposed by Councillor Westbrook, seconded by Councillor Pain with a request for a recorded.

RESOLVED to use the combined total of Solar Farm monies and CIL funding (£57,000) to contribute towards the cost of the new play area in KGV and to delay the planned improvements to Primrose/Dorset and Riverside play areas.

Councillor	For	Against	Abstain
Pat Aves	X		
Sue Brown		X	
Vanessa Fiorelli	X		
Jon Hubbard		X	
Kathy Iles	X		
Clive Jeffries	X		
Geoff Mitcham	X		
Martin Pain	X		
Mike Sankey		X	
Tony Watts	X		
Terri Welch	X		
Adrienne Westbrook	X		
Richard Wiltshire		X	
TOTALS	9	4	

RESOLVED to approve the use of the General Reserve up to £38,000 to support the budget.

Councillor	For	Against	Abstain
Pat Aves	X		
Sue Brown		X	
Vanessa Fiorelli	X		
Jon Hubbard	X		
Kathy Iles	X		
Clive Jeffries	X		
Geoff Mitcham	X		
Martin Pain	X		
Mike Sankey		X	
Tony Watts	X		
Terri Welch	X		
Adrienne Westbrook	X		
Richard Wiltshire		X	
TOTALS	10	3	

RESOLVED to approve the use of the major projects reserve up to £42,000 to support the budget

Councillor	For	Against	Abstain
Pat Aves	X		
Sue Brown		X	
Vanessa Fiorelli	X		
Jon Hubbard		X	
Kathy Iles	X		
Clive Jeffries	X		

Geoff Mitcham	X		
Martin Pain	X		
Mike Sankey		X	
Tony Watts	X		
Terri Welch	X		
Adrienne Westbrook	X		
Richard Wiltshire		X	
TOTALS	9	4	

RESOLVED to approve the budget for 2021/2022 and resolve to set a precept of £918,750

Councillor	For	Against	Abstain
Pat Aves	X		
Sue Brown		X	
Vanessa Fiorelli	X		
Jon Hubbard		X	
Kathy Iles	X		
Clive Jeffries	X		
Geoff Mitcham	X		
Martin Pain	X		
Mike Sankey		X	
Tony Watts	X		
Terri Welch	X		
Adrienne Westbrook	X		
Richard Wiltshire		X	
TOTALS	4	9	

35/21 Financial Risk Assessment and Reserves Policy

Councillor Pain requested an amendment be made to the Financial Risk Assessment.

It was proposed by Councillor Westbrook, seconded by Councillor Aves and

RESOLVED that consideration of the Financial Risk Assessment and Reserves Policy should be deferred until the return of the RFO in order to obtain a clearer understanding of the legal implications for the Council.

36/21 Payments

It was proposed by Councillor Aves, seconded by Councillor Welch and

UNANIMOUSLY RESOLVED to approve the payments schedule.

37/21 Accounts

Council noted the Accounts as at December 2020.

38/21 Detailed Income & Expenditure Report as at 31 December 2020

Councillors noted the detailed income and Expenditure report as at 31 December 2021.

39/21 Monthly Financial Statements

40/21 Asset Management Committee Minutes

The minutes of the Asset Management Committee held on 14 December 2020 were noted.

41/21 Shurnhold Fields Working Party

42/21 Shurnhold Fields Working Party Notes

The notes of the Shurnhold Fields Working Party meeting held on 14 January 2021 were received.

43/21 Shurnhold Fields Working Party Terms of reference

It was proposed by Councillor Westbrook, seconded by Councillor Aves and

RESOLVED to approve the items to be included in the Shurnhold Fields Working Party Terms of Reference.

44/21 Shurnhold Fields Working Party Recommendations

The Assistant to the Town Clerk confirmed that the original spreadsheet was distributed to Councillors before the revised quote for the access works, which reduced the expenditure to approximately £4,500 to be split equally between Melksham Town Council and Melksham Without Parish Council.

However, using approximately £21,000 from the Open Space Maintenance Fund and the consequences for additional expenditure needed to be considered. The Assistant to the Town Clerk stated that the revised spreadsheet would be distributed, once the precise works to be carried out had been established and accurate costs obtained.

It was proposed by Councillor Westbrook, seconded by Councillor Hubbard and:

UNANIMOUSLY RESOLVED to defer consideration of this agenda item until receipt of up to date, accurate information from the Shurnhold Fields Working Party.

45/21 Confidential Session

It was proposed by Councillor Aves, seconded by Councillor Fiorelli and

RESOLVED that in view of the confidential nature of the information to be discussed, and the implications thereof, that the press and public be instructed to withdraw.

46/21 Job Retention Scheme

Councillors discussed the Job Retention Scheme and reviewed the advice given by the Council's advisers.

It was proposed by Councillor Westbrook, seconded by Councillor Pain, incorporating a 'friendly amendment' by Councillor Hubbard's and:

UNANIMOUSLY RESOLVED the Job Retention Scheme should be utilised for some of the Assembly Hall Team.

47/21 Neighbourhood Plan Draft Minutes

The draft minutes of the Neighbourhood Plan Steering Group meetings held on the following dates were received:

- 25 August 2020
- 23 September 2020
- 21 October 2020
- 25 November 2020

48/21 Neighbourhood Plan Recommendations

The recommendations and resolutions from the Neighbourhood Plan Steering Group meetings held on 25 August 2020, 23 September 2020, 21 October 2020 and 25 November 2020 were received and noted.

49/21 Date and Time of Next Meeting

1 March 2021 at 7.00 pm via Zoom.

Meeting Closed at: 10.02 pm

Signed:

Dated:

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Agenda Item 5

Financial Risk Assessment Master
Financial Risk Assessment January 2021

Risk Identification	Risk	Risk Monitoring and Mitigation	Measurement L/M/H
<u>Accounting System:</u> Rialtas Omega Accounting/Bookings Software.	Run data check routine daily - any discrepancy indicates data corruption.	Report to software provider for correction. Covered by software maintenance agreement.	L
<u>Income</u>			
Precept. Set annually via Town Council Budget.	Represents 90% of the Councils income. Collected on behalf of the Council by Wiltshire Council via the Council Tax and paid in two equal instalments in April and September.	See Appendix 2 for Reserves Policy. Report to the Town Clerk and Chair of the Council if not received by 30 th April and 30 th September each year, contact Wiltshire Council for current situation. Maintain General Fund at 3 months operating costs as a minimum. (See budget process).	Normally Low Risk. However shortage of funds in Principal Authorities due to current Pandemic could increase to Medium Risk.
Commercial Property Lettings	Non- payment of rent by tenants. Premises kept in poor repair by the tenant.	All commercial property rentals secured by formal repairing leases with regular rent reviews. Arrange regular landlord inspection to ensure in good internal repair. Rental invoices raised on monthly/quarterly cycle as defined in lease. If not paid within 30 days standard debt collection routines as defined in accounting procedures come into force.	L/M
Facility Lettings	Non-payment of fees by hirers. Damage to premises by hirers.	Casual Hirers-No credit given - payment in advance. Booking secured by deposit. Regular Hirers with approved credit, if not paid within 30 days standard debt collection routines as defined in accounting procedures come into force. No further hiring allowed until debt cleared in full. For large parties etc. damage deposit taken and not refunded until facility inspected after the event.	L/M
Allotments- Managed on the Rialtas Allotments Computer Package.	Allotment agreement not signed. Non Payment of fees by holder. Non cultivation of allotment.	Allotment Invoices raised April annually, if not paid within 30 days standard debt collection routines as defined in accounting procedures come into force. Allotments inspected regularly and tenant warned if not cultivated to acceptable standard.	L

Risk Identification	Risk	Risk Monitoring and Mitigation	Measurement L/M/H
Income (Cont'd)			
Events/Market Income	Non payment of stall rental at events	All rentals payable in advance of event	L
	Protection of Cash taken at Bars	Minimum of two bar operatives. Supervisor must record the amount of the float and sign. All cash MUST be recorded through till at the point of sale. At the end of the event tills are cashed up and physical cash checked against till roll any overs or unders must be noted at the event. Supervisor must note and sign discrepancy report. Float must be returned separately to safe and signed back in.	H
Deposit of funds with financial institutions.	Financial Institution bankrupt. Misappropriation of funds.	Deposits controlled by Finance and Admin Officer and RFO. All deposits reported to and authorised by the Finance and Admin Committee. All Financial Institutions should be checked with either Moody's or Fitch and have the top credit rating available. No Investment is to be for more than 12 months. Investment in Stocks, Shares or similar is not allowed	L

Risk Identification	Risk	Risk Monitoring and Mitigation	Measurement L/M/H
Expenditure			
Budget setting/Monitoring	<p>Failure to project expenditure accurately.</p> <p>Setting Business Income at an unattainable level.</p> <p>Failure to include projects in the budget.</p> <p>Failure to include capital expenditure.</p> <p>Inclusion of non-budgeted expenditure during the year.</p> <p>Failure to identify and report overspends in a timely manner.</p> <p>Failure to identify shortfall in income and report in a timely manner.</p>	<p>Budgets prepared by RFO RFO in conjunction with senior managers. Initial approval by Finance and Admin Committee authorised by relevant committee and passed by full council.</p> <p>Maintain an Earmarked Reserve to support the Precept.</p> <p>Maintain General Fund at between 40 and 50% of Precept.</p> <p>Produce monthly Budget Monitoring Reports distributed to Finance Working Group. All budget discrepancies investigated by RFO and reported to Finance and Admin Committee.</p> <p>Each spending committee presented with Budget Monitoring Report on a 3 monthly basis with discrepancy report. All budget overspends approved by the relevant committee by resolution.</p> <p>Ascertain reason for shortfall in income and whether it can be recovered in the financial year. If not take appropriate steps to support the General Fund by cutting expenditure or allocating shortfall from Earmarked Reserves</p>	L/M

Expenditure	<p>Expenditure in breach of Financial Regulations.</p> <p>Expenditure exceeds officer authority.</p> <p>Payment to incorrect supplier</p> <p>Payment to non-genuine supplier-hacked supplier account.</p> <p>Expenditure not correctly authorised.</p> <p>Expenditure not allocated to correct Budget.</p> <p>Not genuine council expenditure.</p>	<p>All managers have copy of Financial Regulations and understand contents.</p> <p>All Expenditure must be the subject of a purchase order.</p> <p>All purchase orders must be authorised by relevant manager.</p> <p>All purchase orders must be allocated to the relevant budget heading</p> <p>All approved suppliers to be recorded in the accounts system Purchase Ledger section.</p>	L
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Risk Identification	Risk	Risk Monitoring and Mitigation	Measurement L/M/H
Expenditure – Continued.	Change of supplier banking information from fraudulent emails-supplier account hacked. Inclusion of ghost suppliers as bonafide suppliers. Change of supplier details on cheque after signature.	<div>All approved suppliers to be paid within 30 days on periodic payment runs.</div> <div>All supplier payments to be approved by at least 2 Councillors.</div> <div>All supplier payments to be in line with the payment procedure protocol.</div> <div>All payments by Direct Debit to follow the above procedures.</div> <div>All payment listings to be presented to periodic meetings of Full Council for consideration.</div> <div>Any changes to supplier banking information must be confirmed by a telephone call to the number stated on the supplier invoice.</div> <div>All supplier accounts more than 60 days old to be reported to Finance and Admin Committee.</div>	L
Use of Council Debit or Credit Card	Misuse of Cards. Use by non-authorized staff.	Cards to be kept in safe by Finance and Admin Officer Only senior managers permitted to use cards. Debit/Credit cards to be signed for by the user. After use card must be returned to the Finance and Admin Officer with details of expenditure and backup documentation. Card expenditure to be included in authorisation documentation approved by councillors signing off the payment run.	L
Non-budgeted Expenditure	Impact on General Fund balances.	Approved by relevant committee by resolution. Source of funding: <ul style="list-style-type: none"> a) From General Fund Balance. b) From Earmarked Reserve. c) By transfer from alternative Budget Code with predicted underspend. 	L/M

Risk Identification	Risk	Risk Monitoring and Mitigation	Measurement L/M/H
Payroll	Inclusion of ghost employees on payroll. Falsification of time sheet records. Incorrect calculation of employee pay. Payment of incorrect salary rates. Use of incorrect PAYE/Ni data. Unauthorised changes in employee details. Incorrect or fraudulent expenses claims. Breach of confidentiality of employee details (GDPR).	Have Internal Audit conduct a periodic check of payroll function to verify correctness of payments and employees being paid still work for the Council	L/M
		Create a tracking log and record changes to employee details when made.	
		All time sheets to be authorised by senior managers and counter signed by the Town Clerk	
		All automatic, cost of living scale point changes in pay scale to be authorised by senior managers e and counter signed by the Town Clerk.	
		All changes to salaries to be approved by HR Sub Committee and signed by the Chair.	
		All employee records to be kept under lock and key when not in use.	
Insurance	Danger of under Insurance. Danger of over insurance. All Council Assets not included in insurance Schedule. Insurance premiums too high.	Ensure Insurance Values Included in Asset Register. Periodical review Plant and Equipment to ensure replacement values are realistically reflected in the Insurance Value. Every five years revalue buildings at insurance value and check against insurance policy. Ensure Consequential Loss Insurance adequately covers all Council Liquid Assets. Insurance re-quoted every 3 years.	L

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Melksham Town Council

Reserves Policy January 2021

Introduction

Local Authorities are empowered to hold reserves through section 32 and 43 of the Local Government Finance Act 1992.

Reserves are an essential part of good financial management, they assist the Council to manage unpredictable financial pressures and plan for future spending commitments.

Legislation states the Council must set a balanced budget, in setting the balanced budget the Council should consider the following:

- What level of expenditure is required to deliver the desired level of services;
- What income the Council can generate through fees and charges to support the expenditure;
- The amount of reserves available to support the Council's expenditure;
- The level of reserves required to fund the Council's capital projects contained within the five-year financial plan;
- The level of Precept the Council is prepared to charge local residents.

Reserves-Definition

This Council's reserves fall into three main categories:

1. The General Reserve;
2. Earmarked Reserves to fund future revenue costs;
3. Major Projects Reserve

1 The General Reserve:

The level of this reserve is designed to reflect the general cash flow and day to day risks surrounding the delivery of the Council's services. There is no specific guidance on the minimum level of the general reserve, the Council should determine what is a prudent level of reserve based on its own circumstances, risks and uncertainties.

2 Earmarked Reserves:

These are sums set aside for service departments to meet future expenditure not contained within the annual revenue budget. They are created by carrying approved unspent budgets or over recovery on income into earmarked reserves, also if expenditure on certain items is delayed then these may be earmarked for completion in the following year.

3 Major Projects Reserve:

This is created from sums raised via the Precept and other receipts with restrictions on use (CIL, Solar Farm Receipts and other receipts of a capital nature), this reserve is designed to finance capital projects and other projects for the benefit of the community.

Reserves Policy

General Reserve

As stated above there is no hard and fast rule governing the level of general reserve, using a ratio of Precept to income generated from activities, in this Council 60% Precept 40% other income, the cash flow risk is considered to be medium, based on this income mix the level of General Reserve should be between four and six months operating costs (excluding capital projects). If the General Reserve drops below four months operating costs it should be topped up by either contribution from the Precept or by virement of sufficient funds from the Earmarked or Major Projects Reserves to restore the General Reserve to an acceptable level. If the General Reserve exceeds six months operating costs, surplus funds should be carried into the Major Projects Fund or a new Earmarked Reserve created to support future years Precept.

Earmarked Reserves

Earmarked Reserves are created by carrying surpluses into the following financial year, these may be either underspends on expenditure or over recovery on income budgets. They may also be created to smooth irregular revenue expenditure by making an annual allowance in the budget (for example an Election Reserve). The practice of rolling over budgets due to over budgeting is not allowed, accounting for such surpluses will take place each year end, when the overall financial position of the Council can be established and the treatment of the surplus/deficit is decided by the full Council.

Earmarked Reserves are controlled by the committee responsible for the delivery of the relevant services and are set up and spent by resolution of that committee. The committee in conjunction with the head of service should define:

- The reason for/purpose of the reserve;
- How and when the reserve can be used;
- Procedures for the reserve's management and control;
- Timescale for review of the reserve to ensure its continuing relevance and adequacy.

Major Projects Reserve

The Major Projects Reserves is funded partially by an amount determined each year (subject to any constraints or no requirement) to be included in the annual budget calculation and claimed via the Precept, it may also be funded via special receipts whose use is restricted to projects specifically for the benefit of the community.

The Major Projects Reserve is controlled by the Council in conjunction with the Town Clerk and is set up and spent by resolution of the Council. Capital Projects are defined in the strategic plan (nb strategic plan to be completed). Projects should be reviewed annually and progress reported to the Council, if for any reason the project is abandoned then the funds can be re-allocated to a new project or returned to the General Reserve to support the Precept.

Terms of Reference**Reviewed 21st January 2021**

Cllr Adrienne Westbrook	Melksham Town Council
Cllr Pat Aves	Melksham Town Council (from point 7)
Cllr Richard Wood	Melksham Without Parish Council
Cllr Alan Baines	Melksham Without Parish Council
Linda Roberts	Clerk, Melksham Town Council
Teresa Strange	Clerk, Melksham Without Parish Council

AND SUBSEQUENTLY UPDATED AND APPROVED BY THE NHP STEERING GROUP 24TH FEB 2021 FOR ONWARDS APPROVAL BY THE QUALIFYING BODIES, MTC AND MWPC

1. Purpose

- 1.1 The Steering Group was formed to manage the production of a Neighbourhood Plan (NHP#1) for the Melksham Community Area; with its role now widening to encompass its implementation, review and development of the next version (NHP#2). In broad terms, NHP#1 conforms to the current Core Strategy, with NHP#2 conforming to the emerging Local Plan. The Steering Group brings together representatives of Melksham Town Council and Melksham Without Parish Council and other stakeholders from the local community.

2. Area of Plan

- 2.1 The Plan area covers the two parishes of Melksham Town and Melksham Without. The Steering Group will have regard to the views expressed from other parishes that border the two parishes of Melksham Town and Melksham Without if they are affected by strategic content; e.g., transport.

3. Accountability

- 3.1 The Plan will be jointly led by the two Councils of Melksham Town and Melksham Without, who will jointly appoint permanent members of the Steering Group. The Steering Group will report to both Councils.
- 3.2 To satisfy a regulation requirement to have one single qualifying body for administrative purposes, the lead Council will be *Melksham Town*. However, in every other respect the two Councils will jointly lead and share responsibility for the Plan.
- 3.3 The Steering Group will be required to give a short written report of each Meeting (e.g., draft Minutes) to both Councils within 21 days of the Meeting and give other written reports as required at regular intervals on the progress of the Neighbourhood Plan.
- 3.4 The community as a whole will be fully involved in the process through community consultation events and be informed of the Steering Group's work through the publication of the agenda, minutes and papers of meetings on the Councils' websites, dedicated Melksham Neighbourhood Plan website (www.melkshamneighbourhoodplan.org), and social media channels. In addition, regular updates will be made in the Melksham Independent News.

4. Broad Objectives

- 4.1 To agree a vision for the area's future which represents the aspirations of those who live, work or run a business in the Plan area, against which future decisions and recommendations can be made.
- 4.2 To collect and evaluate information which will identify the priorities for future proposals and plans for the area, with specific focus on identifying any local policy to complement that provided by the adopted Wiltshire Core Strategy and emerging Local Plan and identifying any non-strategic sites for allocation to ensure adequate and appropriate housing and development land is available within the area for the period up to 2036. To input into the development of strategic and non-strategic sites to include shaping of local infrastructure, community facilities, connectivity to existing development and good quality, sustainable housing.
- 4.3 To develop and agree a "Statement of Common Ground" with Wiltshire Council to cover Strategic Priorities that cover the Melksham Neighbourhood Plan, the adopted Core Strategy, emerging Local Plan and other elements.
- 4.4 To inform decisions that are made on development proposals that may come forward during the preparation of the plan.
- 4.5 To convey to the whole neighbourhood area the importance of the Melksham Spatial Planning process and the wider community's crucial role in ensuring that the future hopes, visions and aspirations of Melksham people are accurately reflected in a Neighbourhood Plan.
- 4.6 To keep the lead Councils and the community informed of the Plan's progress via accurately recorded decisions, reports and press releases.
- 4.7 To ensure that a finalised Neighbourhood Plan is in general conformity with national policy, the local development plan and national policy including the NPPF (National Planning Policy Framework)
- 4.8 To engage the wider community (including hard-to reach groups) in meaningful debate about key local economic, social and environmental issues through a variety of consultation methods and events, and accurately record their views.
- 4.9 To ensure that all decisions made throughout the preparation period including local strategic needs for housing, employment, transport, leisure, health, education, town centre regeneration and the environment are based on sound and objective evidence.
- 4.10 To oversee the production of a Neighbourhood Plan in liaison with the Wiltshire Spatial Planning Service that will secure an improved quality of life for the majority of residents in the parishes of Melksham and Melksham Without through greater economic, environmental and social prosperity.

5. Plan Topics

5.1 In the Plan preparation, the Steering Group will ensure that the following topics are fully examined and addressed in the context of the detailed guidance contained in the NPPF, the Wiltshire Core Strategy and the emerging Local Plan: -

NHP#1	NHP#2
Building a strong competitive economy	Local Green Space
Promoting sustainable transport	Housing/Site Allocations
Delivering a wide choice of high-quality homes	Implications of the Bypass
Promoting healthy communities	Town Centre Master Plan
Meeting the challenge of climate change and flooding	Environmental Issues
Conserving and enhancing the natural environment	Implications of the Melksham Canal Link
Conserving and enhancing the historic environment	

6. Scope of work

For NHP#1:

- 6.1 Initial phases will include: formalisation of the Steering Group; initial research; defining the project scope; preparing an up-to-date vision; identifying issues and opportunities; identifying possible development sites which may need to be subject to more detailed analysis; and finalising a detailed project plan.
- 6.2 Further work will be identified once the scoping phase has been completed by the Steering Group following the completion of the scoping phase.

For NHP#2:

6.3 Initial phases will include: review of the Steering Group and encourage new membership; initial research; defining the project scope; preparing an up-to-date vision; identifying issues and opportunities; identifying possible development sites which may need to be subject to more detailed analysis; and finalising a detailed project plan.

7. Steering Group Membership

7.1 The Steering Group will comprise 11 permanent voting members comprising:

- Two representatives from Melksham Without Parish Council
- Two representatives from Melksham Town Council
- One representative from Melksham Area Board
-

7.2 The Steering Group shall seek nominations for representatives of the following through, in the first instance, an open invitation published in Melksham News inviting interested parties to outline in writing the factors supporting their nomination. Representatives must be an appointed representative of a community group. Applications will be considered and appropriate representatives chosen by a majority vote of Steering Group members above presiding at a preliminary meeting. Nominees may be invited to address the preliminary meeting prior to any vote being taken.

- One representative from the business community
- One representative from the health community
- One representative for environmental and climate change interests
- One representative for the historic and built environment
- One representative for transport
- One representative from the “Priority for People” working group

7.3 In addition, the following Council Officers and Consultants will attend where appropriate in an advisory and non-voting capacity:

- One representative from Wiltshire Council’s Spatial Planning Team
- Melksham Town Clerk
- Assistant to Melksham Town Clerk
- Melksham Without Parish Clerk
- Melksham Without Parish Officer

- 7.4 If a Steering Group Member is a member of more than one organisation, they should declare their wider interest. Members must not be “dual hatted”, for example, they cannot be a town, parish or Wiltshire councillor if representing a community group.
- 7.5 Where appropriate, the Steering Group will establish various subject and locality sub-working groups (including hard-to-reach sectors of the community) to provide specific areas of evidence, analysis and expertise. A broad balance of social, environmental and economic interests will strengthen the robustness and integrity of the Plan as a representative community driven document. These working groups can only be established with agreement of the Steering Group.

8 Responsibilities of Steering Group members:

- 8.1 Responsibility for the effectiveness of the Steering Group and thereby the success of the Neighbourhood Planning process depends on positive commitment, respect for others and contributions from its members. The need to work together to generate and maintain momentum is integral to the success of the project and members must be supportive and committed to the process and its implementation.
- 8.2 Recognise that the decisions made by the Steering Group require compromise and consensus building; consequently, members should ensure they are committed to helping to guide the preparation of the Neighbourhood Plan towards the identification and delivery of a shared vision.
- 8.3 Agree in principle to work towards unity and to approach all issues with an open mind and not simply promote sectional interests. Once a decision has been made each member will then recognise the group decision and put the interests of the Group as a whole above their own considerations.
- 8.4 Commit to the development of the plan and attendance at all meetings. In the event that attendance is not possible, representations or comments will be accepted via email. This should be submitted to the group no less than 3 days prior to the date of a meeting. Substitutes will be considered at the discretion of the Steering Group.
- 8.5 Consider progress reports and work undertaken, including the analysis and interpretation of results from inclusive community engagement and public consultation activities, to inform decision-making and determine appropriate courses of action.
- 8.6 Agree community engagement and public consultation at appropriate stages to ensure that the information gathered is representative of those living within the area.
- 8.7 Provide information in the form of evidence to Wiltshire Council’s Spatial Planning Service to influence the development of Core Strategy Policy relating to the area/or to be consistent with any strategic policy once the Core Strategy is adopted.

- 8.8 Ensure consultation with and co-operation from key stakeholders to ensure the deliverability of project and strategy proposals.
- 8.9 Co-opt additional members where necessary to join the Steering Group if required.
- 8.10 To invite experts, stakeholders, professionals to meetings for their input into specific discussion points and topics.
- 8.11 To ensure that any planning related documentation complies with Wiltshire Council's SCI (Statement of Community Involvement) and is appropriate for adoption.
- 8.12 Promote the appropriate development of the area in accordance with the updated Vision and completed plan.

9 Commitment from Wiltshire Council

- 9.1 An Officer from Spatial Planning (Economic Development and Planning) will be assigned to act as advisor and single point of contact for Wiltshire Council to ensure that all recommendations or outcomes of this process are in compliance with current policies and/or strategies, and are used to inform the future development of policies, strategies or direct implementation of work. Specific responsibilities include:
- To respond to requests for information within agreed timescales and proactively suggest options and opportunities to overcome barriers to delivery.
 - To engage expertise as required from across the Council and other bodies/organisations to enable delivery.

10 Steering Group Meetings

- 10.1 The Steering Group will meet monthly on the last Wednesday of the month to review progress of the Plan. Meetings will be held monthly Supplementary meetings will be convened on an ad hoc basis as considered necessary by the Steering Group. The Steering Group must meet at key stages in the development of the Neighbourhood Plan. Both Councils will be informed well in advance of any planned supplementary meetings.
- 10.2 Meetings will convene at 6.00 p.m. and finish no later than 8.00 p.m.
- 10.3 The Steering Group shall elect a Chair by open vote who will serve until the next last Wednesday in May. Thereafter every May, a new Chair shall be elected to serve for one year. The Chair and Vice Chair will be elected from members present at the Steering Group meeting. The Chair or Vice Chair may be replaced by voluntary resignation or by a vote of two thirds of the Steering Group members.
- 10.4 Venues of meetings will be identified on the calling notice and agenda which will be issued to Group members by email by the Council officers at least four working days prior to the date of meeting.

- 10.5 Matters for the Agenda will be determined by the Officer Working Group that meets the week before the meeting and the Agenda will clearly state matters for discussion at meetings. Once a decision is made, there will be no further discussion on that item. There will be no discussion of matters not specified on the Agenda.
- 10.6 Any documents which are to be considered prior to a meeting should be received at least 3 working days prior to a meeting (*where possible*) via email.
- 10.7 Minutes of all meetings will be recorded and kept on file for future reference and examination. Minutes of meetings will be circulated to both Councils following approval by the Steering Group within 14 days of the date of the Meeting. In the interests of openness and transparency, Minutes of public meetings will also be made available on each Council's website, and the dedicated Melksham Neighbourhood Plan website
- 10.8 Draft communication statements including press releases will be circulated to Steering Group members and local Councils for approval at least 48 hours prior to release (*within reason*).
- 10.9 All contributions to meetings and decisions will be made through the Chair who undertakes to be fair and impartial. The Steering Group will seek to reach decisions by consensus which will be recorded in the Minutes. All permanent members will have an equal vote in decision-making within the Steering Group except for the Chair who will have a casting vote in the case of equality of votes at a steering group meeting.
- 10.10 Decisions on key strategic issues, milestones, appointment of consultants and spend in the neighbourhood planning process will be in the form of recommendations to the two respective parish councils for their formal ratification to ensure legal requirements are met. The two Councils will consider the Steering Group recommendations at the next available Council Meeting and report back to the Steering Group at the next meeting.
- 10.11 The Steering Group will be quorate when at least a third voting members are present, no less than three. Members may nominate substitutes from their organisation if they are unable to attend. No decisions will be made without at least one member from each Council being present.
- 10.12 The Chair will ensure that all members have the right to participate and be heard within an atmosphere of trust and mutual respect. Members will respect the role of the Chair and accept the Chair's ruling as final. The Chair will have the option to adjourn the Meeting for 15 minutes if he/she feels this is necessary.
- 10.13 All members, including the Chair have a right to request that an item be deferred if he/she feels that more information is essential to making a wise decision, or if he/she wishes go back to his/her organisation for clarity. The Chair will put any request to defer an item to the vote and the decision will be accepted by all present.

- 10.14 The item “To receive Declarations of Interest” will be placed on all Steering Group Meeting agendas. All Members are required to declare interests and absent themselves from voting on any issue where there is a potential pecuniary benefit to themselves, their family, or any organisation with which they are associated. All members are to complete a Register of Interests within 28 days of being appointed to the Steering Group and it is the Member’s responsibility to update as necessary.

11 Public Participation

- 11.1 Members of the public shall be admitted to all public meetings of the Steering Group. In the event that items to be discussed are of a confidential nature, members of the public may be excluded, in accordance with the provisions of the Public Bodies (Admission to Meetings) Act 1960, by formal resolution. If a person’s advice is needed, they may be invited by name to remain after the exclusion resolution is passed.
- 11.2 Time will be set aside at the start of each meeting for public participation. The total period allowed for public participation shall not exceed twenty minutes.
- 11.3 Each person wishing to address the Joint Steering Group shall be restricted to a total of three minutes within the time allowed for public participation.

12 Resolving Conflict

- 12.1 The Steering Group will seek to resolve any conflict through discussion to reach consensus wherever possible.
- 12.2 Where there is conflict in procedures linked to the Neighbourhood Plan process, members will be encouraged to seek and accept advice from Council Officers. Officers will have the option to refer a matter for further professional advice and report back to the next Group Meeting.
- 12.3 Where there is a clear difference of opinion between representatives from the two lead organisations, the Chair will request representatives to take the issue to both Council Meetings for discussion and a formal vote.
- 12.4 In the extreme event of impasse, officers will arrange for representatives of the two lead councils to meet with an appropriate representative from WALC (Wiltshire Association of Local Councils) and/or the Wiltshire Council Link Officer to agree a way forward...

13 Terms of Reference

- 13.1 The two Councils will be responsible for agreeing the terms of reference and any changes to them.

Stephen Gray & Mary Jarvis 7 February 2013

Ratified by Melksham Town Council on 18 February 2013

Ratified by Melksham Without Parish Council on 18 February 2013

UPDATED BY Lorraine McRandle, Melksham Town Council following May 2017 Steering Group meeting

FURTHER UPDATED BY Teresa Strange, Melksham Without Parish Council following June 2017 Steering Group meeting

Approved by MWPC Full Council 17th July 2017 Min 144/17b

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Market Town Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

Please note that this is a joint submission of the Melksham Neighbourhood Plan Steering Group, Melksham Town Council and Melksham Without Parish Council

Title	Mrs	Mrs
First name	Teresa	Linda
Last name	Strange	Roberts
Job title (where relevant)	Clerk	Clerk

Organisation (where relevant)	Melksham Without Parish Council	Melksham Town Council
Address Line 1	Sports Pavilion	Town Hall
Address Line 2	Westinghouse Way, Bowerhill	Market Place
Address Line 3	Melksham	Melksham
Address Line 4	Wiltshire	Wiltshire
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Telephone Number	01225 705700	01225 704187
Email Address	clerk@melkshamwithout.co.uk	Linda.roberts@melksham-tc.gov.uk

Section Two – Questions

Which Market Town does your response relate to?

Answer:

Melksham (prepared by the Joint Melksham Neighbourhood Plan (JMNP) group)

1. What do you think to this scale of growth?

Should there be a brownfield target? Should it be higher or lower?

Answer:

Set out in two parts. Part one addresses the first part of question 1:
What do you think to this scale of growth?

Melksham Town Council and Melksham Without Parish Council Submission Joint Neighbourhood Plan

In principle both Melksham Town Council and Melksham Without Parish Council support and are proactively planning for the coordinated sustainable development of both administrative areas through their joint commitment to producing their Neighbourhood Plan. Both aim to work constructively with Wiltshire Council to help shape strategic policies for Melksham and produce neighbourhood plan policies that meet neighbourhood plan basic conditions and support meeting community needs at the local level. A Statement of Common Ground is expected to be put in place to underpin this.

Melksham Neighbourhood Plan has now been submitted by Wiltshire Council to the Examiner. Having reached this stage, its policies have passed through Regulation 14 consultation, submission to Wiltshire Council and Regulation 16 Consultation. Whilst a number of its policies and its approach to allocation of housing land at Melksham has attracted ongoing comment and objection, policies that have not been substantially challenged through engagement or questioned by the Examiner may be considered to have gathered weight. In addition, evidence bases that support policies can also be considered to

have benefitted from several opportunities for community engagement and therefore be sound representations of the community's issues, objectives and priorities.

Work undertaken in production of Melksham's Joint Neighbourhood Plan, together with strategic planning and transportation related studies, provide an evidence base that has informed the following comments. Melksham Joint Neighbourhood Plan Steering Group also convened two special (closed) sessions to address and prepare responses.

This feedback provides Wiltshire Council with additional evidence that is specific to Melksham and Melksham Without but also raises questions and issues relating to Wiltshire Council's emerging spatial strategy and growth affecting the neighbourhood plan area.

The response document was approved for submission by the Joint Melksham Neighbourhood Plan Steering Group on Wednesday 24th February 2021, Melksham Town Council on 1st March 2021 and Melksham Without Parish Council also on 1st March 2021.

Wiltshire Housing Requirement Figure

The choice of Wiltshire Council not to use the Government standard calculation method and utilise its own local housing requirement calculation and application of contingency to produce a higher figure is not accepted. Government calculations method would already place a significant demand upon Melksham NDP urban and rural area communities. However, the cumulative effect of this within a strategy that has removed employment growth and skewed strategic housing growth to Melksham, within a strategic approach designed for market towns is inappropriate and likely to lead to development that will be harmful to and not contribute to Wiltshire's climate change objectives.

Whilst initial sustainability appraisal has indicated no adverse impact of applying higher figures, evidence supporting place growth strategies has identified significant environmental and infrastructure constraints at market towns within Chippenham HMA which restrict their ability to accommodate their predicted share of housing growth. This has resulted in a strategy that has diverted significantly more growth towards Melksham, beyond meeting its stated needs and role as a market town. Such increased levels of growth at Melksham are more akin to the proportion and approach for Chippenham where balancing housing, employment and infrastructure are to be coordinated.

The approach to the distribution of higher figures has resulted in a c17% increase in housing requirement for Chippenham HMA, compared to only a c5% and c10% increase at Salisbury and Trowbridge HMAs respectively. The effects of higher growth levels for Chippenham HMA are further concentrated at Melksham as a result of the chosen housing growth scenario CH-C, which diverts an additional c1000 homes (c33%) above CH-A (rolling forward the current Core Strategy approach).

It is noted that the decision to adopt such an approach was informed by an interim sustainability appraisal that reported no unacceptable impacts. Did this take account of the disproportionate uplift on Chippenham HMA and Melksham?

COVID-19 has potentially significantly altered growth needs for at least the initial years of the reviewed plan period. It is suggested this is reviewed.

Climate Change

In adopting the higher growth approach and choosing to focus a larger proportion of only its housing to Melksham without balancing this with land use allocation to increased self-containment and commitments to infrastructure delivery that would neutralise its carbon footprint, the current strategy is also considered contrary to Wiltshire Council's climate change objectives.

The proposed growth level will have significant impacts on its existing locally valued rural setting, compound issues with strained community infrastructure and increase levels of traffic and congestion. The amount of growth will require extension of the town to an extent that is not attractive for walking and cycle connections to its town centre.

Melksham's Councils have a track record of proactively planning for sustainable growth and recognise its benefits if achieved to meet community needs. Within the pool of SHELAA sites put forward by Wiltshire, there are sites and parts of sites that could achieve more sustainable patterns of growth at lower levels, coordinated and balanced with supporting uses, sustainable transport and community infrastructure. However, delivering higher levels will almost inevitably lead to increased requirements to use cars for local trips.

Further comments are made to assist Wiltshire Council work with Melksham and in coordination with its neighbourhood plan to shape an acceptable strategy for the town and its rural setting. These are made without prejudice to the in-principle rejection of the amount of housing only growth that is directed to Melksham.

Employment Balance

Within the consultation material, there are various references to the need to balance housing delivery with allocation of land for employment. There are also references to the economic vitality of Melksham, the availability of the labour force and the shortage of employment space. Whilst Melksham has been expected to accommodate a significantly higher level of housing growth, Wiltshire Council has not adopted the recommendation of scenario CH-C. This approach is questioned. It appears to challenge sustainability objectives for market town self-containment and minimising the need for travel. Both Melksham Councils wish to engage further with Wiltshire Council to resolve a more forward thinking strategic and local approach to employment land allocation and policies for Melksham as a sustainable location for living and working taking account of brownfield land regeneration, town centre renewal, supporting employment to provide community infrastructure and enabling home working.

Coordination of Infrastructure

Melksham and Bowerhill have reached a point where much of its existing market town infrastructure is at or over capacity. If growth is to be seen as acceptable to the community, it must be master plan led and inextricably linked to the simultaneous delivery of community and green and blue infrastructure, strategic and local sustainable transportation investments - and proactive investment in the town centre.

Development must deliver benefits to the existing population and be in a form that contributes to and does not conflict with Wiltshire and Melksham's commitments to tackle climate change. The current strategy does not provide such safeguards and benefits.

Role of Neighbourhood Planning

The Emerging Strategy highlights the importance of neighbourhood plans in preparation or review in working in coordination with the Local Plan Review. This is the case at Melksham. It is planned that following plan-making of the current submission Joint Melksham Neighbourhood Plan, the document would go into immediate review to enable this. In addition to taking a lead in place shaping within Melksham and Bowerhill and the NDP area's rural environment and villages, it is anticipated the Neighbourhood Plan would seek to allocate further sites at Melksham for development.

In particular, in the context of a planned growth strategy, the JMNP Steering Group would wish to agree a key role for the plan in setting master planning and design principles to direct strategic growth deliverables and quality.

Brownfield Land Prioritisation

The JMNP Steering Group is strongly supportive of development of brownfield land being prioritised to maximise the sustainability of development and minimise the demand for greenfield land.

Clarification is requested as to how the brownfield target is a reasonable indicative target figure for housing delivery and how brownfield land can be delivered through the Neighbourhood Plan. Regardless of the figure stated, unless the reviewed JMNP is able to allocate brownfield sites that include housing, it will not be able to be in control of or responsible for brownfield land housing delivery. In addition, the 10-year threshold is not in step with the expected reviewed plan period, linked to the reviewed local plan.

The JMNP will provide a suite of local policies for Melksham NDP area that will provide in-principle support for and guide appropriate development of brownfield land that contributes to NDP or Local Plan objectives. The reviewed plan can explore the potential to agree development briefs for priority areas including within Melksham Town Centre.

Melksham Town Council has invested in analysis of Melksham's current and future issues, drivers and opportunities in its "Melksham 2020-2036" study. It is now engaging with the community area and Wiltshire Council in analysing travel patterns and sustainable transport opportunities, to connect the town centre with its surrounding communities. These studies will provide key evidence to inform strategy and investment in the town centre and local sustainable transport. Melksham TC and the JMNP Steering Group wish to engage with Wiltshire Council towards the collaborative production of a vision and strategy for town centre post COVID-19 recovery.

Brownfield Target Figure

The Brownfield Target figure is derived from past windfall figures and is in addition to the housing requirement figure for the area. It is then taken off the housing requirement for future Local Plan reviews. This methodology appears muddled, with the Brownfield target considered to be external to the housing requirement figure, yet windfall considered to be internal to the housing requirement figure. It is more than likely that some windfall development will occur on Brownfield land. This is not splitting hairs – allocations, indicative housing requirements, brownfield targets, windfall targets are all different concepts in planning and are not interchangeable.

Therefore, we do not agree that the Brownfield target should be in addition to the overall housing requirement figure. In addition, we consider any Brownfield target should align with the Plan period.

2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

This response is supported by a schedule of commentary on the place shaping priorities known to the councils and NDP Steering Group. The commentary in the schedule below is a result of recent stakeholder community consultation and technical work undertaken during the evidence gathering to support the submitted Neighbourhood Plan.

This schedule firstly addresses a review of priorities identified by the Planning for Melksham document. It then itemises and expands upon other place shaping priorities identified through work undertaken in building the NDP evidence base.

Delivery

Wiltshire's Place shaping priorities	Melksham's Comments
<p>i. Ensure town centre regeneration through continued investment in the town centre, maximising brownfield land and encouraging employment opportunities</p>	<ul style="list-style-type: none"> • Clarification: What is meant by "continued investment"? Is this private sector inward investment or capital investment by Wiltshire Council? • Further collaborative work is required to jointly identify the investment and infrastructure needed to support the NDP area until 2036 and beyond. • Town centre investment in environmental quality including clean air through investment in walking and cycling infrastructure is a priority (linked investment with A350 by-pass). • Agree maximising re-use of previously used land. Investment to enable regeneration is a priority. Brownfield sites should be identified and tailored approaches to bringing forward identified. The future reviewed Joint Melksham Neighbourhood Plan 2 (JMNP2) should take a leading role in this. • Shaping and supporting post COVID-19 town centre recovery a priority. This will require a dedicated recovery masterplan and supporting delivery investment. The role of the centre may need to change to a greater level of mixed and community uses. Melksham Town Council and JMNP2 should take a leading role in this, working with partners including Wiltshire Council. Melksham Town Council has produced a Markets Strategy and "Melksham Town 2020-26", which analyses town centre Issues, challenges and drivers. It has also commissioned a Town Centre Access and Movement Study (Places for People) and community consultation. This is due for completion later in 2021. The Town Council is now progressing plans to produce a Town Centre

	Strategy. These can all support shaping and delivery of future town centre renewal.
ii. Out-commuting should be reduced through an improved employment offer	<ul style="list-style-type: none"> • The current draft lack of additional employment land proposed at Melksham is questioned and appears to contradict with Place Shaping Priority ii. Wiltshire Council's own infrastructure needs assessment (ref ME6) comments: "There is a very limited supply of employment sites and premises available in Melksham". This also appears to contradict with growth option testing and sustainability appraisal for growth distribution across Chippenham HMA. Whilst Melksham appears to be identified as a preferred location for increased housing growth (Option CH-C), to support delivery of the A350 Bypass, the preferred approach does not include the recommended focus of employment growth at Melksham: "New employment land proposed only at Melksham and Corsham". • Within the context of potentially lasting changes to working from home and more locally, further consideration should be given to the integration of living and working within Melksham and its neighbourhoods. Potential large-scale growth to the east of Melksham should consider integration of more innovative opportunities for home working and local employment hubs, combined with higher capacity broadband and more robust mobile communications networks. • Renewal of the town centre (ref. place shaping priority i) should also be identified as an opportunity to provide new employment / office floorspace. This may include provision of new office space as part of potential post COVID-19 relocation from London¹ with the rise of flexible working and the decline of the traditional office hours / base. There are currently low rentals and a limited range of office accommodation available in Melksham². • The need / demand for employment land for a new large employer should be considered. As identified in the Emerging Spatial Strategy, Melksham has demonstrated its attractiveness to large employers with investment and creation of high skilled jobs such as Herman Miller and Knorr Bremse³. The benefits of locating employment bases in and around the town is likely to increase through delivery of the A350 by-pass.

¹ <https://londonist.com/london/latest-news/will-london-s-population-shrink-for-the-first-time-this-century-in-2021>

² Melksham Town 2020-2036. A review of the opportunities, challenges and drivers facing Melksham Town during the period of the next Local Plan

³ Melksham Town 2020-2036. A review of the opportunities, challenges and drivers facing Melksham Town during the period of the next Local Plan

	<ul style="list-style-type: none"> • However, it is acknowledged that there is currently vacant floorspace within Bowerhill Trading Estate.
An A350 bypass to the town is a priority to improve the efficiency of the transport network and lead to other benefits for the town	<ul style="list-style-type: none"> • It is agreed that the A350 by-pass is a priority. Atkins Local Transport Plan Review has identified that the cumulative impact of growth will increase traffic on the A350 and exacerbate congestion where the route passes through settlements. This includes Melksham. Para' 3.31 of the Emerging Spatial Strategy for Melksham states that "Higher growth ... has also been seen as a means to help deliver road infrastructure during discussions with the Town Council. In this regard, the Government has announced funding support to progress an A350 Melksham bypass. A preferred scale of development is therefore the higher of the range tested at Melksham (as in CH-C)." • Delivery of planned growth along the A350 corridor between Chippenham and Trowbridge will be likely to increase traffic volumes and HGV number at Melksham. As part of CH-C strategy large scale growth at Melksham will also be likely to contribute to traffic congestion within the town. This impact is in conflict with Local Plan climate change objectives, will undermine the recovery of Melksham town centre, and severely reduce the feasibility of delivering attractive walking and cycling alternatives to driving. • Both Melksham councils consider it is essential that delivery of the by-pass is in advance of phased delivery of growth at Melksham and within the wider HMAs. • In addition, if this priority's objective of delivering "other benefits to the town" are to be realised, these must be identified and agreed through further dialogue, supporting schemes and funding packages brought forward for coordinated delivery with the by-pass and any large-scale housing growth. Melksham Town Council has recently commissioned a local access and movement study "Places for People" which can inform sustainable transport projects within Melksham and linking to its neighbouring community area. Physically separate cycle infrastructure should also be delivered along with space for cars on new roads to ensure a balanced delivery of transport options, and to enable active travel choices. • Parallel delivery of sustainable transportation and green infrastructure within Melksham may contribute to mitigation of conflicts with Wiltshire Council's climate change objectives that the increased volumes of traffic and by-pass construction creates.

	<ul style="list-style-type: none"> • If an acceptable phasing of the by-pass delivery cannot be agreed and committed to, Melksham Councils may be unable to support proposed levels of growth.
To increase levels of train passenger transport and help reduce traffic congestion, railway station parking facilities should be improved and extended	<ul style="list-style-type: none"> • Increased levels of train passenger transport and frequency of trains stopping at Melksham is supported. • The improvement of the environment around the railway station is vital to attract greater levels of passenger use. Current improvements to parking facilities at the railway station are welcomed and should be complemented with improved pedestrian and cycle access. • As part of investment in improved walking and cycling infrastructure, particular investment should be focused on integration of the station with the town centre. This should include addressing replacing the existing underpass as part of re-distribution of traffic onto the A350 by-pass and re-modelling of internal highways to rebalance the distribution of space to cars/cyclists/pedestrians. • Improvements to rail services should be integrated with enhancements to bus connections and facilities at the station.
New development should be accompanied by sufficient healthcare facilities, schools and transport infrastructure which have come under increasing pressure in the town	<ul style="list-style-type: none"> • Melksham Councils strongly support this priority. • Clarification is however needed on how the “sufficient” level is to be assessed and delivered. This should start by addressing the current deficits within the existing community. • Large scale growth should be master planned to ensure such facilities will be delivered and sustainably located for access by new and existing communities. • Housing provision should include provision of accessible types and tenures of homes for key workers to sustain the delivery of local services within a self-sufficient market town.
A holistic town-wide approach to ensure future education provision is required with sufficient primary and secondary school places provided to meet the needs of all new housing development	<ul style="list-style-type: none"> • Agreed. • Primary school provision should be planned to address existing unsustainable locations (e.g. Bowerhill) that result in higher levels of car use from existing communities due to barriers to movements (wide busy roads) and distance. The need for a primary school within safe walking distances should also be a priority within potential larger scale development. • Consents that are being given by Wiltshire Council for speculative development on sites poorly connected to schools is exacerbating unsustainable car journeys within the town.
Continue to safeguard a future route of the Wilts and Berks canal and to enable its delivery to provide significant economic,	<ul style="list-style-type: none"> • In principle this is supported. • Caution is expressed about the amount and location of development considered necessary to “enable” the project delivery. This must balance

environmental and social benefits for Melksham.	delivery of benefits with conservation of environmental assets and character.
Other Priorities:	
Development and investment within Melksham NDP area should enhance the attractiveness of Melksham and the health and wellbeing of its communities through enabling the delivery of improvements to the town's green and blue infrastructure networks (notably the River Avon and Clacker's Brook corridors) to optimise their accessibility and ecological capital, connect communities and link to the surrounding countryside and villages.	
Melksham's rural setting and the villages are an integral part of its quality of place, community and economy. This should be included within a holistic approach to Melksham's Local Plan strategy place shaping as is the case within the Joint Melksham Neighbourhood Plan.	
Development should protect and contribute to the conservation and enhancement of Melksham's designated and locally valued heritage assets.	
Development should contribute to securing sustained and appropriate management and maintenance of capital investments to Melksham's public infrastructure.	
Whilst it is acknowledged that climate change and carbon reduction is addressed through a separate consultation document and is therefore not included in the place shaping priorities for Melksham, this is such a critical issue that we are highlighting it here. Planning has an important role to play in addressing the climate crisis (one which has been constrained for too long) and the JMNP makes clear local ambitions for raising sustainability standards and support for generation of renewable energy locally. The National Planning Policy Framework (2019) says (para 149 and footnote 48): "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures, in line with the objectives and provisions of the Climate Change Act 2008." Sustainable and climate responsive development strategies are vital in the face of the climate crisis.	

3. Is this the right pool of potential development sites? Are there any other sites we should be considering?

Please see attached document (Appendix 1):
LPR / AECOM / JMNP SITES Commentary.xlsx

This spreadsheet compares Wiltshire Council's pool of sites at Melksham with assessments undertaken by AECOM as part of previous work undertaken in developing the Submitted Melksham Neighbourhood Plan. Please note: not all sites assessed are in the AECOM document.

The JMNP Steering Group met to review the pool of sites proposed by Wiltshire Council during February 2021. Harnessing Wiltshire's appraisal, AECOM assessments and Steering Group Members' in-depth understanding of all sites (including those that were not assessed by AECOM), an initial RAG rating response has been provided in the final column of the attached spreadsheet.

This rating represents the current views of the Neighbourhood Plan Steering Group and is validated by the joint qualifying body councils. Informal consultation was also undertaken on a number of these sites during the Neighbourhood Plan preparation process. Feedback from this is also shown in the comparison table. During Regulation 14 and 16 draft plan consultations, full evidence bases linked to site allocations were published. Where sites have not been subject of AECOM assessment responses contained in this schedule represent the views of the JMNP Steering Group as validated by qualifying bodies.

The JMNP Steering Group concluded that the following sites were potentially most suited to be advanced to the next stage of sustainability appraisal:

Large sites

Potential Development Site 1

The northern area of this large site with access from the A3102 is considered to be a reasonable site to progress for further assessment. The green infrastructure corridor of Clackers Brook links into the town and could provide a natural edge to the site (ref. policy 12 of submission JMNP). Impact on the landscape and views from Sandridge Hill across the lower lying and flat area of landscape should be taken into account – it is important to respond sensitively to the transition between the settlement edge and countryside in this location (ref. policy 17 of the submission JMNP). There are also existing trees and hedgerows on this site which development should retain where possible (ref. policy 16 of the submission JMNP) and an area of biodiversity value; an 8-acre plantation on this site is an area of deciduous woodland priority habitat. There is also a new local centre located close to the site on the other side of the Eastern Way - links would need to be made across this road to improve connectivity. Development of the area to the south of Clackers Brook would not be supported (specifically SHELAA site 3123).

Potential Development Site 17

The south-eastern end of this site is considered to be potentially suitable for development specifically SHELAA sites 3478/9 (smaller part of this site identified as 17 by the LPR). These sites have been put forward in the past by Melksham Without Parish Council as the most logical place for next development in the Parish and linked to the town. Impact on the landscape and views from Sandridge Hill across the lower lying and flat area of landscape should be taken into account. Access to this site should be from the roundabout immediately to the south of the site.

For both sites the extension of bus routes into the area would be important as part of a wider sustainable transport network together with walking and cycling routes linked into the town and key locations such as King George V Park and Recreation Ground and importantly, the railway station. It should be noted here that the Town Council has begun work on a Movement Strategy (Priority for People: Melksham 2021) which should inform the site appraisal and master planning processes going forward. Links into the Green and Blue Infrastructure network (Clackers Brook being a key element which links through the site into the town) and additions to the overall network of the town would also be important.

Smaller sites

Potential Development Site 9

Coalescence between Melksham and Bowerhill is a key concern here – it would be important to maintain a landscape buffer.

Potential Development Site 10

The A350 is a significant barrier and concern in terms of walking / cycling access, but the site is potentially within walking distance of a range of facilities if safe crossings are provided.

Potential Development Site 11

There are a number of constraints associated with this site, however there is potentially good access to Aloeric School if a crossing can be provided - the road is a significant barrier so safety and access issues for pedestrians and cyclists would be a priority to address. The land here is Best and Most Versatile (BMV) agricultural land so any development of this

greenfield should minimise land take of this valued resource. Coalescence with / impact on Berryfield is a concern as well as wider impact on the landscape.

Potential Development Site 13

This site is well located for active travel and links into the existing green infrastructure network (ref policy 12 of the submission JMNP) with proximity to King George V Park and access to facilities and services in the town, and supports local ambitions to increase levels of movement and active travel (ref policy 11 of the submission JMNP).

Other Sites

The excel spreadsheet LPR / AECOM / JMNP SITES Commentary.xlsx also includes a table of AECOM Site Assessments for JMNP that are NOT on the Local Plan Review list of sites. This schedule identifies sites within the JMNP area that were assessed by AECOM for suitability for allocation within the neighbourhood plan, but have not been identified by Wiltshire council as being suitable for inclusion within its draft pool of potential allocation sites. NB: The majority of these sites are outside of the Melksham and Bowerhill urban area.

The following site at Melksham was considered to be potentially suitable for allocation:

- SHELAA Site 3333 (Land occupied by Cooper Tires (just the part that is a SHELAA, adjacent river))

4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

Distribution of development has been considered at a special meeting of the JMNP Steering Group. This meeting referenced published analysis and site assessment undertaken during production of the submitted JMNP and Local Plan Review inform the following comments. It also referenced sites it considered potentially suitable from Wiltshire Council's proposed pool of sites as outlined in ME3 above.

Primarily due to the current lack of a demonstrated five-year housing land supply in Wiltshire, Melksham is subject to a number of speculative planning applications, which have either resulted in recent planning consents, applications or likely applications. These schemes relate to SHELAA sites 699 / 1025 / 728 / 715 /1027 & 3243

If consented, these schemes could result in a further c.600 houses being built in addition to schemes in the pipeline identified by Wiltshire Council. This amounts to a potential of approaching 25% of the current proposed strategic housing requirement for Melksham or more than a further three years of supply pipeline. Consideration of preferred locations has taken current knowledge of this speculative development activity into account.

These comments put forward an emerging preferred approach to the allocation of land at Melksham for the remainder of the extended plan period. At this stage, in advance of further sustainability appraisal, it is too early to specify precisely which sites or parts of sites are preferred. Stated preferences do not assume acceptance of the number of homes proposed for the town or the lack of additional employment space currently proposed.

Brownfield Land

The JMNP Steering Group agrees with Wiltshire Council that the development brownfield land should be prioritised to maximise the sustainability of development and minimise the demand for greenfield land. Please refer to ME1. However, it is anticipated that development

of previously used land (definition of brownfield in the NPPF) will take place within the town as current uses give way to new uses (but it is acknowledged that there are no known currently available brownfield sites) as a result of changing economic patterns, and the Covid-19 pandemic. Is the potential for more diversification and change of land uses on previously developed land being taken into account in the overall spatial strategy?

The management of the brownfield target through Neighbourhood Plans is considered to be unclear. Clarification is requested as to how brownfield can be delivered through the Neighbourhood Plan and what the expectations are on a reviewed Neighbourhood Plan for delivery of brownfield land development. Further dialogue with the Local Planning Authority will be sought to clarify the approach to brownfield in the Plan area.

Additionally, paragraph 3.11 of the Emerging Spatial Strategy refers to setting a brownfield target for the next 10 years of the Local Plan period, not for the whole of it. We suggest this should be revisited and instead align with the Local Plan period.

Prioritisation of Most Sustainably Connected Greenfield Allocations

Melksham Town and Melksham Without Parish Councils wish Local Plan allocations to prioritise the allocation of land from its preferred pool of sites. The aim is to maximise the feasibility and attractiveness of walking and cycle as a chosen and inclusive approach to short journeys and connections to local facilities and the town centre. It therefore expresses a first preference for the allocation of suitable sites that are within approximately 20 minutes walking distance of Melksham town centre facilities.

Enabling Delivery of Affordable Housing

The allocation strategy should ensure the annual delivery of affordable homes to meet Melksham's community needs. This should include the allocation of sites that are considered capable of completion within the initial c.10 years of the extended plan period. This is more likely to be through the allocation of smaller sites with less complex site ownership and delivery issues. This may be followed by the delivery of a larger allocation which, whilst requiring greater lead-in times, will be capable of more certain delivery through the latter period of the plan.

Delivery of Infrastructure

Place shaping priorities identified in ME2 and infrastructure requirements identified in ME6 will inform Melksham's future general infrastructure delivery requirements. Each allocation site/area will also generate their own infrastructure requirements to address site specific issues, protect heritage and environmental assets, and to optimise their sustainable connectivity and contribution to the Local Plan and JMNP vision and objectives. The JMNP policy and evidence base provide analysis of community facility, infrastructure and green infrastructure and open space future needs in addition to existing and emerging Wiltshire Council evidence.

Wiltshire Council analysis has identified current provision of major elements of community infrastructure including primary and secondary school places and healthcare facilities are currently at, or near capacity and will need expanding to support current planned growth. Whilst contributions to the network of infrastructure, green space and facilities may be made through incremental contributions from the smaller site allocations coming forward, it is recognised such infrastructure may be more feasibly provided as part of a larger site allocation. In principle therefore, Melksham Councils support further exploration of an opportunity to identify a suitable large scale allocation area that may combine and coordinate

the allocation of a cluster of linked SHELAA sites. These should be the subject of master planning and progression of a proactive delivery strategy to ensure programmed implementation of large-scale infrastructure needs.

A350 By-Pass

The ME1 response has highlighted the critical importance of committed and programmed delivery of the A350 by-pass coordinated with planning and delivery of growth within the Chippenham-Trowbridge corridor and at Melksham.

Wiltshire Council plan delivery of the by-pass around 2027, even if delayed during the Local Plan Review period. Currently the route is yet to be confirmed. However, connecting the by-pass route with the larger allocation area may enable traffic flows to be disbursed. It may also increase the viability and attractiveness of employment and local needs retail/services within the master planned area.

It is important to note here that the Steering Group were clear that larger scaled planned housing growth should be delivered with and not before delivery of the by-pass.

Emerging Locational Strategy

Melksham views further greenfield growth as being in four phases or elements:

- (i) Completion of plan led schemes in the pipeline.
- (ii) Completion of consented speculative development as a result of the five year housing land supply issue.
- (iii) Smaller, less complex housing allocation completions in sustainable locations.
- (iv) Larger scale master plan led allocation phased delivery (with by-pass).

Smaller sustainable sites are considered to be those to the west and south of Melksham, where linked to existing infrastructure, transport-links and without significant environmental constraints.

Coordination of clustered SHELAA sites to the north-east and east of the town (17-1) are currently considered to offer the greatest opportunity. However, site 1 is only considered appropriate where it can be integrated into maximum 20-minute cycle connections to local facilities and the town centre. If considered appropriate, Site 17 should be fully integrated within a comprehensive approach and developed from the south.

Master Planning

A large-scale master planned allocation should include enabling the by-pass route and delivery, the delivery of primary and secondary school expansion, additional healthcare provision and new community playing fields and investment in connecting walking, cycling and public transport links with the town centre and rail station. Development mix should include a small local needs community hub, ongoing delivery of a range of affordable housing options and new employment opportunities and floorspace (which Melksham's Councils believe must be provided).

The submitted JMNP includes locally distinct design policy supported by analysis of local character. Melksham Councils will be supporting the review and additions to the current NDP immediately upon its Making. The reviewed NDP should be considered as an opportunity to set local design parameters, policies and codes that would secure high quality places and design through large scale allocation master planning.

5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see attached document (Appendix 1): LPR / AECOM / JMNP SITES Commentary.xlsx for individual site comments.

The JMNP highlights a number of areas that are important within the Neighbourhood Plan area:

The importance of placing **sustainable development** and the **climate crisis** at the centre of decision making (we acknowledge this is covered in a separate consultation paper) in line with our Neighbourhood Plan policies 1 and 2).

Low emission vehicle charging infrastructure to enable lower carbon forms of transport (Neighbourhood Plan policy 4), together with a **linked sustainable transport system** connecting areas of housing with the town centre and the railway station via bus. Linking in an extensive and improved footpath and cycle network to enable active travel is also a key priority for the Plan area (Neighbourhood Plan policy 11). This all linked to **local delivery of employment** to minimise out-commuting.

Delivery of **schools, healthcare, community infrastructure and services** to support existing and new members of the community is extremely important (Neighbourhood Plan policies 8 / 15).

Edges to the settlement need to be considered carefully and sensitively to protect the **wider landscape setting** and deliver a strong **green and biodiverse edge** to built settlement (Neighbourhood Plan policies 12/13/16 & 17).

The role and function of the **town centre** (Neighbourhood Plan policy 9) in terms of economy, leisure (including the arts, for example the Assembly Hall) and identity are important to consider as the towns grown: strong connections between town centre to new development are vital.

6. Are there any issues or infrastructure requirements that should be identified? Other than that already identified within the 'Planning for' document?

Topic	WILTS Comment	Melksham Comment
		Further detailed information and analysis about community infrastructure and facilities within Melksham and Melksham Without Parishes has been submitted as supporting evidence to the JMNP. This can be accessed via the Neighbourhood Plan website; https://www.melkshamneighbourhoodplan.org

Education	<p>New provision would be required to meet early years needs arising through new housing development. Land for a new primary school has been secured on land south of Western Way, which will supply new places to the south of the town.</p> <p>New provision is required to meet needs in any other area.</p> <p>Melksham Oak is currently undergoing expansion. This is projected to fill. Additional expansion onsite would not be possible, but a satellite of Melksham Oak School could be possible in meeting needs arising from any new housing.</p>	<p>As development and potential strategic allocation sites come forward in the Neighbourhood Area, it will be important to ensure that new facilities are provided so that the day to day needs of the increasing population can be met. This is particularly important for the provision of schools (existing primary schools in the Neighbourhood Area are already oversubscribed).</p> <p>Delivery of a new primary school at Pathfinder Place / Bowerhill is a priority to enable children in the new and forthcoming homes of this area to be within safe walking distance of school. The current extension to Melksham Oak Secondary School (Melksham's only secondary provision) is being funded by S106 contributions and is anticipated to be ready for occupation in September 2021. This will provide 240 additional spaces across years 7 to 11, increasing the capacity for those year groups to 1500 once complete. Another secondary school, either a satellite or separate school under a different Academy is imperative to ensure children do not have to travel to another town for statutory education. More worrying is the lack of provision for Years 12 & 13. The expansion is only to accommodate Y7-11, and there will be an increased pool of pupils looking to enter the only 6th form provision in the town, which has not been expanded at the same level. Alternatives to 6th form such as college and apprenticeships (which include college attendance) all have to be found outside of Melksham as there is no provision in the area. Children aged 16-18 should not have to travel out of their town to fulfil their statutory education commitments, this is not sustainable. Anecdotal evidence of the current 6th form intake for Y12 in September 2021 are higher than levels before for both existing MOCS students, and also from external sources.</p>
Energy	<p>According to Scottish and Southern Electricity Network's (SSEN) Network Capacity Map, the substation and supply points in and around Melksham are currently unconstrained. Some of the infrastructure is unconstrained whereas some is partially constrained in relation to energy generation,</p>	<p>Planning has an important role to play in addressing the climate crisis and the JMNP makes clear local ambitions for raising sustainability standards and support for generation of renewable energy locally. The generation of renewable energy will be critical in addressing the climate crisis, alongside sustainable development locations and carbon neutral development policy.</p> <p>Investment in infrastructure enable more small-scale connections to the grid is a priority.</p>

	according to SSEN's Generation Availability Map. This means new generators may require investment in the infrastructure to be able to connect to the grid.	
Green and blue infrastructure	<p>A multi-functional 'Local Green Blue Infrastructure (GBI) Network' has been identified and is shown on the map in Figure 2 below. The Map indicates areas where improvements will need to be sought – i.e. in the form of functional and sufficiently scaled corridors within which the aim would be to consolidate and incorporate new green and blue spaces into the existing GBI networks.</p> <p>The map in Figure 3 below identifies biodiversity and heritage assets which are also GBI assets. These features are important waypoints within the existing landscape and should be considered as being integral to how new development areas are sensitively planned.</p>	<p>The JMNP Green Infrastructure Evidence Base Report V6 2020, submitted with the NDP, raised the following distinct issues and needs to be addressed within the Neighbourhood Plan area.</p> <p>It is noted that there is a draft Wiltshire Green and Blue Infrastructure (GBI) strategy forthcoming for consultation. The GBI Network diagram as shown highlights broadly similar GBI features to the identified in the Neighbourhood Plan evidence base, from which some key points are extracted below:</p> <p>Allotments: Access to allotments in Melksham is generally poor as there is a under supply of allotments in both the urban and rural areas.</p> <p>New development should meet shortfalls in the area. Consideration should also be given to encouraging community growing areas and/or community orchards in existing open spaces.</p> <p>Amenity green space: Within Melksham the access to amenity green spaces is good with majority of the urban area having access. Onsite provision of amenity green space should be sought through new development proportionate to the scale of the development and drawing on the existing character of frequent amenity green spaces in housing areas.</p> <p>Park and Recreation Grounds: With good provision within Melksham itself, the key priorities are to maintain and improve the quality of existing provision.</p> <p>Children & Youth Facilities: There is an under supply of children's play spaces within Melksham urban area. Youth provision is sufficient, but access with both has gaps. Where development opportunities arise, new onsite provision should be sought. The priority should be for fewer, larger and higher quality play spaces as opposed to a proliferation of smaller play spaces, and for a wide spread of ages, including teenagers</p>

Sport and Leisure Facilities	<p>At Melksham and Bowerhill there is a need for the following, as identified by the Wiltshire Playing Pitch Strategy:</p> <ul style="list-style-type: none"> • Whilst grass pitches for Melksham and Bowerhill are sufficient, Bowerhill Recreation Ground will need upgrading / improvement. • Oakfields is the new home of Melksham Town Football Club and Rugby Club which houses a sufficient number of quality grass pitches. However, a 4G ATP will be needed here. • The Melksham House site is the home of Melksham Cricket Club, where a new pavilion has been provided for the club as part of the campus programme, and the new home of the yet to be built Health and Well Being Centre. The HandWBC is due to be completed in 2022. All further development would be asked for a contribution to the new Leisure Centre, improvements to existing sites, and new 4G ATP at Woolmore Farm. <p>Leisure Facilities</p> <ul style="list-style-type: none"> • Plans for Melksham Community Campus are well underway with construction due to be completed in 2022. The new facility will comprise a swimming pool, learner pool, fitness suite, spin studio, café, library, community spaces, meeting rooms and Melksham Without Town and Parish Council Offices. <p>There are no further plans for additional leisure facilities.</p>	<p>The arts side of leisure needs attention also.</p> <p>Melksham has an excellent arts centre (Assembly Hall) – but it does urgently need investment especially if it is to meet the needs of a growing population.</p> <p>The new campus is being delivered, but some of the early ambitions for the campus have been lost to delivery – is there scope for continued investment in the campus as the town grows?</p> <p>A 4G ATP will be required for each of the two different sports/clubs, so one for Melksham Town Football Club, and one for Melksham Rugby Club. Their uses and construction are different for the individual sports.</p> <p>Please note incorrect statement in your text, this will be the Melksham Without Parish Council office and meeting space only (Melksham Town are not relocating to the Campus)</p>
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Health	<p>There are two GP surgeries in Melksham. A third GP surgery closed in 2020 due to a lack of resources.</p> <p>The two remaining surgeries both have capacity issues. Consideration may need to be given to improving capacity in the future.</p>	<p>There are 11 GP practices which support the local population of Chippenham, Melksham and Trowbridge.</p> <p>Access to local health facilities and services is a very high priority for local residents. The population's recent and expected future growth, caused by significant development in the Neighbourhood Area, is one of the main reasons for this.</p> <p>The Wiltshire Health and Wellbeing Joint Strategic Needs Assessment Report 2017/18, which outlines current and projected need for health and wellbeing infrastructure in Wiltshire, used a projected population increase for the whole of Wiltshire which was surpassed by the actual population increase that occurred. This again highlights the importance of access to health facilities for the Melksham community. Research carried out between 2015-2018 by the Neighbourhood Plan Health and Community Sub-Group indicated a shortfall in GP surgery staff.</p> <p>As development and potential strategic allocation sites come forward in the Neighbourhood Area, it will be important to ensure that new facilities are provided so that the day to day needs of the increasing population can be met. This is particularly important for the provision of health care facilities, such as GP and dental surgeries.</p> <p>How the impact of our ageing population will be planned for in relation to health needs is also important, and this links to a proposal for a 70-bed care home that is a current live planning application.</p>
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Housing needs	<p>In the years 2016-2036 the older population is expected to increase by 26% in the 60-74 age group and 83% in the 75+ age group.</p> <p>At the same time the 0-14 age group is expected to decrease by 3% and the 15-29 age group to increase by 4%.</p> <p>Finally, the 30-44 age group is expected to not change and the 45-59 age group to decrease by 16%</p> <p>Local household income The annual average gross income is £32,800 and the net income after housing costs is £22,700.</p> <p>Affordability Ratio (based on 2 bed property) Median price £171,000 Annual gross income £32,800 Affordability ratio 5.21</p>	<p>In considering planning for the future to meet housing need, it will be important to consider that the NDP area covers Melksham town and Bowerhill urban area, and the rural hinterland of Melksham Without.</p> <p>The NDP area therefore includes a range of types of settlement as defined by Wiltshire Council; Melksham and Bowerhill market town, Whitley and Shaw large village, and number of small villages. Each of these has its own distinct housing need which would need to be considered separately and assessed accordingly.</p> <p>The JMNP review presents the opportunity to undertake detailed primary and secondary evidence collection to explore local housing need.</p> <p>Evidence collection to support the draft allocation of land at Middle Farm in the submitted JMNP identified that Shaw and Whitley have had no affordable housing provision within the current Local Plan period. Whilst the allocation of land at Middle Farm will provide for around 6 affordable homes, there is likely to be pent up demand for affordable homes in Whitley and Shaw.</p> <p>There is a desire locally for single storey homes for the older and less mobile residents, at both market value and affordable/social housing level. This will enable downsizing to free up larger, family homes.</p>
The local economy	<p>High concentration of jobs in manufacturing, with recent major investments at Bowerhill, including the consolidation of Herman Miller's UK manufacturing at its purpose-built Portal Mill facility, and further warehousing/office expansion by Gompels Healthcare and upgrading of hangers for logistic distribution business. Build out of Hampton Park employment area in recent years.</p> <ul style="list-style-type: none"> • Market interest in town. • Low levels of unemployment 	<p>Melksham Town Council commissioned the production of the Melksham Town 2020-2036 Scoping Report, which is a review of the town's issues, opportunities and drivers. This important Melksham evidence base report is available at Appendix 2.</p> <p>Employment Space In December 2017, 13% of Melksham town's employment land was comprised of industrial floorspace, 2.9% was comprised of office floorspace, and 6% was comprised of warehousing and logistics floorspace.</p> <p>Melksham town has seen limited commercial investment for decades (except for supermarkets), whilst Bowerhill and Hampton Park sites within Melksham Without have benefitted from substantial investment and the creation of high skilled jobs.</p>

	<ul style="list-style-type: none"> • Capacity within labour market to accommodate future growth, according to population statistics • There is a very limited supply of employment sites and premises available in Melksham • Several brownfield sites in the town which provide good regeneration opportunities • Town centre vacancies are below the national average. • No capacity for additional convenience retail floorspace, but a small capacity for comparison retail floorspace up to 2036. 	<p>The JMNP supports new employment development in principle - particularly on brownfield land - particularly encouraging employment within business parks and Melksham town centre (ref Policy 10).</p> <p>Population/Workforce Evidence gathering undertaken during the preparation of the JMNP (and pre-pandemic) highlighted that residents have a desire to work closer to their homes; this is likely to be even more of the case post-COVID-19. The JMNP supports development to reduce out-commuting.</p> <p>Town Centre The Melksham Town 2020 - 2036 Scoping Report (2019) (Appendix 2) reviewed the opportunities, challenges and drivers facing Melksham Town over the period of the next Local Plan. This report highlights that though the climate for retail and customer-facing business in the town is seen as relatively good, in the nine years since Wiltshire Council's 2011 Town Centre and Retail Study noted "...a continued need for further town centre regeneration" there has been improvement to the area in front of the Town Hall but no other recent improvement work.</p> <p>As part of the commitment to maintaining and enhancing the town centre, the Town Council will prepare a masterplan for the town centre, including areas for potential expansion that will inform future development opportunities. See Priority Statement 2 and Policy 9 in the JMNP. Expansion of the town centre is something that the Town Council will be actively considering, particularly in terms of the future of commercial sites on the edge of the town centre, such as Cooper Tires.</p> <p>The Masterplan/Vision is at an early stage, but it is likely to specify objectives and opportunities around minimising volumes and speeds of through-town traffic, minimising pollution, promoting shared spaces and developing and utilising event space. It is also likely to:</p> <ul style="list-style-type: none"> - identify a strategy for managing heritage and change in the town centre, - include a design guide for the town centre's public realm and
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		<ul style="list-style-type: none"> - include a strategy for developing the town centre as a venue of choice for experiential activities. <p>Changes to Permitted Development Rights</p> <p>Recent and proposed changes to permitted development rights and associated prior consents create both an opportunity and threat to Melksham town centre in terms of retail / services and heritage. How retail uses in the town centre can be retained in the light of current and proposed changes to enable E Class uses to switch to C3 uses in town centres as permitted development is a key question. This increases the importance and urgency of proactive place shaping and supportive and protective measures and policy.</p> <p>COVID-19 Recovery</p> <p>COVID-19 will have impacted on the economy of the town centre, potentially leading to reduced footfall levels for an extended period and increased premises vacancy levels with a reduction in retail choice. However, potentially lasting changes in the community's patterns of work and relationship with local facilities creates an opportunity to re-shape the role and vitality of Melksham town centre as a focus of a more self-contained retail, service economic and community hub.</p> <p>Pre-pandemic analysis of the town centre and associated policies are now likely to need updating. The LPR and the JMNP review create an opportunity to provide such a suite of supportive recovery policies. However, the period until adoption and making of these plans is not fast enough to provide the recovery support that is potentially needed urgently. Melksham Town Council is already exploring the potential to produce a town centre vision/masterplan and is committed to working with partners including Wiltshire Council to shape and support the town centre's recovery and post-COVID vitality.</p>
Transport	<p>Key Features</p> <p>Melksham is well served by the A350 primary route which provides a direct link to Chippenham (and the M4 at Junction 17) and Trowbridge.</p>	<p>Walking and Cycling</p> <p>The JMNP supports the provision of more opportunities to get around the town and the parish without using a private vehicle (ref policy 11 of the submitted JMNP). Policy 11 of the JMNP is supported by a map showing priority and key walking routes between the town and</p>

	<p>Other key routes provide access to Bath (A365), Calne (A3102), Devizes (A365) and Bradford on Avon (B3107).</p> <p>Bus routes provide regular services to Bath, Chippenham, Trowbridge and Devizes with most services accessed from the Market Place in the town centre.</p> <p>Current constraints/local concerns</p> <ul style="list-style-type: none"> • Confluence of A350 and other radial routes (A365, A3102 and B3107) causes significant peak hour congestion and delays particularly in the central section of the A350 through the town. • Future development growth may increase pressure on the A350 through Melksham and at congestion hot spots such as Farmers Roundabout. This in turn may lead to further rat running through residential and rural roads. • While the TransWilts train service has been significantly improved over the past few years, it is still only a two-hourly service between Westbury and Swindon. • Currently poor environment around Melksham rail station and walking routes to town centre. <p>Opportunities</p> <ul style="list-style-type: none"> • Current joint working between TransWilts Community Rail Partnership, Network Rail, Great Western Railway and Wiltshire Council to develop 	<p>the rural areas as well as existing cycle routes. There are opportunities to improve the network of cycling infrastructure through the town and out into the parish, particularly to link with National Cycle Route 403.</p> <p>Bus Services</p> <p>Additional funding for local bus routes was announced in March 2020 and the Melksham Rail User Group have put forward proposals for improvement to bus services in the JMNP area. Currently, no bus services within the JMNP area link to the railway station – Melksham Councils support the provision of bus services to the railway station that connect with train times in order to provide a joined up transportation system that makes it easier to choose sustainable transport options. It is noted that at present there are no services to Chippenham or Trowbridge on Sundays/Bank Holidays.</p> <p>Train and Rail Services</p> <p>A recent successful campaign by the Trans Wilts Community Rail Partnership has resulted in there are now being eight trains daily in each direction from Melksham Station. The plan is for the doubling of this service to every hour in the future. This may well require investment in additional rail infrastructure.</p> <p>Agreed that there is currently a poor environment around Melksham rail station. Joint working between TransWilts Community Rail Partnership, Network Rail, Great Western Railway and Wiltshire Council has produced an ambitious and detailed master plan for the Melksham station site. The longer-term plan for the Station is summarised as:</p> <ol style="list-style-type: none"> 1. Conversion of redundant building into a café 2. Extension of the car park 3. Reconfiguration of carriageway/footpath in order to add a bus stop 4. Shared use pathway, pedestrian and cycle route to Foundry Close 5. Stepped station access from Bath Road. <p>Phase 1 & 2 of the Plan was implemented in 2020 to include new platform signage, destination indicators, increased parking, electric vehicle charging, cycle storage and the community cafe.</p> <p>Traffic Congestion and A350 By-pass</p>
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	<p>and enhance Melksham rail station, forecourt, parking and facilities.</p> <ul style="list-style-type: none"> • Further development and delivery of an A350 Melksham bypass could relieve peak time congestion and delays. • Bypassing Melksham could also reduce severance between the town centre and areas adjacent to the A350 (including the rail station and recent supermarket developments), create an opportunity to re-design the existing A350 corridor through the town, and support efforts to regenerate the town centre. • An agreed Melksham rail station masterplan that facilitates joint working between TransWilts Community Rail, Network Rail, Great Western Railway and Wiltshire Council to develop and enhance Melksham rail station, forecourt, parking and facilities. 	<p>Melksham Councils support the efforts of Wiltshire Council to progress the delivery of the by-pass, particularly in order to reduce traffic congestion on the A350 and to enable the accommodation of sustainable development in the town and the parish.</p> <p>E-Vehicle Charging The JMNP supports the provision of infrastructure to facilitate an increase in low or zero carbon emission vehicles. Policy 4 in the JMNP requires new residential development with on-plot parking spaces/garages to provide charging technology for low emission vehicles. The policy encourages the same provision in new employment, leisure and retail development.</p> <p>Other Melksham Town Council are progressing a movement strategy entitled 'Priority for People: Melksham 2021'. This strategy will look at movement in the town and beyond. Emerging themes to this strategy are set out below:</p> <p>A connected community: the broadening of links across the community area, with a focus on access to key services and the promotion of alternative means of transport to the car, including public transport and bicycles.</p> <p>- A safer community: the creation of a safer environment for pedestrians and cyclists across the town as a whole, within the villages and across the community's network of roads and paths.</p> <p>- A welcoming town centre: the development of a high-quality public realm and effective traffic management project within the historic heart of the town.</p> <p>- Planning for the future: a strategic study of how the town and villages are likely to evolve; of the impact that change will have on the volume and type of traffic using the town and community area roads; and of what actions are needed to address continuing problems and adverse impacts.</p>
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If you have any further comments you wish to make, please detail them below.

All evidence documents for Melksham Neighbourhood Plan can be accessed at www.melkshamneighbourhoodplan.org

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

☒

NO:

☐

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Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

T. Strange L. Roberts

Date:

02.03.2021

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

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The Emerging Spatial Strategy Consultation Response Form

Ref:

(For official use only)

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

Please note that this is a joint submission of the Melksham Neighbourhood Plan Steering Group, Melksham Town Council and Melksham Without Parish Council

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Last name	Strange	Roberts
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Address Line 3	Melksham	Melksham
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Telephone Number	01225 705700	01225 704187
Email Address	clerk@melkshamwithout.co.uk	linda.roberts@melksham-tc.gov.uk

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

Wiltshire Housing Requirement Figure

The choice of Wiltshire Council not to use the Government standard calculation method and utilise its own local housing requirement calculation and application of contingency to produce a higher figure is not accepted. Government calculations method would already place a significant demand upon Melksham NDP urban and rural area communities. However, the cumulative effect of this within a strategy that has removed employment growth and skewed strategic housing growth to Melksham, within a strategic approach designed for market towns is inappropriate and likely to lead to development that will be harmful to and not contribute to Wiltshire's climate change objectives.

Whilst initial sustainability appraisal has indicated no adverse impact of applying higher figures, evidence supporting place growth strategies has identified significant environmental and infrastructure constraints at market towns within Chippenham HMA which restrict their ability to accommodate their predicted share of housing growth. This has resulted in a strategy that has diverted significantly more growth towards Melksham, beyond meeting its stated needs and role as a market town. Such increased levels of growth at Melksham are more akin to the proportion and approach for Chippenham where balancing housing, employment and infrastructure are to be coordinated.

The approach to the distribution of higher figures has resulted in a c17% increase in housing requirement for Chippenham HMA, compared to only a c5% and c10% increase at Salisbury and Trowbridge HMAs respectively. The effects of higher growth levels for Chippenham HMA are further concentrated at Melksham as a result of the chosen housing growth scenario CH-C, which diverts an additional c1000 homes (c33%) above CH-A (rolling forward the current Core Strategy approach).

It is noted that the decision to adopt such an approach was informed by an interim sustainability appraisal that reported no unacceptable impacts. Did this take account of the disproportionate uplift on Chippenham HMA and Melksham?

COVID-19 has potentially significantly altered growth needs for at least the initial years of the reviewed plan period. It is suggested this is reviewed.

Climate Change

In adopting the higher growth approach and choosing to focus a larger proportion of only its housing to Melksham without balancing this with land use allocation to increased self-containment and commitments to infrastructure delivery that would neutralise its carbon footprint, the current strategy is also considered contrary to Wiltshire Council's climate change objectives.

The proposed growth level will have significant impacts on its existing locally valued rural setting, compound issues with strained community infrastructure and increase levels of traffic and congestion. The amount of growth will require extension of the town to an extent that is not attractive for walking and cycle connections to its town centre.

Melksham's Councils have a track record of proactively planning for sustainable growth and recognise its benefits if achieved to meet community needs. Within the pool of SHELAA sites put forward by Wiltshire, there are sites and parts of sites that could achieve more sustainable patterns of growth at lower levels, coordinated and balanced with supporting uses, sustainable transport and community infrastructure. However, delivering higher levels will almost inevitably lead to increased requirements to use cars for local trips.

Further comments are made to assist Wiltshire Council work with Melksham and in coordination with its neighbourhood plan to shape an acceptable strategy for the town and its rural setting. These are made without prejudice to the in-principle rejection of the amount of housing only growth that is directed to Melksham.

Employment Balance

Within the consultation material, there are various references to the need to balance housing delivery with allocation of land for employment. There are also references to the economic vitality of Melksham, the availability of the labour force and the shortage of employment space. Whilst Melksham has been expected to accommodate a significantly higher level of housing growth, Wiltshire Council has not adopted the recommendation of scenario CH-C. This approach is questioned. It appears to challenge sustainability objectives for market town self-containment and minimising the need for travel. Both Melksham Councils wish to engage further with Wiltshire Council to resolve a more forward thinking strategic and local approach to employment land allocation and policies for Melksham as a sustainable location for living and working taking account of brownfield land regeneration, town centre renewal, supporting employment to provide community infrastructure and enabling home working.

Housing Market Areas

The southern section of Melksham Community Area falls within Trowbridge HMA. Whilst this does not have a direct relevance to the Chippenham HMA approach set out for Melksham, it sets a different spatial strategy and housing demands and focus within the community area focused on Melksham. It is noted that growth at Trowbridge is restricted by the constraints of the Bath – Bradford on Avon Bats SAC, which has redirected growth towards Westbury, which suffers pre-existing air quality issues as a result of A350 traffic. This approach appears fragile. Melksham must be assured that it will not become subject to unmet growth demands from its near neighbour HMA.

Coordination of Infrastructure

Melksham and Bowerhill have reached a point where much of its existing market town infrastructure is at or over capacity. If growth is to be seen as acceptable to the community, it must be master plan led and inextricably linked to the simultaneous delivery of community and green and blue infrastructure, strategic and local sustainable transportation investments - and proactive investment in the town centre.

Development must deliver benefits to the existing population and be in a form that contributes to and does not conflict with Wiltshire and Melksham's commitments to tackle climate change. The current strategy does not provide such safeguards and benefits.

Role of Neighbourhood Planning

The Emerging Strategy highlights the importance of neighbourhood plans in preparation or review in working in coordination with the Local Plan Review. This is the case at Melksham. It is planned that following plan-making of the current submission Joint Melksham Neighbourhood Plan, the document would go into immediate review to enable this. In addition to taking a lead in place shaping within Melksham and Bowerhill and the NDP area's rural environment and villages, it is anticipated the Neighbourhood Plan would seek to allocate further sites at Melksham for development.

In particular, in the context of the planned growth strategy, the JMNP Steering Group would wish to agree a key role for the plan in setting master planning and design principles to direct strategic growth deliverables and quality.

Melksham Town Council has invested in analysis of Melksham's current and future issues, drivers and opportunities in its "Melksham 2020-2036" study (Appendix 2). It is now engaging with the community area and Wiltshire Council in analysing travel patterns and sustainable transport opportunities, to connect the town centre with its surrounding communities. These studies will provide key evidence to inform strategy and investment in the town centre and local sustainable transport. Melksham TC and the JMNP Steering Group wish to engage with Wiltshire Council towards the collaborative production of a vision and strategy for town centre post COVID-19 recovery.

The JMNP Steering Group is strongly supportive of development brownfield land being prioritised to maximise the sustainability of development and minimise the demand for greenfield land (though there are no brownfield sites being progressed for allocation as a strategic site).

However, clarification is requested as to why the Brownfield target is used as the indicative figure for housing, how brownfield can be delivered through the Neighbourhood Plan and what the expectations are on for delivery of brownfield land development through a review of the JMNP. The brownfield target figure is derived from past windfall figures and is in addition to the housing requirement for the area. It is then taken off the housing requirement for future Local Plan reviews. The above methodology appears muddled, with the brownfield target considered to be external to the housing requirement figure, yet windfall considered to be internal to the housing requirement figure. It is more than likely that some windfall development will occur on brownfield land. This is not splitting hairs – allocations, indicative housing requirements, brownfield targets, windfall targets are all different concepts in planning and are not interchangeable. Therefore, we do not agree that the brownfield target should be in addition to the overall housing requirement figure. Additionally, paragraph 3.11 of the Emerging Spatial Strategy refers to setting a brownfield target for the next 10 years of the Local Plan period, not for the whole of it. We suggest this should be revisited and instead align with the reviewed Local Plan period.

Future notification

I wish to be notified of updates relating to the Local Plan Review:

YES:

☒

NO:

☐

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Signature:	<table border="1"><tr><td>T. Strange L.Roberts</td></tr></table>	T. Strange L.Roberts	Date:	<table border="1"><tr><td>02.03.2021</td></tr></table>	02.03.2021
T. Strange L.Roberts					
02.03.2021					

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Empowering Rural Communities Consultation Response Form

Ref:

(For official use only)

The paper 'Empowering Rural Communities' looks at ways the Council's planning policies and proposals might be changed for rural communities along with suggesting scales of housing growth.

To view this document please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

Please note that this is a joint submission of the Melksham Neighbourhood Plan Steering Group, Melksham Town Council and Melksham Without Parish Council.

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First name	Teresa	Linda
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Section Two – Questions

Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings? What other approaches might there be?

Answer:

In principle, raising the affordable housing requirement to 40% on schemes of more than five houses across Wiltshire is supported as a mechanism to help site allocations and developments within rural settlements deliver affordable housing to meet local needs more effectively. Such an approach may require less land to be allocated, infill sites and smaller sites more suited to village expansion to contribute.

Caution is expressed concerning the potential impact of such a policy on the delivery of smaller and medium sized market homes. These contribute to meeting local needs for resident first time buyers and downsizers wishing to remain in the village. Such a policy could result in developer preference for fewer and larger houses to avoid the threshold or maximise return to address viability issues.

Do you agree with the approach set out in the suggested policy? If not, why not? How could it be improved?

Answer:

The revision of Policy 44 to provide single and clear policy support with criteria for the delivery of rural exception site proposals and Community Land Trust led housing schemes is welcomed. The inclusion of local needs criteria for supporting open market housing is also supported to optimise the ability of such sites to deliver both affordable homes to rent and meet market demands for smaller homes. Policy 44 should also consider addition of criteria to restrict such homes to owner occupiers and enable local people the first opportunity to purchase.

Delivery of market homes that are indistinguishable from affordable homes may restrict CLT providing affordable housing for specialist local needs or market homes to widen the scope of availability to respond to a more diverse evidenced housing needs assessment. Where there is no local needs assessment in place, affordable housing providers should be expected to undertake such assessment to an approved methodology and quality.

Do you think this approach is worth pursuing?

Please explain your answer

Answer:

This approach is aimed at preventing the application of permitted development rights to extend and alter houses. It will only apply to single dwelling houses and the criteria permitted development rights allow. However, this has been extended by the Government.

In principle, Joint Melksham Neighbourhood Plan Steering Group agree that all opportunities to deliver and protect a diverse range of housing type and tenure should be explored to maximise the opportunity for residents to secure homes that are accessible with their circumstances and meet their needs within a village and throughout life.

Consents for affordable homes managed by a registered social landlord should be restricted to be available in perpetuity in their intended form. It is also agreed that consents for new market housing should contain a restrictive condition that remove certain permitted development rights to help protect residential amenity, local character and the range of housing type and size available. This does not prevent owners from making alterations to their properties but through the safeguard of planning application assessment.

The extension of similar restrictions to existing residents (article 4 direction) would be more complex and demanding to achieve. Such restriction would not remove the ability to gain planning permission for acceptable changes. But they may serve to add protection to housing range, neighbour amenity and local character.

However, such restrictions may also prevent, and make it more risky, difficult and expensive for existing residents to expand their small homes to accommodate a growing family, changing accommodation needs, home working. This may have the unwanted consequence of forcing people to leave a village. Such a measure may prove unpopular with existing residents.

What local evidence would be needed to justify applying restrictions like these?

Answer:

Applying conditions to new market housing would not require policy or evidence. It is a commonly used tool to enable optimised designed efficient use of land and “fix” resident amenity. It may also enable residential form that creates places that reflect heritage character.

To apply to existing housing, local housing need assessment, survey of housing typology and assessment of risk from application of PD rights could inform need for and potential benefit of such a measure.

Its application across Wiltshire through a blanket policy is considered potentially too indiscriminate. It may be more proportionately and effectively applied on a place by place basis on the strength of such evidence. This may be considered as part of an NDP’s role or as a one-off Article 4 Direction.

To comment on the housing figure that interests you, please state which area of the county the settlement falls within.

Answer:

Melksham Without Parish – Whitley and Shaw

What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

Answer:

Whilst the methodology of distribution between large villages and service centre's using constraints sieve testing appears logical, the baseline figure appears somewhat an arbitrary proportion of the total need calculation for Wiltshire (which is itself questioned). Whilst constraints of designations and environment are one aspect to evidence the suitability of a settlement to accommodate growth, the figure appears to have been attributed to Shaw and Whitley without evidence to justify their combined capacity to accommodate and sustainably support such a level of expansion.

Shaw and Whitley are designated as a large village by Policy 1 of the Local Plan. A target of 95 homes over the plan period that has been attributed to both villages. However, Shaw and Whitley are two distinct and smaller settlements with an important rural separation between them. Both settlements are within the hinterland of Melksham market town and their population largely look to Melksham for their retail and employment needs. This is achievable with relatively short journeys and by connecting bus services.

Melksham's rural setting is characterised by a number of small villages that relate to the market town but are distinct and separate. Treating Shaw and Whitley as a large village with an associated higher housing requirement, risks this character and setting, by potential amalgamation of village and market town or creating a significant settlement with only a modest degree of separation from its market town. Both should be avoided.

The JMNP has analysed the quality of local services at the two villages. Whilst there is primary school provision and community meeting and recreation provision, following the closure of The Toast Office in Whitley, there is currently no local shop or post office.

However, analysis and consultation supporting the JMNP has identified an ongoing lack of affordable housing delivery, a need to rebuild viable local needs shopping and localised flood management at Whitley. MWOPC acknowledge further neighbourhood plan led housing delivery at Whitley can be a route to address these. It would therefore, consider a more limited and achievable level of growth be adopted here that, in line with Policy 1, focuses on, "... helping meet their housing needs and improve employment opportunities, services and facilities".

Ability to Deliver the Proposed Housing Target

The submission neighbourhood plan proposes the allocation of land at Middle Farm, Whitley for approximately 18 dwellings. This leaves a residual figure of c75 dwellings, as there have been a couple of windfall single dwelling permissions recently.

AECOM originally assessed available land at Whitley Farm and east of Corsham Road (opposite First Lane). However, further detailed assessment concluded development of these sites was not suitable.

A further 9 homes have been proposed through a planning application at First Lane, Whitley (20/05766/OUT) but has been withdrawn.

Between 2016-19 six dwellings (two per year) were delivered. This trajectory could deliver a further c30 homes by 2036. But the pattern of small-scale infill would not deliver any affordable units. Taking into account, the c18 homes to be delivered at Middle Farm, this could leave a residual c 40 homes to be delivered at Shaw and Whitley by 2036, to meet the Local Plan target.

This approach may require further allocation of land for at least about 40 homes. But if MWOPC wished to deliver 40% affordable homes within future growth, it would likely necessitate allocations

to deliver the entire residual figure of c70 homes. This is a very significant amount of growth proportionate to the scale and population of both villages requiring new greenfield land allocation,

This required accelerated trajectory of growth creates a tension with the driver and purpose of housing delivery at large villages set out in Core Strategy Policy 1; the appropriate level and locations for growth should be resolved through a process of analysis of local housing need and assessment of available sites through the JMNP review process. These may result in a different but more robust figure.

Through the coordination between Local Plan and Neighbourhood Plan Reviews there is an opportunity to resolve how rural housing needs and growth within the JMNP area are addressed. It may also be feasible for JMNP to determine how an agreed rural housing target should be delivered by 2036, combining housing at Shaw and Whitley, meeting needs at other small villages within the NP area and coordinating with allocations at Melksham.

If you have any further comments you wish to make, please detail them below.

All evidence documents for Melksham Neighbourhood Plan can be accessed at
www.melkshamneighbourhoodplan.org

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: ☒ NO: ☐

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

Comparison of Local Plan Review Sites vs AECOM Site Assessments for Melksham NHP

LPR Site No.	LPR Description	"Local" Description	SHELAA Site No.	Assessed by AECOM? Site No.	Green/Brown Field?	AECOM capacity	AECOM Verdict	Melksham & Bowerhill OR Rural Communities	Additional Information	Public Response	Comments from JMNP Steering Group
1	Land to the east of Melksham	Snarleton Farm, Blackmore Farm	3552 3686 3525 3123	NO NO 30 NO	Greenfield	499	Significant constraints	Melksham		Site 3525 - Yes 30% NO 53%	The northern area of this large site with access from the A3102 is considered to a reasonable site to progress for further assessment. The GI corridor of Clackers Brook links into the town and could provide a natural edge to the site. Impact on the landscape and views from Sandridge Hill across the lower lying and flat area of landscape should be taken into account. Important to respond sensitively to the transition between the settlement edge and countryside in this location (ref policy 17 of the submission JMNP). There are also existing trees and hedgerows on this site which development should retain where possible (ref policy 16 of the submission JMNP) and an area of biodiversity value - 8 acre plantation which is an area of deciduous woodland priority habitat. There is also a new local centre located close to the site on the other side of the Eastern Way - links would need to be made across this road to improve connectivity. The area to the south of Clacker's Brook would not be supported (specifically SHELAA site 3123)
2	398a The Spa		3249	NO	Greenfield			Melksham			This site has significant constraints notably the setting of heritage and access.
3	Land adjacent to Woolmore Manor		1034 3219	28 NO	Greenfield	29	Significant constraints	Melksham		3219 58% Yes 33% No	This site has significant constraints notably setting of heritage assets and access issues together with ecological
4	Land to the east of Bowerhill		3345 3331	29 NO	Greenfield	47	Significant constraints	Melksham		3345 45% Yes 34% No	Concerns for this site are linked to it's peripheral location and impact on the landscape character

5	Land to the south of Bowerhill	Opposite side of A350 from Air Ambulance land	1005 1006 3603	25 NO NO	Greenfield	185	Appropriate for development	Melksham		1005 51% No 30% Yes	This site is not within walking distance of many of Melksham's facilities. Recreation space needed as its current use is one of recreation with popular walking routes and local recreation space (note recently allocated Local Green Spaces of the BRAG picnic site and Giles Wood. Impact on the setting of the canal would need to be carefully considered (a buffer would be critical)
6	Land south of Hampton Park	Remainder of Air Ambulance Site	1004	24	Greenfield	202	Appropriate for development	Melksham		38% Yes 42% No	This site is again important to the setting of the canal and is a transition area between the settlement edge and countryside in this location (ref policy 17 of the submission JMNP). The area also access issues and distance from facilities is a concern. Proximity to Semington a concern - landscape gaps between settlements important to maintain. Bus connections from here are reasonable.
7	Land to the south of Berryfield	West of Semington Road - Opposite Shails Lane/Ashville Centre	1002 1003 1019	NO 23 NO	Greenfield	300	Minor constraints	Melksham		1003 85% Yes 36% No	This site is again important to the setting of the canal and it would be vital to respond sensitively to the transition between the settlement edge and countryside in this location (ref policy 17 of the submission JMNP). The area also access issues and distance from facilities is a concern. Proximity to Semington a concern - landscape gaps between settlements important to maintain. Concern about linear expansion of Berryfield. Bus connections from here are reasonable. It is noted that the route of Wilts and Berks canal goes through this site and is protected by Core Strategy Policy.
8	Land to the north of Hampton Park West	Land west of Semington Road, next to sewage works/A350/Shails Lane	699 827600	22 NO	Greenfield	216	Significant constraints	Melksham	Planning Application Approved by Strategic Committee 27th Jan 21 for 144 dwellings	54% YES 22% NO	PERMISSION GRANTED for 144 dwellings

9	Land south of Western Way	Next to Pathfinder Place	1025	14	Greenfield	173	Significant constraints	Melksham	Subject to current planning application by Hallam Land, pending decision, 240 dwellings & 70 bed care home. Also part of Phase 2 of Gary Cooke/Boomerang leisure proposal along with	35% YES 46% NO	Current planning application. Coalescence between Melksham and Bowerhill a key concern here – a landscape buffer would be important to maintain.
10	Land at Lonsdale Farm		3455	No	Greenfield			Melksham			The A350 is a significant barrier in terms of walking / cycling access is a concern, but the site is potentially within walking distance of a range of facilities if safe crossings are provided.
11	Land to the west of Melksham	Behind Townsend Farm	3645		Greenfield			Melksham	Turned down several times for planning application, has current plan in for 50 dwellings pending decision 3105 split up to accommodate canal?		There are a number of constraints associated with this site, however there is potentially good access to Aleoric School if crossing can be provided but the road is a significant barrier so safety and access issues for pedestrians and cyclists would be a priority to address. The land here is Best and Most Versatile agricultural land so any development of this greenfield should minimise land take of this valued resource. Coalescence with / impact on Berryfield is a concern and wider impact on the landscape. It is noted that the route of Wilts and Berks canal goes through this site and is protected by Core Strategy Policy.
			728	5	Greenfield	121	Significant constraints				
			3105a 3105b 3105c	27 NO NO	Greenfield	180	Minor constraints			3105a 34% YES 42% NO	
			3105d	26	Greenfield	232	Significant constraints			3105d 49% YES 32% NO	

12	Land to west of Shurnhold	"Gladman" site, opposite George Ward Gardens	3310 3352	NO 32	Greenfield	443	Locally significant constraints	Melksham	Planning application turned down, and at appeal too	3352 59% NO 26% YES	This site is not considered to be suitable for development as demonstrated by recent refusal of planning application. Key issues are flooding / proximity to sewage works / access - especially bad for people walking.
13	Land to rear of Lowbourn Infants School	Murray Walk - land to rear of KGV & Rivermead school	1000	4	Greenfield	74	Minor constraints	Melksham			This site is well located for active travel and links into the existing GI network (reference policy 12 of the submission JMNP) with proximity to King George V Gardens and to access facilities and services in the town and supports local ambitions to increase levels of movement and active travel (ref policy 11 of the submission JMNP).
14	Land north of Dunch Lane	Land between the railway line and Beanacre Road	3243	10	Greenfield	152	Unsuitable for development	Melksham			There are significant issues linked to this site including heritage issues - impact on Beanacre and coalescence between the village and Melksham. Difficult to walk in to town from this location and primary school access would be difficult within walking distance. The overhead powerlines are also noted as a constraint to development north of the line.
15	Land to the north of Melksham	Between River Avon & Beanacre	187 3405	NO 11	Greenfield	309	Significant constraints	Melksham			Significant issues and concerns here linked to land quality here which is Best and Most Versatile and should be protected. Difficult to walk in to town from this location and primary school access would be difficult within walking distance. Coalescence between the Beanacre and Melksham is also a concern as is impact on heritage. The overhead powerlines are also noted as a constraint to development north of the line.

16	Land off Woodrow Road		1001 3107	31	Greenfield Greenfield	176	Significant constraints	Melksham		Access is a key issue for this site together with pylons / PROWs / flooding. Locally significant archaeology is also present.
17	Land to the north of A3102	Adjacent to the latest Barratt homes development and stretching back to Woodrow	715 1027 3478 3479	8 9 6 7	Greenfield Greenfield Greenfield Greenfield	264 186 138 125	Unsuitable for development Minor constraints Minor constraints Appropriate for development	Melksham	1/3 site Subject to consultation by Pegasus during 2020 1/2 site Subject to consultation by Pegasus during 2020 Put forward in past by MWPC as most logical place for next development Put forward in past by MWPC as most logical place for next development	The northern end of this site is considered to be potentially suitable for development specifically SHELAA sites 3478/9 (smaller part of this site identified as 17). These sites have been put forward in past by MWPC as most logical place for next development in the Parish and linked to the town. Impact on the landscape and views from Sandridge Hill across the lower lying and flat area of landscape should be taken into account - there would be a need to respond sensitively to the transition between settlement edge and countryside in this location (ref policy 17 of the submission JMNP). There are also existing trees and hedgerows on this site which development should retain where possible (ref policy 16 of the submission JMNP). Forest Community Centre would serve residents of this site and was a well established and well supported community centre, which included a large recreational area. Access to this site should be from the roundabout of the A3102 immediately to the south of the site. Concerns about potential heavy use of New Road to Lacock which is currently a narrow road.

AECOM Site Assessments for Melksham NHP that are NOT on Local Plan Review list of sites

LPR Site No.	LPR Description	"Local" Description	SHELAA Site No.	Assessed by AECOM? Site No.	Green/Brown Field?	AECOM capacity	AECOM Verdict	Melksham & Bowerhill OR Rural Communities	Additional Information
N/A	N/A	Land north of Dunch Lane	707	18	Greenfield	48	Significant constraints	Melksham	
N/A	N/A	Greenfield land at Avonside Enterprise Park	3335	1	Greenfield	28	Unsuitable for development	Melksham	
N/A	N/A	Brownfield land at Avonside Enterprise Park	3334	2	Brownfield	35	Significant constraints	Melksham	
N/A	N/A	Land occupied by Cooper Tires (just the part that is a SHELAA, adjacent river)	3333	3	Brownfield	51	Appropriate for development	Melksham	
N/A	N/A	Woolmore Farm Yard	No SHELAA	15	Former Agricultural Use? AECOM class as "mixed"	21	Appropriate for development	Melksham	
N/A	N/A	Merretts Yard, Snarlton Lane	No SHELAA	16	AECOM class as "mixed"	12	Appropriate for development	Melksham	Already has permission and is being developed
N/A	N/A	Middle Farm, Whitley	3148	12	Greenfield	38	Minor constraints	Rural Communities (Large Village of Shaw & Whitley)	Allocated in NHP#1 but with capacity circa 18
N/A	N/A	Land east of Corsham Road (opposite First Lane)	3246	13	Greenfield	15	Minor constraints	Rural Communities (Large Village of Shaw & Whitley)	

47% YES
37% NO

N/A	N/A	Whitley Farm, First Lane, Whitley	No SHELAA	17	Former Agricultural Use, AECOM have classed as Brownfield	31	Minor constraints	Rural Communiti es (Large Village of Shaw & Whitley)	Considered for housing allocation in NHP#1, but not allocated, NHP capacity 8 due to heritage constraints
N/A	N/A	West of Chapel Lane, Beanacre	3225	19	Greenfield	13	Minor constraints	Rural Communiti es (BUT NOT Large Village)	
N/A	N/A	Lacock Road, Beanacre	3226	20	Greenfield	38	Unsuitable for development	Rural Communiti es (BUT NOT Large Village)	
N/A	N/A	East of Chapel Lane, Beanacre	3266	21	Greenfield	11	Minor constraints	Rural Communiti es (BUT NOT Large Village)	

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Melksham Town 2020-2036

A review of the opportunities, challenges and drivers facing Melksham Town during the period of the next Local Plan

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1. INTRODUCTION

We are facing an inflection point in the way we live. Climate change, shifting patterns of global economic forces, Brexit and population growth are changing mindsets. The world we face over the next 15-20 years will be very different from that of the past 75. We can no longer assume the future will be a reflection of the past.

The challenge is particular for our long-established market towns. They have faced substantial increases in population, the loss or removal from the town centre of sources of employment, sweeping changes in how we buy things, often substantial disparity in cost between traditional retail and technology-based online shopping, increased demand for quality leisure provision, increased demand for health and social care provision and a major reduction in the capacity of local authorities to provide support and resource.

An analysis of almost 1.5 million Ordnance Survey (OS) business records between 2014 and 2019 by Which? Magazine released in October 2019 indicated how life is changing. Nevertheless, while major retail chains have all suffered massively over the past few years, “a model more familiar to older generations is re-emerging – with flourishing personal services, markets, and food specialists that focus on ‘experiences’ replacing retailers hit directly by the rise of online shopping. The analysis found businesses offering personal services that cannot be replicated easily online – such as hair and beauty services, tattoo and piercing shops, and funeral directors – have boomed.”¹.

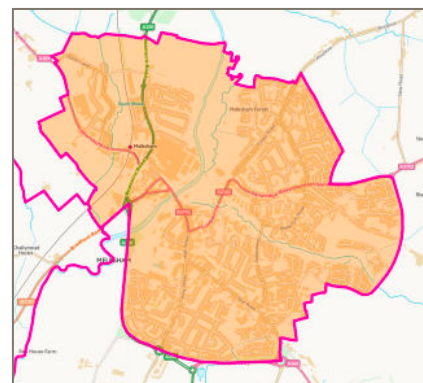
PURPOSE OF THIS REVIEW

The purpose of this document, commissioned by the Town Council, is to start us on the journey of defining and building that new purpose and core. The ambition is to build and strengthen resilient economic activity through the development of new commercial and social areas and opportunities in the town centre, together with relevant infrastructural changes.

This is about developing “plans that are business-like and focused on transforming the place into a complete community hub incorporating health, housing, arts, education, entertainment, leisure, business/office space, as well as some shops, while developing a unique selling proposition”².

The document covers the area that falls within the remit of Melksham Town Council (see map right) and brings together in one document a broad range of facts and figures. Although the area of Melksham Town Council does not include Bowerhill and Hampton Park, the businesses based there are, of course, critical to local employment and the town's economy – and their impact is also reviewed below.

The review concludes with proposals for the next stage of the journey, with the building of a vision for the town centre that dovetails with the evolving Neighbourhood Plan, and that can provide the springboard for more intensive strategic and detailed masterplanning to take the Town through the period of the new Wiltshire Local Plan 2016-2036.



Gerald Milward-Oliver
Townswork | November 2019.

¹ <https://press.which.co.uk/whichpressreleases/back-to-the-future-for-the-high-street-as-independents-and-services-replace-retail-giants-which-reveals>

² vanishinghighstreet.com/wp-content/uploads/2018/07/GrimseyReview2.pdf

2. A PROFILE OF THE TOWN

The name 'Melksham' is assumed to derive from the Old English words 'meolc' (milk) and 'ham' (village). The settlement was based around a ford across the River Avon, and the naming infers that milk was always an important part of the settlement's community and economy.

Although there is a good amount of detail about Melksham agriculture in the Middle Ages (e.g. "in 1086 Melksham contained 130 acres of meadow and eight 'leagues' of pasture"³), few records have been found that give any detailed information about Melksham agriculture in later periods, making it difficult to know when the change from mixed to mainly dairy-farming took place. However, by 1500 the north of Wiltshire was almost entirely devoted to dairying – and, in particular the production of cheese – and from the late 16th century onward there were notable advances across Wiltshire in farming techniques, implements, land-use, and management generally, amounting to an early agricultural revolution.

A survey of 1833 shows that out of 7,120 acres of agricultural land in Melksham itself, 5,903 acres were 'meadows and pasture'. We also know that cheese-making was still sufficiently important to justify the opening in 1847 of a 'New Cheese Market' in the town, now the Town Hall. By the time the History of the County of Wiltshire was published in 1953 (see footnote), land in Melksham and the surrounding districts was given over almost entirely to dairy-farming, half of which was carried on by smallholders.

In the late 19th century a group of Melksham Farmers persuaded Charles Maggs, grandson of the founder of the Maggs rope factory and rope-walks (still located by the old canal bridge in Spa Road in 1953), to build a collecting depot and butter factory at West End Farm in Semington Road. The business grew and the company moved to the site of the old dye works on the junction of New Broughton Road. The company merged with North Wilts Dairy and a number of smaller firms to form Wilts United Dairies (WUD). The factory, on the three acre site known today as the Avonside Enterprise Park, became the company's main depot with milk coming in from a 20 mile radius. By 1899, the Melksham factory was handling approx. 2,000 galls. of milk a day in winter and 5,000 galls in summer – and by 1935 total capacity was 51,000 galls. of liquid milk a day. WUD became part of the Unigate Group and the business was transferred from Melksham to Wootton Bassett in the 1980s. The site was recently sold to a Bristol-based mixed-use development company (see page30).

A TRUE MARKET TOWN

From the time of the Norman conquest, the right to award a charter was generally seen to be a royal prerogative. However, the granting of charters was not systematically recorded until 1199. The English system of charters established that a new market town could not be created within a certain travelling distance of an existing one. This limit was usually a day's worth of travelling (c. 10km) to and from the market. If the travel time exceeded this standard, a new market town could be established in that locale. As a result of the limit, official market towns often petitioned the monarch to close down illegal markets in other towns. Apparently, these distances are still law in England today. Other markets can be held, provided they are licensed by the holder of the Royal Charter, which tends currently to be the local town council. Failing that, the Crown can grant a licence.

A Friday market and a Michaelmas fair were granted to Melksham in 1219, while a Tuesday market and a fair on the vigil, feast, and day after of Michaelmas (29 September) in 1250. The market rights were devolved with the manor, whose owner sold them to the Urban District Council in 1912 for £250.

CLOTH AND RUBBER

Like neighbouring towns Trowbridge and Bradford on Avon, Melksham was also for many years a cloth town. Melksham weavers are mentioned as early as 1349, and reference to fulling mills has been found in 1555. In the 16th and early 17th centuries, Melksham clothiers exported as far as central Europe, but their fortunes can be traced, in many cases, to war or peace in their European markets. In the later 17th and the 18th centuries there was some revival, but in the 18th century the industry declined and ended in the 19th century.

³ This and additional material taken from British History Online, a History of the County of Wiltshire Volume 7, 1953. www.british-history.ac.uk/vch/wilts/vol7/pp91-121

However, disused cloth mills and a skilled workforce became the foundation of major changes to commercial life. In 1848, Stephen Moulton pioneered the country's first rubber mill at Bradford on Avon, having brought the vulcanization process over from America where it had been patented just four years earlier.

In 1875, a second rubber business was started in a deserted woollen mill downstream at Limpley Stoke. In 1889 it became the Avon Rubber Company and moved to Melksham, in another disused cloth mill. Although initially formed to provide materials for the railway industry, by the end of the 19th century Avon was focused on pneumatic tyres, as well as milking machine tubes. The company rapidly expanded in the 1950s and 60s, changing from a UK company to an international group of companies. In 1997 the Avon Tyres business was sold to Cooper Tires and other parts of the company moved to Hampton Park in 2000.

Two other items of historical importance to the economy of the town:

- ▶ The defunct Wilts and Berks canal linking the Kennet and Avon canal with the Thames opened in 1819, running almost through the centre of town. The canal was abandoned in 1914, and the area redeveloped. The proposal to reopen the canal is discussed on page 31.
- ▶ RAF Melksham (No.12 School, Technical Training) was opened in Bowerhill in 1940 and closed in 1965. At its peak, the base accommodated over ten thousand personnel. The base was not operational (it had no runway), but it did have aircraft parked on the base (dismantled before arrival and departure) for ground crew and technician training⁴. Part of the site (including eight original 200,000 sqft hangars) was sold in 2018 to Nigel Pattinson, an investor based in Penrith, Cumbria.

DEMOGRAPHY

The population of Melksham Town in mid-2018 was estimated at 16,678⁵. This is very much a working town: Melksham's population is skewed more to those of working age than is found in other towns, with 57% between the ages of 18-64. By gender the population is split 50/50, with 88% ethnically white and 86% born in the UK. Melksham Area Board population is of interest, particularly in view of discussions over future governance relating to Melksham Town and Melksham Without (see page 36). The breakdown is as shown below.



Melksham Area Board parish populations 2001-2018			
	Population Census 29.04.2001	Population Census 27.03.11	Population Estimate 30 June 2018*
Melksham Town	14,515	15,229	16,678
Melksham Without	5,914	6,678	7,374
Atworth	1,280	1,321	1,275
Broughton Gifford	822	851	813
Bulkington	273	285	292
Great Hinton	185	171	182
Keovil	432	441	437
Poulshot	376	370	406
Seend	1,074	1,132	1,095
Semington	830	930	969
Steeple Ashton	938	935	1,403
Total	26,640	28,343	30,934
Total w/out MT	12,125	13,114	14,256
Total w/out MT & MW	8,211	6,436	6,882

*www.citypopulation.de using UK Office for National Statistics as source

⁴ <http://visit-melksham.com/melksham-information/history-melksham>

⁵ https://www.citypopulation.de/en/uk/southwestengland/admin/wiltshire/E04012693_melksham/

In common with the UK generally, the employment profile of the area has moved in recent years from an industrial economy, dominated by one international employer, to a mixture of industrial, service and retail sector businesses. A number of large employers have closed or relocated, while the level of out-commuting to neighbouring towns and to jobs along the M4 corridor has grown. It is worth noting that, again, in common with populations across the country, residents' comments through community engagement suggest that people want to work closer to their homes.

A new Joint Strategic Assessment is due to be published shortly by Wiltshire Intelligence. Although this will cover the whole Melksham Community Area, it will provide some more up-to-date material than is presently available – and this will be of use in a number of areas. It remains to be seen whether a census will be made in 2021 as expected – if it goes ahead, it will be of considerable value in due course in planning for the longer term to 2036.

One factor that needs to be borne in mind in terms of future development of housing, but also retail, leisure etc. is that, across the south west, the population is ageing. Between 2016 and 2041, the number of people aged 65 and over in Wiltshire is expected to grow by more than 60% – that's an additional 66,000 over 65⁶. That is the fastest rate of growth in the south west as a whole, alongside Gloucester, Tewkesbury and Taunton Deane. By contrast, the equivalent figure in B&NES is less than 40%, while in Swindon it is 82.2%. Across the south west as a whole, that means building an extra 81,600 specialist units over and above registered care home places. Melksham will not be immune to these changes.

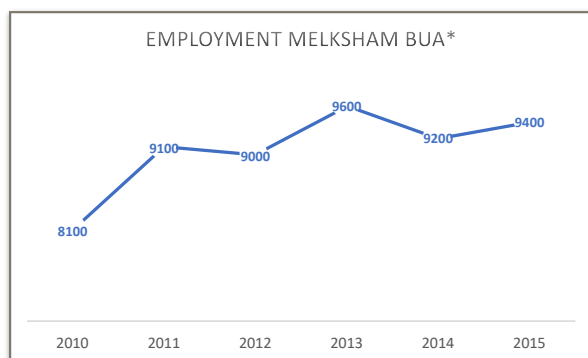
BUSINESS PROFILE

Wiltshire Council defines three distinct Functional Economic Market Areas (FEMAs) in the county – the Wiltshire part of a larger M4/Swindon FEMA, an A350 FEMA and an A303/Salisbury FEMA. In terms of total floorspace in Melksham, including relativity to other towns, the December 2017 figures in the May 2018 Employment Land Review showed the following:

Wiltshire industrial stock (Dec 2017)				
	Total stock (sqm)	% total stock	No. properties	% of properties
TOTAL	1,520,000	100.0%	2779	100.0%
Melksham	203,000	13.4%	187	6.7%
Trowbridge	139,000	9.1%	93	3.3%
Devizes	114,000	7.5%	109	3.9%
Chippenham	106,000	7.0%	97	3.5%
Salisbury	83,000	5.5%	164	5.9%
Corsham	64,000	4.2%	132	4.7%
Wiltshire office floorspace (Dec 2017)				
	Total stock (sqm)	% total stock	No. properties	% of properties
TOTAL	489,000	100.0%	2,847	100.0%
Salisbury	80,000	16.4%	422	14.8%
Trowbridge	71,000	14.5%	220	7.7%
Corsham	58,000	11.9%	139	4.9%
Chippenham	55,000	11.2%	238	8.4%
Devizes	40,000	8.2%	106	3.7%
Royal Wootton Bassett	29,000	5.9%	219	7.7%
Melksham	14,000	2.9%	123	4.3%
Wiltshire warehousing & logistics stock (Dec 2017)				
	Total stock (sqm)	% total stock	No. properties	% of properties
TOTAL	1,553,000	100.0%	2,107	100.0%
Chippenham	94,000	6.1%	118	5.6%
Melksham	93,000	6.0%	103	4.9%
Westbury	89,000	5.7%	40	1.9%
Trowbridge	84,000	5.4%	96	4.6%
Corsham	66,000	4.2%	79	3.7%
Devizes	66,000	4.2%	101	4.8%

⁶ https://lichfields.uk/media/5115/lichfields-insight-focus_solutions-to-an-age-old-problem-in-the-south-west.pdf

The Employment Land Review also noted that total jobs in Melksham have grown by 16.6% since 2009:



The claimant count in the five Melksham wards as at March 2019 was broadly in line with the Wiltshire average, although slightly lower in Melksham Without than in Melksham Town:

Area : March 2019	Claimant Count %
Melksham North	1.8
Melksham South	1.6
Melksham Central	2.0
Melksham Without North	1.1
Melksham Without South (Bowerhill)	1.3
Wiltshire	1.6
Great Britain	2.6

However, Melksham can be seen as a town of two halves. The area covered by Melksham Town Council has seen next to no commercial investment for decades (with the exception of the supermarkets), while the **BOWERHILL** and **HAMPTON PARK** sites (within the civil parish of Melksham Without) have benefited from substantial investment and the creation of new high skill jobs – e.g. Herman Miller, Knorr-Bremse and Avon Rubber.

While these companies are outside the area covered by Melksham Town Council, they are critical to local employment and to cementing the position of the town as a whole as an important centre for engineering and manufacturing.

AVON RUBBER'S global headquarters is at their Hampton Park site. Through additional sites in the UK, US, China, Italy and Brazil, and with customers in 89 countries, the company operates two core businesses:

- ▶ Avon Protection (providing 70% of revenues), states the company, is “the world leader in respiratory protective equipment, providing complete solutions for air, land and sea based personnel in military, law enforcement, first responder community, firefighting and industrial sectors. It includes escape devices, full face masks, powered air systems, self-contained breathing apparatus, and a full range of filters and accessories to deliver maximum operational flexibility and accommodate changing threats. The company has been supplying respirators to the UK Ministry of Defence and other NATO allies since the 1920s and it is the primary supplier of advanced chemical, biological, radiological and nuclear (CBRN) respiratory equipment to all US Department of Defense Army, Navy, Marines, Air Force and Special Operations Forces.”
- ▶ milkrite | InterPuls (30% of revenues) is “the market leader for milking cluster technology to remove milk from the animal in the most efficient way and maximise the performance of the farm with improved cost benefits for the farmer and improved animal health for the animal.”

KNORR-BREMSE is the global leader in braking systems for both commercial road and all rail vehicles and offers a wide portfolio of innovative sub-systems for both road and rail vehicles.

Also at Hampton Park is the iconic **G-PLAN UPHOLSTERY** – one of the UK's biggest upholstery manufacturers and a company that has been a design benchmark since 1953. And in March 2019, planning approval was given for **DICK LOVETT** to build a new BMW Mini dealership on land bordering the A350 and directly opposite the same company's Jaguar Land Rover dealership, further cementing the quarter's motor trade importance.

With its corporate headquarters in Michigan, US, the workplace furniture designer and manufacturer **HERMAN MILLER** has its international headquarters in Chippenham and a new manufacturing facility at Bowerhill (formerly split between Bath and Chippenham). The 170,000 square foot (15,794 square meter) development brought together the company's regional research and development, manufacturing, and logistics operations into one building, which also showcases the company's approach to designing office work spaces.

There are a great many other successful companies and organisations operating out of the Bowerhill/Hampton Park estates – from motor supplies and engineering to warehousing and play materials for children – as well as the Wiltshire School of Gymnastics. This report has not been able to quantify the total employment, but a recommendation at the end of the report is to build a database of businesses and companies in the town (covering both civil parishes) so that a full and up-to-date understanding of the employment and economic scale of Melksham can be fully understood – and play its role in future planning strategies and policies (see page 34).

Meanwhile, **MELKSHAM TOWN'S** long famine of commercial investment is showing signs of change. The decision by **AB DYNAMICS** to build a new factory on the site of the former Countrywide Farmers store, within the Melksham Town Council area and with a target opening date of Q3 2021, is significant and welcome. In a recent planning document, the company stated as follows:

"The growth of ABD has far exceeded expectations at the start of this decade. Employee numbers have grown from approximately 40 in 2012 to over 190 today with no let-up in recruitment. Sales have grown at a compound rate of 36% per annum since 2014 and the result is a demand for manufacturing space which already exceeds that currently available. ABD now needs a dedicated facility to pull together all manufacturing onto one site. ABD is on the cusp of becoming a major enterprise with 98% of its output exported around the world. A dedicated manufacturing centre in Melksham is essential in order to make this possible."

The **AVONSIDE ENTERPRISE PARK** was acquired in mid-2019 by a new investment and development company in Bristol called Create Real Estate, in mid-2019. See page 30 for more detail.

The key employment site within Melksham Town is, of course, **COOPER TIRES**. In 2018, the company employed more than 730 in Melksham – by the end of 2019, the number was down to approx. 400, following the company's decision to end light vehicle type production at the works. However, the company remains a key employer. The site continues as the Cooper Tire Europe headquarters and includes the important Europe Technical Center – as well as motorsports and motorcycle tyre production, a materials business, sales and marketing. Wiltshire Council has been working with Cooper Tires since the announcement of the redundancies, both coordinating and sharing information from other local employers who have vacancies and arranging jobs fairs for affected employees. Of those leaving the company and seeking fresh employment, it is understood that a significant majority have been re-employed in the immediate area. See page 30 for more on the future of the site.

RETAIL, OTHER CUSTOMER-FACING SERVICES, AND OFFICE SPACE

Melksham's setting between the larger towns of Chippenham and Trowbridge means that the retail sector serves a mainly local catchment area for top-up shopping and as the source of leisure and other services.

According to an early draft of the nascent Melksham Neighbourhood Plan, there are approx. 155 businesses in the town centre. In terms of retail provision, the town has a mix of independent traders and national retail brands. The prime shopping area around the intersection of Church Street and High Street is busy but activity declines down Bank Street toward the river. Some unattractive 1960s buildings and heavy traffic flows were felt by residents to detract from the shopping experience⁷.

The **Leekes** store off the Beanacre Road continues to be a key retailer in the town. The company is one of Wales' oldest and most successful retailers. In February 2019 it unveiled plans to build a 71-bed Premier Inn hotel and 246-seat Beefeater restaurant in the car park of its Melksham store (using 100 of the existing 507 parking spaces). The company reported that "The project is expected to create 50 full-time jobs during the construction phase and

⁷ Text taken from early iteration of the Melksham Neighbourhood Plan

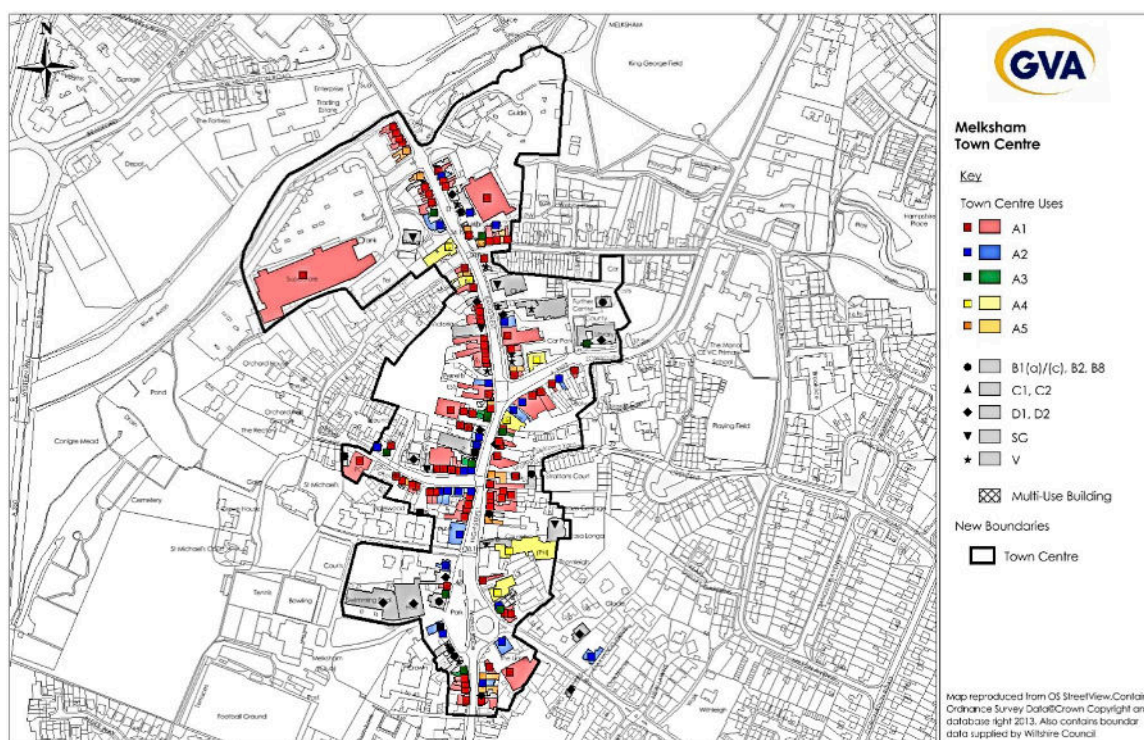
an additional 50 positions within the establishment and is estimated to contribute £2.4 million annually to the local economy”.

Chris Leeke, operations director of Leekes Retail, explained that “for historic planning reasons our stores have what are now excessively large car parks for our requirements given the extended opening hours we now operate and the move to researching and often purchasing online.”⁸.



Computer drawing of the proposed Premier Inn, located in the north part of the Leekes car park off Beanacre Road.

This map shows the defined town centre, along with the various planning usages of retail/commercial properties. See Appendix on page 39 for use class definitions.



The Wiltshire Core Strategy Retail Review (2015) noted “an over-provision of convenience goods floorspace in Melksham, following the introduction of the ASDA store. There has also been a reduction in the amount of comparison goods floorspace capacity, which is now relatively modest in the medium to longer term and not felt sufficient to prompt the allocation of land for new development”⁹.

More up-to-date findings should be available as work progresses both on Town Council plans for the future development of the town centre and Wiltshire Council’s Local Plan Review. Five years on, the essence is likely to be the same. However, while Melksham is unusual in having such a mix of supermarkets so close to the town centre (which will have had a negative impact on other food retailers), it also has the potential for increasing overall footfall – if the right mix of retail opportunities are available (see page 19 for comments on future retail).

Overall, the climate for retail and customer-facing businesses in the town is seen as relatively good – certainly compared to the difficulties faced by many other small and market towns. However, there has not been any

⁸ <https://www.leekes.co.uk/blog/search/?s=Premier>

⁹ www.wiltshire.gov.uk/mobile/wiltshire-core-strategy-retail-review-draft-feb2015.pdf

substantive change in the look or feel of the town centre in the eight years since Wiltshire Council's 2011 Town Centre and Retail Study noted "... a continued need for further town centre regeneration in the town."

The relatively low demand for office space in Melksham Town Centre is reflected in the limited range of flexible accommodation suited to today's demands, but also low rentals. For example, a snapshot of office space on the market at the end of October 2019 shows the following:

Chalkeymead Business Park	Offices	4,266 sqft	£37,327 p.a.	£8.75/sqft
Chalkeymead Business Park	Offices	4,289 sqft	£37,529 p.a.	£8.75/sqft
Caithness House	Offices	4,323 sqft	£33,000 p.a.	£7.63/sqft
Unit F16, Avonside Enterprise Park	Offices	2,090 sqft	£16,000 p.a.	£7.66/sqft
Unit F1B, Avonside Enterprise Park	Offices/workshop	504 sqft	£3,750 p.a.	£7.44/sqft
Station Approach, Bath Road	Offices	1,343 sqft	£9,500 p.a.	£7.07/sqft

This may be a reflection of the lack of demand reflecting the limited availability of the right kind of office space in markets that are changing radically worldwide. It is also worth noting that in the May 2018 Wiltshire Employment Land Review, average asking rent for offices in the A350 economic market area was set at £11.80/sqft (£127/sqm), well above advertised rental rates in Melksham.

Countering the above rather downbeat assessment, a different picture of Melksham's business community is painted by the town's **Business Growth Group** (BGG)¹⁰. With members embracing both business-to-business and public-facing companies, and meeting every Friday morning, BGG describes itself as "the largest and most successful referral-based networking group in the South West of England". It has been established for six years, with more than 30 members ranging from businesses such as Priority IT, Office Evolution and Embroidery UK, to local trade firms CK Painting and decorating, Renew Flooring and JP Building Contractors. Other industries represented include HR, web design, branding and the care sector.

In 2018, there were 859 referrals passed between members, representing £1.25 million of business, averaging £34,760 for each member. An October 2019 news release reported that "despite national Brexit uncertainty local business is stronger than ever: over £1.3 million has been passed between members in the past 12 months".

TOURISM AND COMMUNITY ACTIVITIES

Tourism is not currently a key sector in the Melksham economy when compared to towns and villages such as Castle Combe, Lacock or Bradford on Avon – perhaps not surprising given the town's strong industrial base. One of those consulted in the writing of this report summed up his view of the tourism offer: "There is nothing that shouts out MELKSHAM, no monument or feature that says 'Yes, this is us, you are in Melksham'. No ancient buildings of historic interest and no entertainment facilities other than the Assembly Hall."

However, the bare bones of a strong tourism offering *are* to be found in the town's long industrial and agricultural heritage, its position on the River Avon, the prospective pivotal position for Melksham in the plan to renew the link between the Wilts & Berks and the Kennet & Avon Canals, and the position of Melksham as part of the Great West Way – the "touring route between London and Bristol based on ancient routes, following 500 miles of navigable routes, roaming through idyllic countryside, quaint villages and elegant towns".

While the town may not be a strong destination for in-coming tourism, there is no shortage of events for all ages and tastes organised by and for the people of Melksham, through some 48 voluntary groups and associations. They include the Carnival (June), the Party in the Park (July), the Food and River Festival (September), the annual fireworks display (November) as a money-raiser for the Melksham Christmas lights and the popular Christmas Fayre (December).

The level of community resource reflected in these and other events is of major importance to the future of the town, its continued resilience and its ability to address future opportunities. This is also reflected in support

¹⁰ www.businessgrowthgroup.co.uk

provided by the Melksham Area Board for a range of community-led projects – support that has itself been pivotal in unlocking additional resource. So in 2018-19, £90,189 was provided for projects by the Area Board, but this was leveraged to deliver total investment of more than £450,000.

For the future, the long-promised campus development should make a major contribution to the day-to-day life of Melksham residents. For more details on that, see page 33.

SKILLS

There are discrepancies between average earnings by workplace and average earnings by residence in Wiltshire suggesting that Wiltshire's higher skilled resident workers are unable to secure the higher than average earnings within Wiltshire and therefore commute outside of the county for work, according to the Wiltshire Local Plan Sustainability Appraisal Scoping Report, published in February 2019¹¹.

At the same time, Wiltshire house prices are too high for younger people and people in lower skilled/paid jobs who tend to work locally. This means that some local industries struggle to secure labour at a price that enables them to compete with lower cost foreign production.

These conditions place further pressures on manufacturing in the Wiltshire economy. Wiltshire also has a higher than average proportion of young people not in Employment, Education or Training (NEET). Data suggests that many jobs taken by 16-18 year olds are often temporary.

This point was forcefully made at a meeting called in June 2019 by Wiltshire Council as an opportunity to understand Melksham's attitude towards growth and the strategic priorities for Melksham over the next 20 years. Attendees included representatives from Melksham Town Council, Melksham Without Parish Council, Seend Parish Council and Broughton Gifford Parish Council. The minutes note: "There were also mentions that many of the jobs available in Melksham are only part-time, which leads to out-commuting. There is general consensus among the attending parishes that high skilled employment is what is needed in the town, as opposed to what is believed to be in Melksham now, which is low-skilled, low-wage employment. This low-skilled, low-wage employment was said to be partly caused by a lack of higher education facilities/no university in the county."

Significant efforts are being directed by Wiltshire Council and the Swindon & Wiltshire LEP at remedying what translates into a low level of value added employment, including in Melksham. For example, 'Be Involved' is the Wiltshire Council Employment & Skills initiative that enables employers to support the employability of young people and the future workforce. Several Melksham employers have pledged to work together with the Council's team, which can include supporting young people through local schools and those members of the community who are experiencing barriers to work; creating opportunities through apprenticeships, traineeships and supported internships.

A further example: a 'Work Wiltshire' Apprenticeships, Employment and Skills Roadshow was held at Melksham Library in May. Amongst others, Knorr-Bremse Rail Systems (UK) Ltd were present with their recruitment team. The event highlighted the significant numbers of job vacancies available in Melksham across a wide range of sectors. Between 50 and 60 people attended with an age range of 17 to 67 – they were supported with information across a wide range of employment related subjects.

CONCLUSION

Perhaps not surprisingly, discussions with a broad range of councillors and respondents over the past couple of months in the run-up to this study has produced a consensus that Melksham Town has significant opportunities for societal and economic improvements. But the town must first reach some consensus about how it should best develop strategically over the short-term (<5 years) and over the longer term (5-15+ years) – in other words, with the period of the forthcoming Local Plan 2016-2036. And that is where we now turn our attention.

¹¹ <http://www.wiltshire.gov.uk/spp-local-plan-review-scoping-report-2019.pdf>

3. PLANNING POLICY

WILTSHIRE CORE STRATEGY

The 2015 Wiltshire Core Strategy¹² sets out ambitious targets, including the following: “Market towns and service centres will have become more self-contained and supported by the necessary infrastructure, with a consequent reduction in the need to travel. In all settlements there will be an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place. This pattern of development, with a more sustainable approach towards transport and the generation and use of power and heat, will have contributed towards tackling climate change”.

More specifically for our purposes, it anticipated that, “by 2026, Melksham will be a thriving and accessible market town that respects its heritage and rural environment, whilst welcoming the expansion of local inward investment from new high quality businesses. The town’s employment base will have been strengthened, helping to improve its economic self containment. Inward investment will also help support regeneration ambitions for the town centre ...”.

The Core Strategy also noted that:

“... the town centre is in need of regeneration and the retail offer has suffered for a number of years. Community and health facilities in Melksham are under pressure, with most GP surgeries and primary and secondary schools at capacity. Although Melksham has a relatively strong existing employment base, and has the capacity for future employment growth, there is a high degree of economic out-commuting...”

“... Melksham is identified as having an important strategic employment role. The town has a reasonably broad economic base and has historically been able to attract large employers... there are good opportunities to expand the employment base within Melksham.

“... The strategy for Melksham will be to ensure an appropriate and balanced mix of housing and employment growth is managed to provide contributions to town centre improvement and delivery of enhanced services in the town.”

The Core Strategy went on to outline a number of specific issues that would need to be addressed in planning for the Melksham Community Area. They included:

- ▶ residential growth in Melksham should help address the shortfall in affordable housing and contribute towards delivering improved infrastructure,
- ▶ growth should contribute towards town centre regeneration, including traffic management improvements and the revitalisation of the retail and employment offer,
- ▶ improving Melksham’s town centre is a priority and this should assist in improving the setting of the historic environment ... Wherever possible, key community services and facilities should be located within or well related to the town centre to help promote and deliver regeneration ... There is a need to increase the capacity of GP surgeries, particularly towards the west of the town,
- ▶ there is limited scope for any further convenience retail provision in the town, but potential for expansion of comparison retailing, which should support town centre regeneration. Any proposals for large format retail units should demonstrate how they would integrate with and enhance existing town centre businesses, incorporating high quality public realm and strong pedestrian linkages,
- ▶ further employment growth in Melksham will help to further diversify the employment base, providing protection against possible future changes in the employment market. The regeneration and improvement of existing employment sites, such as the Bowerhill Industrial Estate, remains a priority,
- ▶ any new development in the town should have strong walking and cycling linkages to the town centre,

¹² www.wiltshire.gov.uk/planning-policy-core-strategy

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- ▶ opportunities to enhance the riverside area in Melksham as an important leisure corridor could be integrated into plans for the proposed restoration of the Wilts and Berks Canal and any regeneration proposals. These will need to be carefully considered through a community-led process.

Progress in delivering these issues and policies has not been immediate. Indeed, in today's fractured world, it would be easy to dismiss them as so much 'motherhood and apple pie'. However, they do provide a helpful framework both for the evolving Neighbourhood Plan (and its subsequent review) and for the prospective work on town centre regeneration.

CHANGES TO NATIONAL PLANNING POLICY FRAMEWORK

All planning strategy and implementation has to conform to the National Planning Policy Framework, whose latest iteration was published in February 2019¹³. In the context of future development of the economy of Melksham Town and the expectation of the planning authority, as well as local bodies, it is worth highlighting a few points.

- ▶ "Planning law requires that applications for planning permission be determined in accordance with the development plan¹⁴, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements."
- ▶ "The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives:
 - an economic objective ... to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure,
 - a social objective ... to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being, and
 - an environmental objective ... to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
- ▶ "Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently."
- ▶ "Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area. Communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. These require the support of the local community through a referendum. Local planning authorities should take a proactive and positive approach to such proposals, working collaboratively with community organisations to resolve any issues before draft orders are submitted for examination. The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area."

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

¹⁴ This includes local and neighbourhood plans brought into force and any spatial development strategies produced by combined authorities or elected Mayors.

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- ▶ In the context of building a strong, competitive economy, “planning policies should:
 - set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to ... local policies for economic development and regeneration,
 - set criteria, or identify strategic sites, for local and inward investment ...
 - seek to address potential barriers to investment, such as inadequate infrastructure ... and
 - be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices ...

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

- ▶ In the context of ensuring the vitality of town centres, “planning policies should:
 - define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters,
 - define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre,
 - retain and enhance existing markets and, where appropriate, re-introduce or create new ones,
 - allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary,
 - where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre, and
 - recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”
- ▶ In the context of supporting high quality communications, the paper states that “advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).
- ▶ In the context of meeting the challenge of climate change ... “the planning system should support the transition to a low carbon future ... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- ▶ In the context of conserving and enhancing the historic environment, heritage assets ... are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

NOTE: A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. That includes, but is NOT exclusive to, listed buildings – meaning that an old industrial building or an area of land can be defined as a heritage asset. When considering a planning application, the NPPF states that the planning authority should consider “(1) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent

with their conservation; (2) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and (3) the desirability of new development making a positive contribution to local character and distinctiveness". Those are important points worth bearing in mind.

PLANNING PRACTICE GUIDANCE: TOWN CENTRES AND RETAIL

In July 2019, the UK Government published an update to its practice guidance on planning for retail and other town centre uses¹⁵. This is of interest when considering future planning for the town centre.

The introduction notes that "local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change.

"A wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. The same is true of temporary activities such as 'pop ups', which will often benefit from permitted development rights. Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services...

"Evening and night time activities have the potential to increase economic activity within town centres and provide additional employment opportunities. They can allow town centres to diversify and help develop their unique brand and offer services beyond retail. In fostering such activities, local authorities will also need to consider and address any wider impacts in relation to crime, noise and security.

Lichfields explain that "the overdue update of the PPG does not radically change the approach to town centres and retail but there is a clear shift in emphasis. Restricting out-of-centre development is not the key to saving town centres and high streets, they need to change and evolve to respond to structural changes in the economy.

"Local planning authorities can still define primary and secondary retail frontages but this is not mandatory. The use of frontages and policies to control the mix of uses need to be justified i.e. where it clearly supports the vitality and viability of a centre. This change implies a more flexible and location specific approach to the protection of retail uses. Finally, the need for a collaborative partnership approach between local authorities and other parties is reiterated and expanded, with a list of relevant stakeholders provided."¹⁶

NATIONAL DESIGN GUIDE

In October 2019, the UK Government published a National Design Guide¹⁷. The National Design Guide "outlines Government priorities for well-designed places through ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. These characteristics are considered to create the character of a well-designed place, to nurture and sustain a sense of community and to work positively to address environmental issues affecting climate.

"According to the guide, a National Model Design Code will set out detailed standards for key elements of successful design. The Code will be informed by the final report of the Building Better, Building Beautiful Commission and be consulted on in early 2020. The guide notes that 'specific, detailed and measurable criteria for good design are most appropriately set out at the local level. They may take the form of local authority design guides, or design guidance or design codes prepared by applicants to accompany planning applications'.

¹⁵ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

¹⁶ <https://lichfields.uk/blog/2019/july/24/town-centres-and-retail-implications-of-the-amended-ppg/>

¹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

“However, it also says that ‘in the absence of local design guidance, local planning authorities will be expected to defer to the illustrated National Design Guide and National Model Design Code. This will be consulted on, alongside the consultation on the use of the National Model Design Code, in early 2020.’”¹⁸

HOUSING DELIVERY 2006-2026 AND THE LOCAL PLAN REVIEW 2016-2036

The Wiltshire Core Strategy (2015) covered the period 2006-2026. The indicative requirement for housing over that period for Melksham Town and Bowerhill Village was 2,240 homes. Completions between 2006-2017 totalled 1,370 and ‘developable commitments’ 2017-2026 have totalled 1,221. This total of 2,591 shows that the housing delivered was 16% over the requirement.

The latest figures coming as a result of discussions and work completed for the Local Plan Review in readiness for the Local Plan 2020-2036 show a requirement for 3,950 homes in Melksham, but with a residual number of only 2,600. The first draft of the Local Plan is due to be published in the Spring of 2020.

It’s worth noting the following comment re: Melksham from Wiltshire Council’s informal consultation with Town and Parish Councils in October 2018 on appropriate levels of growth (report published April 2019):

“It was felt that the town had taken significant growth in recent years with a lack of infrastructure including medical provision. The importance of delivering infrastructure before any large scale future growth could be accommodated was emphasised. This included a specific focus on the provision of an eastern bypass, without which it was felt development would be difficult to accommodate (the indicative requirement discussed was about 3500 homes with a residual of about 2400 homes to allocate). Other constraints included education provision (and the need for a new secondary school) and the improvement of transport infrastructure, not only roads but also sustainable transport options and the improvement of the railway station.”¹⁹

“A need exists to regenerate the town centre, encourage a wider variety of employment opportunities into the town and possibly pedestrianise parts of the town centre. Investment must continue in the town centre and brownfield opportunities must be maximised moving forward.”²⁰

The increased likelihood of an eastern bypass for the town – and its possible completion by the late 2020s – clearly opens the possibility of pressure from developers to push housing eastwards to the bypass boundary. This will doubtless form part of the thinking as the new Local Plan evolves. But with that comes the critical issues of physical and social infrastructure, as well as employment. See page 25 for more.

¹⁸ Summary from Lichfields planning & development consultancy : <https://lichfields.uk/content/news/2019/october/1/england-planning-news-october-2019/#section1>

¹⁹ www.wiltshire.gov.uk/spp-informal-consultation-report-autumn-2018.pdf

²⁰ www.wiltshire.gov.uk/spp-informal-consultation-report-autumn-2018-appendices.pdf

4. DRIVERS FOR CHANGE

There is uniform agreement that Melksham town centre needs investment, a revitalisation, fresh thinking, better resources and facilities. That's nothing new. As we have seen, it's been part of formal planning policy for years. There has been some improvement, some cash spent on enhancing the area around the Town hall, on providing better facilities in King George V Playing Fields. As was noted on page 10, the Community Area Board has been able to provide funding that has been successfully leveraged to deliver much-needed community support.

But there is no over-arching plan for the town centre, no strategic positioning. As we said in the Introduction (page 3), there is now an ambition is to build and strengthen resilient economic activity through the development of new commercial and social areas and opportunities in the town centre, alongside relevant infrastructural changes.

We have brought together a view of the town as it is today. Now we turn to what is driving change, what themes and ideas and external shocks are going to provide a framework for redefining the town centre.

CLIMATE CHANGE

The 2015 Core Strategy appeared to recognise the challenge: "Climate change is possibly the greatest long-term challenge facing the world today. Tackling climate change is therefore a key Government priority for the planning system. Local authorities are uniquely placed to act on climate change and the planning system can help by contributing to delivering the most sustainable development and shaping communities that are resilient to the unavoidable consequences of a changing climate"²¹.

There were specific objectives set out:

- ▶ "A sustainable pattern of development, including improvement to the self-containment levels of the main settlements and a reduction in the need to travel, will have contributed towards meeting climate change obligations.
- ▶ The supply of energy and heat from renewable sources will have contributed towards meeting national targets and helped to address fuel poverty.
- ▶ New development will have incorporated sustainable building practices and where possible will have contributed to improving the existing building stock.
- ▶ High energy efficiency will have been incorporated into new buildings and development. New developments will have incorporated appropriate adaptation and mitigation for climate change.
- ▶ New development will be supported by sustainable waste management".

This is not the place to review progress since 2015. However, we do know that what was previously a challenge has now become an emergency. Not enough has been done to reduce carbon usage, to address the rise in global warming, to reduce our use of plastics. As one US writer put it trenchantly: "The planet has already warmed by one degree Celsius. Most of the coral reefs are going to die, and many of the glaciers will melt. Climate change is here, leaving grubby human fingerprints on parched, burned, flooded and melted landscapes. Climate change isn't a cliff we fall off, but a slope we slide down. And, true, we've chosen to throw ourselves headlong down the hill at breakneck speed. But we can always choose to begin the long, slow, brutal climb back up. If we must argue about what the view will be like when we get there, let's at least agree to turn around first"²².

Much *is* changing. In the third quarter of 2019, the UK's wind farms, solar panels, biomass and hydro plants generated more electricity than the combined output from power stations fired by coal, oil and gas²³. But change is not moving quickly enough – and plans for Melksham town centre over the next 15-20 years cannot ignore the likelihood, let alone the moral imperative, that a low carbon economy, infrastructure and lifestyle will be required.

²¹ www.wiltshire.gov.uk/planning-policy-core-strategy page 28

²² <https://blogs.scientificamerican.com/hot-planet/thinking-about-climate-on-a-dark-dismal-morning/>

²³ <https://www.carbonbrief.org/analysis-uk-renewables-generate-more-electricity-than-fossil-fuels-for-first-time>

That is not going to be easy without a major shift at national government level. In the meantime, Wiltshire Highways, even while seeking to make their own contribution to a less carbon heavy infrastructure, will be under pressure to provide road improvements to accommodate more vehicles and more people. Investors will look for returns where they can best be made, not necessarily where they are most needed – because of the pressures they are under from the wider financial system. And housebuilders will continue to respond to anticipated housing needs while adhering to legal requirements in terms of the carbon impacts of their work – requirements which are set at national level and which local authorities, let alone town councils, are unable to radically change. Again, whether that is enough is for others to judge.

These are not political comments. They are the facts that must be accommodated, addressed, changed or ignored at a domestic, local, regional, national and global level. And they must inform the process of change that lies ahead of us in building a strong and successful future for the town centre and the people of Melksham.

ALTERNATIVE ECONOMIC MODELS

The Economist newspaper commented in June 2018 on a speech given by Michael Gove (then secretary of state for the environment). He began, according to The Economist, “by praising the system as the most successful wealth-creating machine the world has seen, but went on to lament ‘the failure of our current model of capitalism to deliver the progress we all aspire to’. ... Mr Gove is surely right that if capitalism’s friends don’t reform the system, then capitalism’s enemies will do it for them”²⁴.

A couple of months later, in September 2018, the **New Economics Foundation** launched a pamphlet proposing six stepping stones to a new economy. They said: “We believe there are six systemic changes that we must achieve over the next decade to create the stepping stones for a new economy. Across each of these, NEF has and will continue to develop radical solutions for how we respond. These systemic changes cover: A purposeful economy, urgent green transition, more worker power, homes for all, decent quality of life, a digital revolution. We need truly radical thinking for truly radical times and we present this pamphlet not as the last word, but as the beginning of a conversation about how we can ensure the next decade brings better lives for the many, lived within the limits of our planet”²⁵.

In the months since those two examples, discussion about economic direction has grown considerably. Whether the December general election will provide any guidance on future direction remains to be seen, but there is a widespread belief that the economic model needs to change. Mayhem in the high street and the impact of digital commerce has made certain of that.

One way to boost local retail and commercial activity that is getting a lot of attention is known as ‘**community wealth building**’. At its heart is the idea of rebuilding strong connections between the enterprises, people and places that create wealth and those who benefit from it. It’s known that locally owned or socially minded enterprises are more likely to employ, buy and invest locally, thereby contributing to local economic and social development. In these instances, therefore, there is a higher propensity for wealth to be generative rather than extracted. As such, community wealth building seeks to promote locally owned and socially minded enterprises. It also seeks to democratise the economy with greater local authority insourcing and development of municipal enterprise²⁶.

In the UK the idea has been most widely observed in the city of Preston²⁷, the Lancashire town of 140,000 that was in the 20% most deprived areas of the UK. Over the past five years the local authority has turned things round, with a critical emphasis on local procurement. The Council identified a number of ‘anchor’ institutions, including Lancashire County Council, who agreed to ‘buy local’. The impact has been significant, with the most recent anchor institution spend analysis finding that the procurement spend retained within Preston was £112.3m,

²⁴ <https://www.economist.com/britain/2018/06/07/good-capitalism-v-bad-capitalism>

²⁵ <https://neweconomics.org/2018/09/an-economy-for-the-people-by-the-people>

²⁶ You can read more about community wealth building at <https://cles.org.uk/publications/community-wealth-building-2019/>

²⁷ <https://cles.org.uk/publications/how-we-built-community-wealth-in-preston-achievements-and-lessons/>. See also <https://thenextsystem.org/the-preston-model>

a rise of £74m from 2012/13. Within the wider Lancashire economy (including Preston) £488.7m of spend had been retained, a rise of £200m from the baseline analysis.

Another interesting approach is what are called **foundational economies**, an idea being tested across Wales by the devolved government. According to Business Wales, “the services and products within the foundational economy provide those basic goods and services on which every citizen relies and which keep us safe, sound and civilized. Care and health services, food, housing, energy, construction, tourism and retailers on the high street are all examples of the foundational economy. The industries and firms that are there because people are there. Estimates suggest they account for four in ten jobs and £1 in every three that we spend. In some parts of Wales this basic ‘foundational economy’ is the economy.

“The (Welsh Government’s) economic action plan has set the direction for a broader and more balanced approach to economic development with a shift towards a focus on place and making communities stronger and more resilient. The plan places a greater emphasis on tackling inequality and signals a shift to a ‘something for something’ relationship with business. Promoting inclusive growth through a new focus on the foundational economy sits alongside the other three pillars of our economic contract: supporting business investment that future-proofs the economy ... a regional approach to investing in the skills people need to enter, remain and progress in work ... and the infrastructure communities need to be connected and vibrant”²⁸.

That would seem as good a definition of how we would all want our towns to be, particularly when it comes to living our day-to-day lives in the high street

THE CHANGING HIGH STREET

One of those consulted for this paper considers that “the High Street has no character that would make anyone say ‘Let’s go shopping in Melksham’ and only those residents and those working here tend to shop here ... as Melksham follows the national trend towards the cheaper and more convenient anytime on-line shopping trend. Somehow we need to take advantage of the large increase in our population, our high employment rate and the changing lifestyle habits of the town’s younger and newer inhabitants”.

Of course, the problem is that the high street has changed irrevocably in the past decade. Amongst the plethora of books and programmes about how to revive the High Street, some of the most practical and inspiring work has been produced by veteran retailer Bill Grimsey, who specialised in the food and DIY sectors, most notably at Wickes, Iceland, and Focus (DIY), as well as spells abroad and at Tesco.

In 2012, he published a book called *Sold Out—Who Killed the High Street?*²⁹. The following year, he published a report on the state of the high street, *The Grimsey Review*³⁰. An update – *Grimsey Review 2* – was published in July 2018³¹. The second Review is particularly recommended for those who want to find some more in-depth reading on the way forward. Many of the recommendations are directed at planning authorities, but others are directly relevant to this present exercise. Some of the key excerpts are provided below – we suggest these should be taken into account in any strategic planning for the future of the town centre.

► From the Foreword ...

- By becoming gathering points for whole communities, which also offer a great experience facilitated by technology and incorporating health, entertainment, education, leisure, business/office space and shops at the heart of a thriving community hub, every high street and town centre can have a positive future.
- We still rely on old models that are not fit for the 21st century and this is holding back change.

²⁸ <https://businesswales.gov.wales/foundational-economy>. See also <https://foundationaleconomy.com/introduction/>

²⁹ <http://www.vanishinghighstreet.com/shop/>

³⁰ <https://web.archive.org/web/20131007232318/http://www.vanishinghighstreet.com/wp-content/uploads/2013/09/GrimseyReview04.092.pdf>

³¹ <http://vanishinghighstreet.com/wp-content/uploads/2018/07/GrimseyReview2.pdf>

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- In Scotland they have started testing Community Improvement Districts (CIDs), which by definition embrace all stakeholders in the area. This is a good first step. (NOTE: this chimes with the idea of the foundational economy model, described above.)

► **Key Findings ...**

- There is a need for all towns to develop plans that are business-like and focused on transforming the place into a complete community hub incorporating health, housing, arts, education, entertainment, leisure, business/office space, as well as some shops, while developing a unique selling proposition. (NOTE: ditto.)
- The key is outstanding, talented and committed leadership... Strong leadership and vision are essential.
- The curating of a place based on its distinct heritage is multi-dimensional and complex but should feature strongly when developing the “offer”: Why would people want to live, work, play, visit and invest in the ‘place’? What does it stand for?

► **Recommendations (excerpts) ...**

- Accept that there is already too much retail space in the UK and that bricks and mortar retailing can no longer be the anchor for thriving high streets and town centres. They need to be repopulated and re-fashioned as community hubs, including housing, health and leisure, entertainment, education, arts, business/office space and some shops.
- Embed libraries and public spaces at the heart of each community as digital and health hubs that embrace smart technology.
- Introduce clear high street assets ownership for each town to be able to trace the owner of every single property and engage them in the health and wellbeing of the place.
- Create a nominal maximum charge (£1) for the first two hours of parking in town centres, while introducing 30 minutes free parking in high streets with no paid extension option.

► **Other highlights ...**

- The form and function of cities and towns across the world has had to change as a result but their composition, identity and ability to change have evolved in different ways. One golden thread connects them all – they are communities of people who create economic value to the place where they live. The level of economic health determines the volume and value of the people that occupy it and from this, money flows into the local economy and creates the need for shops, bars, restaurants, cinemas, clubs and other consumer facing businesses.

► **At home in town ...**

- Residential growth requires supporting community infrastructure, notably functioning town centres, which will have a significant impact on the quality of life for new and existing residents.
- The potential for residential development in our town centres is a win-win proposition. It would make a major contribution to the housing crisis, while responding to the change in working patterns, connectivity and consumer habits. Homes in town centres serve to increase footfall and increase demand. The obvious response to any town with a falling footfall, particularly one seeking an evening economy, is to build more homes.
- There is no one prescription for residential building in any town centre. It is contingent upon a decent master plan and design brief – but there is a hierarchy of desirability: homes in empty spaces above shops are always desirable and should be encouraged. Landowners and landlords should be incentivised to give over redundant upper floor spaces to well-planned and well-designed residential units.
- Opportunities for new housing development in poorly used spaces – infill sites, underused car parks, redundant service yards – should be identified through the master planning process.
- Permitted development rights to allow homes to be formed from redundant retail stock can be encouraged, as long as these are outside the core.
- New residential development should only be co-located with evening economy uses when sufficient thought is given to management of potentially conflicting uses. Within the core, permitted development rights would only be accorded to conversion for economic uses (offices or workshops).

► Cafe working in the freelance revolution ...

- Flexible workspaces have grown from 2% of office space in 2015 to 7.5% in 2017. Three quarters of this capacity is outside London, so this is very much a national pattern, according to Cushman & Wakefield. Forecasters expect these types of working environments to account for 12.5% of office space by 2020. Flexible workspaces will need broadband upgrades, requiring landlords to act more as service and infrastructure providers, developing 'Space as a Service'.
- Local shopping venues, close to where the flexi-worker lives, and those in bigger cities to which they travel, will benefit from these new work patterns. Spending by these types of visitors feed into cafes and collaborative work places ... but also hairdressers, gyms, convenience stores and a host of other shops. The revenue of the UK's coffee shops is expected to reach £4.9bn a year by 2020, a significant proportion of which will come from flexi-workers.
- Premises for stylish cafes and town centre flexible workspaces are still under-supplied. Research by the Retail Practice has highlighted a whole range of locations which have failed to create sufficient capacity for this important cohort of new users.
- Affordable shared workspace is one of the urgent priorities for improving high street and town centre density and attraction as a work destination. Each location needs a local policy for supporting flexible workspaces as well as new, innovative retail concepts to serve the emerging freelance audience. The optimal increase in office space density needed can be worked out from the new footfall measurement data, using local high street and town centre sensors.

Grimsey also offered 13 Principles for a thriving town centre:

PRINCIPLES FOR A THRIVING TOWN CENTRE

- Understanding the historic context – what are the drivers in the historic growth of the centre in relation to the wider settlement and broader area?
- Celebrating the setting and character – what makes the place special, both the historic environment and the area's role and retail identity in terms of specialist, traditional or niche roles and offer?
- Exploring how people identify with their high street/town centre – their aspirations for its future role and how it could build meaningfully on the past.
- Knowing the economic trajectory – developing a brief and strategy that responds to wider economic trends, understanding the position of the centre in relation to others in the retail hierarchy.
- Creating an agile framework which fosters resilience and adaptability – strategies need to be sufficiently flexible to respond to shifting market conditions and structural forces.
- A joined-up approach to transport and movement – to create a welcoming arrival experience.
- A balanced mix – niche and mainstream shops alongside services, businesses, leisure activities and new homes, creating vibrancy and diversity of activity across the day and through the seasons.
- Creating spaces for civic and social use – and encouraging better quality streets, spaces and "third spaces", popular with local people and visitors.
- High quality design which works with heritage – to maintain the overall identity of town centres, particularly where they have a special setting or historic character. New development should be carefully integrated, using adaptation, infill, redevelopment and extension.
- Targeting the experience economy – centres need to appeal to younger and older people and create a vibe.
- Innovative approach to leases – town centres might adopt a WeWork approach of short-term, rolling three-month leases with minimal upfront costs, encouraging startups and less conventional retail. Meanwhile strategies and interim uses can also play a key role in setting the context for future change.
- Embracing diversity – retailers are broadening their offer, they can be adaptive, savvy, inventive and there are pioneers who point the way.
- Town centres need to continuously adapt and enhance the commercial, civic, education and leisure offer to remain prosperous and relevant to communities. It is increasingly important to also integrate residential uses that diversify the local housing offer but also extend the hours of activity throughout the day and evening.

Many of the ideas produced by Grimsey resurfaced in a report, *High Streets and town centres in 2030*³², published in February 2019 by the **House of Commons Housing, Communities and Local Government Committee**.

³² <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/1010.pdf>

Some of the conclusions included:

- ▶ Our high streets and town centres can have a better and more balanced future ahead of them ... This will require a shift from the retail focused activities of high streets and town centres today to new uses and purposes which foster greater social interaction, community spirit and local identity and characteristics. With a properly planned strategic intervention led by the local authority, with the backing of local stakeholders and the wider community, we can redefine our high streets and town centres and ensure their long-term sustainability for future generations to come.
- ▶ Achieving the large-scale structural change needed will require an intervention led by the local authority, using all its powers and backed by cross-sector collaboration. However, given the financial pressure faced by local authorities, central government funding will be needed for this, as well as significant private sector investment.
- ▶ The Government has announced the introduction of a Digital Services Tax in April 2020 to address issues related to historic avoidance of corporation tax. However, this does not address the imbalance between online and high street retailers. The Government needs to go further and move faster to level the playing field between online and high street retailers.
- ▶ Planning is crucial to high street and town centre transformation. Given this, the Government should ensure that planning powers are fit-for-purpose, sufficiently responsive and up-to-date and undertake a comprehensive review of planning as it pertains to the high street. *In particular, we believe that permitted development rights (PDRs) risk undermining the strategic vision that a community has developed for its high street or town centre. The Committee is recommending the Government should suspend any further extension of PDRs, pending an evaluation of their impact on the high street (our italics).*
- ▶ Policies should reflect the wide variety of local circumstances. Councils should be actively encouraged to develop town centre masterplans and use their powers positively to renew their town centres. Where PDRs conflict with particular designations in the Local Plan or other established planning documents, councils should be given greater freedom to suspend PDRs in the affected area.
- ▶ We recommend that action is taken at local level to create visionary strategies for high streets and town centres which have the backing of the local community, to support local traders, to facilitate parking and to develop the role of place partnerships.
- ▶ Local Plans must be living documents, regularly updated to capture and reflect changing trends, and must be forward looking, anticipating what will happen in five years' time. They should be supplemented with dynamic strategies covering specific high streets and town centres. We recommend that all local areas should also develop an overarching vision setting out the direction for the future of their high streets and town centres.
- ▶ We were attracted by the idea that BIDs should be replaced with community improvement districts but recognise that legislative changes might be needed to implement this. We encourage the Government to consider how this might be done and, in the interim, recommend the appointment of community representatives to BID panels in order to encourage a more balanced approach in their work.
- ▶ With online shopping only set to grow in the future, we heard that, to compete and be successful, high street retail needs to carve out a separate role, focusing on providing "experience" and "convenience".
- ▶ In many places, store opening hours do not reflect the fact that many people need and want to be able to shop at the end of the day after they have left work. If they cannot shop on the high street at their convenience, they will shop online or at an out-of-town retail centre instead. Retailers should conduct research with shoppers to find out whether their opening hours are meeting people's needs and adjust them in accordance with the results on a local, shop-by-shop basis.
- ▶ Landlords are often the least visible stakeholders in high streets and town centres but are among the most important. The Committee is recommending all landlords recognise that the retail property market has changed and take an active approach, providing their tenants with good quality properties on a flexible basis and investing in and reconfiguring properties for new uses. Further, we encourage them to fully engage in local

partnerships working on high street and town centre transformation and to consider the potential for further investment to help bring plans to fruition.

Evidence that high streets are evolving in response to the demise of the major retailers came from a Which? survey published in October 2019³³. It revealed that:

“Services such as cafés, markets, and tattoo parlours have thrived even as major retailers struggle amid concerns for the future of the UK high street (*following an analysis of*) almost 1.5 million Ordnance Survey business records to compare Britain’s retail and services landscape from 2014 to 2019.

“Many high streets are moving away from being carbon copies of one another. Instead, flourishing personal services, markets, and food specialists that focus on ‘experiences’ (*are*) replacing retailers hit directly by the rise of online shopping.

“Of the 10 sectors that have seen an increase in premises on UK high streets, six are categorised as ‘eating out and services’, with the biggest increase since 2014 seen in banqueting and function rooms (114%). This was followed by markets, one of the few sectors categorised as a retailer in the top 10, which saw an increase of 52% between 2014 and 2019. Tattooing and piercing services increased their presence on the high street by 44%; cafés, snack bars and tea rooms by 35%; and hair and beauty services by 31%.

“Of the 10 hardest hit sectors, only two were categorised as offering personal services – fast food delivery services (-50%) and internet cafés (-36%). The rest were categorised as retailers. The most negatively impacted sector was book and map sellers, which saw a reduction of 70% over the five-year period. Other sectors to suffer include computer shops (-56%), shops selling second hand supplies (-44%), electrical goods and components sellers (-39%) and art and antique stores (-41%).

“Despite ongoing concerns regarding the ‘death of the high street’, businesses offering services or experiences that cannot be replicated online have prospered in the face of the booming digital economy. These traders can also function as effective drivers of footfall to other businesses, with many traditional retailers now pivoting towards offering these kinds of services in-store.

“The analysis suggests that in order to thrive in the face of the growing digital economy, UK high streets need to become wise to the unique role they can play in consumers’ lives, offering services that cannot be replicated online to act as an anchor for bringing people into town centres.”

One further comment from one of the leading activists in the fight to save town centres. In his excellent 2015 book *How to save our town centres*³⁴, Julian Dobson wrote that “the future of the High Street lies not in campaigns to save this and to stop that, but in actively shaping what is to come: both literally and metaphorically to nurture, connect, forge, build, perform and celebrate. The town centre will not be as we or our parents remember it, and it will require less physical space as digital connectivity alters almost every aspect of our lives. But it can be a place that once again belongs to all of us and functions as the heart of a community, a pump that gives vitality to the whole.”

THE CHANGING WORKPLACE

While the High Street is changing, so is the office workplace. Collaboration and community are the key watchwords that are coming to define how and where people in what used to be called ‘white collar’ jobs are working. White collars are gone. Hierarchy is gone. Information is no longer the means to power. Technology has seen to that – and those who have grown up over the past 20 years since broadband was first introduced in the UK have been party to massive changes in how *and where* people work.

³³ <https://press.which.co.uk/whichpressreleases/back-to-the-future-for-the-high-street-as-independents-and-services-replace-retail-giants-which-reveals/>

³⁴ http://urbanpollinators.co.uk/?page_id=2028

Ten years ago a small company in a medium-sized town with three or four employees might work in an office above a retailer or, if they were lucky, in a 'business centre' with half a dozen similar-sized companies. Working collaboratively together was not an option. There was no networking to speak of, either digitally or physically.

With technology, all that has changed. Today's new generation of 'knowledge workers' are born to collaborate – and the model is generally called 'coworking'. This is how one operator describes the new culture of working:

"Coworking is an innovative, relatively new way of working that puts an independent yet community-oriented spin on the traditional office space. At its broadest point, coworking is simply the practice of multiple businesses and/or freelancers from unrelated companies or fields sharing a workspace and its amenities.

"Another way to put it is that coworking constitutes a shared workplace. Because it's not like a traditional office, the coworking model often attracts non-traditional workers such as freelancers, independent contractors, and satellite professionals who work from home, creative companies like media and tech, as well start-ups. However, as the model continues to grow in popularity, mid-size companies and enterprise institutions with thousands of employees are also starting to take advantage of the added efficiency.

"As the coworking model has become more standardized, one additional part of the definition is that the companies who work in the same building experience a shared use of the operator's administrative and amenities functions. This can mean everything from fibre optic-fast Internet to professional receptionists who can screen and transfer calls, to a gym and restaurant on-site. For growing businesses who need these resources and amenities to attract and retain talent but don't have the capacity to engage them on their own, the coworking model is a lifeboat.

"Coworking is a perfect example of where these changes are headed. By combining the communal aspect of a traditional corporate office with the flexibility and freedom of independent work conducted at home (or more often than not, at the local coffee shop), coworking meets both styles in the middle. Freelancers need not remain isolated at home, and traditional companies need not remain rigid at the office.

"The modern workspace is also affected by who is working, and companies need to appeal to a younger workforce. Location is always important, which means everything from the actual physical location of the office, as well as the design and aesthetic of the building's shared office spaces, walkability, and access to amenities."³⁵

The model for these workspaces is based on easy-in/easy-out terms (e.g. one-month licence rather than complicated sub-leases), and a monthly fee – typically £200-350 per month per desk (+VAT), which includes rent, rates, gigabit high speed synchronous connectivity, free coffees, teas etc, community events and other bonuses.

The model is now to be found worldwide, including a significant number of spaces in Bristol and a growing number in Bath. There are constraints on making the model work (it needs to be at scale with dozens of desks available rather than a handful – so typically 10-20,000 sqft and more. But it is a model that is becoming increasingly attractive – see comments from the Grimsey Review 2 on pages 19-21 above. It has real potential in our market towns and specifically in the future redevelopment of sites north of the Melksham town bridge.

OUR DIGITAL WORLD

Strong and consistent connectivity to the digital world is a must for the future. Unfortunately, all too often our connectivity is neither strong nor consistent. The lexicon of words used to describe internet connections is being tested to destruction. 'Superfast' seems to be the current word of the main providers – but that appears to cover speeds from as little 30Mbps to 900Mbps.

Current speeds being achieved in Melksham town are in the region of 40-50Mbps³⁶ while offers vary from an advertised average speed of 35-65Mbps³⁷. But look at the small print. One example (Virgin) offers an *average*

³⁵ <https://www.techspace.com/coworking-definition/>

³⁶ <https://www.broadbandspeedchecker.co.uk/broadband-speed-in-my-area.html>

³⁷ <https://www.broadbandchoices.co.uk>

download speed of 53Mbps “based on the download speeds that at least 50% of customers get at peak time”. So more typically you may get a lot less. Particularly relevant for anyone using these services for business are the upload speeds. The same Virgin deal offers an *average* upload speed of just 3Mbps. Another provider, PlusNet, offers averages of 66Mbps download, but only 18Mbps upload.

There is much frustration and aggravation, particularly among rural businesses, over the way connectivity is being handled. In some parts of the country, communities have taken things into their own hands, the leader being the social enterprise Broadband for the Rural North Limited (BARN) which claims to offer the fastest rural broadband service in the world, with gigabit connectivity (1,000Mbps+) available at £30 month for households and small businesses. Other for-profit companies are offering improved services in the southwest, including Gigaclear, which is running a programme with Wiltshire Council's Wiltshire Online to provide services to North Wiltshire's rural areas – including Whitley (from Q1 2021) and Sandridge Common (from Q2 2021)³⁸.

Mobile coverage in Melksham is generally good, but not universally so. According to their own network coverage maps for 4G in the town, the main providers say as follows:

- EE: Good coverage outdoors and varying levels of coverage indoors.
- O2: Good indoors and outdoors. Good for mobile broadband.
- Vodafone: Good indoor and outdoor.
- 3: You can use the internet in most instances on our 4G network, indoor signal strength may vary.

The new 5G networks will be a complete game-changer, with massively increased speeds (c. 2Gbps) and an ability to handle data much more effectively (so, for example, allowing for much easier streaming of events, films etc). The first 5G phones are now available and some cities have services, including Bristol. There are some health concerns in terms of radiation, but it is unlikely that this will curtail the eventual rollout worldwide.

CHANGING METHODS AND MEANS OF MOVEMENT

Significant investment has taken place along the A350 to remove pinch points in Chippenham and enable smoother onward transit to Melksham. However, high traffic volumes, particularly in the peak periods, result in congestion, delays and unpredictable journey times around and through the town. Long queues commonly form on the A350 corridor to the west of Melksham during the morning and evening peak periods, with queuing and delays remaining throughout the inter-peak. Investment of £3m has been used to improve the flow and reduce congestion on the Farmers Roundabout. Traffic lights are now linked to the existing lights providing access to the ASDA and A365 junctions.

Meanwhile, the options for an eastern bypass received a mixed reaction. Revealed in August, they are now based on two options. The first would connect the A350 north of Beanacre to Eastern Way where it meets with Sandridge Common. The price was put at £51.2 million. The second would connect the A350 north of Beanacre to the A350 Semington bypass, south of Bowerhill. The price for this option was put at £135.8 million. Reader comments to the Melksham Independent News at the time of the reveal favoured the longer option, not least because it would avoid “dumping” traffic into the housing estates to the east of the town. However, others criticised the longer route because of the environmental cost, including the loss of open countryside and woodland. The plans are currently with the Department of Transport. A decision, originally due by December, will doubtless be delayed as a result of the General Election. Construction has been slated as possible in early 2024, with completion by March 2026 for the shorter route and June 2028 for the longer bypass.

Whichever route is selected, the bypass will undoubtedly make a big difference to the volume and type of traffic travelling through the town, and in particular the town north of Farmers Roundabout. It will also enable far greater consideration being given to changes to the roads from Market Place, up High Street, Bank Street and across the river to Bradford Road, Old Broughton Road and pedestrian/cycle routes from the town centre to the railway station (see below).

All of that said, the need for clean air and the climate change emergency will/should have a profound impact on means of movement in and around Melksham over the next 15 years. In England and Wales all new vehicle sales

³⁸ <https://www.gigaclear.com/wiltshire-online>

from 2040 must be petrol-free (2032 in Scotland, who have devolved powers on this issue). Depending on the extent to which future UK governments react to events and public pressure, it must be thought likely that England and Wales will move closer to other European countries – including Norway (2025), Ireland (2030), Netherlands (2030), Sweden (2030), Denmark (2030) and Scotland (2032).

So within the period of the next Wiltshire Local Plan, major changes are likely to be introduced, impacting on the way we move around and on public acceptability of vehicles in our town centres, themselves are set to change.

As part of any future redevelopment of the town centre, there have already been calls for elements of pedestrianisation – particularly along Bank Street/High Street – as well as substantial improvements in all forms of public transport, cycle ways, footpaths and train services (see below). There is no shortage of guidance and advice about how to make town centres more attractive, healthy and people-friendly and this can be brought to bear if progress is made on a movement study and strategy (see page 37). One document, *Street Design for All*³⁹, has a number of short, sharp headlines that few would quarrel with, but which nonetheless provide a possible framework for future consideration:

- Make movement safe, efficient and pleasant for all
- Design and manage for place as well as movement
- Use the street to enhance the place
- Cut clutter
- Encourage cycling through attractive, safe, direct routes
- Combine safety with amenity
- Create crossings which are direct, elegant and safe
- Use courtesy crossings to complement the quality of a place
- Put street lights on buildings and service boxes underground
- Design street corners for the safety and convenience of pedestrians
- Either ensure good maintenance or design out the need.

TRANS WILTS RAIL

The community rail service in Wiltshire has received permanent status from the government after a successful trial. The TransWilts line links Westbury, Trowbridge, Melksham and Chippenham with Swindon and the service is a partnership between Great Western Railway and TransWilts Community Rail Partnership.

TransWilts Community Rail Partnership comprises local organisations, train operators, Wiltshire Council, rail users and other interest groups. The 32-mile (51 km) TransWilts service launched in December 2013 and was funded via a Department for Transport grant of £4.25m, supporting the service for three years.

TransWilts have been in the process of acquiring the lease from Wiltshire Council for the former Reed's site, adjacent to Melksham station. This will allow redevelopment of a community hub and café. Car parking will be extended and charging introduced to fund the lease costs. Target completion is by 1st quarter 2020.

There are ambitious plans for the future expansion of the rail service over the next decade. They include:

- ▶ 2019-2020
 - Extension of TransWilts to Southampton by combining with Three Rivers CRP train service
 - Passing Loop in Melksham single track section to facilitate an hourly service
 - Improved service frequency to Dilton Marsh station by using Trans Wilts
 - A fourth platform at Westbury to improve it's operation as a key service connection hub
- ▶ 2020-2022
 - A parkway station at Wilton, now identified as "Stonehenge & Wilton Junction", to better represent the tourist passenger potential
 - A Devizes Parkway station at Lydeaway connecting Wiltshire's fifth largest town to the railway network and an improved stopping service between Newbury and Westbury to Frome and Taunton
 - Extension of TransWilts to Oxford and proving improved economic links to the Midlands

³⁹ <https://publicrealm.org/street-design-for-all/>

► 2024-2026 onwards

- A station at the important Porton Science Park location, which includes Porton Down UK and Bascombe Down MOD strategic facilities. Located on the SWR service line Salisbury to Andover and London Waterloo
- A Royal Wootton Bassett parkway station to serve the west of Swindon expansion and close to M4 Jctn 16
- A Corsham station which is subject to a suitable stopping service being provided between Bristol TM and Swindon. Possibly by an extension of the EastWest Rail but also subject to increased rail infrastructure capacity between Royal Wootton Bassett and Didcot.

The increase in service frequency will be marked, with the number of trains doubling from today's level to 18 a day by 2026.

BUS SERVICES

On the face of it, Melksham is relatively well served by buses. They run regularly between 7:00am and 6:00pm. However apart from the routes to Bath, the town is virtually inaccessible outside of these hours. It's a familiar chicken-and-egg story – the bus companies insist that outside of these hours, operations are not commercially viable. Of course, a more substantial night-time economy would help counter that economy, but public transport is becoming a central issue in response to the climate emergency, so there are likely to be significant moves to enhance public transport in the years ahead.

It is worth noting some comments from bus operator Stagecoach, in their December 2018 response to the issues and options consultation on the November 2017 Wiltshire & Swindon Joint Spatial Framework.

Stagecoach describes the north and west of Wiltshire as among the most car-dependent parts of England. Other relevant comments include the following:

- ... Subject to major local transport and movement issues being appropriately addressed ... Melksham could accommodate additional development on a strategic scale. Planning to provide a step change in terms of public transport frequency, reliability and journey times will be required to ensure that the movement demands arising from strategic scale growth can be accommodated, and we believe that a significant degree of mode shift towards buses is possible with a properly conceived transport strategy focused on these towns and the key inter-urban bus corridors between them.
- ... Census data already shows recent development east of Melksham at Clackers Brook is among the most car-dependent in the UK. Merely adjoining a larger settlement does not in any way guarantee the availability of real choices to meet new residents' actual travel needs, the majority of which involve trips out of the town, for which walking and cycling are no substitute.
- ... At Melksham, it is important that opportunities to enhance the strategic north-south bus corridor through Melksham and towards/through Semington are taken up. It is especially important that master planning of any further growth that takes place at Melksham to the north-east and east of the town, makes provision to deliver direct and effective bus routing and penetration of both existing and additional development. Effective bus priority might be achievable within Melksham town centre and on its immediate approaches, and on Bath Road in particular, needs to be carefully considered. This could especially assist the development of the important east-west X72 inter-urban corridor linking Melksham and Bowerhill to Atworth and Bath.
- Melksham has seen significant recent growth over several years, and recent commitments mean that this growth is to continue. However, almost none of the recent development mainly towards the east, is directly served by regular commercial bus services, which are mainly focused closer to the A350 corridor, or terminate at Bowerhill. Not only that, but traffic is clearly seeking longer-distance destinations via the A350 in particular. There is strong demand for further development in Melksham, where there is also significant local employment, but if patterns of movement are not to result in a perpetuation of very high car-dependence, then options need to be considered that would either help catalyse new services running towards the east, and potentially linking to Devizes and/or Calne; or perhaps better still, west of the town that would be within easier walking and cycling distance of the station and the town centre.

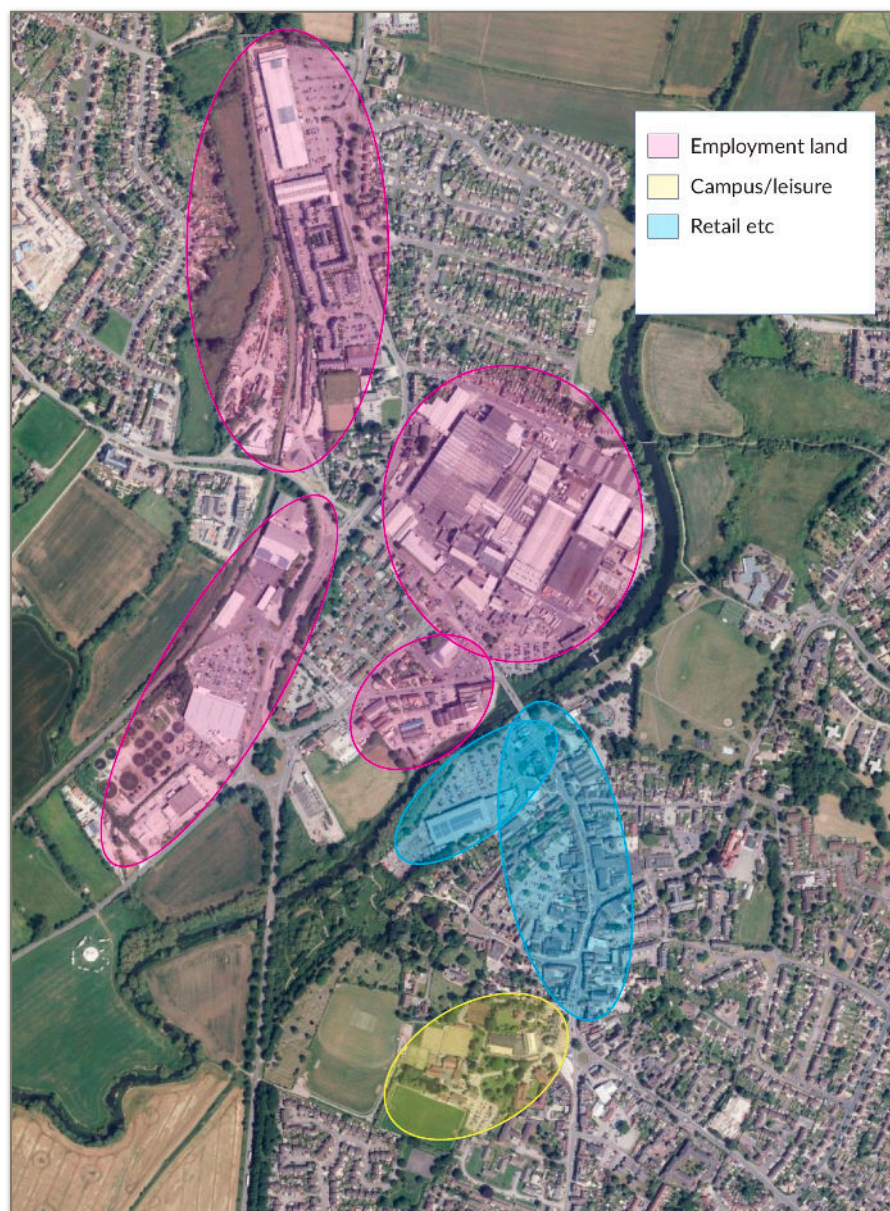
-
- ▶ We understand a need exists to bypass Melksham on the A350 route, and that the logical route options have historically been considered to lie to the east. Recent development at Sandridge/Clackers Brook has made provision for this to an extent. If an eastern bypass line is to be taken, this would open up a significant area to the north east of the town, north of Sandridge Common. However, this would need to be very carefully masterplanned to ensure that scope was created to create a new or amended north-south inter-urban corridor that would also pick up recent unserved development, and that committed nearby as far as possible.

Our proposal (see page 37) for a broad 'movement strategy' study for Melksham, embracing all modes of movement, would enable the town to start finding answers to some of the hard questions posed here and elsewhere about how we move from one place to another.

5. POTENTIAL DEVELOPMENT INITIATIVES IN MELKSHAM

This job of this document is not to propose specific actions in the town, but to provide the backcloth or canvas against which these can be prepared. However, the preceding pages will have given food for thought as to what might work and there are several key pointers that will or could make a considerable difference to the future strength, resilience and wellbeing of the town.

The map below shows how the town's layout already provides a framework for its future commercial and community development, along the lines set out in the Grimsby Review 2 (see page 19).



The north end is strongly commercial, dominated by the 29-acre Cooper Tires site. Despite the reduction in employment over the past year, the company remains the largest employer and have stated their intention to continue to locate at Melksham their European headquarters and Europe Technical Center (see page 8).

As noted earlier, the Avonside Enterprise Park has recently been acquired for commercial development and AB Dynamics will shortly be submitting their planning application for a new factory on the former Countrywide site. The growing scope and development of the railway by TransWilts Rail – with increased services and frequency – adds to the attraction of this quarter for future commercial growth.

The north end will also be the focus for the Melksham Link Project – the proposed reinstatement of the portion of the Wilts and Berks Canal that runs through Melksham between the Kennet and Avon Canal and the River Avon. The project is part of a larger scheme to restore the entire Wilts & Berks Canal, which was closed in the early 20th century (see below).

The other end of the town is the future community and social quarter, with the development of the campus project and a key contributor to the health and wellbeing of the community (see below).

These two areas at the northern and southern end will act as ‘anchors’ for the further improvement, development and regeneration of the town centre. They will create the strongest potential for substantially increased footfall – the core requirement for a healthy town centre.

Feedback from consultation during the early stages (2015-17) of the Neighbourhood Plan expressed concern over the growth of out-of-town retail, and the impacts this has on the town centre and traffic. There was also a desire for more shops, particularly comparison retail, to allow Melksham to be more self-contained and reduce the need to travel elsewhere. The consultation also supported the need to make Melksham a more attractive location to investors and employers – improving the road network and the appearance of the town centre and riverside areas – and providing more high quality and attractive workspace offering a range of job opportunities⁴⁰.

It is also worth noting that Wiltshire Council has previously stated that new allocations of employment land are being considered, recognising that the highest forecast demand scenario is more than double the currently available supply⁴¹. It has also noted that the level of out-commuting to neighbouring towns and to jobs along the M4 corridor remains high, and residents’ comments through community engagement suggest that people want to work closer to their homes.

COOPER TIRES / AVONSIDE ENTERPRISE PARK / UPSIDE BUSINESS PARK / RIVERSIDE / MELKSHAM LINK

As noted previously, the **COOPER TIRES** site is critical to the evolution of the town centre. Following its decision to end light vehicle tyre production, and even though there remain some 400 staff employed on site, at some stage within the next decade or so (maybe longer, maybe shorter), the company will consider the future of the 29-acre site, as well as some 40 acres of riparian farmland opposite and to the northwest of the industrial site.

The factory site is currently identified in planning terms as commercial land. It is critical to creating future employment, leisure and other commercial opportunities that the town prepares its own views on how the factory space should be used and **we recommend that this be started as soon as possible**. The town should also have a view as to the future of the 40 acres of farmland.

This does not place the town in opposition to Cooper Tires, but the preparatory groundwork should ensure that the outcomes are designed and presented as a contribution to the company’s own deliberations. The emphasis should be always on creating a partnership between the town and the company to deliver the best possible solution for the site that balances varied expectations.

Contact has already been made between the Town Council and the new owners of the **AVONSIDE ENTERPRISE PARK** – Create Real Estate. Here again the objective must be to develop a constructive relationship between the town and the owners in order to ensure maximum input to the future development of the site. The new owners have not yet revealed any plans, although early indications are anticipated in early 2020.

Once again, we suggest that the town prepares its own views on how the site should be used and **we recommend that this be started as soon as possible**. This is likely to involve a mix of leisure, retail, office and residential. Done sensitively, such a mixed development can transform the north side of the river and the riverbank itself.

We also believe that some **initial design thinking should be undertaken** with Wiltshire Council to explore how the public space around the junctions of Bath Road and Beanacre Road (including the important proximity to the

⁴⁰ Issues Report for Melksham Neighbourhood Plan 2015-17

⁴¹ Melksham Briefing Note for Michelle Donelan MP, May 2019

railway station), Old Broughton Road and Bradford Road should be enhanced to create a stronger and more pedestrian/cycle friendly public space and northern gateway to the town.

UPSIDE BUSINESS PARK (see below) is a 14.6 acre site at Roundponds which has been on the market through Carter Jonas for some while. Part of the site is at flood risk from South Brook.



The advertised intent is to provide “a variety of high quality B1 (offices and light industrial), B2 (general industrial) and B8 (storage and distribution) properties”. The agents add that outline planning consent has previously been granted for these uses. The proposal also defines the space as “serviced sites and ‘built to suit’ opportunities”, with interest sought “from office, industrial, warehouse and distribution occupiers, as well as commercial developers”.

Of particular interest is that the site borders the railway line and so is well-placed to benefit from the future expansion of services (see page 26). Given the potential importance of its location for future employment (but bearing in mind that there is extant outline planning approval for a range of commercial uses), we recommend that the Town Council should have a view about what the site has to offer – and that **this be started as soon as possible**.

The **RIVERSIDE** is another key element in regenerating Melksham town. The future development of the Cooper Tires site and the Avonside Enterprise Park are, of course, critical to the opening up of the riverside for leisure (restaurant/café) use. But equally important are other sections of the riverside, including Sainsbury’s, the car park and land between Bank Street and King George V Park, and other parts that form the Millennium Riverside Walk.

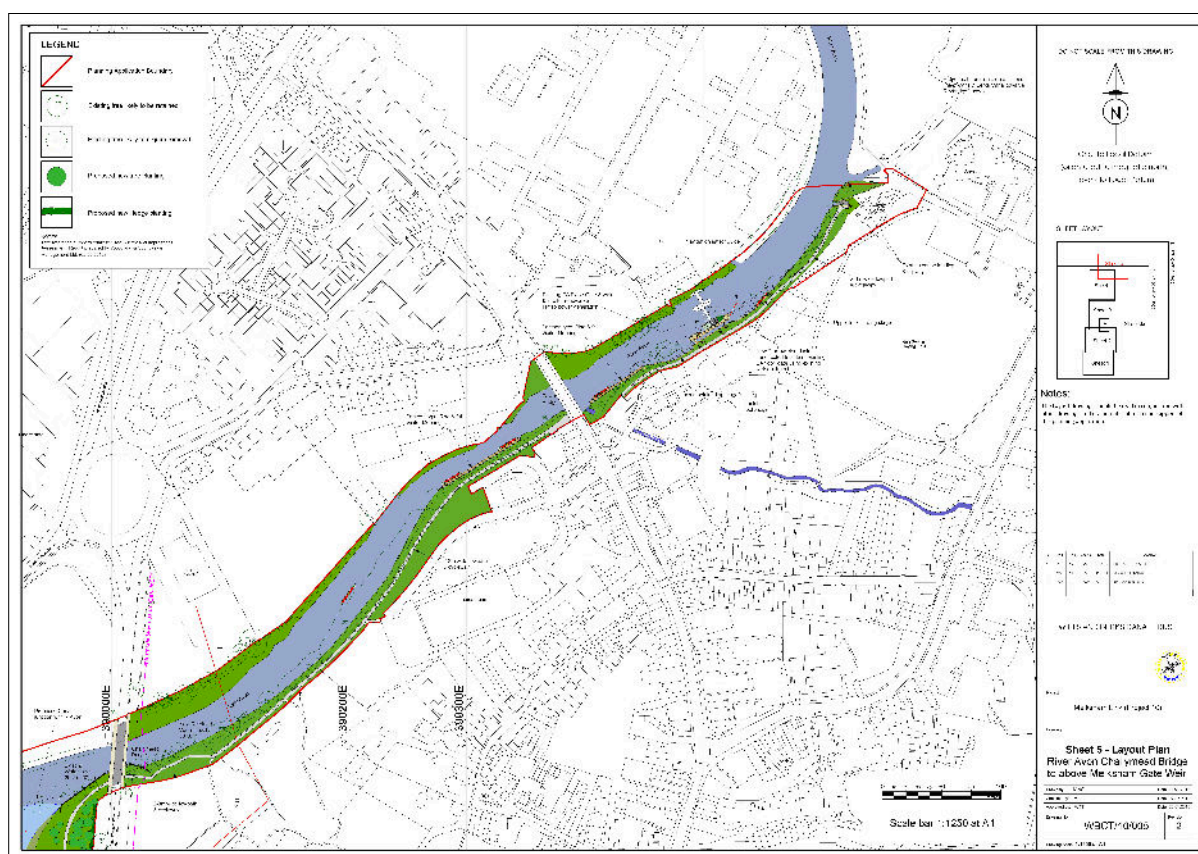
Of major importance will be the future of the proposed **MELKSHAM LINK PROJECT**. As noted earlier, this involves the proposed reinstatement of the portion of the Wilts and Berks Canal that runs through Melksham between the Kennet and Avon Canal and the River Avon. The project is part of a larger scheme to restore the entire Wilts & Berks Canal, re-establishing a direct link from the Kennet & Avon Canal at Semington through to the River Thames at Abingdon and Cricklade.

Work on the overall plan began in the 1990s. In 2012, a planning application for the Melksham link was submitted, but this has still not been determined, due to continued objections by the Environment Agency. Wiltshire Council and Melksham Town Council have remained committed to the scheme. Wiltshire Council is the lead for the Wiltshire Swindon & Oxfordshire Canal Partnership, which is providing strategic guidance for delivery of the scheme. The Wilts and Berks Canal Trust has been pursuing a formal complaint against the Environment Agency for their handling of the application.

The scheme⁴² comprises:

- A junction with the Kennet & Avon canal at Semington
- Around 3km of new canal to the west of Semington Rd, through Berryfield, with a lock and an aqueduct over Berryfield Brook.
- New access roads and bridges at Berryfield.
- Two further locks dropping down to a junction with the River Avon just west of the A350 Challymead road bridge.
- A new weir across the River just downstream of this junction.
- Re-profiling the river bed from this junction upstream under the Town Bridge to Melksham Gate weir.
- A lock on ground adjacent to the weir with a hydro-electric generator on the island formed between the weir and the lock.
- Towpath and footbridges to maintain existing footpaths and provide new pedestrian/cycle connection from the Kennet & Avon to the town and from the northern end to Lacock.
- Mooring facilities for canal boats along the new canal and on the river near Town Bridge.

The project will need to be financed largely by new housing alongside the new canal link, which does not form part of the present planning application. How much housing and how that will be fitted into the new housing allocations produced by the Local Plan has yet to be determined and will need to form part of future consultation.



A report on the economic and tourism benefits of the Melksham Link was prepared in 2014 for Wiltshire Council, Melksham Town Council, Melksham Trust and the Wilts & Berks Canal Trust⁴³. The report noted that “the construction of the new waterway constitutes a major investment in Melksham, estimated at approximately £14m for the core elements and a further £7m for additional infrastructure”. Doubtless costs have increased substantially since.

⁴² <http://www.melkshamlink.org.uk/>

⁴³ <https://www.canalpartnership.org.uk/files/studies/amecfinal.pdf>

The report also examined the economic effects arising from ambitious but indicative regeneration proposals in the town centre and along the proposed route. They included: the construction of a new marina in the vicinity of Semington; 620 additional homes on six different plots and at different densities; a new camping/caravan site; a new restaurant, cafe and public house; and 6,250sqm (67,274sqft) of retail floorspace on the waterfront in Melksham town centre.

The report based its assessment on two components:

"First, an assessment of the economic effects arising from the expenditure from new day and overnight visitors associated with the link. Overall, the assessment suggests that the Melksham Link could attract annual gross visitor expenditure from all sources (including everyday usage by local people) of between £0.75 million and £2.7 million annually assuming all regeneration opportunities are developed. In employment terms, this would lead to between 20 and 75 new Full Time Equivalent (FTE) jobs with a greater number of jobs in total (up to 100 net additional jobs) when part time working is accounted for. Based on average Gross Value Added (GVA) per filled job in Wiltshire, this could inject between £0.5 million and £1.7 million into the local economy each year.

"Second, the assessment considers the economic effects from both the construction of the waterway and the regeneration opportunities, alongside employment opportunities, once these have been built. These are in addition to the visitor effects described above, but are interdependent – the conclusions of the study do not hold if one component is excluded.

"In total, from both tourism and regeneration opportunities, up to 500 (gross) job opportunities in total could be created in Melksham, some 430 net additional job opportunities in total across the local economy. This could ultimately inject up to £7.5 million pounds into the economy per year.

"The Melksham Link also provides wider environmental benefits such as contributing to reductions in car journeys and to nature conservation as well as supporting the significant historical and heritage value of canals and their associated locks, buildings, tunnels and bridges. There are new opportunities for improvement to health and wellbeing and social benefits of access to a range of recreational and leisure opportunities from walking, cycling and boating as well as education and volunteering opportunities."

Again, bear in mind that the figures quoted here are from a 2014 report, so caution should be used in taking them too literally. However, they do provide an idea of the potential that exists if the scheme is able to proceed.

THE CAMPUS

The campus project has been another long-standing but as yet unfulfilled promise. The following is from a brief prepared in 2019 for the town's MP by Wiltshire Council.

- ▶ As part of Wiltshire Council's Melksham Campus Project the following investments have been made into community facilities in Melksham:
 - Oakfields new football and rugby facility – £7,293,000
 - New skate park – £200,000
 - Market Place refurbishment – £570,000
 - Melksham cricket pavilion rebuilt after a fire – £337,000
- ▶ The council is investing some £16m in a new community campus, including £1.6m of Sport England investment. The scheme will provide the following facilities:
 - Café
 - Six lane 25-metre pool with accompanying learner pool and spectator seating
 - Wet and accessible change
 - Six court sports hall
 - 75 station fitness suite
 - Fitness studio
 - New library
 - Office accommodation
 - Meeting rooms and community space
 - Tennis courts (two already complete).



The plans were finally approved on 13 November 2019. In February 2019, Wiltshire Council stated that they expected construction to start in early 2020 with completion in mid-2021. However, this was predicated on planning approval being given in August 2019, so in the absence of further details, a fair assumption would be for completion in late 2021.

BANK STREET / HIGH STREET

With the actual and potential development of the two anchor locations – commercial at the northern end of the town centre and the campus at the southern end, together with possible moves to create pedestrian-only streets and increased pedestrian and cycle activity – it is reasonable to expect a strong boost in footfall for the core retail areas of Bank Street and the High Street. The more so if strategies are developed along the lines suggested by Grimsey Review 2 (see page 19).

One drag on the ability of towns generally to react swiftly to opportunity, or to develop workable strategies and plans in tandem with existing landowners is the lack of up-to-date property registers. **We recommend the Town Council creates a complete register of retail and commercial properties in the town**, together with freehold owners and leasehold tenants. This should have up-to-date contact details, square footage, a photo and contact details for the tenants etc. It should also identify any buildings of particular heritage or architectural merit. We recommend further that this register should also extend to include Bowerhill and Hampton Park.

As part of any masterplanning activity (see below), there will be the opportunity to understand the kind of retail (including cafés, bars, restaurants etc) activity that will best appeal to local residents and visitors. Working closely with landowners, there can then be a degree of 'curation' of Bank Street/High Street, to maximise footfall – including opportunities for a burgeoning night-time economy and improved tourist offer.

BEANACRE/BATH ROAD

Commercial activity on Beanacre Road north of the Bath Road junction is dominated by Leekes and Aldi – and will be further boosted by the opening of the Premier Inn and Beefeater restaurant (see page 8). One comment from the Neighbourhood Plan 2015 consultation summed up the risk of focusing too closely on the 'town centre': "Living on Beanacre Road, we like most people here feel totally left out. The traffic is constant, fast and loud, and the road is filthy".

However, the prospective eastern bypass (see page 25) will open up the potential for significant improvements in the environment and overall atmosphere of Beanacre Road, pulling more people to the north part of the town. **We recommend that any masterplanning activity takes the Beanacre Road into account** in anticipation of an eventual bypass. If that is not done, then important opportunities may be missed.

GOVERNANCE REVIEW

One last issue that may will impact on how the wider Melksham community evolves is a process for changing local parish governance arrangements, launched by Wiltshire Council in May 2019 to explore the possible merger of Melksham Town and Melksham Without Councils.

This report is not concerned with the political rights or wrongs of the proposed merger. However, from a masterplanning and strategic perspective, it makes sense for one Council to cover the whole of Melksham. Some 40% of employed residents work in the town⁴⁴ – many will live in the area covered by Melksham Town although employed in the area of Melksham Without. As things evolve, in the current position we could end up with competition between the two councils over who invests in employment where. That will ultimately benefit nobody.

There is also a strong population argument. Mid-2018 estimates prepared at parish level⁴⁵ show that currently the two Melksham parishes of Melksham Town and Melksham Without are the seventh and 17th largest parishes in Wiltshire. If the two parishes are combined, Melksham becomes the fourth largest parish, only below the three heavyweights of Salisbury, Trowbridge and Chippenham. That will offer the whole town far stronger bargaining power when it comes to leveraging public investment not only from Wiltshire Council but also, and perhaps more importantly, the Swindon & Wiltshire Local Enterprise Partnership.

CURRENT GOVERNANCE			CHANGED RANKING IF MT AND MW MERGED		
Rank	Parish	June 2018 est.	Rank	Parish size	June 2018 est.
1	Salisbury	40,589	1	Salisbury	40,589
2	Trowbridge	36,376	2	Trowbridge	36,376
3	Chippenham	35,719	3	Chippenham	35,719
4	Calne	18,204	4	Melksham	24,052
5	Warminster	17,904	5	Calne	18,204
6	Devizes	16,838	6	Warminster	17,904
7	Melksham	16,678	7	Devizes	16,838
8	Westbury	15,607	8	Westbury	15,607
9	Wootton Bassett	13,129	9	Wootton Bassett	13,129
10	Tidworth	13,020	10	Tidworth	13,020
11	Corsham	12,810	11	Corsham	12,810
12	Amesbury	12,029	12	Amesbury	12,029
13	Bradford on Avon	9,860	13	Bradford on Avon	9,860
...			...		
17	Melksham Without	7,374			

* <https://www.citypopulation.de/en/uk/southwestengland/admin/>

Wiltshire Council will make the decision, and will receive recommendations from the Council's Electoral Review Committee. The calendar is as follows:

Stage	Action	Dates
Pre-consultation	Liaising with parish councils on suggested areas for consideration for review and receipt of initial submissions.	12 July 2019 – 30 September 2019
Stage one	Commencement of CGR – Terms of Reference published Schemes uploaded to public portal for any initial comments, to be updated with any relevant additional information. To include any further schemes received which fall within the scope of the Review	1 November 2019 1 November 2019 – 30 November 2019
Stage two	Consideration of submissions received in relation to proposed schemes. Local briefings and meetings as appropriate with unitary councillors and/or parish representatives. Scheme consultation Draft recommendations prepared.	1 December 2019 – 21 February 2020 1 January 2020-21 February
Stage three	Draft recommendations published Draft recommendations consulted upon	Mid-Late March 2020 Mid-late March 2020 – 30 April 2020
Stage four	Consideration of submissions received. Final recommendations prepared	1 May – 24 June 2020
Decision	Recommendations submitted to Full Council for approval	Circa Late July 2020 – September 2020

⁴⁴ <http://www.wiltshire.gov.uk/spp-swjsf-2017-11-chippenham-housing-market-area-profile.pdf> page 32. The figures quoted are based on census data and so are now slightly dated, but we would expect the 40% approximation to still be correct.

⁴⁵ www.citypopulation.de/en/uk/southwestengland/admin/wiltshire

Although the result will impact on future regeneration activity, it should only have minimal impact on the key conclusions of this report – the need and opportunities for development of the town centre.

COMMENTS RE EMPLOYMENT AND ECONOMY

We conclude this part of the report with some comments from the consultation conducted in 2015 as part of the developing Neighbourhood Plan:

- A training college for young people to develop their skills ie: engineering, building, electrical & code development for computing which is sorely lacking.
- NO to out of town retail areas – we need to be supporting and developing our town centre more, not giving people more reasons to go elsewhere.
- More planning needed for town centre. Many people go out of town because there is so little choice apart from supermarkets.
- Need to make better use of natural advantages/features, e.g. the river to create a better atmosphere and retail experience.
- Further education facilities would be fantastic to encourage mature students to further their skills that could benefit out town in turn.
- A better transport network can only be a benefit. If there is investment in transportation in and out of Melksham that will drive investment from other businesses. Having a train service will help employers and employees.
- Improve the appearance of the entrance to the town – bridge etc.
- Use the river more as an attraction with riverside shops cafe etc.
- Exploit the opportunities the canal extension into the town will bring. We have a real chance to put Melksham on the map as a tourist venue.
- Melksham needs to be a hub for people to meet, socialise, and then shop. Good eateries, bars, restaurants, coffee shops.
- Create space for more local employment. Need to help business expand or attract new employers to area.
- Can the gateway to our town not be cleaned up & investment made to use of the riverside for leisure use – pavement cafes – it could be lovely.
- A place where there is a wide range of employment opportunities including non-skilled, skilled and professional.
- Low carbon economy driven by local investment opportunities in local renewable energy projects.
- Ideally by 2025 Melksham should be prosperous, vibrant and a pleasant place to live in the best traditions of an English market town. Notwithstanding the requirement for the country as a whole to be economically sound, the town itself needs an effective and efficient economy with the people and businesses capable of achieving and maintaining it.
- Clearly there must be something about Melksham that will encourage the entrepreneurs to live in or near the town and site their businesses here.
- Encouragement for companies to come to Melksham to provide meaningful, stable and permanent employment for local people.
- Improve the appearance of the Avonside Enterprise Park and entice more tenants.
- We need more hotel rooms and a decent restaurant or two.
- Improving the image of the town centre, with landlords being encouraged to update their properties while keeping the feeling of a small market town.

-
- Priority for creation of new jobs.
 - Make use of the riverside – with investment, effort it could be so lovely to access for leisure – footpaths, clean up, tidy up.

6. NEXT STEPS

This document brings together a range of information as the start of a conversation within the town, with property and business owners, with planners and local authorities and anyone else whose input and knowledge can contribute to the future of the town. As such – and bearing in mind the footnotes with links to more intensive reading – we hope this report will help in the development of ideas and practical actions.

It will be clear that these proposals suggest the Town Council taking a lead in areas over which it has no legal authority. However we would argue it has the moral authority and the expectation of the townspeople to act on their behalf in shaping the future.

These actions will also need to be phased and merged into the nascent Neighbourhood Plan. We have already discussed with the NP consultants that master planning of the town centre is going to be a strategic project in the Plan – and that the eventual Review of the NP will provide scope to ensure proposed actions can be taken within the legal scope of the NP.

There are a number of actions recommended in the report that should help further drive progress:

1. Create **A COMPLETE REGISTER OF RETAIL AND COMMERCIAL PROPERTIES IN THE TOWN**. We have also suggested this should include Bowerhill and Hampton Park (see page 34). The register would include the following information:
 - Name, address and contact details of freehold owner of the property
 - Planning use
 - Name, address and contact details of lessee, as relevant
 - Plans of premises (if available)
 - Description of use (e.g. type of retail)
 - Photograph of exterior
 - Any additional material that might be of use, e.g. recent planning applications.

This will be a time-consuming exercise but we might approach the student community for help with data crunching. A process will also need to be put in place to keep the register updated, as well as a process for retaining and filing any public information that may be relevant, such as press clippings. As well as providing a key resource for the development of an eventual masterplan for the town centre (without which progress will be more difficult to achieve), over time the register will provide invaluable background for the Town Council, enabling accurate and efficient responses to simple and complex queries.

2. Develop **A VISION FOR THE FUTURE OF THE TOWN**. Once the register is under way, it makes sense to start with a plan for how the town sees itself evolving. Successful communities always have a plan for the future – and a community plan, or vision, is simply a blueprint for the future. It is anchored in the ‘personality’, the ‘DNA’ of the place. Some of the best town visions are simple – but they must also be strategic and strongly focused. We do not envisage this as a significant public consultation exercise. The work on the Neighbourhood Plan has included extensive consultation and there is much helpful raw material. Rather, we anticipate bringing together a broad range of stakeholders – including business owners, residents, young people, older people, long-time residents and newly arrived.

Once the work on a vision is under way, we propose four working groups to explore specifics that will need to meld into the vision and eventual detailed planning work.

3. The first **WORKING GROUP** (including external-sourced expertise) should begin deliberations about **THE FUTURE OF THE AVONSIDE ENTERPRISE PARK, THE UPSIDE BUSINESS PARK, AND THE COOPER TIRES SITE**. The emphasis should be on creating a genuine partnership between the town and the landowners in which each party recognises the benefits the others can bring in reaching a workable and satisfactory solution. The Group should develop its own range of key expectations to promote – for example, creating a coworking space/innovation hub to complement the town’s significant and substantial engineering skills.
4. The second Working Group (also including external-sourced expertise) should consider the creation of a **MELKSHAM IMPROVEMENT DISTRICT**, based on the Scottish Improvement Districts model (or similar), which seek to provide a vehicle for local businesses to work together with other public and private sector

partners to improve local economies and, by extension, local communities in a variety of contexts. At their heart, they are the realisation of a meaningful corporate–community–public partnership working collaboratively to deliver better local economic and social outcomes⁴⁶. As part of its brief, this Group would be custodians of proposals for improving the core retail areas of the town.

5. The third Working Group (also including external-sourced expertise) should undertake an initial **STUDY LEADING TO A MOVEMENT STRATEGY FOR THE FUTURE OF THE TOWN**. This is movement of people, goods, vehicles throughout the town and will prepare for a future over the next 15 years in line with the needs of the climate emergency. Once again, the emphasis should be on creating a genuine partnership between the town and a range of parties in which each party recognises the benefits the others can bring in reaching a workable and satisfactory solution.
6. The fourth Working Group should **EXPLORE THE FINANCIAL SIDE OF THE FUTURE VISION** – including sources of investment, fundraising through grants and public funding, the viability of various alternatives.
7. To start the process, and in order to open minds, we suggest holding a **DEBATE ON THE FUTURE OF MARKET TOWNS**. This will cover the key opportunities and concerns facing market towns in the next 15 years (broadly outlined in this report), using Melksham as an exemplar. Townswork organised a similar exercise (covering market towns in general, rather than focusing on a particular town) a few years ago in partnership with the RSA (Royal Society of Arts) and with the support of Wiltshire Council. We would be excited to run this debate along similar lines and have a roster of potential speakers in mind who can inspire and challenge in equal measure.

I understand there is much to digest in this report, with a number of substantial recommendations. I hope that, once the Town Council has had an opportunity to read and digest its contents, I may have the opportunity to help work with the Council to determine the best way forward.

Gerald Milward-Oliver
18 November 2019.

⁴⁶ <https://improvementdistricts.scot/>

APPENDIX

PLANNING USE CLASSES

The following list gives an indication of the types of use which may fall within each use class⁴⁷:

► PART A

- A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes
- A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops - these are now classed as "sui generis" uses (see below)
- A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes
- A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs) including drinking establishments with expanded food provision
- A5 Hot food takeaways - For the sale of hot food for consumption off the premises.

► PART B

- B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area
- B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
- B8 Storage or distribution - This class includes open air storage.

► PART C

- C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)
- C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres
- C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks
- C3 Dwellinghouses - This class is formed of three parts
- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child
- C3(b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger
- C4 Houses in multiple occupation - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

► PART D

- D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non-residential education and training centres

⁴⁷ https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

-
- D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).

► **SUI GENERIS**

- Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.

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Section 1 – Annual Governance Statement 2019/20

We acknowledge as the members of:

Melksham Town Council
ENTER NAME OF AUTHORITY

our responsibility for ensuring that there is a sound system of internal control, including arrangements for the preparation of the Accounting Statements. We confirm, to the best of our knowledge and belief, with respect to the Accounting Statements for the year ended 31 March 2020, that:

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

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

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

20/08/2020

and recorded as minute reference:

57/20.2

MINUTE REFERENCE

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

Chairman

FOR SIGNATURE REQUIRED

Clerk

Stephen P. Mullan RED

Other information required by the Transparency Codes (not part of Annual Governance Statement)

Authority web address

www.melkshamtown.co.uk

AUTHORITY WEBSITE ADDRESS

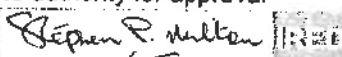
Section 2 – Accounting Statements 2019/20 for

Melksham Town Council
ENTER NAME OF AUTHORITY

	Year ending		Notes and guidance
	31 March 2019 £	31 March 2020 £	
1. Balances brought forward	929,063	1,147,312	Total balances and reserves at the beginning of the year as recorded in the financial records. Value must agree to Box 7 of previous year.
2. (+) Precept or Rates and Levies	763,750	844,910	Total amount of precept (or for IDBs rates and levies) received or receivable in the year. Exclude any grants received.
3. (+) Total other receipts	338,253	377,354	Total income or receipts as recorded in the cashbook less the precept or rates/levies received (line 2). Include any grants received.
4. (-) Staff costs	399,267	465,177	Total expenditure or payments made to and on behalf of all employees. Include gross salaries and wages, employers NI contributions, employers pension contributions, gratuities and severance payments.
5. (-) Loan interest/capital repayments	0	0	Total expenditure or payments of capital and interest made during the year on the authority's borrowings (if any).
6. (-) All other payments	484,487	863,812	Total expenditure or payments as recorded in the cash-book less staff costs (line 4) and loan interest/capital repayments (line 5).
7. (=) Balances carried forward	1,147,312	1,040,588	Total balances and reserves at the end of the year. Must equal (1+2+3) - (4+5+6).
8. Total value of cash and short term investments	1,160,980	1,011,595	The sum of all current and deposit bank accounts, cash holdings and short term investments held as at 31 March – To agree with bank reconciliation.
9. Total fixed assets plus long term investments and assets	5,385,233	5,692,083	The value of all the property the authority owns – it is made up of all its fixed assets and long term investments as at 31 March.
10. Total borrowings	0	0	The outstanding capital balance as at 31 March of all loans from third parties (including PWLB).
11. (For Local Councils Only) Disclosure note re Trust funds (including charitable)	Yes	No	The Council, as a body corporate, acts as sole trustee for and is responsible for managing Trust funds or assets.
		✓	N.B. The figures in the accounting statements above do not include any Trust transactions.

I certify that for the year ended 31 March 2020 the Accounting Statements in this Annual Governance and Accountability Return have been prepared on either a receipts and payments or income and expenditure basis following the guidance in Governance and Accountability for Smaller Authorities – a Practitioners' Guide to Proper Practices and present fairly the financial position of this authority.

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



Date

29/07/2020

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

20/08/2020

as recorded in minute reference:

57/20.3

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



Section 3 – External Auditor Report and Certificate 2019/20

In respect of

Melksham Town Council WI0161

1 Respective responsibilities of the body and the auditor

This authority is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The authority prepares an Annual Governance and Accountability Return in accordance with *Proper Practices* which:

- summarises the accounting records for the year ended 31 March 2020; and
- confirms and provides assurance on those matters that are relevant to our duties and responsibilities as external auditors.

Our responsibility is to review Sections 1 and 2 of the Annual Governance and Accountability Return in accordance with guidance issued by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General (see note below). Our work **does not** constitute an audit carried out in accordance with International Standards on Auditing (UK & Ireland) and **does not** provide the same level of assurance that such an audit would do.

2 External auditor report 2019/20

Except for the matters reported below, on the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met.

The smaller authority has submitted its AGAR and supporting documentation prior to 30 November 2020; however, we have not been able to complete our review work in time to enable the smaller authority to publish the required documentation in line with statutory requirements. Once we have completed our review a final report will be provided with the certificate of completion detailing any qualifications and 'other' matters.

An invoice for the standard annual review fee (and chaser letter charges where they apply) has been issued with this interim certificate; however, this interim invoice does not fall due for payment until we certify completion and issue our final report and certificate. Should we receive challenge correspondence before we have certified completion, any additional fees arising from additional work required as a result of that correspondence will be invoiced with the certificate of completion; where no additional fees apply a zero invoice will be issued on completion. Both the interim and final invoices do not fall due for payment until we issue our final invoice with the certificate of completion.

Other matters not affecting our opinion which we draw to the attention of the authority:

Please see above.

3 External auditor certificate 2019/20

We do not certify that we have completed our review of Sections 1 and 2 of the Annual Governance and Accountability Return, and discharged our responsibilities under the Local Audit and Accountability Act 2014, for the year ended 31 March 2020

We do not certify completion because:

We have received the AGAR and supporting documentation but we have not been able to complete our review work prior to 30 November 2020.

External Auditor Name

PKF LITTLEJOHN LLP

External Auditor Signature

PKF Littlejohn LLP

Date

29/11/2020

* Note: the NAO issued guidance applicable to external auditors' work on limited assurance reviews for 2019/20 in Auditor Guidance Note AGN/02. The AGN is available from the NAO website (www.nao.org.uk)

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Melksham Town Council

Notice of conclusion of audit Annual Return for the year ended 31 March 2020

Sections 20(2) and 25 of the Local Audit and Accountability Act 2014

Accounts and Audit Regulations 2015 (SI 2015/234)

Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 (SI 2020/404)

	Notes
1. The audit of accounts for Melksham Town Council for the year ended 31 March 2020 has been completed and the accounts have been published.	This notice and Sections 1, 2 & 3 of the AGAR must be published by 30 November. This must include publication on the smaller authority's website. The smaller authority must decide how long to publish the Notice for; the AGAR and external auditor report must be publicly available for 5 years.
2. The Annual Governance & Accountability Return is available for inspection by any local government elector of the area of Melksham Town Council on application to:	
(a) <u>PATSY CLOVER - ASSISTANT TO THE TOWN CLERK</u> <u>TOWN HALL MARKET PLACE</u> <u>MELKSHAM SN12 6ES</u>	(a) Insert the name, position and address of the person to whom local government electors should apply to inspect the AGAR
(b) <u>BY EMAIL REQUEST TO</u> <u>PATSY.CLOVER@MELKSHAM-TC.GOV.UK</u>	(b) Insert the hours during which inspection rights may be exercised
3. Copies will be provided to any person on payment of <u>£10</u> (c) for each copy of the Annual Governance & Accountability Return.	(c) Insert a reasonable sum for copying costs
Announcement made by: (d) <u>PATSY CLOVER</u> <u>ASSISTANT TO THE TOWN CLERK</u>	(d) Insert the name and position of person placing the notice
Date of announcement: (e) <u>2 FEBRUARY 2021</u>	(e) Insert the date of placing of the notice

Final External Auditor Report and Certificate 2019/20 in respect of Melksham Town Council WI0161

Respective responsibilities of the body and the auditor

This authority is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control. The authority prepares an Annual Governance and Accountability Return in accordance with Proper Practices which:

- summarises the accounting records for the year ended 31 March 2020; and
- confirms and provides assurance on those matters that are relevant to our duties and responsibilities as external auditors.

Our responsibility is to review Sections 1 and 2 of the Annual Governance and Accountability Return in accordance with guidance issued by the National Audit Office (NAO) on behalf of the Comptroller and Auditor General (see note below). Our work **does not** constitute an audit carried out in accordance with International Standards on Auditing (UK & Ireland) and **does not** provide the same level of assurance that such an audit would do.

External auditor report 2019/20

On 29 November 2020, we issued a report detailing the results of our limited assurance review of Sections 1 and 2 of this authority's Annual Governance & Accountability Return for the year ended 31 March 2020. We explained that we were unable to certify completion of the review at that time. We are now in a position to certify completion of the review.

The external auditor report given in Section 3 of the Annual Governance & Accountability Return requires amendments as follows:

Except for the matters reported below, on the basis of our review of Sections 1 and 2 of the Annual Governance and Accountability Return (AGAR), in our opinion the information in Sections 1 and 2 of the AGAR is in accordance with Proper Practices and no other matters have come to our attention giving cause for concern that relevant legislation and regulatory requirements have not been met.

Section 1, Assertion 5 has been incorrectly completed. Information received from the internal auditor in the Annual Internal Audit Report indicates that the risk assessment was not approved by the smaller authority during the year under review and so this Assertion should have been answered "No". The smaller authority has confirmed that the risk assessment has taken place since the year end.

Other matters not affecting our opinion which we draw to the attention of the authority:

We note that the smaller authority did not comply with Regulation 15 of the Accounts and Audit Regulations 2015 as amended by SI 2020/404 the Accounts and Audit (Coronavirus) (Amendment) Regulations 2020 as it failed to make proper provision during the year 2020/21 for the exercise of public rights, since the period for the exercise of public rights did not start on or before 1 September 2020. As a result, the smaller authority must answer 'No' to Assertion 4 of the Annual Governance Statement for 2020/21 and ensure that it makes proper provision for the exercise of public rights during 2021/22.

External auditor certificate 2019/20

We certify that we have completed our review of Sections 1 and 2 of the Annual Governance & Accountability Return, and discharged our responsibilities under the Local Audit and Accountability Act 2014, for the year ended 31 March 2020.

PKF Littlejohn LLP

PKF Littlejohn LLP
22/01/2021

Tel: +44 (0)20 7516 2200 • www.pkf-l.com

PKF Littlejohn LLP • 15 Westferry Circus • Canary Wharf • London E14 4HD

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Melksham Town Council

Internal Audit Report: Interim 2020-21

Stuart J Pollard

*Director
Auditing Solutions Ltd*

Background

Statute requires all town and parish councils to arrange for an independent annual internal audit examination of their accounting records and systems of internal control and for the conclusions to be reported in the Annual Governance and Accountability Return (AGAR).

This report sets out the work undertaken in relation to the 2020-21 financial year, during our interim review of the Council's records for the year, which was again undertaken remotely due to the ongoing Covid-19 situation and restrictions in early February 2021. We wish to thank the Town Clerk and her staff for assisting the process, providing all requested documentation in hard copy and electronic format to facilitate commencement of our review for the year.

Internal Audit Approach

In undertaking our review, we have again had regard to the materiality of transactions and their susceptibility to potential mis-recording or misrepresentation in the year-end Statement of Accounts / AGAR. Our programme of cover is designed to afford assurance that the Council's financial systems remain robust and operate in a manner to ensure effective probity of transactions and to afford a reasonable probability of identifying any material errors or possible abuse of the Council's own and the national statutory regulatory framework. The programme is also designed to facilitate our completion of the 'Internal Audit Report' in the Council's AGAR, which requires independent assurance over a series of internal control objectives.

We hope to be able to conduct the final review on site in the spring / summer and will liaise with the Clerk and Finance Officer to determine the approach to be taken nearer that time, which will obviously be dependent on the prevalent Covid situation and be timed to follow closedown of the year's Omega Accounts.

Overall Conclusions

We are pleased to advise that, based on the work undertaken to date, officers continue to maintain adequate and effective internal control arrangements with a few issues identified requiring attention. Details of those issues are set out in the following detailed report with any resultant recommendations further summarised in the appended Action Plan: we ask that the report be presented to members and a formal response be provided in advance of our final visit / review to those recommendations indicating the actions taken and / or in hand at that time.

Detailed Report

Maintenance of Accounting Records & Bank Reconciliations

Officers maintain the Council's accounting records using the RBS Omega software with two separate bank accounts in place at Lloyds relating to the Assembly Hall and two at the Co-op for the main Council's transactions, with detail of the latter two recorded in a single cashbook with a "sweep" arrangement in place to retain a £5,000 balance in the Current Account. Further funds are held in a Lloyds Periodic short-term deposit with a further small sum held in the CCLA Deposit Fund.

Our objective here is to ensure that the accounting records are being maintained accurately and currently and that no anomalous entries appear in cashbooks or financial ledgers. We have consequently: -

- Verified the accuracy of the opening Omega Trial Balance by reference to the certified AGAR and last year's closing Omega Trial Balance detail;
- Ensured that the financial ledger remains "in balance" at 31st December 2020;
- Verified detail in each of the Council's three main cashbook accounts for three months of the year (April, August & December 2020) by reference to the underlying bank statements in the four bank accounts in everyday use; and
- Checked and agreed detail on the same three cashbook accounts' bank reconciliations as at 30th April, 31st August and December 2020.

Conclusions and recommendations

Whilst we are pleased to record that no significant issues arise in this area, we have seen no indication from the documents provided for our examination that bank reconciliations have been subjected to periodic scrutiny and formal sign-off by a nominated councillor, as required by the Council's Financial Regulations (Para 2.2) adopted in April 2019 in line with the NALC model document. We note that, following receipt of our 2019-20 report pointing out this requirement that the Council has agreed to implement such a review: we also appreciate that, given the ongoing Covid situation, it has probably not been possible to implement this check to date. However, several of our clients have made appropriate arrangements to address this requirement providing the nominated councillor with electronic copies of the bank reconciliations and bank statements for their review and sign-off, requesting them to scan and return the documents to the office for retention and subsequent audit examination. To ensure that this requirement is not overlooked going forward, we reiterate the recommendation.

We also note the existence of two cheques issued in July 2020 that remain uncleared through the Council's bank accounts as at 31st December. As indicated in last year's report, where cheques remain uncleared for 3 or more months, the payee should be contacted to establish whether they have received, misplaced or otherwise overlooked banking of the cheque and / or require a replacement.

R1. The Council should implement the agreed independent review and sign-off of bank reconciliations by a nominated councillor in accordance with the adopted Financial Regulations (Para 2.2 refers).

- R2. Where cheques remain uncleared through the Council's bank account for a significant period appropriate follow up action should be taken to determine whether a replacement is required, or the payee no longer requires the cheque.*

Review of Corporate Governance & Regulatory Framework

Our objective here is to ensure that the Council has a robust regulatory framework in place, that as far as we are reasonably able to ascertain as we do not attend meetings Council and Committee meetings are conducted in accordance with the adopted Standing Orders (SOs) and that no actions of a potentially unlawful nature have been or are being considered for implementation.

We note that the Council's SOs and Financial Regulations (FRs) have both been subjected to relatively recent review and re-adoption and have reviewed their content: whilst we note that they are in line with the latest NALC model documents including appropriate reference to the requirements of the 2015 Public Contracts Regulations with the limit for formal tender action set at £25,000, the SOs appear to imply (Para 20.a.v) that formal tender action may be waived for tenders below £50,000, whilst the FRs refer to a uniform tender limit of £25,000 (Paras. 11.1.b & h). A consistent value for tender action should be identified in both documents.

We have reviewed the minutes of the full Council and standing committees, excluding those relating to planning issues, for the financial year to date to ensure that as far as we may reasonably be expected to ascertain, the Council has neither considered nor is considering taking any action that may result in ultra vires expenditure being incurred.

Conclusions and recommendation

We are pleased to record that no significant issues arise in this area at the present time, although we suggest that, when next reviewed, either the SOs and /or FRs be amended to reflect the same tender limit: we shall continue to review the Council's approach to governance at future visits, also continuing our review of minutes.

- R3. The Standing Orders and Financial Regulations should record a consistent value for formal tender action.*

Review of Expenditure & VAT

Our aim here is to ensure that: -

- Council resources are released in accordance with the approved procedures and budgets;
- Payments are appropriately supported, either in the form of an original trade invoice or other appropriate form of document confirming the payment as due and/or an acknowledgement of receipt, where no other form of invoice is available;
- All discounts due on goods and services supplied are identified and appropriate action taken to secure the discount;
- An official order has been raised on each occasion when one would be expected;
- The correct expense codes have been applied to invoices when processed; and
- VAT has been appropriately identified and coded to the control account for periodic recovery.

We are pleased to note that, following our previous recommendation, the use of separate certification slips has ceased with an appropriately designed rubber certification stamp acquired and now in use

on purchase invoices. Whilst councillors attend the offices to sign cheques and initial the Omega generated schedules of payments, which also identify the cheque reference number, we have seen no indication that they are initialling the certification stamp on the individual invoices. We do not wish to imply that any improper action by the Finance Officer, but suggest that to further reduce risk, including the potential for duplicated payments arising, members should, when signing cheques, or authorising the release of payments online, also initial or sign-off the hard copy invoices.

To ensure compliance with the above criteria, we have selected a sample of payments in the year to 31st December 2020 for examination. Our test sample includes 54 individual payments and totals £333,400 equating to 66% by value of non-pay related payments in the year to that date. In examining the selected sample, we were initially unable to trace invoices supporting 11 of our selection, 8 of which related to grants paid out. We understand that the grants, whilst now paid online, were accompanied with a request for a response confirming receipt of the grant which have duly been received and are held on the Council offices: we will examine these at our final review, assuming we are able to attend the offices at that time.

Obviously, our task in reviewing the documents has again proved more difficult than would normally be the case were we able to visit the Council and we wish to thank the Finance Officer for her assistance in attempting to track down the “missing” documentation: she is continuing to acquire the relevant confirmatory evidence supporting these few payments and we will, on receipt of the relevant documents update this report accordingly.

In checking the above sample of invoices, we noted that the cost of “locum” staff provision totalling approximately £18,000 to date has been coded to nominal account code 4000 in the Omega accounts, which is automatically linked as a “Staff cost” at Section 1, Box 4 of the AGAR. As the locum costs are invoiced and not paid through the payroll, they should be coded to a separate / new nominal account code and be regarded as Agency staff linked to Box 6 of the AGAR.

We also noted a minor error on the September 2020 payment to Water2Business, which is paid monthly by direct debit of £19.00, with VAT recorded as recoverable for that month’s payment: water rates are a non-vatable supply and no VAT has been identified on the other monthly payments.

We had hoped to review the procedures in place for seeking tenders / quotations for work on behalf of the Council at this review, but due to the ongoing “lockdown” we have not been able to examine this aspect at this time, but will do so as soon as we are able to schedule our final review visit for the year, which we would hope to be able to undertake on site in the summer.

We note that VAT reclaims are prepared and submitted to HMRC for repayment at the end of each quarter and have checked and agreed detail of the final 2019-20 quarter reclaim, together with the first two reclaims for 2020-21 ensuring appropriate recovery of the amounts by reference to the control account.

Conclusions and recommendations

Whilst pleased to note the acquisition of a rubber certification stamp and as set out in our 2019-20 report, we urge that members also evidence their review of the invoices when signing cheques, etc on the actual invoices as well as the accompanying Omega generated schedule of payments by initialling the certification stamp now being placed on each invoice and reiterate last year’s recommendation accordingly.

The identified miscodings, as detailed above, will need to be amended prior to closing down the year’s accounts.

We shall extend our test sample of purchase invoices at our final review, also examining the last two quarters VAT reclaims and agreeing detail to the Omega control account.

- R4. *Members should evidence their examination of invoices, duly initialling the authorisation boxes on the rubber certification stamp now affixed to invoices.*
- R5. *The identified miscodings / analysis of staff costs should be corrected prior to the financial year-end.*

Assessment and Management of Risk

Our aim here is to ensure that the Council has put in place appropriate arrangements to identify all potential areas of risk of both a financial and health / safety nature, whilst also ensuring that appropriate arrangements exist to monitor and manage those risks in order to minimise the opportunity for their coming to fruition.

We note that a Risk Management Register has been developed and will be presented to the March 2021 Council meeting for formal approval and adoption and will review the document and ensure its formal adoption at our final visit.

We have examined the Council's 2020-21 insurance policy with WPS and consider that appropriate cover is in place with Public and Employer's Liability in place at £15 million and £10 million respectively, together with Fidelity Guarantee cover at £1 million and Business Interruption – Loss of Revenue cover also in place at £337,414, which adequately covers the Assembly Hall and Town Hall hire income.

We also note that annual inspections of play areas are undertaken by a RoSPA accredited company, supplemented by regular "in-house" inspections with any remedial works required undertaken either by the Council's own maintenance staff or an appointed specialist contractor.

Conclusions

We are pleased to record that no issues arise in this area currently warranting formal comment or recommendation.

Budgetary Control and Reserves

Our objective here is to ensure that the Council has a robust procedure in place for identifying and approving its future budgetary requirements and level of precept to be drawn down from Wiltshire Council: also, that an effective reporting and monitoring process is in place. We also aim to ensure that the Council retains appropriate funds in general and earmarked reserves to finance its ongoing spending plans, whilst retaining appropriate sums to cover any unplanned expenditure that might arise.

We note that, following due and significant deliberation / debate, the Council agreed its budgetary and precept requirements for 2021-22 setting the latter at £918,750 at the 25th January 2021 full Council meeting.

We are pleased to note that members continue to be provided with routine budget reports throughout the year based on the accounting software with questions raised periodically and investigated accordingly. We have reviewed the latest Omega budget report (as at 31st December 2020) seeking

and obtaining appropriate explanations for the few significant variances arising by reference to the detailed transaction reports in the Omega nominal account codes. Consequently, no further issues arise other than the aforementioned need to remove the cost of locum staff from the exiting nominal account code to ensure their exclusion from reporting as a Box 4 expense in the AGAR at Section 2.

Conclusions

No issues arise in this area warranting formal comment or recommendation currently. We will undertake further work at our final review, examining the final budget outturn for the year, and assessing the ongoing appropriateness of the level of retained reserves to fund planned revenue spending and development aspirations.

Review of Income

Our objective in this area is to ensure that the Council identifies and recovers all income to which it is entitled and has appropriate arrangements in place to ensure its prompt recovery.

Our work in this area has, of necessity due to the ongoing Covid-19 situation, been significantly restricted, as the Council's various premises are currently closed with a consequent reduction in the level of income received. Notwithstanding that, we have examined the recovery of income from the various allotment sites for 2020-21 by reference to the spreadsheet registers of tenants and fees payable being maintained by officers. The tenancy year runs from 1st March annually with tenants generally being invoiced in February and the majority paying their rents prior to 31st March annually. In total, rental income per the register of tenants records total income due of £4,600, of which (for 2020-21) over £4,000 was received prior to 31st March 2020, the balance being received and accounted for in the current financial year.

Due to the detail of income received being recorded in the Omega accounts in blocks rather than identifying which tenants' income is being brought to account and the absence of detail on the spreadsheet record of detail of the date of payment, we have only been able to establish in broad terms that all income due has in fact been recovered. We note that the Council has acquired the Rialtas Allotment package, but has not, as yet, due to the Covid situation, been able to implement it for the 2021-22 allotment rental year. Consequently, we suggest that to ensure that an appropriate audit trail is in existence, detail of the date of receipt and banking of tenancy fees be recorded on the allotment register.

The Council does not use the Rialtas Omega Sales Ledger currently and, consequently, we have not been able to assess the extent of any outstanding debt at the present time, other than noting the existence of an Assembly Hall debt of £6,228.01, which has remained unchanged since the close of 2019-20 (Code 102 refers). We will, consequently, examine any relevant documentation maintained in respect of that one outstanding debt and any others existing at the current financial year-end at our final review ensuring that appropriate follow up procedures are in place to pursue any such long-standing debts.

The Council should / may wish to consider acquiring and using the Omega Sales Ledger to help manage debt collection, given the volume of allotment tenants and, under normal circumstances, income arising from hire of the Council's various facilities (room hire and property leases).

Finally, in this area, we have examined the nominal income transactions for the year to date recorded in the Omega accounts with no obvious mis-postings or areas of uncollected debt apparent: we do, however, understand that income in respect of certain leased premises was waived for part of the year due to the Covid situation.

Conclusions and recommendations

Whilst we are pleased to record that no significant issues of concern arise in this area currently, we suggest that, until such time as the Rialtas Allotment package is implemented, the existing allotment spreadsheet register be expanded to include detail of the dates when the Council receives tenants' rents together with the amounts received.

- R6. *The existing allotment register detail should be expanded to include detail of the date of receipt of tenants' fees and the amount received to provide a comprehensive and clear audit trail.*
- R7. *Consideration should be given to acquiring the Rialtas Sales Ledger addition to the existing Omega accounts package to assist in the raising of invoices and management of debt.*

Petty Cash Account

We are required, as part of the AGAR internal audit certification process to assess the Council's approach to and control of the management of petty cash account transactions. The Council operates a small petty cash account with periodic round sum (generally £200) top-ups as and when required (3 to date in 2020-21). Additionally, a bar "change float" is held at the Assembly Rooms.

Conclusions

Due to our not being able to visit the Council, we have not undertaken any work in this area currently and intend to review the controls in place, also examining a sample of the year's transactions at our final review.

Review of Staff Salaries

In examining the Council's payroll function, we aim to confirm that extant legislation is being appropriately observed as regards adherence to the Employee Rights Act 1998 and the requirements of HMRC legislation as regards the deduction and payment over of income tax and NI contributions and the implementation of the nationally agreed pay award payable from 1st April 2020 with staff also assimilated to the revised pay spinal points. The pay award was implemented with the October salary payment together with arrears due backdated to 1st April 2020. We note that preparation of the monthly payroll is outsourced to Wiltshire Council. To meet the above objective, we have:

- Examined payslips for all staff in September and October 2020 agreeing the gross salaries payable to the "Establishment record" provided for our use taking account of implementation of the pay award in the October salary payments;
- Checked the calculations of arrears paid to staff with the October salaries;
- Ensured that tax and NI deductions, together with pension contributions, have been calculated applying the appropriate tax code and NI Table, also ensuring that the relevant deductions / contributions have been paid over to HMRC and the Pension Fund Administrators accurately, and
- Ensured the accurate payment to staff of their net salaries for October 2020.

Conclusions and recommendation

We are pleased to report that no major issues have arisen from our work in this area. However, in examining the calculation of the arrears paid in October we noted that appropriate adjustment had

been made for all staff basic pay. However, where certain staff work overtime (4 in all per the September and October payslips), the October payslips only reflect adjustment for overtime hours paid in their September salaries based on the revised hourly pay rates. Whilst it may be that no overtime hours were worked between April and August inclusive due to the Covid situation, we suggest that the position be checked and, if appropriate, the next month's salary payment be adjusted to include the uplifted hourly rate for any overtime worked and paid between April and August.

- R8. *Staff salaries paid between April and August should be checked to establish whether any staff worked overtime in those five months: if so, their next monthly pay should be adjusted to include the pay award arrears in respect of that overtime.*

Investments and Loans

We aim here to ensure that the Council is maximising its interest earning potential through the "investment / deposit" of surplus funds in appropriate interest bearing accounts/deposits. Despite the level of retained funds at the prior year-end (> £1 million), the Council only received £512 that year and has, to date in 2020-21 received no interest on the amounts deposited. Whilst we acknowledge the impact of the Covid situation on interest rates generally, the Council should seek to ensure that interest earning opportunities are maximised in accordance with its adopted Investment Policy, which appears to have been last reviewed in May 2018.

In examining the Investment Policy content at last year's final review, we noted that it refers to legislation and associated guidance as "*optional for parish councils where investments are not expected to exceed £500,000 and no action is required below £10,000*" (Para 1.3 refers). Legislation changed in April 2018 and now requires all councils with funds in excess of £100,000 to adopt a formal Investment Policy / Strategy. Whilst the Council's funds exceed the former £500,000 threshold, the Policy / Strategy needs update to reflect the above legislative change.

Whilst we appreciate that, in the present circumstances, the opportunities for gaining a reasonable rate of return on funds held in bank accounts are very limited, councils have a duty to endeavour to maximise their interest earning opportunities, whilst ensuring public funds are appropriately safeguarded. With over almost £500,000 held currently in the combined two Co-op accounts and almost £650,000 in the two Assembly Hall accounts, should either fail, the Council would, at best, only be able to recover a maximum of £85,000 through the Governments Compensation Scheme from each bank.

The Council has no loans repayable to external bodies at the present time.

Conclusions and recommendations

Whilst no significant control issues arise in this area, we remain concerned that the Council does not appear to be seeking to maximise its interest earning potential and, with the majority of funds effectively held in two banks, it also remains at a high degree of risk of loss should either bank "fail", however unlikely that may be.

- R9. *The extant Investment Policy should be amended to reflect current legislative requirements and be subjected to regular, ideally annual, review and formal re-adoption.*

- R10. Consideration should be given to the diversification of funds into further banking institutions to ensure the funds are fully and effectively protected against potential loss in the event that either bank should “fail”.*
- R11. The Council should review available investment opportunities to ensure that interest earning potential is maximised whilst continuing to ensure that funds are adequately protected.*

Rec. No.	Recommendation	Response
Review of Accounting Records and Bank Reconciliations		
R1	The Council should implement the agreed independent review and sign-off of bank reconciliations by a nominated councillor in accordance with the adopted Financial Regulations (Para 2.2 refers).	
R2	Where cheques remain uncleared through the Council's bank account for a significant period appropriate follow up action should be taken to determine whether a replacement is required, or the payee no longer requires the cheque.	
Review of Corporate Governance		
R3	The Standing Orders and Financial Regulations should record a consistent value for formal tender action.	
Review of Expenditure & VAT		
R4	Members should evidence their examination of invoices, duly initialling the authorisation boxes on the rubber certification stamp now affixed to invoices.	
R5	The identified miscodings / analysis of staff costs should be corrected prior to the financial year-end.	
Review of Income		
R6	The existing allotment register detail should be expanded to include detail of the date of receipt of tenants' fees and the amount received to provide a comprehensive and clear audit trail.	
R7	Consideration should be given to acquiring the Rialtas Sales Ledger addition to the existing Omega accounts package to assist in the raising of invoices and management of debt.	
Review of Staff Salaries		
R8	Staff salaries paid between April and August should be checked to establish whether any staff worked overtime in those five months: if so, their next monthly pay should be adjusted to include the pay award arrears in respect of that overtime.	
Investments and Loans		
R9	The extant Investment Policy should be amended to reflect current legislative requirements and be subjected to regular, ideally annual, review and formal re-adoption.	
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Rec. No.	Recommendation	Response
Investments and Loans (Continued)		
R10	Consideration should be given to the diversification of funds into further banking institutions to ensure the funds are fully and effectively protected against potential loss in the event that either bank should “fail”.	
R11	The Council should review available investment opportunities to ensure that interest earning potential is maximised whilst continuing to ensure that funds are adequately protected.	

Internal Audit Report – Interim 2020/2021 – Recommendations and Actions Taken

1. R1 – The Council should implement the agreed independent review and sign-off of bank reconciliations by a nominated councillor in accordance with the adopted financial regulations.

Councillors Brown and Watts were tasked with doing this. Reminder email sent to them 17 February with the Finance Officer/ Assistant to the Town Clerk to email bank reconciliations to them.

2. R2 – Where cheques remain uncleared through the Council's bank account for a significant period, appropriate follow-up action should be taken to determine whether a replacement is required, or the payee no longer requires the cheque.

Email to the Finance Officer 22 February asking her to investigate the two cheques issued in July 2020, referred to in the report.

3. R3 - The Standing Orders and Financial Regulations should record a consistent value for tender action.

It appears that the Standing Orders are out of kilter. The Assistant to the Town Clerk is to amend these to show £25,000, prior to their next review.

4. R4 – Members should evidence their examination of invoices, duly initialling the authorisation boxes on the rubber certification stamp now affixed to invoices.

Email to the Councillors responsible for this 22 February, copying in the Finance Officer, asking them to do this.

5. R5 – The identified miscodings/ analysis of staff costs should be corrected prior to the financial year end.

Email to the Finance Officer 22 February asking her to make these amendments.

6. R6 – the existing allotment register detail should be expanded to detail of the date of receipt of tenants' fees and the amount received to provide a comprehensive and clear audit trail.

Email 22 February to the Finance Officer asking her to amend the register to include this information and to Town Hall staff asking them to record this information when fees are received.

7. R7 – Consideration should be given to acquiring the Rialtas Sales Ledger addition to the existing Omega accounts package to assist in the raising of invoices and management of debt.

The purchase of the Rialtas Sales Ledger addition has been agreed by the Town Clerk as has the incorporation of a purchase order system to allow committed expenditure to be shown on budget reports.

8. R8 – Staff salaries paid between April and August should be checked to establish whether any staff worked overtime in those five months; if so, their next monthly pay should be adjusted to include the pay award arrears in respect of that overtime.

The Locum Administrator has confirmed that no overtime was worked by staff between April and August.

9. R9 – The extant Investment policy should be amended to reflect current legislative requirements and be subjected to regular, ideally annual, review and formal readoption.

The Town Clerk has prepared a new investment policy which has been submitted for approval by Council.

10. R10 – Consideration should be given to the diversification of funds into further banking institutions to ensure the funds are fully and effectively protected against potential loss in the event that either bank should 'fail'.

This has been covered in the new investment policy prepared by the Town Clerk.

11. R11 – The Council should review available investment opportunities to ensure that interest earning potential is maximised whilst continuing to ensure that funds are adequately protected.

This has been covered in the new investment policy prepared by the Town Clerk.



DORSET & WILTSHIRE FIRE AND RESCUE AUTHORITY

Item 21/07

MEETING	Dorset & Wiltshire Fire and Rescue Authority
DATE OF MEETING	11 February 2021
SUBJECT OF THE REPORT	Technical rescue review
STATUS OF REPORT	For open publication
PURPOSE OF REPORT	For approval
EXECUTIVE SUMMARY	<p>This paper provides an overview of the current technical rescue provision within the Service and outlines two options to improve the efficiency and effectiveness of these specialist functions.</p> <p>Currently five stations provide technical rescue capabilities that include large animal rescue, working at height, bariatric support to the Ambulance Service, water rescue, technical search and confined space rescues. As it currently stands these stations have different combinations of technical rescue capabilities, which means that the provision across the wider Service is not aligned. This can result in an over mobilisation of firefighters and appliances to incidents, at additional cost, and can result in problems with wider crewing. In some cases, it also means that station availability is sometimes adversely impacted, particularly in the north of the Service.</p> <p>Within the water rescue element of the technical rescue, all 50 stations provide a level of capability whereby all firefighters are trained to work safely near water and perform rescues where the casualty can be reached using flotation and throw line equipment. This is known as Level 1 capability.</p> <p>In addition to this, currently crews from Bradford on Avon, Bridport, Christchurch, Malmesbury, Salisbury and Sturminster Newton have the capability to perform</p>

	<p>rescues of a higher specialism, usually where people are trapped in vehicles and homes in flood water. This is known as Level 2 capability.</p> <p>Crews at Chippenham, Poole, Stratton, Trowbridge and Weymouth have Level 3 capability, where firefighters may affect rescues from fast flowing water, through either performing a swim type rescue or with inflatable non-powered boats off rope cableways. This capability also provides a safe system of work for all other crews operating at the lower levels.</p> <p>Members are asked to consider two options to improve the efficiency and effectiveness of the Service's technical rescue capabilities, including water safety.</p> <p>The first option comprises of three teams that will be crewed by wholetime firefighters at Poole, Stratton and Weymouth. These stations have the capability to provide all technical rescue specialisms, including water rescue, in a consistent and more resilient way. This option includes maintaining a Level 2 water rescue capability at Bradford on Avon, Bridport, Chippenham, Christchurch, Malmesbury, Salisbury, Sturminster Newton and Trowbridge to allow for rescues where people are trapped in vehicles and homes in flood water. Should spate flooding conditions occur then teams from across the Service would be mobilised and local or national mutual aid arrangements initiated, as necessary. This option requires a one-off expenditure of £33,841 for training courses and £36,278 for equipment alignment, however, it provides ongoing annual savings of £29,834. In addition, capital programme costs have been reduced by £257,805.</p> <p>The second option comprises of three teams that are crewed by wholetime firefighters at Poole, Stratton and Weymouth. These stations have the capability to provide all of the technical rescue specialisms, including water rescue, in a consistent and more resilient way. This option includes maintaining a Level 2 water rescue capability at Bradford on Avon, Bridport, Christchurch, Malmesbury, Salisbury and Sturminster Newton to allow for rescues where people are trapped in vehicles and homes in flood water. This option would see Chippenham and Trowbridge retain Level 3 water rescue capability. This option has the same one-off costs as Option 1, but additional ongoing annual costs of £33,517.</p>
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	<p>The capital programme would need to be increased by £120,000 to allow for the replacement of the current vehicles at Chippenham and Trowbridge, which will increase future capital financing costs.</p> <p>Officers will present both options at the Fire and Rescue Authority meeting to build upon the Members' seminars which have already been held in November 2020, December 2020, and January 2021.</p>
RISK ASSESSMENT	Known risks have been identified within the body of the report, with potential mitigations as required.
COMMUNITY IMPACT ASSESSMENT	<p>An impact assessment has been completed which shows that the disposition of technical rescue stations in Option 1 allow at least one technical rescue resource to reach all 50 station areas within 60 minutes and meets the Service's risk profile, therefore improving the provision currently provided.</p> <p>Option 2 has additional positive community impacts, provided that an increase in revenue and capital financial provision can be allocated by Members within their Medium-Term Finance Plan.</p>
BUDGET IMPLICATIONS	<p>Option 1:</p> <p>This option would require one-off expenditure of £70,119 for training courses and equipment with ongoing annual costs of £139,550. This provides an ongoing annual saving of £29,834, compared to current costs. This option avoids the need to spend £257,805 to replace the technical rescue vehicles at the current stations.</p> <p>Option 2:</p> <p>This option would require the same one-off expenditure for training courses and equipment as Option 1 with ongoing annual costs of £173,067. This is an ongoing annual increase of £33,517 above the costs of Option 1. In addition, £120,000 would need to be added to the capital programme for vehicle replacements required in 2025-2026, reducing the capital saving from £257,805 to £137,805.</p>

RECOMMENDATIONS	<p>Members are asked to consider and approve one of the following options:</p> <p>Option 1:</p> <p>Establish three consistent technical rescue teams, aligned to the Service risk profile, that are crewed by wholetime firefighters at Poole, Stratton and Weymouth.</p> <p><i>Note: This option includes maintaining Level 2 water rescue capability at Bradford on Avon, Bridport, Chippenham, Christchurch, Malmesbury, Salisbury, Sturminster Newton and Trowbridge, to allow for rescues where people are trapped in vehicles and homes in flood water.</i></p> <p>or</p> <p>Option 2:</p> <ul style="list-style-type: none"> a) Establish three consistent technical rescue teams, aligned to the Service risk profile, that are crewed by wholetime firefighters at Poole, Stratton and Weymouth; and, b) Retain a Level 3 water rescue capability at Chippenham and Trowbridge. <p><i>Note: This option includes maintaining Level 2 water rescue capability at Bradford on Avon, Bridport, Christchurch, Malmesbury, Salisbury and Sturminster Newton to allow for rescues where people are trapped in vehicles and homes in flood water.</i></p> <p>Following a comprehensive review, the officer recommendation is Option 1.</p>
BACKGROUND PAPERS	<ol style="list-style-type: none"> 1. UK FRS National Operational Guidance- Water Rescue and Flooding (21 September 2020) 2. UK FRS National Operational Guidance- Operations: Hazard- Bodies of Water (8 May 2019) 3. Department for Environment Food and Rural Affairs (DEFRA): Flood rescue Concept of Operations (November 2019) 4. UK FRS National Operational Guidance- Incidents Involving Animals (29 March 2018) 5. National Fire Chiefs Council Operations Coordination Committee: Safe Working at Height- Team Typing (6 September 2017)

APPENDICES	<p>Appendix A - Costings, Benefits and Risks of combinations of Technical Rescue Stations.</p> <p>Appendix B - Flood Maps for Water First Responder and Water Technician stations from the Environment Agency.</p> <p>Appendix C - Details the type of flood warning and the location for which it was issued, between 2006 and 2017.</p> <p>Appendix D - Summary of the communication and engagement carried out during this technical rescue review.</p>
REPORT ORIGINATOR AND CONTACT	<p>Name: James Mahoney, Assistant Chief Fire Officer (Community Safety)</p> <p>Email: james.mahoney@dwfire.org.uk</p> <p>Tel no: 01722 691387</p>

1. Background

- 1.1 Technical rescue is an enhanced rescue capability undertaken by a limited number of stations. Technical rescue comprises of an enhanced capability in the following areas:
- Animal rescue
 - Working at height
 - Bariatric support to the Ambulance Service
 - Water rescue
 - Technical search
 - Confined space rescue
- 1.2 Technical rescue is not a statutory requirement for the Fire and Rescue Authority, and several fire and rescue services no longer have or offer this capability but instead rely on mutual aid arrangements.
- 1.3 The Service has maintained a technical rescue capability to ensure provision is made for a safe system of work for activities that are statutory. Technical rescue also enhances the Service's ability to respond to other eventualities under section 11 of the Fire and Rescue Services Act 2004 and supports our requirements outlined in the Civil Contingencies Act 2004. When planning for response to water rescues and flooding the Service follows the guidance provided within UK FRS National Operational Guidance, which refers to best practice detailed within the Department for Environment Food and Rural Affairs' Flood Rescue Concept of Operations. Guidance related to working near water or unstable surfaces is not limited to water related incidents and is included in National Operational Guidance issued by the National Fire Chiefs Council.

2. Current position

- 2.1 Currently the Service has a technical rescue capability located at five stations, which are: Chippenham, Poole, Stratton, Trowbridge and Weymouth. These are illustrated in Figure 1.

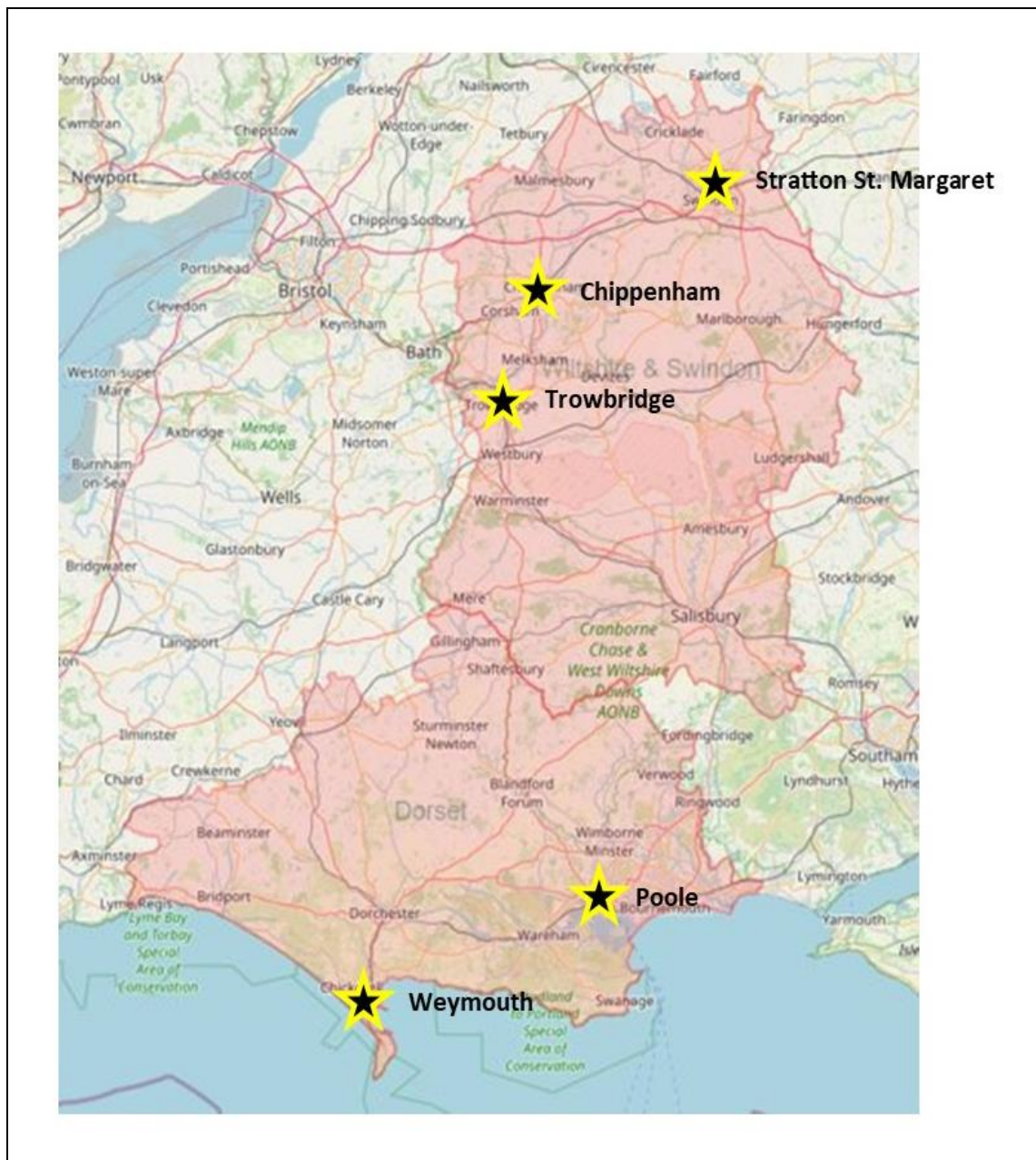


Figure 1 - Locations of current Service technical rescue capabilities.

- 2.2 The capabilities and locations of technical rescue derives from the two legacy fire and rescue services and as a result the stations deliver different levels of these capabilities. It should be noted that the rationale for the locations of these specialist services is against risk but also for practical purpose, such as, balancing the range of operational competencies for firefighters or the suitability of operational duty systems to help maintain availability.

2.3 The current technical rescue provision across the Service can be seen in Table 1.

Station	Current technical rescue Specialism	Crewing System	Number of trained staff
Chippenham	Rope, Water, Boat, Technical Confined Space	Day crewed	14
Poole	Animal, Rope, Water, Bariatric, Technical Confined Space	Two Wholetime Watches	48
Stratton	Animal, Water	Wholetime	28
Trowbridge	Rope, Water, Bariatric, Technical Confined Space, Technical Search	Day crewed	14
Weymouth	Rope, Water, Technical Search, Technical Confined Space	Wholetime	28

Table 1 - Current technical rescue provision and arrangements.

2.4 As previously stated, the current provision of technical rescue is not consistent across the Service with resultant levels of inefficiencies and potential cost avoidance. This is due to:

- i. *Operational capabilities:* Not all technical rescue stations have the full range of capabilities, therefore, some incidents require the mobilisation of more than one technical rescue station to resolve the incident. For example, if the technical rescue team at Stratton fire station is mobilised to a large animal rescue incident that requires the use of ropes, an additional team will need to be mobilised to provide the capability. This means that two stations are now engaged in an incident which may have a consequential impact on appliance availability and attendance to other emergency incidents. In some cases, it may also incur additional costs due to operational backfill arrangements.
- ii. *Equipment and vehicles:* The differences in the equipment carried by different technical rescue teams can lead to more than one technical rescue team being mobilised to an incident to provide all the equipment required to resolve the incident. Different technical rescue vehicle solutions across the Service result in inconsistencies from a fleet perspective, and this incurs additional maintenance costs. Some of the current technical rescue vehicles in the north of the Service area are already at their maximum weight capacity and unable to stow all the required equipment. This has resulted in equipment allocated to one station being kept at another. This occurs at Chippenham and Trowbridge fire stations.
- iii. *Duty systems:* Two of the stations delivering a technical rescue capability operate on a day crew duty system. These are Trowbridge and Chippenham. Technical rescue requires a minimum of five crew members and the day crew

duty system means there are occasions when the technical rescue capability is unavailable due to insufficient crews being on duty. Whilst this may affect the availability of technical rescue deployment from these stations, it does not impact on the availability of a fire appliance that require a crew of four to be deployed. In these instances, it is necessary to mobilise both of the day crewed technical rescue stations to an incident to form a full team.

- 2.5 Under delegation, the Chief Fire Officer, through his senior officers, commissioned a comprehensive review of the Service's technical rescue provision with the aim of realigning existing assets to the most efficient and effective way, addressing community risk and operational demand. No prescribed options were given to the officers conducting this review, although a parameter was set that it should operate within the current cost envelope, due to the medium-term financial cost pressures facing the Authority.
- 2.6 A significant number of variations and combinations of stations were considered by specialist officers throughout this review (see appendix A). After a significant level of discussions and a high-level option appraisal, an initial scoping report proposed a three-station solution as the best way forward. Importantly, due to the increased complexities of the new aerial ladder platform appliances, it concluded that technical rescue capabilities could not be located at the same station due to the requirement for staff to maintain too many operational competencies within the rostered time they have available.
- 2.7 Senior officers subsequently requested a more detailed feasibility study to also consider the disposition of resources between Weymouth fire station and Salisbury fire station. They asked that staff and their representative bodies be fully engaged to avoid any preconceived perceptions and to secure frontline views to ensure they were fully considered. Numerous visits to affected stations were held and representative bodies were systematically engaged.

3. Technical rescue risk profile

- 3.1 To support the wider review of technical rescue, incident data, that has been gathered in a consistent way across the Service since 1 April 2016 has been used. For the water rescue element of this review, and to put some further contextual information with regards to the spate flooding conditions, the review has also analysed:
- fire and rescue water rescue activity experienced in 2013-14 when significant spate conditions last occurred
 - strategic flood risk assessments for each unitary authority within the Service area
 - flood warning information from the Environment Agency between 2006 and 2017.

- 3.2 Between 1 April 2016 and 31 March 2020, 630 technical rescue incidents which involved large animal rescue, working at height, bariatric support to South West Ambulance Service NHS Trust (SWAST), water rescue, technical search and confined space rescues occurred within Service.
- 3.3 Of the 630 incidents where technical rescue assets were mobilised, only 335 (53%) required a technical rescue capability to resolve the incident. The number of which, split by capability type, can be seen below in Figure 2.

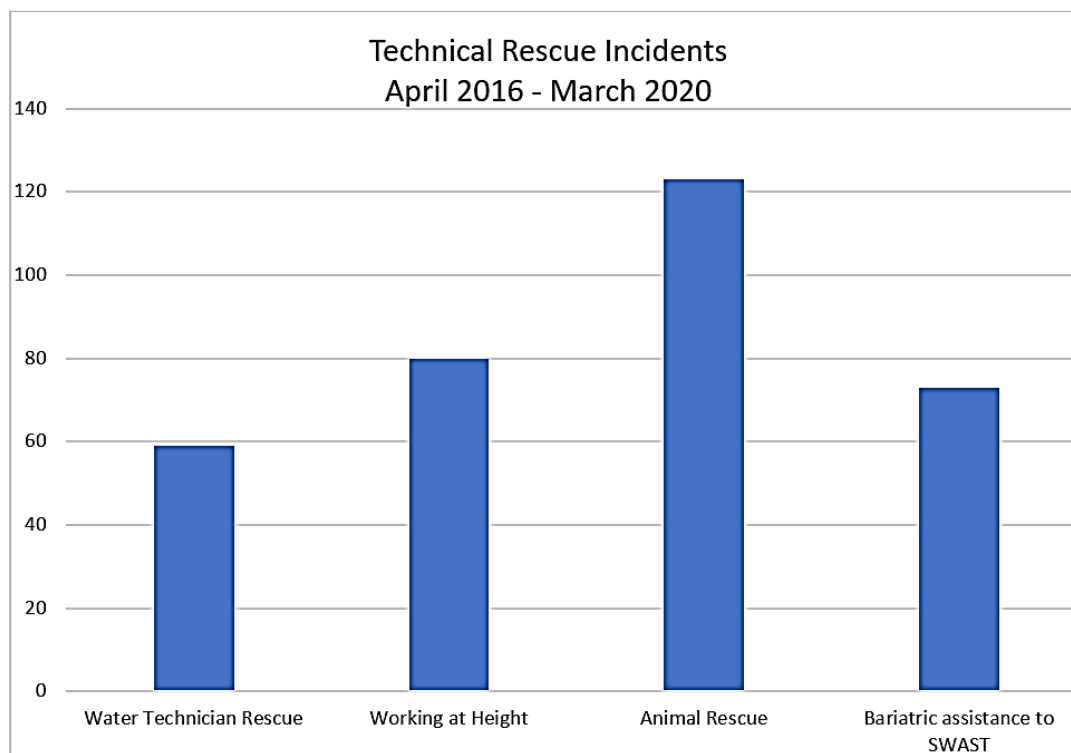


Figure 2 - Number of technical rescue incidents by capability type from April 2016 to March 2020.

- 3.4 The following sections provide an overview of the risk and demand profiles in order of greatest to least incident demand.

3.5 Animal rescues

- 3.5.1. As stated earlier in the report, fire and rescue authorities have no statutory duty to respond to animal rescues. However, the Authority has chosen within its policies to provide a response using powers under section 11 of the Fire and Rescue Services Act 2004 - Power to respond to other eventualities, (2) the event or situation is one that causes or is likely to cause (b) harm to the environment (including the life and health of plants and animals).
- 3.5.2. There are two levels of animal rescue response within the Service that are aligned to standards set in the National Operational Guidance - Incidents Involving Animals. All operational crews across the Service are trained in line with these standards and will often be mobilised following the request from the RSPCA to provide the assistance to rescue trapped *smaller* animals in distress. Technical rescue teams

at Poole and Stratton have enhanced training and equipment to carry out more specialist or complex rescues involving *larger* distressed animals (e.g. deer, horses, sheep) and provide a safe system of work to all other crews undertaking animal rescues.

- 3.5.3. Between 1 April 2016 and 31 March 2020, the Service attended 169 animal rescue incidents. Of these incidents 123 required a technical rescue team intervention from one of the Service's two technical rescue teams with a large animal rescue capability, located at Poole and Stratton fire stations (see Figure 3).

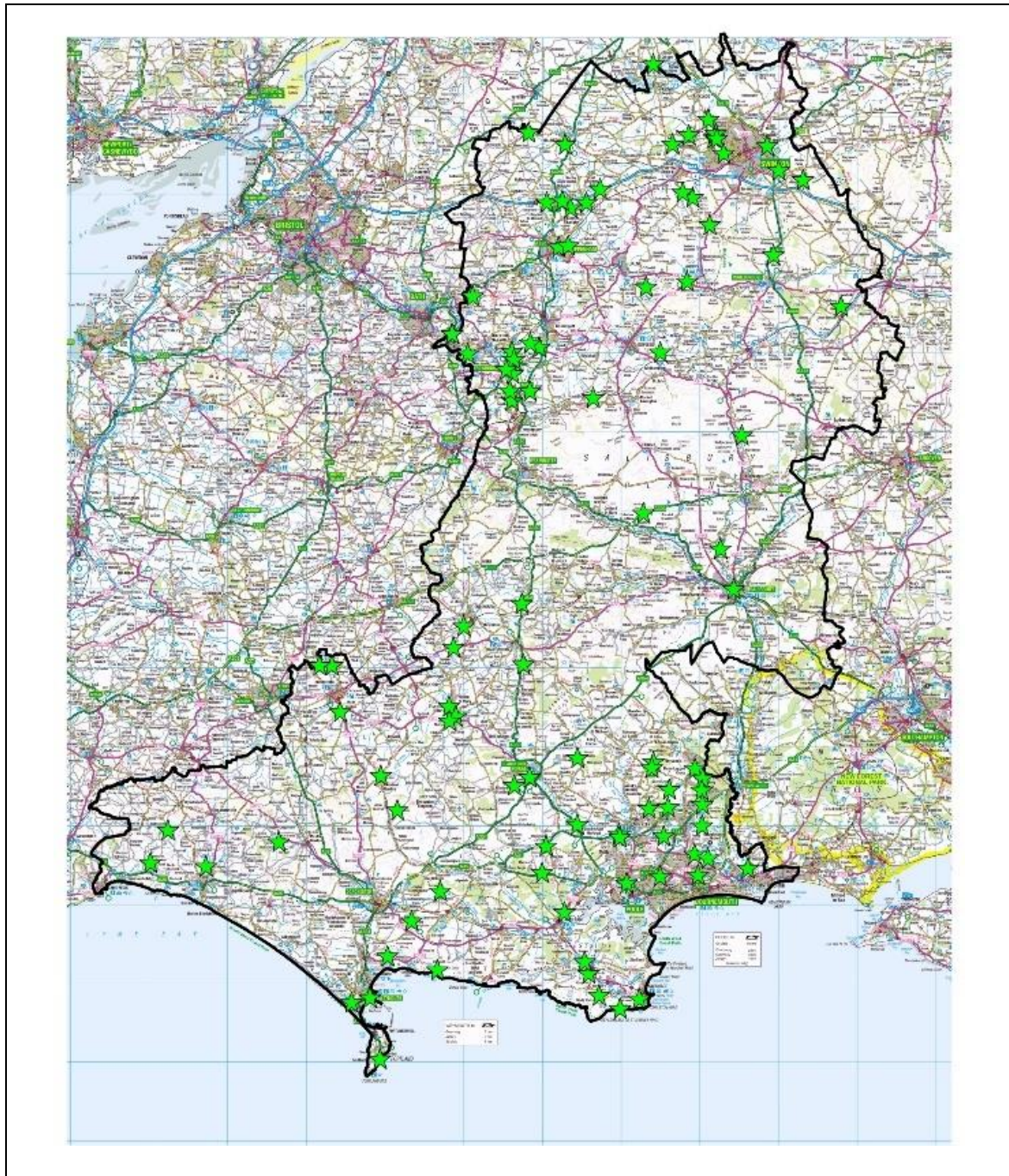


Figure 3 - Large Animal rescue incidents attended by the Service.

3.5.4. Large animal rescue incidents constitute the highest area of demand for the Service's technical rescue teams. As a predominantly rural Service animal rescue incidents occur throughout the Service area. The current disposition of technical rescue teams with an animal rescue capability enables a response to 46 of the Service's 50 fire stations within a 60-minute timeframe.

3.6 Working at height

3.6.1. There are three levels of working at height capabilities within the Service, aligned to the National Fire Chiefs Council 'Safe working at height/Rope Rescue' team guidance:

- *Level 1 (Safe Working at Height)*: This capability allows all operational crews to perform rescues using standard fire service ladders and aerial ladder platforms. Level 1 teams can also use a single rope to secure a casualty whilst awaiting rescue from a twin line rope team. This capability is available at all fire stations
- *Level 2 Rope Rescue*: This capability enables rescues to be performed using twin line ropes so a casualty can be lowered to a point of safety. All 12 fire stations with a wholetime firefighter complement are trained and equipped to work at this more complex level
- *Level 3 Rope Rescue*: This capability enables complex technical rope rescues to be undertaken. Casualties can be rescued from above or below ground or by lowering, or raising, to a point of safety. This capability provides a safe system of work for all other crews operating at the lower levels (for rescuing the rescuers). Technical rescue crews at Chippenham, Poole, Trowbridge and Weymouth are equipped and trained to work at Level 3 rope rescue.

3.6.1.1. Between 1 April 2016 and 31 March 2020 technical rescue crews attended 121 rope incidents in total, 80 of which required a Level 3 rope rescue intervention as shown in Figure 4.

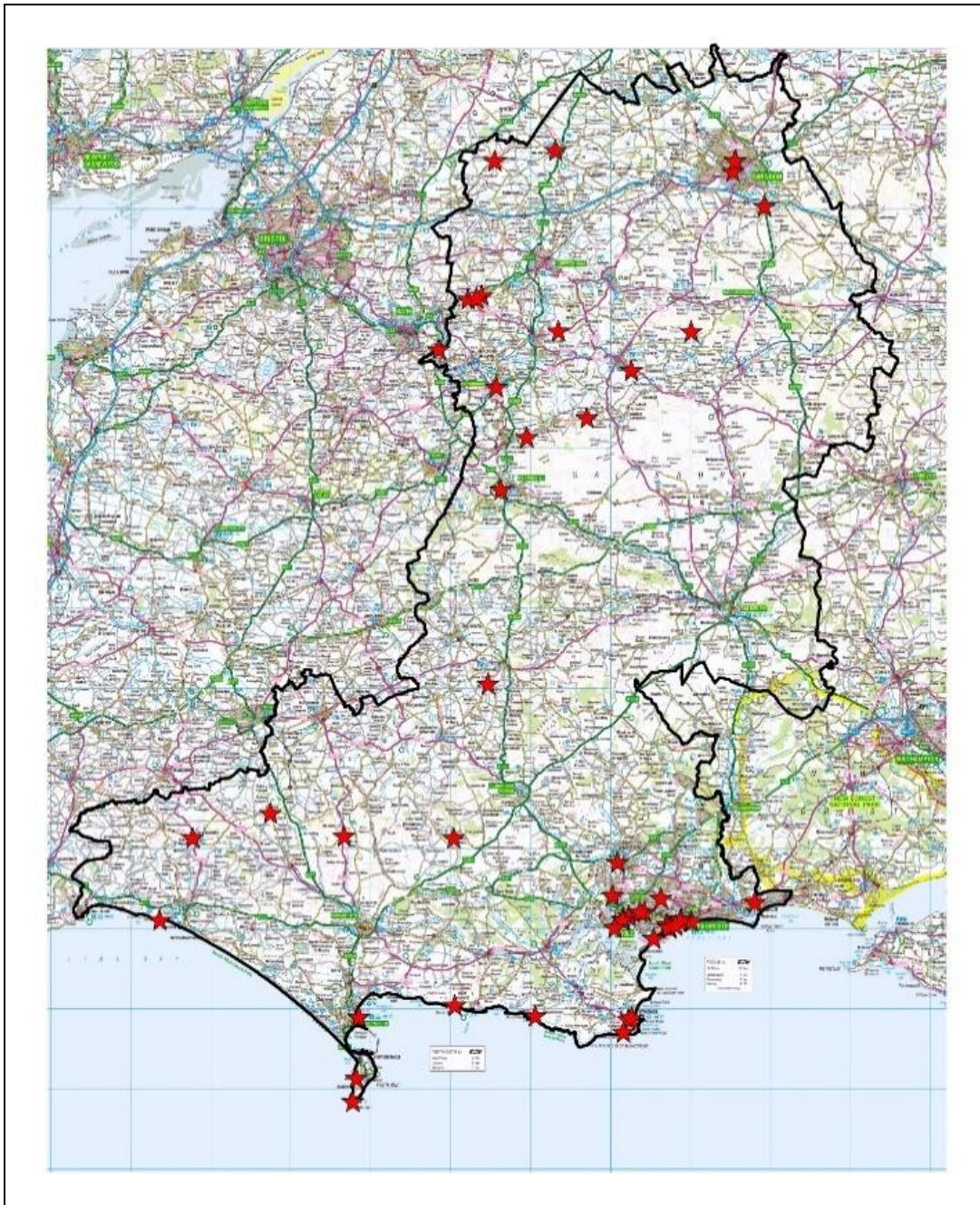


Figure 4 - Level 3 rope incidents attended by the Service.

- 3.6.2. It is clear that incidents occur across the Service area, but with a higher concentration of incidents in the conurbations of Swindon, Bournemouth, Christchurch and Poole and along the coast. The incidents in urbanised areas of the Service are predominantly due to higher buildings and structures and the increased populations in those areas.
- 3.6.3. In terms of coastal rescues, the two search and rescue co-ordinating authorities within the UK are the Police and HM Coastguard. To avoid duplication in effort between HM Coastguard and the Police it has been agreed that a coastal incident which develops on the seaward side of the coastline, below the mean high water spring tide mark, but including sea cliffs, shoreline, and other littoral areas, will be co-ordinated by HM Coastguard, and those above the mean high water spring tide mark by the Police.

3.6.4. The Service has discretionary powers to respond where there is risk of illness, death or injury to persons or harm to the environment. Between 1 April 2016 and 31 March 2020, the Service's technical rescue resources have assisted search and rescue efforts, by either the Police or HM Coastguard, on 62 occasions, predominantly with the provision of Level 3 rope rescue teams.

3.7 **Bariatric support to the Ambulance Service**

3.7.1. The Service's strategic assessment of risk, presented to Members last year, highlights that the number of morbidly obese patients has almost doubled in the last ten years. This indicates a likely increase in the number of incidents the Service will be required to attend, in the case of a life-threatening emergency, or requested to attend to assist the Ambulance Service in getting patients to hospital.

3.7.2. There are two levels of bariatric support response within the Service. Prior to mobilisation, all incidents of this type are assessed by the duty Tactical Advisor:

- *Non-complex response:* All 50 fire stations are equipped and trained to provide general assistance to ambulance crews at non-complex bariatric incidents
- *Complex support:* For more complex bariatric incidents often, involving complex ropes, shoring of ceilings and building structures, a specialist technical rescue response with enhanced training and equipment is needed. This capability is currently available from Poole and Trowbridge fire stations.

3.7.3. Although there is not a statutory duty within the Fire and Rescue Services Act 2004 to support the Ambulance Service with moving bariatric casualties, it should be acknowledged the Service may be called to incidents within their statutory duties involving bariatric casualties, such as, road traffic incident or fires within buildings.

3.7.4. Between 1 April 2016 and 31 March 2020 the Service provided a specialist technical rescue response to 73 bariatric incidents (shown in Figure 5). It should be noted that the number of bariatric incidents responded to by the Service has increased each year, with 47 bariatric incidents during 2019-20, supporting the findings of the strategic assessment of risk.

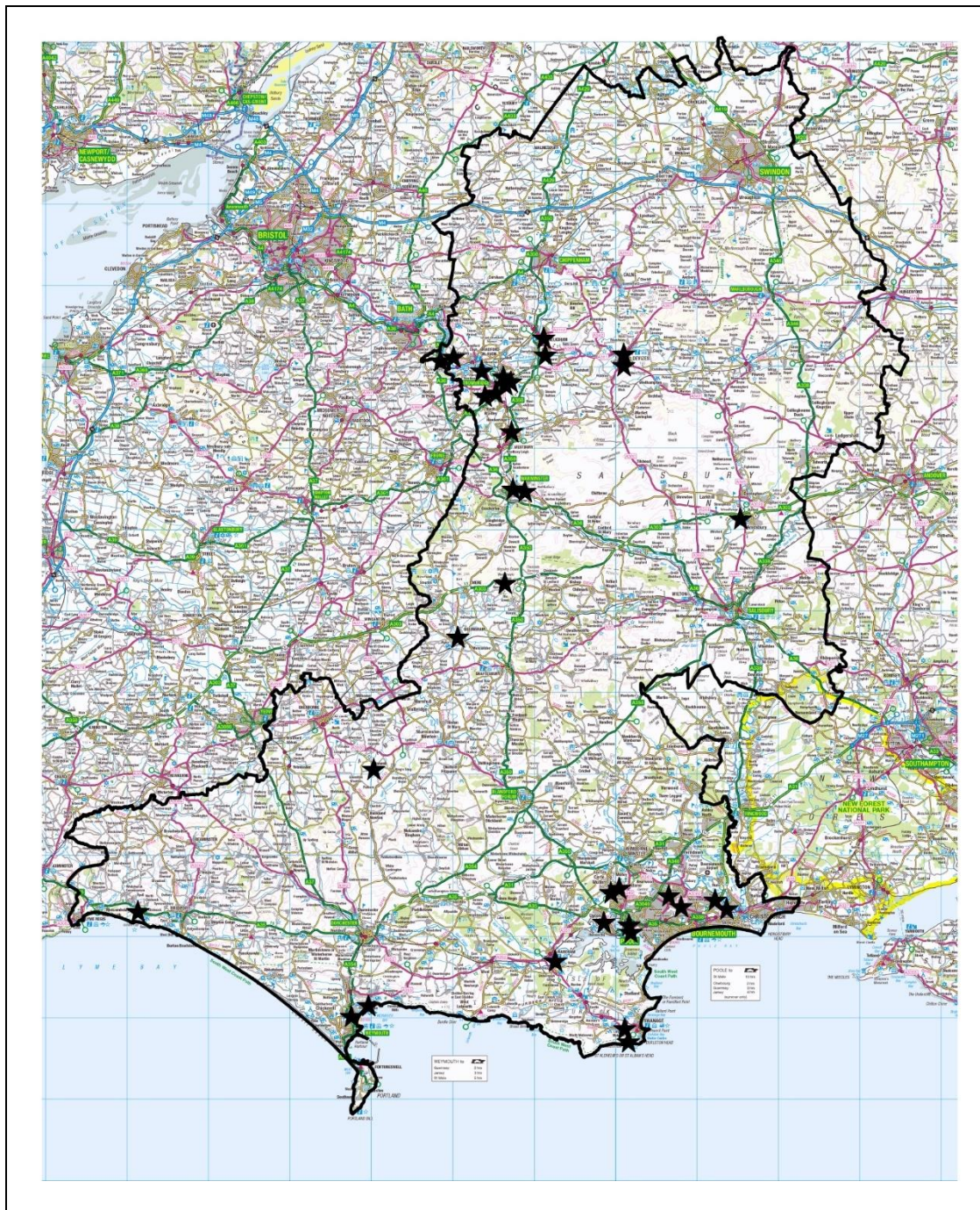


Figure 5 - Location of bariatric rescues or support by the Service.

3.8 Water rescue

3.8.1. There are three levels of water rescue response within the Service aligned to the Department for Environment Food and Rural Affairs concept of operations.

- *Level 1 (Water Awareness Teams)*: This capability allows all our frontline firefighters the ability to work safely near water and perform rescues where the casualty can be reached using flotation and throw line equipment
- *Level 2 (Water First Responder)*: This capability allows crews from Bradford on Avon, Bridport, Christchurch, Malmesbury, Salisbury and Sturminster Newton to enter water in a non-buoyant capacity, to perform rescues (usually where people are trapped in vehicles and homes in flood water)
- *Level 3 (Water Technician Teams)*: This capability allows crews from Chippenham, Poole, Stratton, Trowbridge and Weymouth to enter Class 2 water (fast flowing), through either performing a swim type rescue or with inflatable non-powered boats off rope cableways, which all Level 3 water technician teams are equipped with. The Service also have a rigid inflatable boat based at Chippenham fire station. Level 3 water technician teams provide a safe system of work for all other crews operating at the lower levels (for rescuing the rescuers).

3.8.2. Between 1 April 2016 and 31 March 2020 technical rescue teams attended 105 water incidents. 59 of these incidents required a Level 3 intervention (shown in Figure 6). In addition to this, there were four incidents which Chippenham's powered boat attended, none of which were life critical.¹

¹ Two of these incidents were for body retrieval from water and two were related to animal rescues.

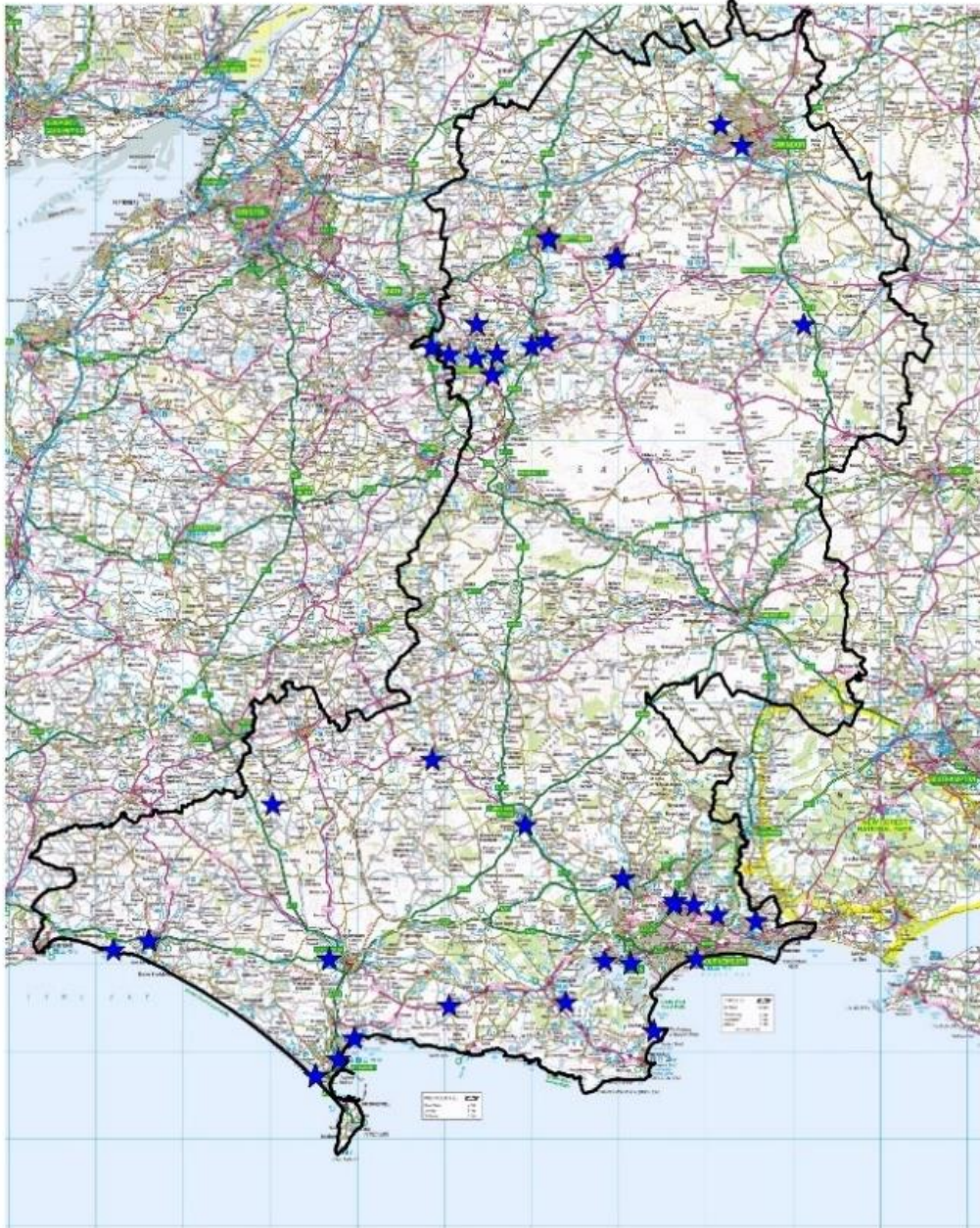


Figure 6 - Level 3 water incidents attended by the Service.

3.8.3. A breakdown of the 59 Level 3 water incidents, attended by the Service, can be seen in Table 2. Of the 59 incidents 14 were classified as life critical and these were located across the Service in Bradford on Avon, Bridport, Calne, Chippenham, Christchurch, Pewsey, Poole, Trowbridge, Weymouth and Wimborne.

	Chippenham	Poole	Stratton	Trowbridge	Weymouth	Total
Rescue- non-life critical	0	8	1	2	4	15
Life critical	4	5	1	2	2	14
Assist other agency missing person search	1	5	0	2	1	9
Assist other agency (general)	2	2	0	2	0	6
Assist other agency body retrieval	0	1	0	5	0	6
Animal rescue from water	2	0	1	0	0	3
False alarm	0	0	0	1	2	3
Stood by due to location	0	1	0	1	0	2
False alarm malicious	1	0	0	0	0	1
Total	10	22	3	15	9	59

Table 2 - Breakdown of the Level 3 Water incidents attended by technical rescue stations.

3.9 Water rescue risk

3.9.1. The main types of flooding risk within the Service are fluvial, pluvial and coastal:

- *Fluvial*: Where rivers become overwhelmed and expand from their riverbanks onto surrounding areas. This can be due to rainfall and run-off from higher ground
- *Pluvial*: Caused by extreme rainfall or run-off from higher ground. It can cause two types of event, surface water flooding where drainage systems become overwhelmed and flash flooding causing a large moving body of water to flow through particular areas. Flash flooding is becoming more prevalent as areas are becoming increasingly urbanised and due to the impacts of climate change
- *Coastal*: Flooding caused by changes to the tide level when impacted by a storm surge.

3.9.2. Fluvial and pluvial flooding is found in the north of the Service and fluvial, pluvial, and coastal being found in the south.

3.9.3. To further support an understanding of our future potential risk, appendix B shows the Environment Agency's flood risk mapping around the areas where (Level 2) water first responder and (Level 3) water technician stations are located.

- 3.9.4. Table 3 shows the number of postcodes at risk of flooding near to the current technical rescue stations with (Level 3) water technician teams that have been identified by the Environment Agency. This data shows that the areas with the greatest number of at-risk postcodes are Weymouth, Poole and Stratton, with a significantly lower number in Chippenham and Trowbridge.

	High ²	Medium	Low	Very Low	Total	Total properties in postcode area
Weymouth	87	28	95	2	212	32,042
Poole	39	27	51	0	117	119,039
Stratton	27	41	80	9	157	100,722
Chippenham	15	39	26	0	80	25,263
Trowbridge	4	0	26	0	30	20,059
Total	174	172	377	11	734	319,134

Table 3 - Number of at-risk postcodes near to the current technical rescue stations with (Level 3) water technician teams.

- 3.9.5. Table 4 shows the number of postcodes at risk of flooding near to the current (Level 2) water first responder stations. Several of these areas have similar or higher risk than Chippenham or Trowbridge, which are currently technical rescue stations with (Level 3) water technician teams.

	High	Medium	Low	Very Low	Total	Total Properties in postcode area
Bridport	19	8	49	17	93	10,130
Christchurch	12	40	103	0	155	23,537
Bradford on Avon	9	1	9	0	19	5,867
Malmesbury	8	4	13	0	25	5,722
Salisbury	2	37	99	0	138	22,009
Sturminster Newton	1	1	1	0	3	5,179
Total	51	91	274	17	433	72,444

Table 4 - Number of at-risk postcodes near to the current (Level 2) Water First Responder stations.

- 3.9.6. In 2019, permanently situated lockable flood gates were installed at either end of the B3106 between Holt and Staverton (near Trowbridge). Unlike portable road closure signage these gates make it more difficult for drivers of vehicles to bypass the road closure signs, preventing their vehicles from becoming trapped in flood water. This should reduce the need for Service interventions in these types of incidents.

² (Per year the risk of flooding is: High- greater than 1 in 30 (3.3%), Medium- between 1 in 30 (3.3%) and 1 in 100 (1%), Low- between 1 in 100 (1%) and 1 in 1000 (0.12%), Very Low- less than 1 in 1000 (0.1%).)

- 3.9.7. There is one main canal system within the Service area, the Kennet and Avon Canal, which runs across mid Wiltshire and consists of several locks along the length of the canal. Additionally, there is a section of the Wiltshire and Berkshire Canal in the north of the Service.
- 3.9.8. Water rescue incidents in canals can generally be categorised as either:
- *Immediate rescue*: This is carried out by the initial responding crew, primarily a Level 1 or Level 2 crew. A Level 3 crew is mobilised as part of the response plan to provide an additional safe system of work
 - *Body retrieval*: Sadly, this is the most common way the Service gets deployed to incident in canals. Body retrieval is the responsibility of the Police. Firefighting crews support the Police, when requested, with the provision of a Level 3 water technician team. Due to the nature of these incidents an emergency response is not required.
- 3.9.9. Between 1 April 2016 and 31 March 2020 11 incidents occurred within the area of the Kennet and Avon Canal and one incident occurred in the canal in Swindon. The incidents were predominantly to assist the Police with body retrievals and were resolved by either a safe working near water (Level 1) or water first responder team (Level 2), prior to the arrival of the water technician (Level 3) team.
- 3.9.10. The Police have the responsibilities for body retrievals, however, given the Service's water rescue capabilities there are occasions when the Police request our assistance to support this function.
- 3.9.11. Sadly, the majority of incidents involving canals often result in a body retrieval, regardless of the proximity of the water rescue teams. On those occasions where it is possible to execute a rescue, working near water (Level 1) or water first responder (Level 2) teams are suitably trained and equipped to carry out the rescue. A water technician (Level 3) team is mobilised to provide a safe system of work in support of those teams, if required.
- 3.9.12. To mitigate the risk presented by canals the Service proactively promotes water safety and prevention activities in areas surrounding the canal networks together with published water safety advice on our website.
- 3.10 **Spate conditions**
- 3.10.1. During periods of severe weather the Service can experience higher than normal levels of activity. These periods are known as *spate conditions*.
- 3.10.2. Spate conditions are often described as 'rising tide' events due to the pre-warning given through both the Meteorological Office forecasting and the Environment Agency flood warning service. This enables the Service to work in

conjunction with Local Resilience Forums to strategically deploy (Level 2) water first responder and (Level 3) water technician teams to the areas of the Service deemed to be at the greatest risk.

- 3.10.3. When forecasting these events, the Meteorological Office will issue a flood warning or flood alert aligned to the severity of the risk.³ To further support the Service's understanding of the historic flood risk appendix C details the type of flood warning and the location for which it was issued between 2006 and 2017. A summary of the number and type of flood warnings/alerts over this period can be seen in Table 5.
- 3.10.4. The last spate conditions within the Service area occurred between 21 December 2013 and 17 February 2014 where there were 107 water/flooding related incidents in Dorset. Three of which required (Level 3) water technician teams to resolve. Within the same period there were 193 incidents in Wiltshire, none of which required a (Level 3) water technician team to resolve.

County	Severe Flood Warning	Flood Warning	Flood Alert	Total
Dorset	20	514	1946	2480
Wiltshire	0	228	857	1085

Table 5 - Number and type of Environment Agency flood warning/alerts issued between 2006 and 2017.

3.11 Technical search

- 3.11.1. The main type of risk requiring the attendance of a technical search team in the Service is presented from people who are trapped.
- 3.11.2. Areas of the Jurassic Coast in Dorset are susceptible to cliff face collapse, this can lead to people becoming trapped underneath debris. People can also become trapped under collapsed structures or in subsurface collapses.
- 3.11.3. The Service currently provides an initial technical search capability at Trowbridge and Weymouth, utilising equipment such as a snake eye camera and sound monitoring apparatus, to undertake lower risk activities such as small animal rescues.
- 3.11.4. Technical search is a complex discipline and as such additional support is provided to all fire and rescue services through national resilience arrangements. This enables any service to access specialist urban search and rescue teams, hosted by strategically located fire and rescue services across England, including neighbouring services.

³ (Met office flood warnings have four classifications; Severe Flood Warning – danger to life, Flood warning – flooding is expected immediate action required and Flood alert – flooding is possible be prepared).

- 3.11.5. During the period being reviewed the majority of technical search incidents in the Service have involved the use of a snake eye camera to locate animals trapped in building voids or in underground areas.

3.12 **Technical confined space**

- 3.12.1. All firefighting crews are equipped and trained to carry out rescues in confined spaces, with the use of breathing apparatus. Often access into these areas does not require the use of rope access equipment, however, on occasion this is required.
- 3.12.2. Level 3 rope rescue teams are equipped and trained to enable rescues to be carried out in confined spaces where rope access equipment is required. This capability enables those teams to work without the need for full breathing apparatus, instead using ventilation and gas monitoring techniques, which allows access that otherwise could not be achieved by a standard firefighting crew.
- 3.12.3. Any work activity, including fire and rescue service incidents, undertaken in confined spaces are bound by the Confined Space Regulations 1997. The Service's technical confined space teams ensure the Service has a means of providing a safe system of work required by these regulations.
- 3.12.4. Between 1 April 2016 and 31 March 2020 there were seven incidents where a technical confined space team was required as part of the response plan. If required, additional support is available through the national resilience arrangements.
- 3.12.5. The Service's technical confined space capability is currently provided by technical rescue crews at Chippenham, Poole, Trowbridge and Weymouth fire stations.
- 3.12.6. Each confined space team is currently made up of eight Level 3 rope trained personnel, including one team supervisor (i.e. two Level 3 rope rescue teams). The Service's current operational risk assessment requires that a team of eight qualified personnel make up one technical confined space rescue team.
- 3.12.7. In the event of a technical confined space rescue in the north of the Service area, three stations are mobilised to achieve the required safe system of work. This is due to the aggregate crewing arrangements at Chippenham and Trowbridge, as stated earlier in the report.
- 3.12.8. Following the alignment of Level 2 rope teams across the Service in 2018, the technical rescue steering group is currently reviewing the risk assessment to confirm if a safe system of work could be achieved utilising greater support from a Level 2 rope team.

4. Proposed technical rescue solution

- 4.1 The review team, along with senior officers, visited each of the current technical rescue stations to discuss the technical rescue review. During these visits, a presentation was given. During the meetings any questions, comments, ideas, and risks were captured by the review team. Following these meetings an electronic form was also sent out to capture any further feedback. This feedback was incorporated into the review.
- 4.2 Representative bodies were engaged through a structured meeting process and invited to feedback on the proposal. The Fire Brigades Union have engaged fully in the discussion and acknowledge the proposal is a viable option.
- 4.3 A summary of the communication and engagement carried out during this technical rescue review can be seen in appendix D.
- 4.4 The review, conducted by specialist officers, proposed a three-team solution crewed by wholetime firefighters at Poole, Stratton and Weymouth. These stations will have the capability to provide all technical rescue specialisms, including water rescue, in a consistent and more resilient way. This option includes maintaining a water rescue capability at Bradford on Avon, Bridport, Chippenham, Christchurch, Malmesbury, Salisbury, Sturminster Newton and Trowbridge to allow for rescues where people are trapped in vehicles and homes in flood water. Should spate flooding conditions occur then teams across the Service would be mobilised and local or national mutual aid arrangements initiated, as necessary.
- 4.5 The provision of three strategically located technical rescue stations, with a full range of capabilities, will have the following operational advantages:
- **Greater resilience** as crews at each technical rescue station will be able to provide crewing resilience at all other stations, all on the same duty system
 - **Improved strategic cover** ensuring all 50 station areas can be reached within 60 minutes and align to Service demand and community risk profile
 - **Interchangeability of vehicles and equipment.** Aligning vehicles to the same technical rescue vehicle solution will allow interchangeability between technical rescue stations and other Service vehicles (e.g. operational support unit), if required
 - **An increase in operational teams to meet the risk profile of the Service.** A comparison of the number of trained staff/teams currently and with the recommended option for a three-station solution (Poole, Stratton, and Weymouth), can be seen in Table 6.

	Number of Trained Staff			Number of Teams*		
	Current	Proposed	Difference	Current	Proposed	Difference
Large Animal	76	104	+28	2	3	+1
Level 3 Rope	104	104	0	3	3	0
Water Technician	132	104	-28	4	3	-1
Water First Responder	66	122	+56	5	8	+3
Bariatric Technical	62	104	+42	2	3	+1
Confined Space Technical	104	104	0	3	3	0
Technical Search	42	62	+20	2	2	0
Rope L2	216	216	0	8	9	+1

Table 6 - Number of staff/teams trained in differing technical rescue specialisations.

*Number of teams assumes Chippenham and Trowbridge are co-mobilised as one team due to their current aggregate crewing arrangement.

- 4.6 Chippenham and Trowbridge technical rescue crews operate on a day crew duty system. Technical rescue requires a minimum of five crew. The day crewed duty system means there are occasions when the technical rescue capability is unavailable due to insufficient crews being on duty. Whilst this impacts on the availability of technical rescue teams, this does not impact on the availability of a fire appliance which requires a crew of four.
- 4.7 In these instances, it is necessary to mobilise both stations to an incident to form a full technical rescue team. These additional mobilisations incur additional costs, increase the level of risk due to more vehicles responding on blue lights and deplete cover for other emergencies whilst backfill arrangements are coordinated.
- 4.8 Chippenham and Trowbridge should therefore be regarded as a single team and the current number of teams for Level 3 rope and (Level 3) water technician teams should be considered to be one lower.
- 4.9 As can be seen from Table 6, the proposal to have three technical rescue stations would increase:
- the overall number of large animal and bariatric rescue teams
 - the number of crews trained and equipped to resolve these incident types, which represent the area of highest and fastest growing demand.

4.10 Under the proposal:

- the number of Level 3 rope teams will remain the same at three
- the number of trained and equipped staff across the Service will also remain the same, although the disposition of these teams will change
- there will be an additional Level 2 rope team.

4.11 The community risk profile and historic incident demand supports increasing the number of (Level 2) water first responder crews, who are equipped and trained to deal with the majority of foreseeable water rescue incidents.

4.12 To ensure the Service maintains a (Level 3) water technician capability to meet demand and provide a safe system of work for all other crews, the proposal will retain three strategically located teams at the three full technical rescue stations.

4.13 As previously outlined in the report the use of a powered boat is infrequent and largely to support body retrieval rather than rescues. The overwhelming majority of requirements are met by the non-powered boat capability used by Level 3 water technician teams. Additional support is available to the Service through national resilience arrangements and the voluntary sector. This enables any Service to access specialist boat rescue teams hosted by strategically located fire and rescue services across England, including neighbouring services. The Service has a memorandum of understanding with Wessex Flood Rescue Unit, who can provide a crewed powered boat trained to at least the same standard as the Service's Level 3 operatives. This is a 24-hour response, 365 days a year, and covers the whole Service area.

4.14 The proposed location of water rescue assets is shown in Figure 7.

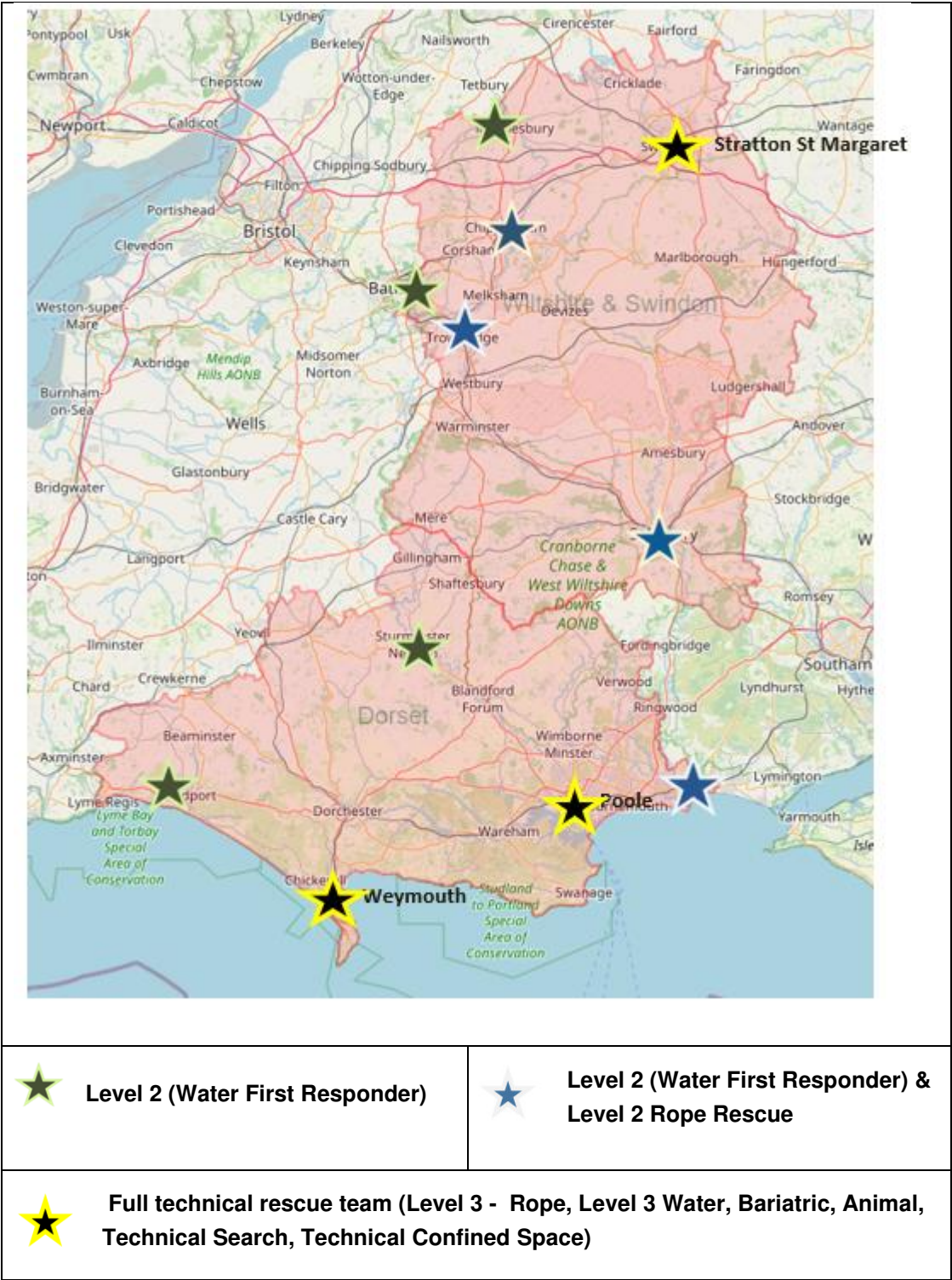


Figure 7 - Proposed locations of water rescue assets.

4.15 Vehicle costs and potential cost avoidance arising from the proposal

- 4.15.1. The capital programme for 2021-22 had included £433,000 to purchase two replacement technical rescue vehicles and £82,610 for two 4x4 support vehicles, a total of £515,610. The current vehicles used in the north of the Service are no longer suitable for stations providing full technical rescue capabilities as they are unable to carry all the technical rescue equipment, due to insufficient load capacity.
- 4.15.2. The provision of three technical rescue stations requires the purchase of only one of each type of these vehicles. This represents a cost avoidance of £257,805 helping to further reduce borrowing and associated capital financing costs, helping to mitigate risks outlined in the Medium-Term Finance Plan.

4.16 Technical rescue training and equipment costs

- 4.16.1. The current cost of technical rescue training and equipment is £85,297 per year. The annual cost of having three technical rescue stations at Poole, Stratton and Weymouth, all carrying out aligned specialisms, is £72,696, providing an annual saving of £12,601.
- 4.16.2. To affect this change there are one-off alignment costs required. These are £33,841 for training and £36,278 for equipment, to enable the proposed three stations to deliver all technical rescue specialisms.

4.17 Special rescue allowance payments

- 4.17.1. Currently staff providing Level 3 rope capability and Level 3 water technician capability receive Special Responsibility Allowance (SRA) payments. The current payments are £801 for supervisors and £585 for operators and total costs are £84,087. By having three specialist teams these costs reduce to £66,354, leading to an annual revenue saving of £17,233. No pay protection costs arise from this proposal as these allowances are only payable whilst undertaking these specialisms.

4.18 Option 1 ongoing cost summary

- 4.18.1. The ongoing revenue costs of Option 1 compared to current costs are as follows:

	Current	Option 1	Difference
Training & equipment	£85,297	£72,696	£12,601
SRA payments	£84,087	£66,854	£17,233
	£169,384	£139,550	£29,834

4.19 Disposition of technical rescue stations

- 4.19.1. The provision of three strategically located technical rescue stations will provide greater resilience across the Service area, ensuring all 50 station areas can be reached within 60 minutes. It also aligns the operational capabilities to the demand and risk profile.
- 4.19.2. In addition, in the north of the Service area it will improve operational availability of fire appliances due to reducing the over mobilisation of stations required for the different capabilities, equipment and vehicles located at different stations.
- 4.19.3. Reductions in the over mobilisation of stations, due to different specialists being vested on different stations, will also see a reduction in costs to the Service. Currently every additional technical rescue resource mobilised incurs a cost of £368 per hour for the additional technical rescue asset and often a cost of £160 per hour for an on-call crew to provide cover for other emergencies whilst the technical rescue asset is attending the incident.

Option 1	<p>Establish three consistent technical rescue teams, aligned to the Service risk profile, that are crewed by wholetime firefighters at Poole, Stratton and Weymouth.</p> <p><i>Note: This option includes maintaining Level 2 water rescue capability at Bradford on Avon, Bridport, Chippenham, Christchurch, Malmesbury, Salisbury, Sturminster Newton and Trowbridge to allow for rescues where people are trapped in vehicles and homes in flood water.</i></p>
Benefits and opportunities	<p><i>Operational</i></p> <ul style="list-style-type: none"> • Consistent delivery model across the Service • Optimises the availability of technical rescue assets and capabilities • Aligns the most appropriate resources to risk • Improves operational resilience • Provides cover across the whole Service area within the 60-minute standard • Additional flood water rescue, large animal, technical search, and bariatric rescue teams • Reduces co-mobilisation of technical rescue teams as each team have all skills and equipment available • Retains a sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Capacity created at stations that no longer provide a technical rescue provision enabling crews to undertake other activities (e.g. Prevention). <p><i>Financial</i></p> <ul style="list-style-type: none"> • Reduce one off alignment costs • Reduced training and salary training costs

	<ul style="list-style-type: none"> • Reduced equipment costs • Reduced fleet costs • Reduced borrowing and capital financing costs.
Risks and implementations issues	<ul style="list-style-type: none"> • Availability of external training providers for rope Level 3 courses, leading to extended timescales for full implementation • Time to consolidate skills requiring the need to potentially maintain the capability at Chippenham or Trowbridge to support Stratton • Lead time of new vehicles could lead to short term stowage issues for technical rescue equipment • Lead time of new equipment • Short term costs associated with implementation of changes • Short term cost maintaining existing provision until newly formed teams are trained • Increased demand on stations affecting prevention activities.

5. Alternative proposal

- 5.1 In addition to having Poole, Stratton and Weymouth carrying out all technical rescue capabilities, there is an alternative option of maintaining Chippenham and Trowbridge as Level 3 water technician teams only.
- 5.2 This option would be an enhanced water rescue capability for the Service but incur additional annual revenue costs for SRA payments, annual training, equipment, and vehicle maintenance of £33,517 compared to Option 1.
- 5.3 There would also be additional capital costs for vehicle replacements when the current two vehicles become end of life in 2025. To replace these vehicles with a like for like replacement in 2025 would cost approximately £120,000 for which no provision is currently made within the Medium-Term Finance Plan. This reduces the capital saving from £257,805 to £137,805.

5.4 Option 2 ongoing cost summary

- 5.4.1. The ongoing revenue costs of Option 2 compared to Option 1 are as follows:

	Option 1	Option 2	Difference
Training & equipment	£72,696	£95,812	£23,116
SRA payments	£66,854	£77,255	£10,401
	£139,550	£173,067	£33,517

5.4

Option 2	<p>a) Establish three consistent technical rescue teams aligned to the Service risk profile that are crewed by wholetime firefighters at Poole, Stratton and Weymouth; and,</p> <p>b) Retain a Level 3 water rescue capability at Chippenham and Trowbridge.</p> <p><i>This option includes maintaining Level 2 water rescue capability at Bradford on Avon, Bridport, Christchurch, Malmesbury, Salisbury and Sturminster Newton to allow for rescues where people are trapped in vehicles and homes in flood water.</i></p>
Benefits and opportunities	<p><i>Operational</i></p> <ul style="list-style-type: none"> • Consistent delivery model across the Service for technical rescue, with an enhanced capability at Chippenham and Trowbridge • Optimises the availability of technical rescue assets and capabilities, although Chippenham and Trowbridge will have a different vehicle and equipment solution to allow Level 3 water rescue capability • Provides cover across the whole Service area within the 60-minute standard • Additional flood water rescue, large animal rescue, technical search and bariatric rescue teams • Retains a sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Capacity created at stations that no longer provide a technical rescue provision enabling crews to undertake other activities (e.g. prevention).
Risks and implementations issues	<p><i>Financial (when compared to option 1)</i></p> <ul style="list-style-type: none"> • Increased one off alignment costs • Increased training and salary training costs • Increased equipment costs • Increased fleet costs • Increased capital borrowing • Increased costs resulting from mobilising Chippenham and Trowbridge as a single water rescue team • Savings would potentially need to be found elsewhere given the Authority's forecasted budget deficits, dependent upon future financial settlements and council tax flexibilities.

6 Summary

- 6.1 This review of technical rescue capability has focused on developing a more consistent capability in the following areas: animal rescue, working at height, bariatric support to the Ambulance Service, water rescue, technical search and confined space rescue. There is no statutory requirement to provide these services and many fire and rescue authorities rely entirely on mutual aid. However, to provide safe systems of work for stations and to support community and partnership requests it is believed that these services should continue to be provided.
- 6.2 Under delegated arrangements and after considerable data analysis, engagement with staff and their representative bodies, the result has concluded from a professional perspective that a three-station enhanced technical rescue capability should be established at Poole, Stratton and Weymouth. At an increased cost, an alternative option is also proposed that retains a (Level 3) water technician capability at Chippenham and Trowbridge fire stations.
- 6.3 Members are asked to consider and decide the best way forward at the public meeting as outlined in the recommendations presented in this report. Following a comprehensive review, the officer recommendation is Option 1.

Appendices

Appendix A

Costings, benefits, and risks of combinations of technical rescue stations

Stations	Number of stations reached in 60 minutes	Alignment Costs (training)	Alignment Costs (vehicles)	Alignment Costs (equipment)	Annual Costs	Total Trained Staff	Number of Supervisors	Number of Operators
Current Provision	Animal: 46 Rope: 50 Water: 50 Bariatric: 48	£0	£1,002,740	£0	£169,383	Animal: 76 Rope: 104 Water: 132 Bariatric: 62	Animal: 20 Rope: 28 Water: 36	Animal: 56 Rope: 76 Water: 96
Poole, Salisbury, Stratton	48	£80,788	£246,305	£36,278	£139,549	104	28	76
Chippenham, Poole, Stratton	48	£29,309	£246,305	£36,278	£120,901	90	24	66
Chippenham, Stratton, Weymouth	45	£38,478	£246,305	£36,278	£93,242	70	20	50
Poole, Trowbridge Stratton	48	£28,203	£246,305	£36,278	£120,901	90	24	66
Trowbridge, Stratton, Weymouth	49	£37,478	£246,305	£36,278	£93,242	70	20	50
Salisbury, Stratton, Weymouth	50	£90,063	£246,305	£36,278	£110,158	84	24	60
Poole, Stratton, Weymouth	50	£33,841	£246,305	£36,278	£139,549	104	28	76

Stations	Number of stations reached in 60 minutes	Alignment Costs (training)	Alignment Costs (vehicles)	Alignment Costs (equipment)	Annual Costs	Total Trained Staff	Number of Supervisors	Number of Operators
Poole, Stratton, Weymouth (Chippenham and Trowbridge water rescue only)	50	£33,841	£366,305	£36,278	£173,067	Animal Large: 104 Rope L3: 104 Water Tech: 132 Bariatric: 104	Animal Large: 28 Rope L3: 28 Water Tech: 36	Animal Large: 76 Rope L3: 76 Water Tech: 96

	Benefits	Risks
Poole, Salisbury, Stratton	<ul style="list-style-type: none"> Reduced training costs Reduced equipment costs Reduced fleet costs Reduced additional responsibility allowance costs Consistent delivery model across the Service Reduced co-mobilisation of rescue teams from separate stations to form a single team Sufficient number of trained staff for resilience purposes (training and crewing shortfall) Creates capacity for prevention activities at stations that no longer provide a technical rescue provision. 	<ul style="list-style-type: none"> Short term costs associated with implementation of changes Short term costs associated with maintaining the existing provision until newly formed teams are trained Increased demand on stations affecting prevention activities Disengagement of staff from station where provision is removed Two station areas not within 60 minutes attendance time of a technical rescue station Too many competencies with aerial ladder platform and technical rescue based at the same station.
Chippenham, Poole, Stratton	<ul style="list-style-type: none"> Reduced training costs Reduced equipment costs Reduced fleet costs Reduced additional responsibility allowance costs Consistent delivery model across the Service Reduced co-mobilisation of rescue teams from separate stations to form a single team Sufficient number of trained staff for resilience purposes (training and crewing shortfall) Creates capacity for prevention activities at stations that no longer provide a technical rescue provision. 	<ul style="list-style-type: none"> Increased likelihood of an unavailable crew. Chippenham's duty system makes it more difficult to maintain five trained technical rescue staff overnight, with an historic reliance on Trowbridge to support them Reduced training for Level 2 stations. Chippenham's duty system impacts on the time available to provide training support to on-call water first responder stations and Level 2 rope teams Two station areas not within 60 minutes attendance time of a technical rescue station Increased demand on stations affecting prevention activities.

	Benefits	Risks
Chippenham, Stratton, Weymouth	<ul style="list-style-type: none"> • Reduced training costs • Reduced equipment costs • Reduced fleet costs • Reduced additional responsibility allowance costs • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision • Lower short-term costs associated with maintaining the existing provision as each station only needs to be trained in one additional skill set • Lower one-off alignments costs, • Capacity created at stations that no longer provide a technical rescue provision. 	<ul style="list-style-type: none"> • Increased likelihood of an unavailable crew. Chippenham's duty system makes it more difficult to maintain five trained technical rescue staff overnight, with an historic reliance on Trowbridge to support them • Reduced training for Level 2 stations. Chippenham's duty system impacts on the time available to provide training support to on-call water first responder stations and Level 2 rope teams • Five station areas not within 60 minutes attendance time of a technical rescue station • Increased demand on stations affecting prevention activities.
Poole, Trowbridge, Stratton	<ul style="list-style-type: none"> • Reduced training costs • Reduced equipment costs • Reduced fleet costs • Reduced additional responsibility allowance costs • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision • Lower short-term costs associated with maintaining the existing provision as each station only needs to be trained in one additional skill set • Lower one-off alignments costs. 	<ul style="list-style-type: none"> • Increased likelihood of an unavailable crew. Trowbridge's duty system makes it more difficult to maintain five trained technical rescue staff overnight, with an historic reliance on Chippenham to support them • Reduced training for Level 2 stations. Trowbridge's duty system impacts on the time available to provide training support to on-call water first responder stations and Level 2 rope teams • Two station areas not within 60 minutes attendance time of a technical rescue station • Increased demand on stations affecting prevention activities.

	Benefits	Risks
Trowbridge, Stratton, Weymouth	<ul style="list-style-type: none"> • Reduced training costs • Reduced equipment costs • Reduced fleet costs • Reduced additional responsibility allowance costs • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision • Lower short-term costs associated with maintaining the existing provision as each station only needs to be trained in one additional skill set • Lower one-off alignments costs. 	<ul style="list-style-type: none"> • Increased likelihood of an unavailable crew. Trowbridge's duty system makes it more difficult to maintain five trained technical rescue staff overnight, with an historic reliance on Chippenham to support them • Reduced training for Level 2 stations. Trowbridge's duty system impacts on the time available to provide training support to on-call water first responder stations and Level 2 rope teams • One station area not within 60 minutes attendance time of a technical rescue station • Increased demand on stations affecting prevention activities.
Salisbury, Stratton, Weymouth	<ul style="list-style-type: none"> • Reduced training costs • Reduced equipment costs • Reduced fleet costs • Reduced additional responsibility allowance costs • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision • All station areas within 60 minutes response time for a technical rescue station. 	<ul style="list-style-type: none"> • Short term costs associated with implementation of changes • Short term costs associated with maintaining the existing provision until newly formed teams are trained • Increased demand on stations affecting prevention activities • Disengagement of staff from station where provision is removed • Increased demand on stations affecting prevention activities • Too many competencies with aerial ladder platform and technical rescue based at the same station.

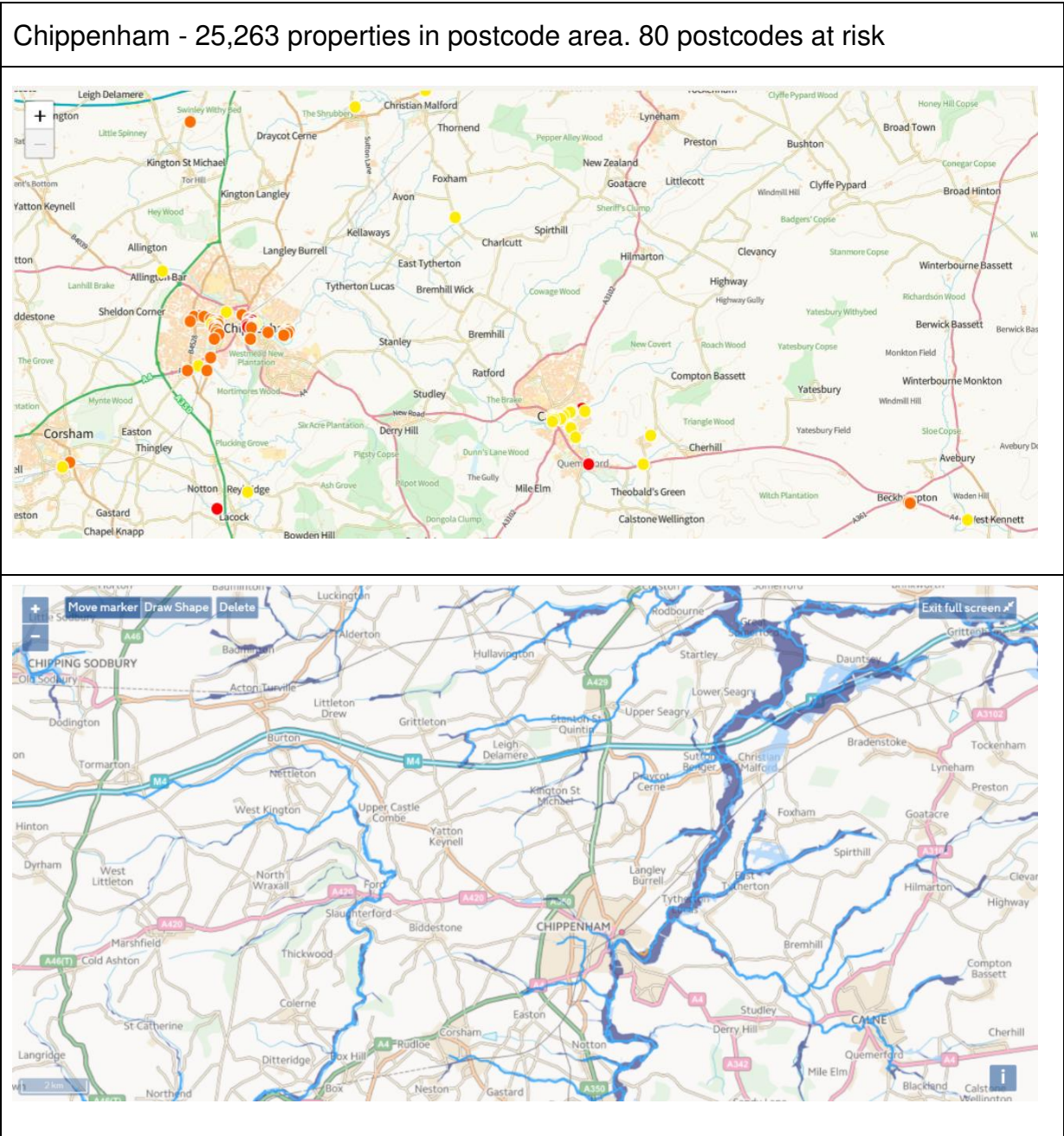
	Benefits	Risks
Poole, Salisbury, Stratton, Weymouth	<ul style="list-style-type: none"> • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision • All station areas within 60 minutes response time for a technical rescue station. 	<ul style="list-style-type: none"> • Increased short term costs associated with implementation of changes • Short term costs associated with maintaining the existing provision until newly formed teams are trained • Increased demand on stations affecting prevention activities • Disengagement of staff from station where provision is removed • Increased demand on stations affecting prevention activities • Too many competencies with aerial ladder platform and technical rescue based at the same station.
Poole, Stratton, Weymouth	<ul style="list-style-type: none"> • Reduced training costs • Reduced equipment costs • Reduced fleet costs • Reduced additional responsibility allowance costs • Consistent delivery model across the Service • Reduced co-mobilisation of rescue teams from separate stations to form a single team • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • Creates capacity for prevention activities at stations that no longer provide a technical rescue provision. 	<ul style="list-style-type: none"> • Short term costs associated with implementation of changes • Short term costs associated with maintaining the existing provision until newly formed teams are trained • Increased demand on stations affecting prevention activities • Disengagement of staff from station where provision is removed • Increased demand on stations affecting prevention activities • Too many competencies with aerial ladder platform and technical rescue based at the same station • Two station areas not within 60 minutes attendance time of a technical rescue station.

	Benefits	Risks
Poole, Stratton, Weymouth Water rescue only at Chippenham and Trowbridge	<ul style="list-style-type: none"> • Sufficient number of trained staff for resilience purposes (training and crewing shortfall) • All station areas within 60 minutes response time for a technical rescue station • Additional water technician teams at Chippenham and Trowbridge, additional flood water rescue, large animal, technical search and bariatric rescue teams. 	<ul style="list-style-type: none"> • Increased short term costs associated with implementation of changes • Increased annual training cost • Increased equipment costs • Increased fleet costs to supply two additional vehicles to keep Chippenham and Trowbridge as Level 3 water technicians when current vehicles become end-of life • Additional vehicle and equipment maintenance costs, not within existing cost envelope • Inconsistent appliances, equipment and training as different vehicle solution would be used at Chippenham and Trowbridge • Increased costs associated with co-mobilisation of Chippenham and Trowbridge • Teams not matched to risk profile, • Increased demand on stations affecting prevention activities, • Disengagement of staff from station where provision is removed • Too many competencies with aerial ladder platform and technical rescue based at the same station.

Appendix B

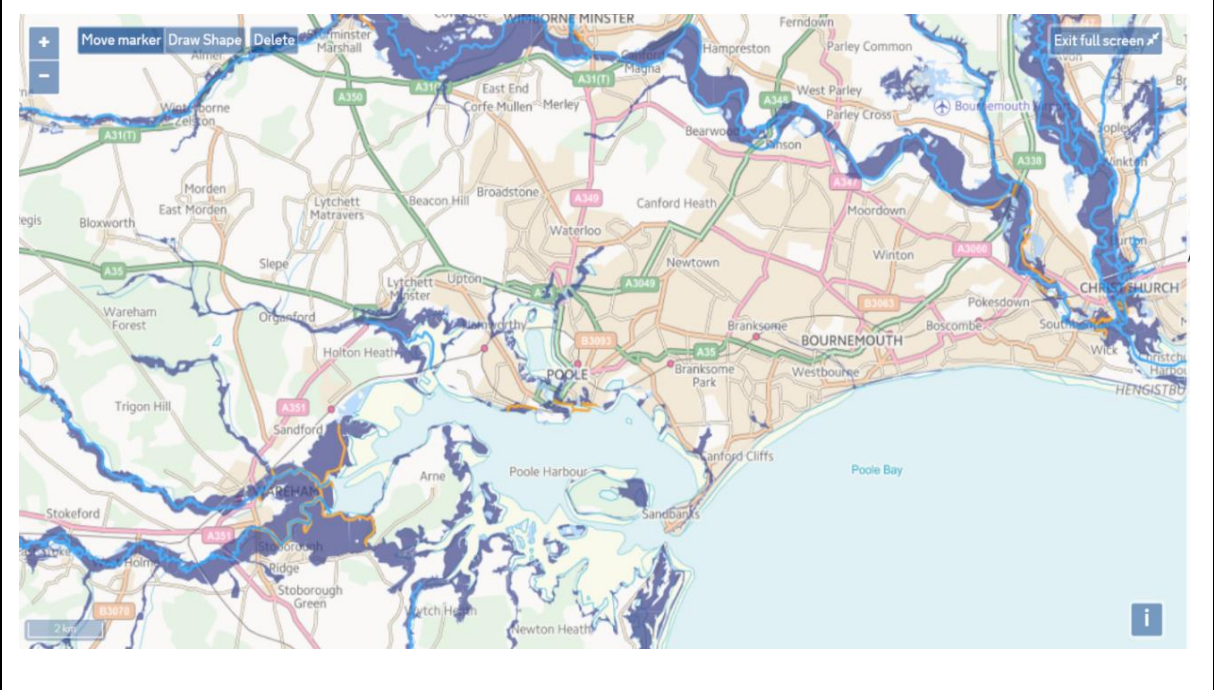
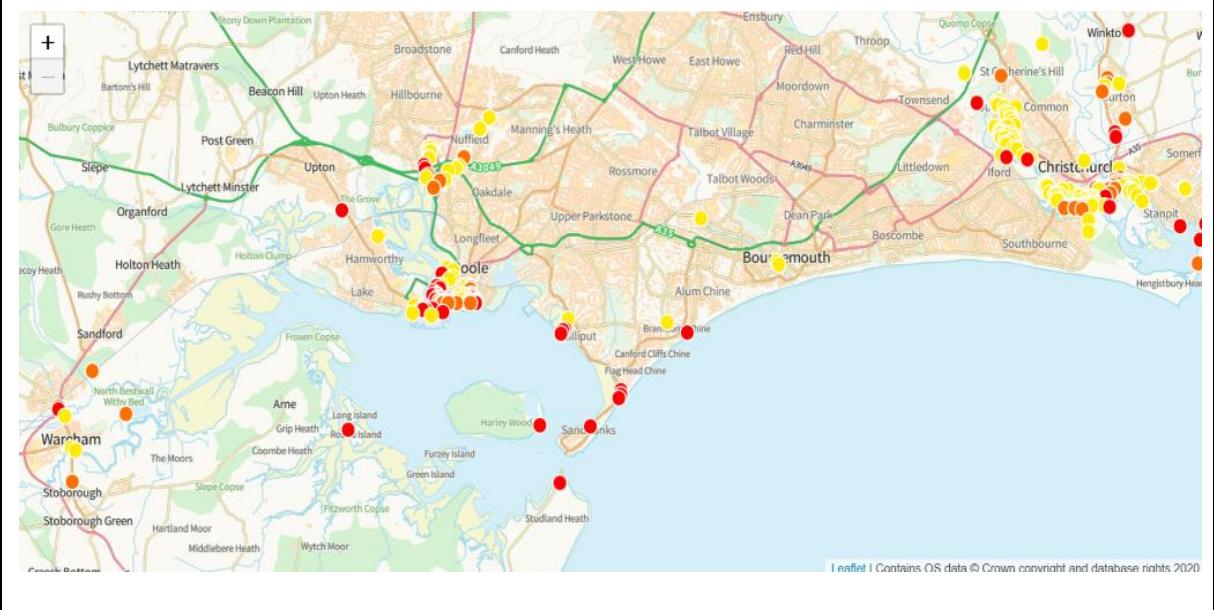
Flood maps for current water first responder and water technician stations from the Environment Agency

Current (Level 3) water technician stations

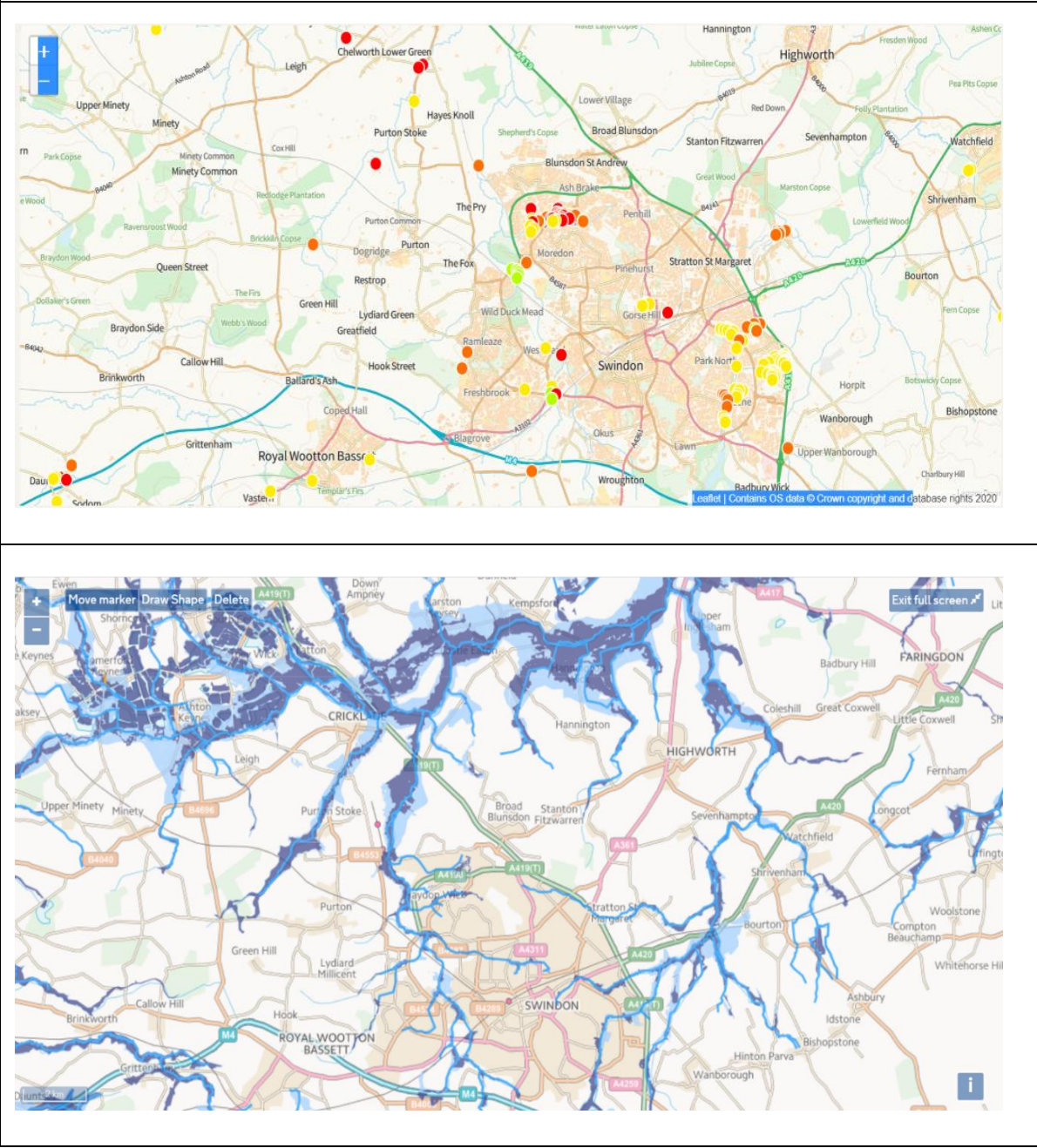


High	Each year, there is a chance of flooding of greater than 1 in 30 (3.3%).
Medium	Each year, there is a chance of flooding of between 1 in 30 (3.3%) and 1 in 100 (1%).
Low	Each year, there is a chance of flooding of between 1 in 100 (1%) and 1 in 1000 (0.1%).
Very Low	Each year, there is a chance of flooding of less than 1 in 1000 (0.1%).
None	This value is added by GetTheData to indicate a postcode which is not in a flood risk area.

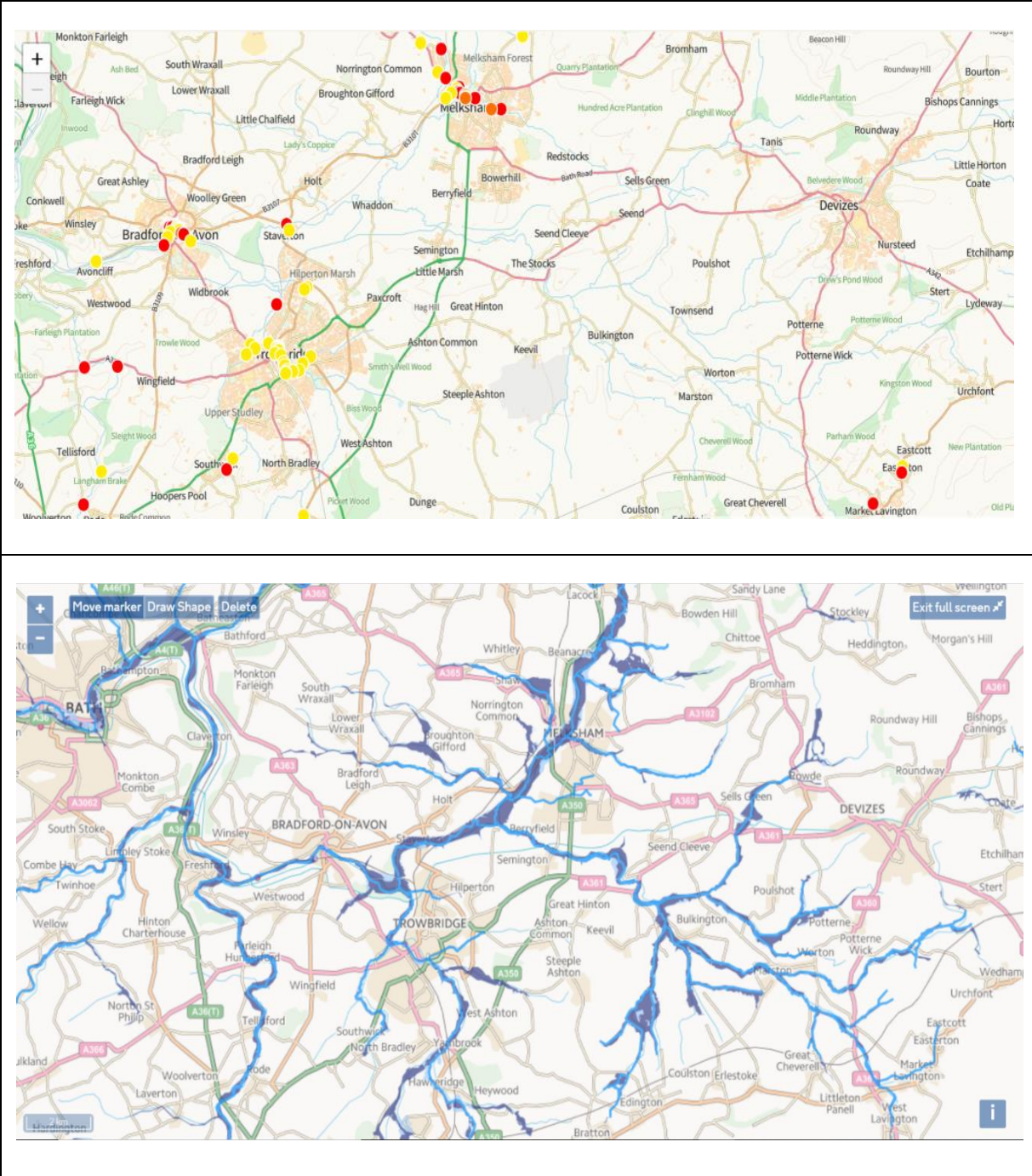
Poole - 119,039 properties in postcode area. 117 postcodes at risk



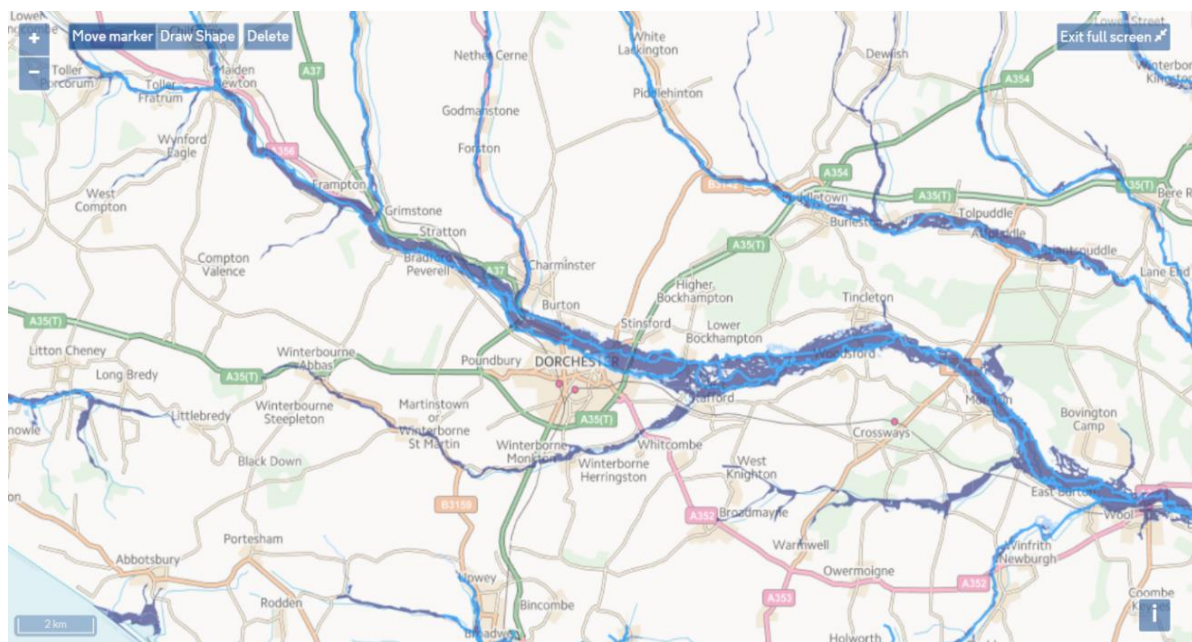
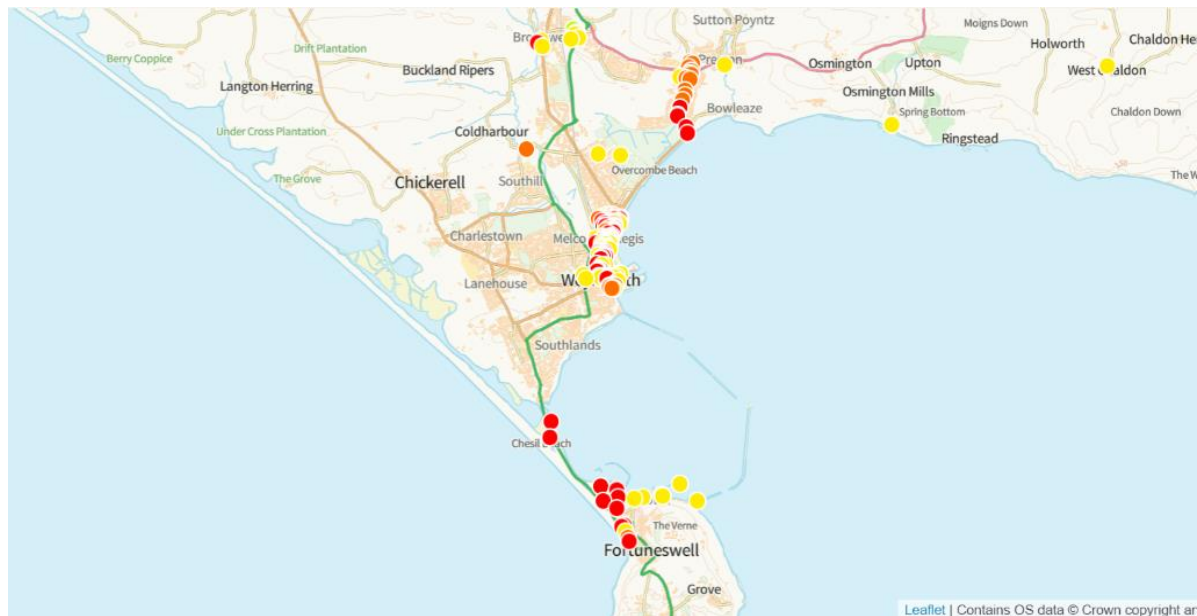
Stratton - 100,722 properties in postcode area. 157 postcodes at risk



Trowbridge - 20,059 properties in postcode area. 30 postcodes at risk

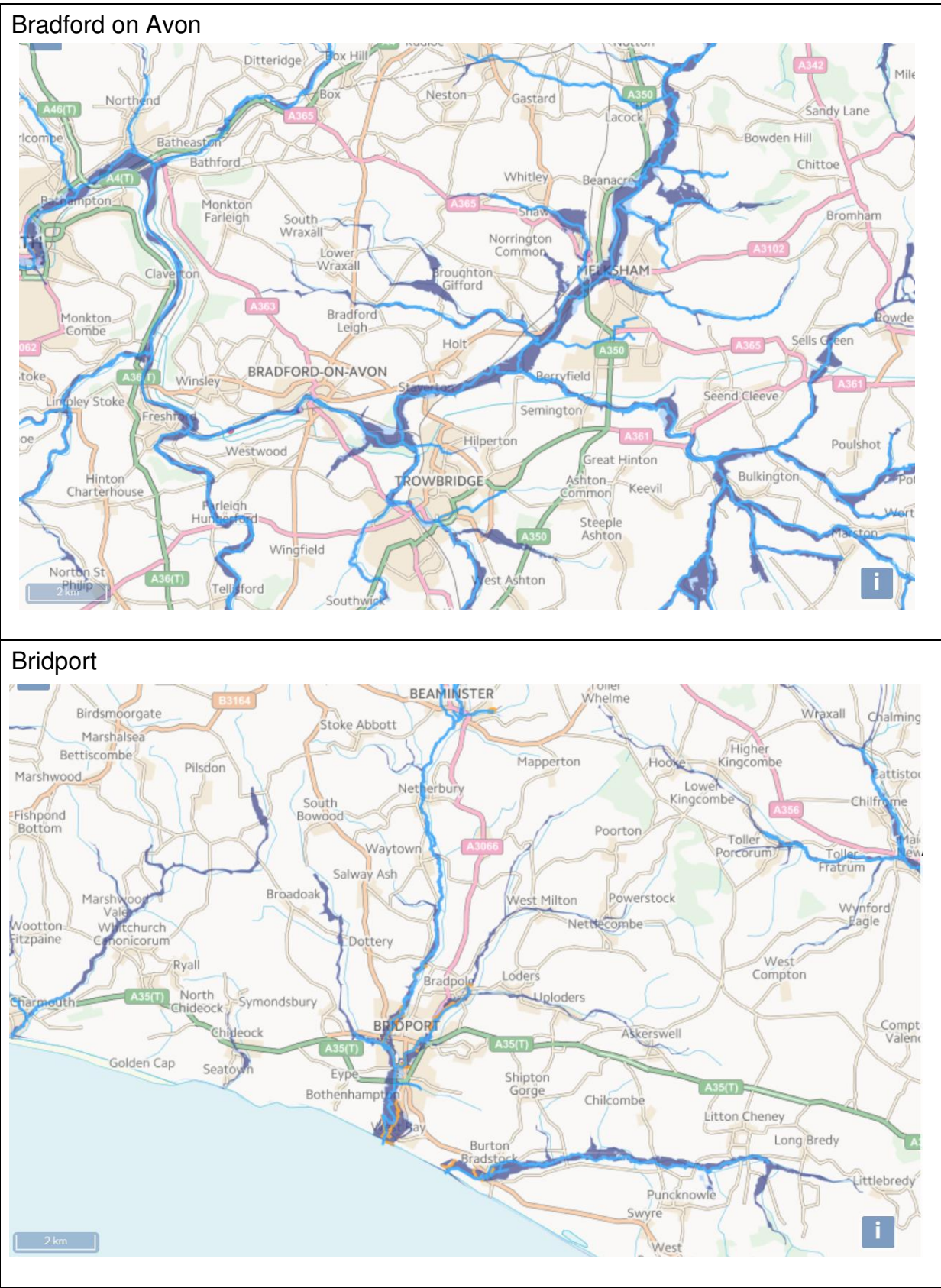


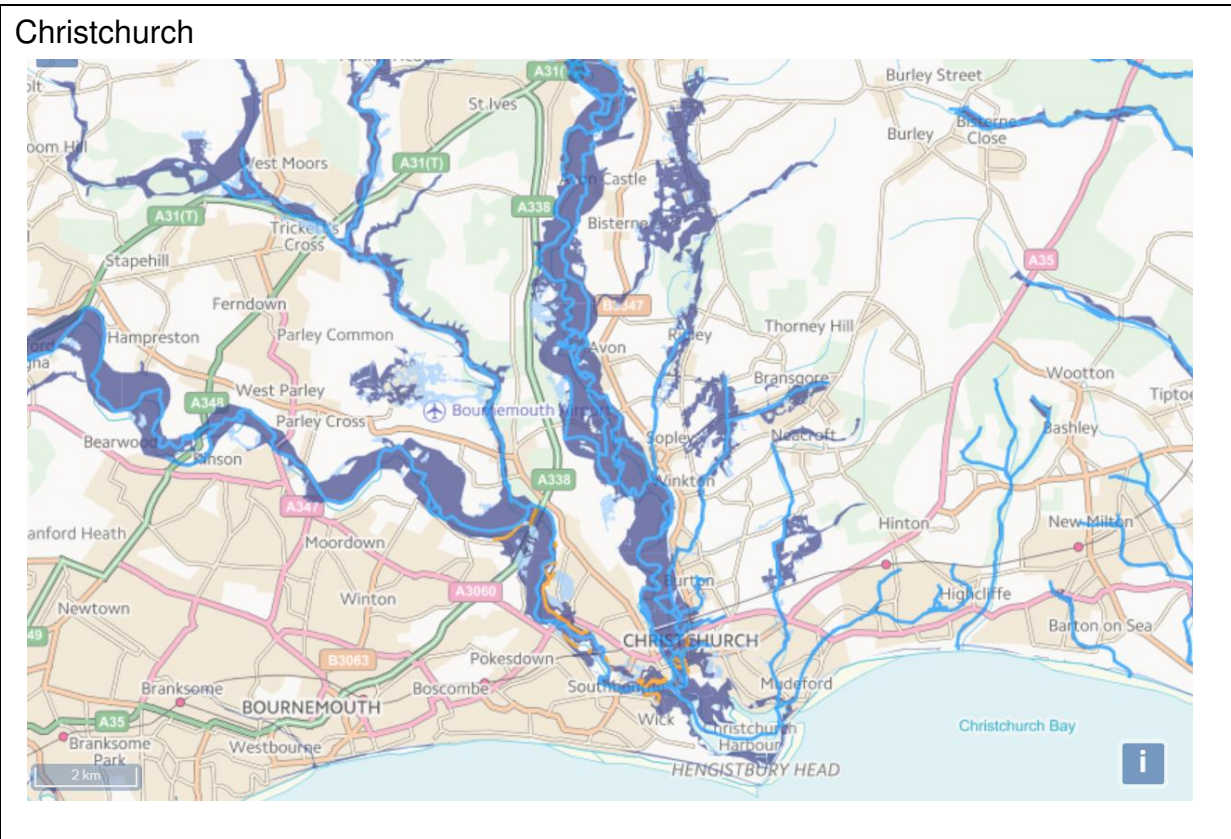
Weymouth - 32,042 properties in postcode area. 212 postcodes at risk

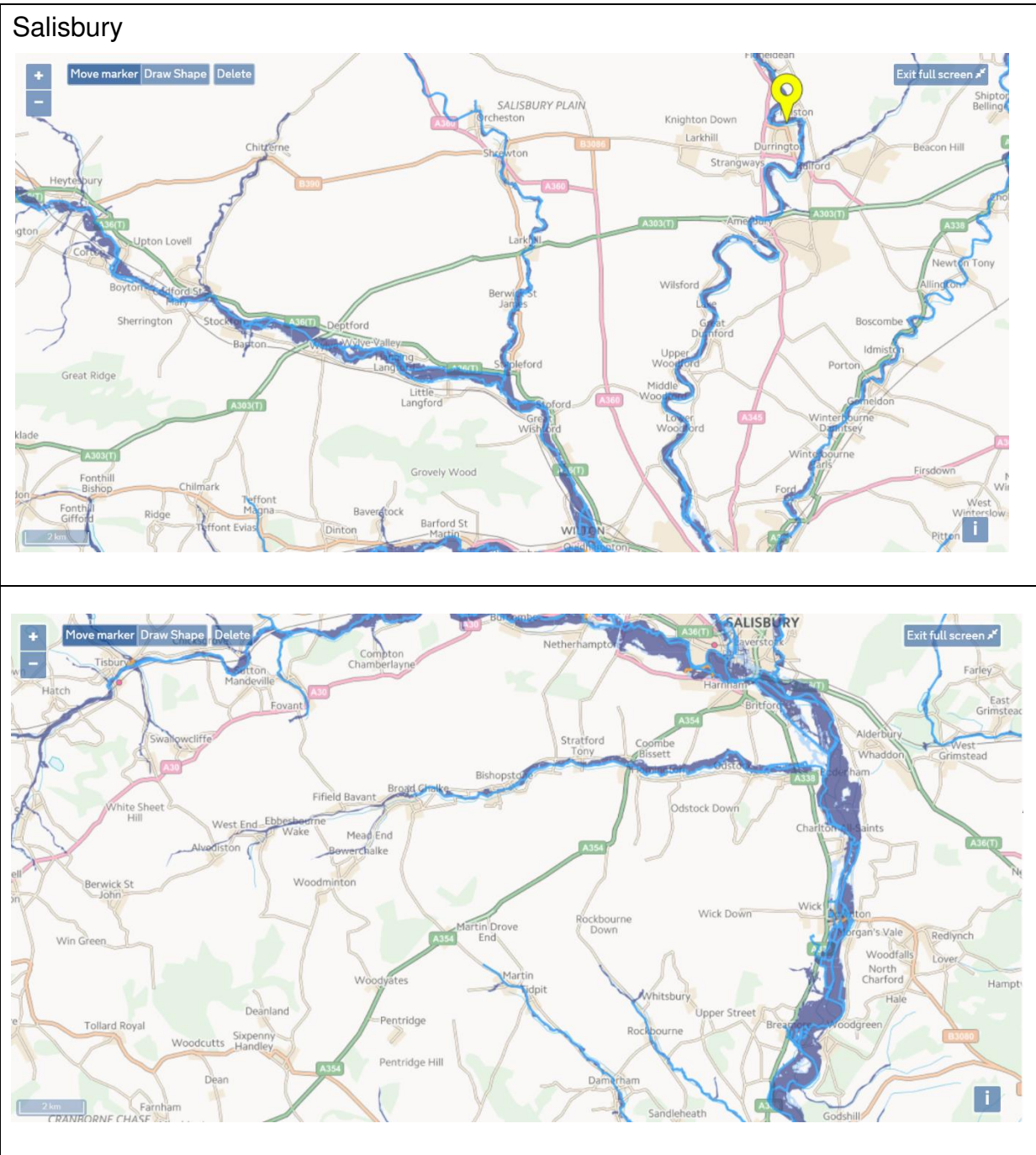


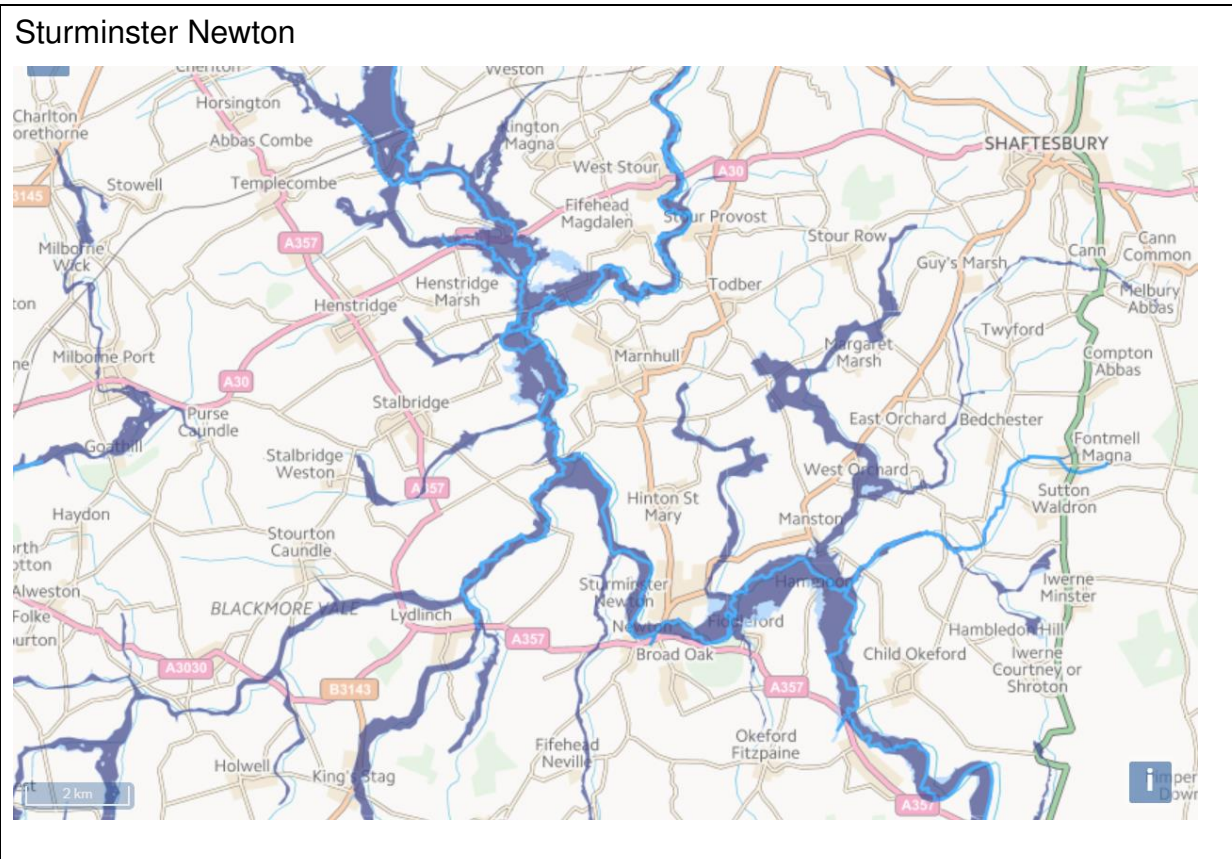


Water first responder (Level 2) teams



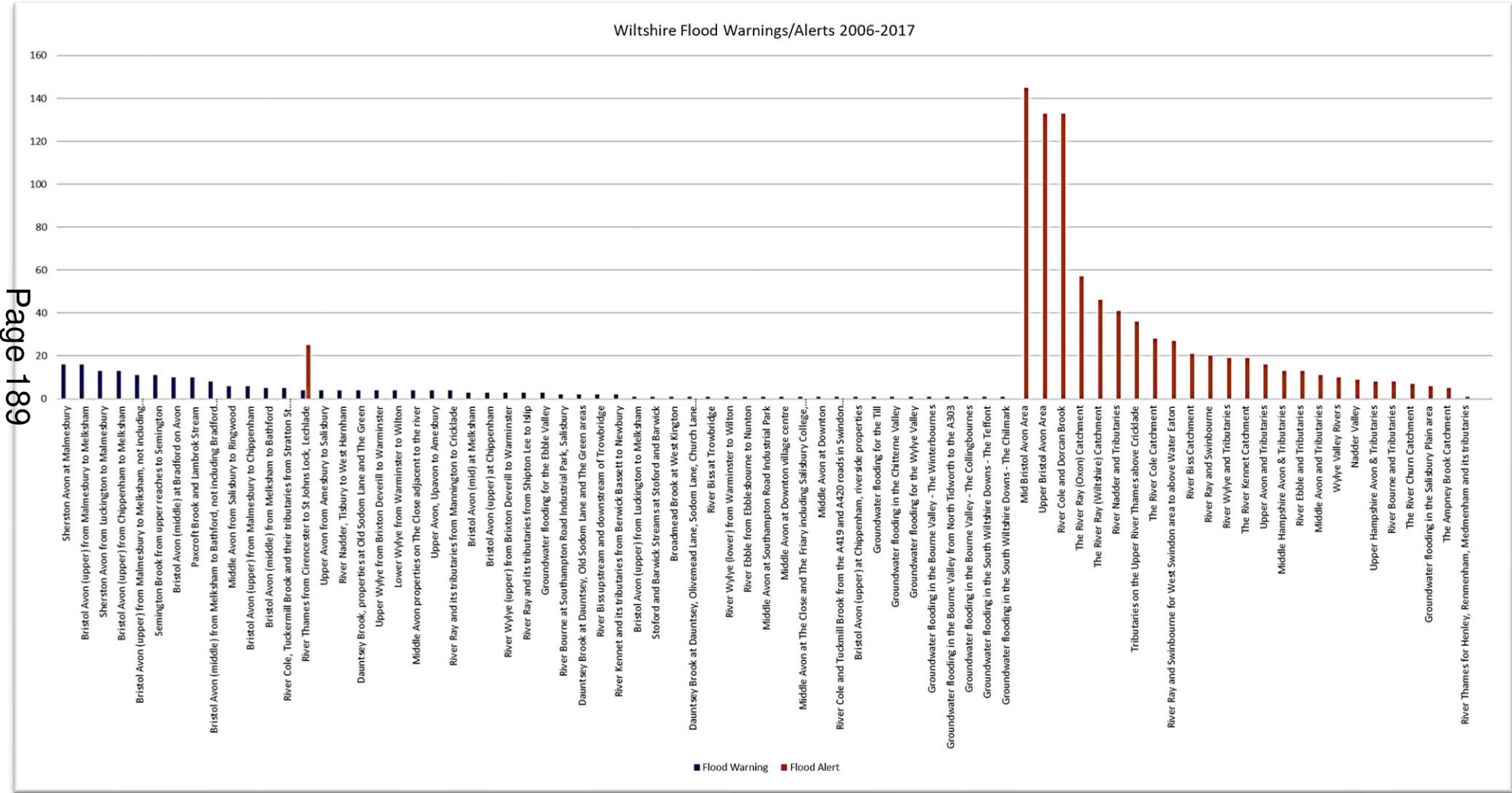


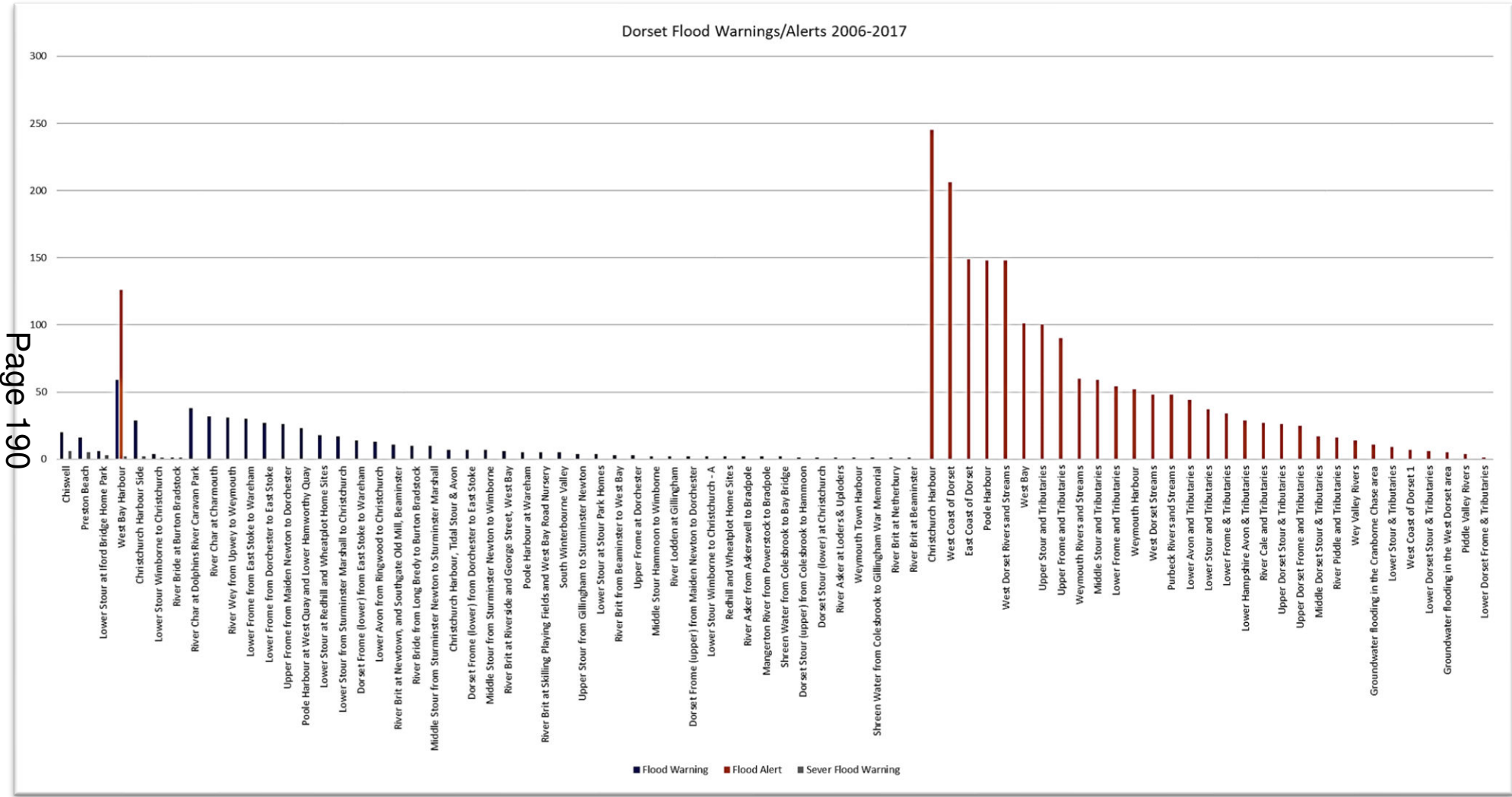




Appendix C

Details of the type of flood warning and the location for which it was issued between 2006 and 2017





Appendix D**Summary of the communication and engagement carried out during this technical rescue review**

Stakeholders	Date	Communication or engagement
Fire and Rescue Services Association (FRSA) liaison meeting	10/09/2019	Review update
Joint Working Group involving Fire Brigades Union (FBU) representatives	16/09/2019	Review update
Station Manager and Group Manager review update	20/09/2019 04/10/2019 07/10/2019	Review update
Station Manager, Group Managers and Area Managers for technical rescue stations	04/11/2019	Briefing
FRSA liaison meeting	18/12/2019	Review update
Technical rescue stations (Chippenham, Poole, Salisbury, Stratton, Trowbridge and Weymouth)	12/2019 - 01/2020	Station based meetings with all watches/groups. Feedback forms left with watches for individual feedback/comments
Joint Working Group involving FBU representatives	11/12/2019	Review update
Managers Consultation Days	07/01/2020 09/01/2020 16/01/2020 17/01/2020 23/01/2020	Briefings
All staff	13/01/2020	Weekly update
FRSA liaison meeting	03/03/2020	Review update
All staff	09/03/2020	Weekly update
FRSA liaison meeting	10/06/2020	Review update
All staff	15/06/2020	Detailed information available on dedicated SharePoint site
Joint Working Group involving FBU representatives	20/08/2020	Review update

Joint Working Group involving FBU representatives	03/09/2020	Review update
Station Managers, Group Managers and Area Managers for technical rescue stations	09/09/2020	Briefing
FRSA liaison meeting	30/09/2020	Review update
Technical Rescue Steering Group	29/10/2020	Review update
FRSA liaison meeting	11/12/2020	Review update
Member seminar for Chairs of Local Performance & Scrutiny Committees and Chair/Vice Chair of Fire and Rescue Authority and Finance & Audit committee	12/11/2020	Members seminar
Joint Working Group involving FBU representatives	13/11/2020	Review update
Fire and Rescue Authority seminar	10/12/2020	Review update
Joint Working Group involving FBU representatives	08/12/2020	Review update
Fire and Rescue Authority seminar	13/01/2021	Review update
Joint Working Group involving FBU representatives	20/01/2021	Review update
FRSA liaison meeting	28/01/2021	Review update
All staff	2019/2020/2021	Question time sessions

Council are requested to adopt the amended Allotment Agreement for the year commencing 1 March 2022 as recommended by the Environment and Climate Working Group. The amended Agreement will prohibit allotment holders from using all pesticides, including insecticides, pesticides, herbicides, and fungicides.

It is proposed that the ban will be enforced once three months of the new tenancy year have elapsed.

The Environment and Climate Working Group determined that the definition of this group of chemicals is to be decided. It is recommended that the Asset Management Committee be tasked with the creation of an Aide Memoire to guide Tenants regarding this.

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ALLOTMENT RULES – 1st March 2022

Made by Melksham Town Council in accordance with the Allotment Acts of 1908 - 1950

Throughout these rules the expression “the Council” means Melksham Town Council

1. Any person who, at the time of application to the Council for an allotment garden, is a resident of Melksham Town shall be eligible to become a tenant of an allotment subject to the statutory provision that one person shall not hold allotments acquired under the above mentioned Acts exceeding ½ acre. If a tenant moves out of the area during their tenancy period then their right to an allotment within the Melksham Town area will cease on the next renewal date.
2. The tenant of an allotment garden shall comply with the following conditions:-
 - a) The Tenant must use the plot as an allotment garden only and for no other purpose. The Tenant must cultivate the allotment garden wholly or mainly for the production of vegetable, fruit and flower crops for domestic consumption by themselves or their family.
 - b) The Tenant must keep the allotment clean, free from weeds and otherwise maintain it in a good state of cultivation and fertility and good condition and must keep any pathway included in or abutting on the allotment (or, in the case of any pathway abutting on the allotment and any other allotment garden or allotment gardens, the half width of it) reasonably free from weeds.
 - c) If any Tenant has not adhered to the cultivation rules, a first warning letter will be sent outlining the issue(s) and giving the Tenant 4 weeks to rectify it/them. If no significant improvement has been made a Notice to Quit will be issued to the Tenant, giving them a further 4 weeks to rectify the issue(s) specified. Then if no significant improvement is seen to have taken place the Tenant will be sent a third and final letter informing them that their tenancy has ended. The Council has also the right to seek compensation for the clearing of any plot left in an untidy condition.
 - d) New Tenants will have an initial 3-month grace period without inspection, after which they are expected to have at least 25% of their plot cultivated. Plots should be 50% cultivated after 6 months, and 75% cultivated after 12 months. If this is not achieved a tenancy may be terminated and the plot re-let. The only exception is for Tenants taking up their tenancy between December and February – this period will be discounted.
 - e) The Tenant must not cause or permit any nuisance or annoyance to the occupier of any other allotment garden or obstruct or encroach on any path or roadway set out by the Council for the use of the occupiers of the allotment gardens.
 - f) The Tenant must at all times during the tenancy observe and comply fully with all enactments, statutory instruments, local, parochial or other bylaws, orders or regulations affecting the Allotment.
 - g) The Tenant shall not under-let, assign or part with the possession of the allotment garden or any part of it, without the written consent of the Council.
 - h) The Tenant must not cut or prune any timber or other trees, or take, sell or carry away any mineral, gravel, sand, earth or clay without the written consent of the Council.

- i) The Tenant shall not connect a hosepipe to any water tap on the allotment gardens provided by the Council.
 - j) The Tenant shall not erect any building on the allotment without the written consent of the Council.
 - k) The Tenant shall not use barbed wire for a fence adjoining any path set out by the Council for the use of the occupiers of the allotment gardens.
 - l) The Tenant must not plant any trees or fruit bushes or any crops requiring more than twelve months to mature, without the written consent of the Council.
 - m) The Tenant must not deposit, or allow other persons to deposit, on the allotment any refuse or any decaying matter, except manure and compost in such quantities as may be reasonably required for use in cultivation or place any matter in the hedges or ditches in the allotment field of which the allotment forms part or on adjoining land. The Tenant must remove all waste generated from the allotment from the site.
 - n) No bonfires are permitted between 1st April and 30th September.
 - o) The Tenant shall not bring any dog into the allotment field of which the allotment forms part, or cause one to be brought in, unless the dog is held on a leash. The Town Council reserves the right to refuse admittance to any dog causing a nuisance.
 - p) No livestock of any kind, except as specifically allowed by statute, shall be kept on the allotment garden.
 - q) **With effect from 1 March 2022, allotment tenants are banned from using all pesticides, including insecticides, pesticides, herbicides, and fungicides. Detailed guidance will be made available.** All reasonable care must be taken to ensure that adjoining hedges, trees and crops are not adversely affected when addressing weed issues, and should any damage occur this must be made good or replanted as necessary.
 - r) The Council shall accept no liability in respect of any claim whatsoever arising from personal injury to the Tenant or any third party and the Tenant agrees to indemnify the Council in respect of any such claim made against it. The Council shall accept no liability to the Tenant in respect of any damage to the allotment or theft of any item or structure placed on the allotment.
 - s) The Tenant shall observe and perform any other specific conditions which the Council consider necessary to preserve the allotment garden from deterioration and of which notice to the applicants for the allotment garden is given in accordance with these rules.
3. The rent of an allotment garden shall be determined by the Council and be subject to periodic review. The rent shall, unless otherwise agreed in writing by the Town Clerk, be paid yearly on 1st March in advance for the period 1st March to the last day of February. If a tenancy is commenced in the last quarter of the tenancy year, then a pro-rata payment will be due. The Tenancy will be terminated by the Council, giving one month's notice, if the rent is in arrears for 40 days or more, whether legally demanded or not.
4. Any member or officer of Melksham Town Council shall be entitled, at any time when directed by the Council, to enter and inspect an allotment garden. The Tenant agrees that the Council shall have the right to refuse admittance to the allotment to any person, other than the Tenant or a member of his family, unless accompanied by the Tenant or a member of their family.

5. Any notice required to be given by the Council to the Tenant may be signed on behalf of the Council by the Town Clerk and may be served on the Tenant either personally or by leaving it at their last known address or by letter sent by recorded delivery service addressed to them there or by fixing the same in some conspicuous manner on the Allotment. Any notice required to be given by the Tenant to the Council shall be sufficiently given if signed by the Tenant and sent in a pre-paid post letter to the Town Clerk. The Tenant agrees to inform the Council immediately of any change of his address.
6. The tenancy will end on the death of the tenant. The Tenant's surviving family may continue with the tenancy, with the consent of the Council and on the signing of a new allotment agreement.
7. The Tenant agrees that any case of dispute between himself and any other occupier of an allotment garden in the allotment field shall be referred to the Council whose decision shall be final.
8. This agreement replaces all previous allotment agreements, if any exist, between the Council and the Tenant, and if not returned signed within 30 days of receipt, serves as 12 months' notice of termination in accordance with the Allotments Act.

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MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: WORKING FROM HOME ALLOWANCE

1. Background

- 1.1 From 6 April 2020, employers have been able to pay employees up to £6 a week tax-free to cover additional costs if they have had to work from home.
- 1.2 Employees who have not received the working from home expenses payment direct from their employer can apply to receive the tax relief from H M Revenue and Customs (HMRC).
- 1.3 Employees can claim tax relief based on the rate at which they pay tax. For example, if an employed worker pays the 20% basic rate of tax and claims tax relief on £6 a week, they would receive £1.20 a week in tax relief (20% of £6 a week) towards the cost of their household bills.
- 1.4 Higher rate taxpayers would therefore receive £2.40 a week (40% of £6 a week).
- 1.5 Over the course of the year, this could mean employees can reduce the tax they pay by £62.40 or £124.80 respectively, if a claim is made to HMRC.
- 1.6 Alternatively, if the allowance is paid by their employer, employees would receive £312.00 over the course of a year.

2. Options

- 2.1 Melksham Town Council has two options:
- 2.2 Firstly, pay the working from home allowance in full as a one-off lumpsum payment of £312.00 in the 2020/2021 tax year and on a monthly basis, thereafter.
- 2.3 Secondly, to make Town Council employees aware of the scheme, advising them to make a claim online to obtain the tax relief to which they are entitled.

3. Budget

- 3.1 Melksham Town Council has 21 employees in total: four in the Assembly Hall, eight in the Amenities Team and nine in the Town Hall. The Amenities Team are not required to work from home. One member of the Town Hall team is employed through an agency.
- 3.2 The payment of the allowance by the Council under option one would cost a maximum of £3,744 per annum for the 12 employees who are required to work from home.
- 3.3 However, one member of the Assembly Hall team is leaving the employment of the Town Council on 8 March 2021.
- 3.4 Additionally, employees who are furloughed will not be entitled to the allowance.
- 3.5 The allowance will no longer be payable if and when employees are able to resume working from the 'office' rather than from home.
- 3.6 Option two will have no budgetary implications for the Council.

4. Recommendations

- 4.1 That this report is noted and that a decision be made:
- 4.2 Either, to pay the Working From Home allowance retrospectively for the current tax year and also for future tax years.
- 4.3 Or, advising employees to make a claim for tax relief themselves through the HM Revenue and Customs website.

5.0 Contact

Patsy Clover

Assistant to the Town Clerk

patsy.clover@melksham-tc.gov.uk

MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: CARRY FORWARD OF UNUSED ANNUAL LEAVE FROM 2020/21 TO 2021/22 AND THE TAKING OF LEAVE IN FUTURE YEARS

1. Background

- 1.1 Melksham Town Council's Employee Handbook currently states the following regarding annual leave:

'Our Holiday Year

All employees are encouraged to take their full holiday entitlement during the holiday year which runs from 01 April to 31 March. However, it is your responsibility to schedule your holiday so that it can be taken at an appropriate time.

Employees will not usually be permitted to carry over holiday entitlement into the following holiday year.

In certain circumstances, at the Council's discretion and subject to certain rules, the carrying over of a proportion of annual leave may be allowed.'

- 1.2 The Working Time Regulations (1998) stipulate that an employee's leave entitlement under regulation 13 (four weeks annual leave in each leave year) cannot generally be carried between leave years, with exceptions due to sickness or maternity leave.
- 1.3 They also stipulate that an employee's leave entitlement under regulation 13A (1.6 weeks annual leave in each leave year from 1 April 2009) can be carried forward one leave year but no further through agreement between workers and their employers.
- 1.4 The Working Time (Coronavirus) (Amendment) Regulations 2020 amends the Working Time Regulations 1998 to create a further exemption relating specifically to COVID-19. Where it is not reasonably practicable for a worker to take some, or all, of the holiday to which they are entitled due to the coronavirus, they have a right to carry the 4 weeks under regulation 13 into the next 2 leave years. This will not apply to the 1.6 weeks under regulation 13A leave, but this can be carried forward one year by agreement between workers and employers.

1.5 The impact of various lockdowns and workload pressures during the current leave year have resulted in a backlog of leave to be taken in the final quarter of the leave year.

1.6 In addition, the ability for certain employees to take leave has been affected by staffing issues.

2. Actions

2.1 To note the effect of the Working Time (Coronavirus) (Amendment) Regulations 2020.

3. Proposals/ Recommendations

3.1 To avoid a backlog of leave, it is proposed that the following addition be made to the Employee Handbook:

Employees are requested to take a minimum of their pro-rated leave each quarter.

3.2 To allow members of staff unable to take their annual leave during the current leave year because of staffing issues to carry forward the unused balance to be used over the next two leave years.

4. Contact

Patsy Clover - Assistant to the Town Clerk

patsy.clover@melksham-tc.gov.uk



MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: UPDATE - Proposed Acquisition of The Spiritualists' Church, Friends' Garden - off King Street, Melksham

1 BACKGROUND

- 1.1 At the meeting of this Full Council on 16 November, it was resolved to work with the Trustees to gather the evidence to demonstrate 20 years unhindered access to The Spiritualists' Church, Friends' Garden in line with our Solicitor's recommendation in the matter, to enable the Town Council to register a right of access to the garden.
- 1.2 It was recommended by our solicitor that the Trustees should be asked to provide the relevant evidence from several people as to the use of the right of way on a regular basis, without consent or interruption by the owners of the right of way for at least 20 years. This should be undertaken before any transfer to the Council is completed and details of the response provided to our solicitor.

2 PROGRESS

- 2.1 Progressing this work has proved problematic.
- 2.2 Until very recently, no response to enquiries of the Trustees regarding the necessary evidence of the use of the right of way over the last 20 years has been forthcoming.
- 2.3 Local enquiries regarding the use of the right of way, set in motion by the Economic Development Manager, have not yet produced the necessary evidence of the use of the right of way over the last 20 years.
- 2.4 The Trustees responsible for The Spiritualists' Church, Friends' Garden have now been in touch, acknowledged the delay in responding to enquiries and have committed to assisting in any way they can in getting this sorted out to enable the transference of the property into the Town Council's hands.
- 2.5 The Trustees are taking advice from their own solicitors and are hoping they can provide the certain information this Council is looking for [as advised by our solicitor].

3 RESOURCES AND BUDGET

- 3.1 There are no budget implications currently although there will be legal and conveyancing costs in due course, assuming the establishment of the right of way and subsequent acquisition of The Spiritualists' Church, Friends' Garden is successful.

4 RISK

- 4.1 The greatest risk is that the right of way across the track from King Street is not proven in which case the acquisition of The Spiritualists' Church, Friends' Garden, should it go ahead, would be without any right of way access and would therefore be a significant risk.

5 RECOMMENDATIONS

- 5.1 That this Council should await the response from the Trustees.
- 5.2 This is considered the appropriate action to take as it closely follows the advice from our solicitor in this respect.
- 5.3 That the Economic Development Manager brings regular update reports to this Council regarding progress in this matter.

6 CONTACT

David McKnight

Economic Development Manager

david.mcknight@melksham-tc.gov.uk

07759 284 266



MELKSHAM TOWN COUNCIL

CCTV WORKING GROUP

23 FEBRUARY 2021

Report: CCTV Provision in Melksham and Melksham Without - PROJECT UPDATE

1 BACKGROUND

- 1.1 For a number of years, there has been ambition in the Melksham area for a high-quality Closed-Circuit TV [CCTV] system in priority areas of the town, and hinterlands, to safeguard local residents, as well as visitors, as they go about their legitimate activities – either business or leisure.
- 1.2 Increasingly the lovely Market Place in Melksham town centre is a focal point for activities, formal and informal gatherings; it is also a transport hub for visitors to the town from outlying areas and from further afield.
- 1.3 There is existing CCTV provision in the town centre, developed by a team of volunteers, led by Mr Colin Goodhind. This provision, not currently actively monitored, with its central hub at the Town Hall, needs detailing, mapping and its fitness for purpose assessing.
- 1.4 There is also a second system covering areas of the King George V Park [KGV], with its central hub at the Pavilion in the park. This also needs assessing in terms of fitness for purpose and scope. The future use of the Pavilion is set to change with café facilities being introduced and managed by a third party (yet to be appointed).
- 1.5 There is no major CCTV provision with Melksham Without, although there is some very good quality local provision, notably in the area of Melksham Without Parish Council's offices – a system with was specified, installed, maintained and managed by Melksham provider KAN Connections, with whom Mr Colin Goodhind [see 1.3 above], is associated. We understand that this system is evidential quality and used from time to time by Wiltshire Police.
- 1.6 A CCTV Working Group of interested parties has been established, hosted by Melksham Town Council to explore the need for further developing CCTV in the town and in Melksham Without, reporting back and making recommendations to the Town Council's Asset Management Committee and Melksham Without Parish Council, for discussion and consideration/decision as necessary.
- 1.7 The Melksham Town Council Economic Development Manager is the lead officer for the Working Group. Councillor Adrienne Westbrook, of Melksham Town Council, is chair.

2 PROPOSAL

- 2.1 Sgt James Twyford of Wiltshire Police has provided a detailed assessment to substantiate the need for CCTV in Melksham Town [Appendices 1 and 2] and are currently working with Melksham Without Parish Council to assess the need for CCTV in Melksham Without Parish.
- 2.2 The positive police assessment of the need for CCTV in Melksham Town is detailed and convincing. The CCTV Working Group is very grateful for the assistance of Wiltshire Police in this matter. Police officers are also working with Pub Watch landlords in Melksham Town regarding the provision of CCTV in and around their premises. The CCTV Working group is liaising with the secretary of Melksham Pub Watch.
- 2.3 We are currently awaiting the outcome of discussions of Melksham Without Parish Council regarding the need for CCTV in Melksham Without.
- 2.4 We believe the case for CCTV provision in Melksham Town itself is now substantiated and therefore seek agreement to proceed with Stage 2 of this project – i.e. to assess and scope the existing provision in Melksham Town and review existing documentation.

3 DETAILS

- 3.1 Proceeding with stage 2 of this project will involve the support of one of the contractors with knowledge of our existing CCTV infrastructure to provide the specification and location of existing cameras, underground ducting and provisions within the current CCTV monitoring hub in the Town Hall.
- 3.2 This second stage of the project will provide the necessary baseline information to assist in the future development of stage 3 of the project whereby:
 - 3.2.1 *Developing a CCTV specification across the identified priority locations in Melksham and Melksham Without, which can form the basis of a tender, taking into account existing provision/equipment and its suitability. Decide how the system will be linked / managed / monitored / information stored. The output of stage 3 will identify potential CCTV providers and allow the obtaining of indicative costs for budgetary and fundraising purposes. Outright purchase and lease options should be explored at this stage; also maintenance / support specifications and indicative annual costs.*
- 3.3 It should be made clear that agreement for stage 2 only is being requested at this stage. Further agreement will be sought before progressing beyond stage 2. By this time, we will also be aware of the conclusions from Melksham Without Parish Council in respect of CCTV provision in the parish and therefore will be able to consider the spatial requirements of a system across the Town and the Parish as a whole.

4 RESOURCES AND BUDGET

- 4.1 The cost of stage 2 is likely to be modest. The Economic Development Manager proposes working closely with the successful contractor in order to gain a detailed understanding of the existing provision and also to minimise the cost of this work.
- 4.2 The Town Clerk will be consulted to determine whether there is headroom in the 2020/21 budget for this element of the work or whether the work will need to be undertaken in 2021/22 where there is a total provision for CCTV works of £2500 in the budget.

5 RECOMMENDATION

- 5.1 That this report is received and the development of Stage 2 of the CCTV project work is approved.

- 5.2 That the timing of stage 2 of the works, in terms of financial year, is determined by the Town Clerk.
- 5.3 The constraints of the CCTV budget are noted.
- 5.4 The support necessary for Stage 2 works is procured in accordance with this Council's policy.
- 5.5 That the outcome of Stage 2 of the project works is reported back to this Council with a recommendation for the development of Stage 3.

6 CONTACT

David McKnight

Economic Development Manager

david.mcknight@melksham-tc.gov.uk

07759 284 266

APPENDIX 1

WILTSHIRE POLICE – MELKSHAM CCTV REPORT



Introduction

This Report is provided to support the Geographical and Crime-Trend Data with accompanying Analysis and Recommendation, with a view to helping determine the most effective way forward with any future CCTV installation.

The overarching objective behind this, is to look for ways to reduce Town Centre Crime and Anti-Social Behaviour in areas which suffer the most. CCTV has been shown to have a mild to moderate impact upon both the prevention and detection of Crime and ASB, depending on the effectiveness of its deployment. It is a resource that a vast majority of Wiltshire Towns have access to in varying guises.

The most relevant KPI's for this objective are:

- The Overall rate of Public Space Crime within the Town.
- The Rate of Detection for Crime within the Town, specifically the proportion of investigations which suffer from investigation-terminal evidential difficulties.
- The Level of Anti-Social Behaviour within the Town.

Current Situation / Background

The Charts, Graphs and Maps provided in the accompanying document, demonstrate that the levels of Crime and Anti-Social Behaviour remained roughly stable at around 2600 incidents per year, over a 24-month period covering 2019/2020. They show a clearly defined Hot Spot of incidents which encompasses the following areas:

- King George V Playing Field
- Skate Park
- Bath Road
- Bank Street
- Lowbourne
- Church Street and Church Walk with associating Car Park
- High Street and Stratton's Walk
- Marketplace and Melksham House
- King Street and King Street Car Park

There are two distinctly different types of incident which plague this area. The first is Youth-Related Anti-Social Behaviour, which predominantly afflicts the Playing Field and Skate Park. The second is broader and encompasses Violence, Damage and Alcohol-related ASB across the other areas. There is overlap between the two.

Melksham has a Pubwatch Scheme and a majority of the Town's Pubs are active members. CCTV is fitted in almost all pubs and is currently used to good effect in the Detection of Crime within individual establishments. There are however issues when incidents occur outside; often out of the reach of CCTV, in alleyways or by late night food establishments.

Issues relating to Licensed Premises account for around 20% of the total reporting, leaving 80% of incidents to chance as to whether they will be captured on CCTV or not, whether in part or in full.

Issues within the Town Park generally suffer with poor quality Witness Evidence. There is poor ambient lighting other than within the Skate Park and no natural surveillance from neighbours for the area.

Incidents are most often between teenagers and there is often evidence of alcohol and drug use left behind. If there are witnesses to incidents, they are often unwilling to assist investigations due to mixed loyalties or concern for reprisals.

- *One notable recent success was the Arrest and Charge of five individuals who attacked a handful of Skateboarders who were making good, legitimate use of the Skate Park. This prosecution was made possible thanks to the cooperation of three Witnesses, one of whom supplied a Video Recording they'd made on their phone during the incident. The phone footage was instrumental in clearing up identification issues with the Offending Group.*

Speaking more generally; common issues that Local Officers encounter when investigating crimes include:

- *Generally poor-quality footage in terms of lighting, image resolution and frame rate*
- *Footage being captured from too great a distance to portray an incident accurately*
- *Gaps in footage continuity, resulting in partial incident-capture*
- *Time taken to recover images being too great; meaning loss of evidence through overwriting, or significant Investigatory Milestones being passed before footage is recovered.*

These issues are commonplace throughout the County, with both Public and Privately-owned CCTV systems.

The current system also means that it is often the case that Officers arrive to an incident and are either faced with Witnesses who are either unwilling or unable to furnish them with sufficient detail to take further action. This contributes to the fact that 65% of reported crime is closed due to Evidential Difficulties.

Options

There are several available options to resolve the known issues and improve upon the current situation. All of these options are employed within various Wiltshire Towns, based upon individual local requirements. There are full-time, part-time (usually volunteer-led) and passive systems in use.

Full Time

The first option is a full-time, staffed, CCTV System with a Police Radio Terminal. This is only employed within Trowbridge and Swindon at this time, with the Trowbridge system being linked to The Shires Shopping Centre. This is the most expensive, but the most comprehensive solution. It allows Operators to communicate in real time with the Officers on the ground; it permits discreet observation of ongoing incidents and Operators can capture evidence for later use, ensuring its

quality through use of pan/tilt/zoom cameras.

It also mitigates against the pitfalls of Marked Police Vehicles being present at crucial stages. It has often been observed that Offenders will hide or change their appearance as they hear a vehicle approaching. This creates missed opportunities, especially if Officers are arriving at incidents 10 minutes after a report and are left with a 1-mile radius to search.

Additionally, if Offenders are tracked in real-time through an area, it is possible to connect them to scenes they would otherwise not be linked to.

Part Time

The second option is a part-time, volunteer-led scheme, as used in Devizes, Calne, Warminster / Westbury (jointly), Salisbury, Chippenham and Royal Wootton Bassett. This offers a “best of both worlds” solution, which provides monitored CCTV at Peak Times and a review facility outside of those hours. They have Police Radio Base Stations and appropriate training is given; it provides the above solution on a more cost-effective basis.

The system in Devizes is in a building where Police Officers have 24/7 access to review footage or monitor the system in real time if required. This has been utilised with great success in the past.

Passive

The third option is an unstaffed CCTV system which is available on a reactive basis. This is the system presently employed in Melksham, Marlborough and Pewsey.

This provides no proactive coverage but is a simpler scheme to operate. The success of these schemes is limited and dependent on the times of day that footage is available for review.

If nothing is changed, the latter is the service Melksham will continue to receive. The coverage is limited in terms of area and quality, which represents a risk of Crimes continuing to go undetected at a similar rate.

From a Policing perspective, a Staffed CCTV Control Room has huge advantages and in addition to the above points, it removes the delay in messages being passed through a Control Room. 24/7 access to both the Live and Recorded Footage, helps to bridge the gap between Full and Part Time run systems still further.

Recommendation

Considering the large cost of staffing a Full-Time system and the relatively small size of the Town; the Recommendation would be for a Volunteer-Led Part Time Monitored System to be implemented.

The Recommendation would also be to allow Police Officers and Staff to be able to access Live and Recorded Footage 24/7. Night-vision in poorly lit areas would be advantageous; or improving ambient lighting where required. The advantages of this system are as follows:

- Volunteers can monitor Live Footage during peak times and events such as Carnival, Party in the Park, Night-Time Economy Hours or Community Events. These events generally have Police Staff dedicated to them; so monitored CCTV at these peak times provides extra support and targeting of patrols.

- Footage would be available for review at any time. This can dramatically alter the progress of investigations in their Golden Hour. If Suspects can be identified within a short space of time after the offence, the likelihood of obtaining sufficient evidence to Charge is greater.
 - o There is a greater likelihood of recovering stolen property; catching Offenders in the same clothing or location, or with the same injuries visible, as examples.
 - o In Devizes last year a male was caught after committing an Indecent Exposure. Officers were able to access the CCTV Office out of hours and then used it to track the male through Town and identify his vehicle. The footage was of sufficient quality to read his number plate and get a clear picture of his face. He was arrested within two hours of the Offence and later convicted at Court for a series of similar incidents.
- Volunteers become subject-matter experts over time and are able to stay abreast of issues and maintenance with the system. They also become able to identify blind spots and help develop the system in line with the needs of the time.
- More Incidents would be captured on footage and identified at the time. This potentially identifies any hidden Demand that currently goes unreported. In turn, this helps to shape the overall Demand picture and ensures Melksham receives its continued fair share of Officers.
- There is scope to reduce the current percentage of crimes closed due to insufficient evidence, from its current rate at 65%.
- Perpetrators of Anti-Social Behaviour can be identified more readily, which allows for Interventions to be targeted at the right people, at the right level. At this current time, this is largely dependent on Witness evidence. This would likely be the single biggest improvement brought by any expansion to the system.
- In instances of Violence, independent CCTV evidence opens up the possibility of dealing with Offenders under the Public Order Act, without the inherent need for the support of a Victim. This technique has been used successfully a number of times this year to prosecute Officer-witnessed offences. The scope of this could potentially be expanded with the additional CCTV.
- If a physical CCTV Office were to be included in the ultimate plan, there could be potential for the Neighbourhood Team to utilise a new touchdown point and target their patrols based upon the Live Feeds. This would provide a little further informal surveillance over currently secluded locations.

Provided that any future system is of sufficient quality and camera placement were tactically sound, an upgraded system would achieve all of the stated objectives.

Sgt James Twyford
Melksham Community Policing Team

APPENDIX 2

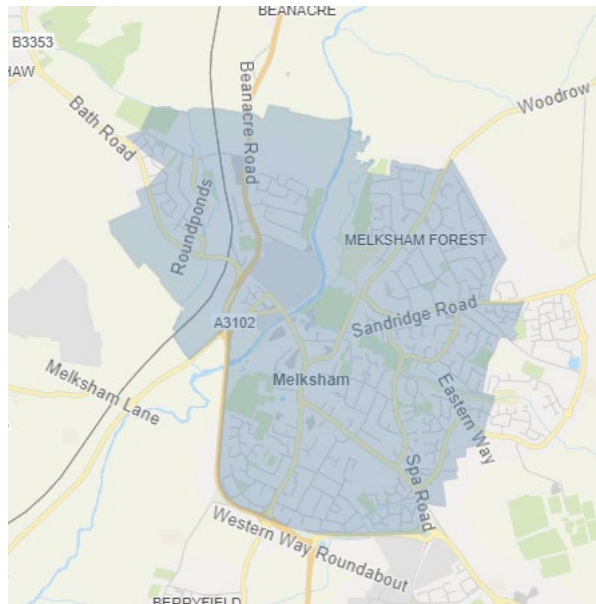
WILTSHIRE POLICE – MELKSHAM DEMAND REPORT

Police Recorded Crime and ASB Data
2019 / 2020
“Melksham Town” Beat Area



Background and Overview

“Melksham Town” Beat Area, known as “ED11” is a geographical area comprised of the three Wards Melksham North, Central and South.



“Melksham Town” Beat Area

The Town has a population of 23,000 as of the most recent data and the area is predominantly occupied by Residential Estates. The Town Centre area is comprised of a mixture of Industrial, Retail, Community Space and Licensed Premises, with four Supermarkets and the Cooper Avon Factory located toward the edge of the Town and smaller Businesses located toward the Centre. There is a large Park and an adjacent Skate Park within the Town Centre.

The Town is Policed by Response and Neighbourhood Teams based out of Trowbridge and Melksham Police Stations; these Officers cover an area known as “Community Policing Team – West”, which includes the two aforementioned Towns and Bradford on Avon. There is a Neighbourhood Sergeant; 9 Response Constables, 2 Neighbourhood Constables and 3 Police Community Support Officers allocated this Beat as their patrol area.

Using Data from 2020, CPT West have recorded a grand total of 15864 separate incidents, of which “Melksham Town” accounts for 2839 incidents, or 17.8% of the Total Demand.

This places Wiltshire amongst the safest Counties in the Country; a vast majority of these incidents are not recordable “Crimes” and a very small minority are defined as Serious Crime.

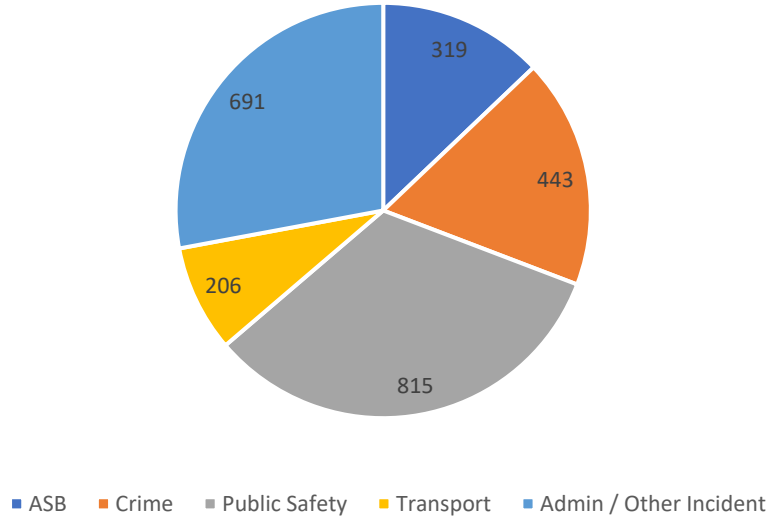
Scope

This Document is intended to inform the Melksham Town CCTV Working Group of the Data and Statistics around Crime within this geographical area. It will consider Spatial and Time-Trend data; prevalence of behavioural issues such as Mental Health problems; along with factors which traditionally impact upon Policing Demand such as Alcohol and Recreational Drug Use.

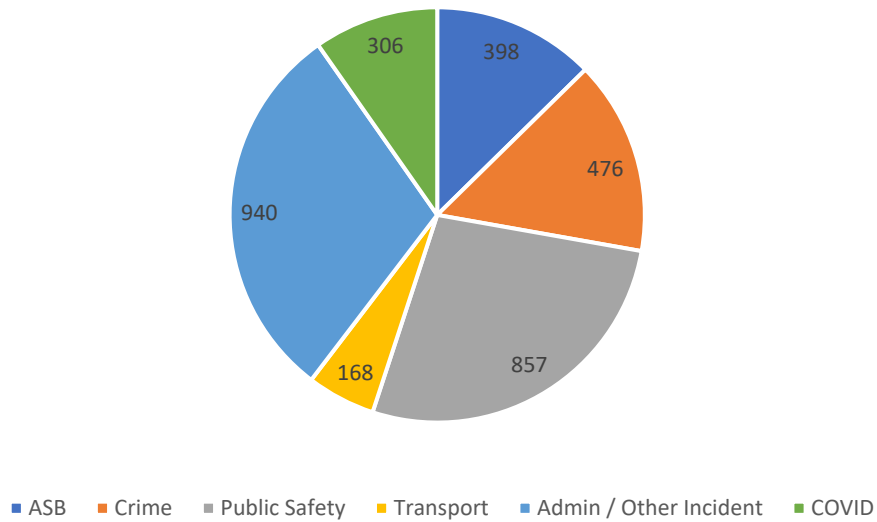
Allowances have been made for the ongoing COVID-19 Pandemic and as such, a 24-month sample of Data has been used, to show both pre and post-Pandemic levels of Demand.

Data Overview / Overall Demand

2019 - Log Types - Total: 2474



2020 - Log Types - Total: 2839



Q1 2019 - 540 Logs

Q2 2019 – 635 Logs

Q3 2019 – 643 Logs

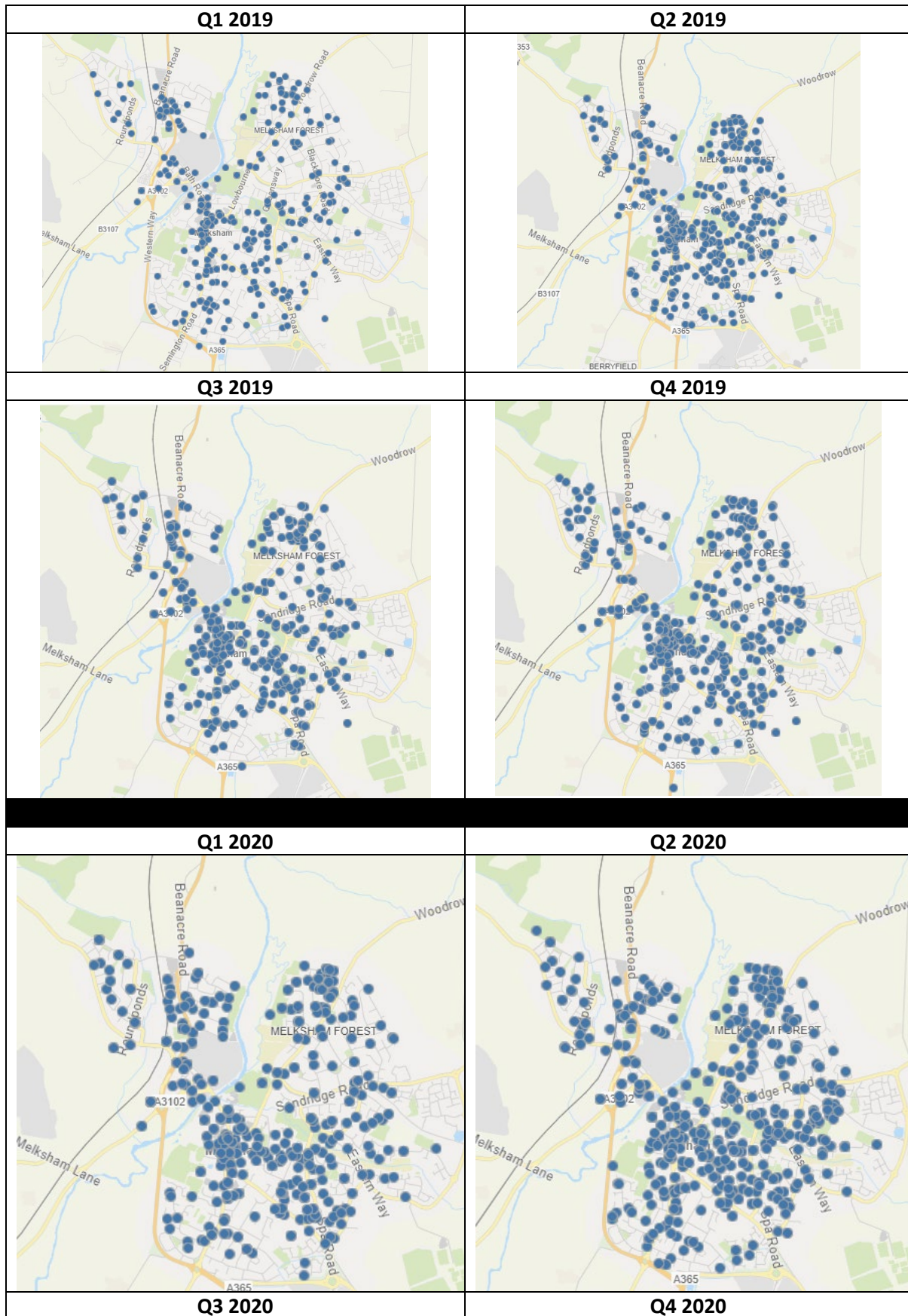
Q4 2019 – 656 Logs

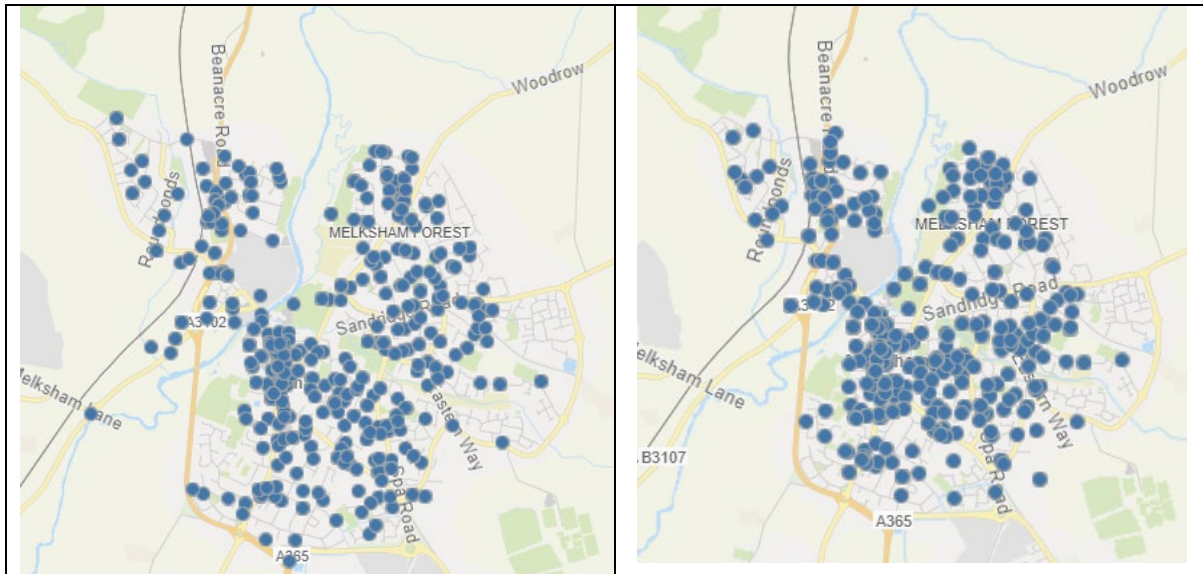
Q1 2020 – 614 Logs (4 COVID)

Q2 2020 – 804 Logs (222 COVID)

Q3 2020 – 709 Logs (29 COVID)

Q4 2020 – 712 Logs (51 COVID)





Recorded Crime

“Recorded Crime” differs from the Total Recorded Demand above; it is based on the “Home Office Counting Rules” and works on the presumption that a Crime has been committed if an identifiable offence has been alleged by a Victim, or by somebody reporting on their behalf.

A Crime will stay recorded whether ultimately proven or otherwise, unless its occurrence is categorically disproven. This intentionally creates a wide picture. It is worth noting that Harassment, Malicious Communications and s.5 Public Order are all categorised under the umbrella of Violent offences. Additionally, there is an anomaly within the Counting Rules where Harassment is recorded in addition to the primary offence; for example: two reports of Public Order involving the same two people, would generate three Crimes (two for Public Order and a third for Harassment). This has a minor effect on the general statistics, but it is however worth noting.

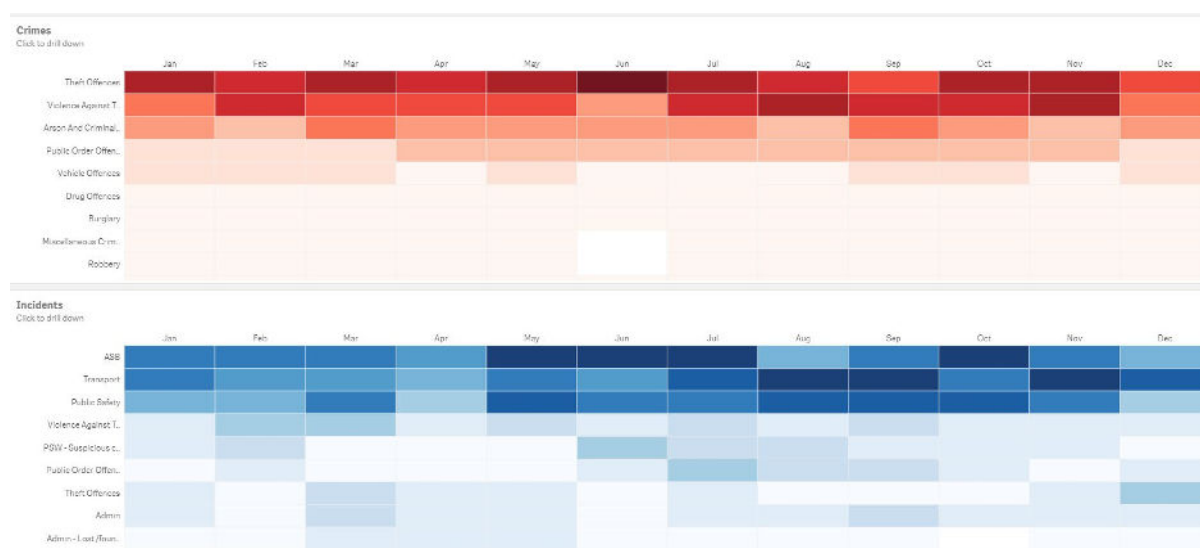
2019

Throughout 2019 a total of 1109 Crimes were Recorded. Categorised and ordered by prevalence, this is a breakdown of 2019 Recorded Crime:

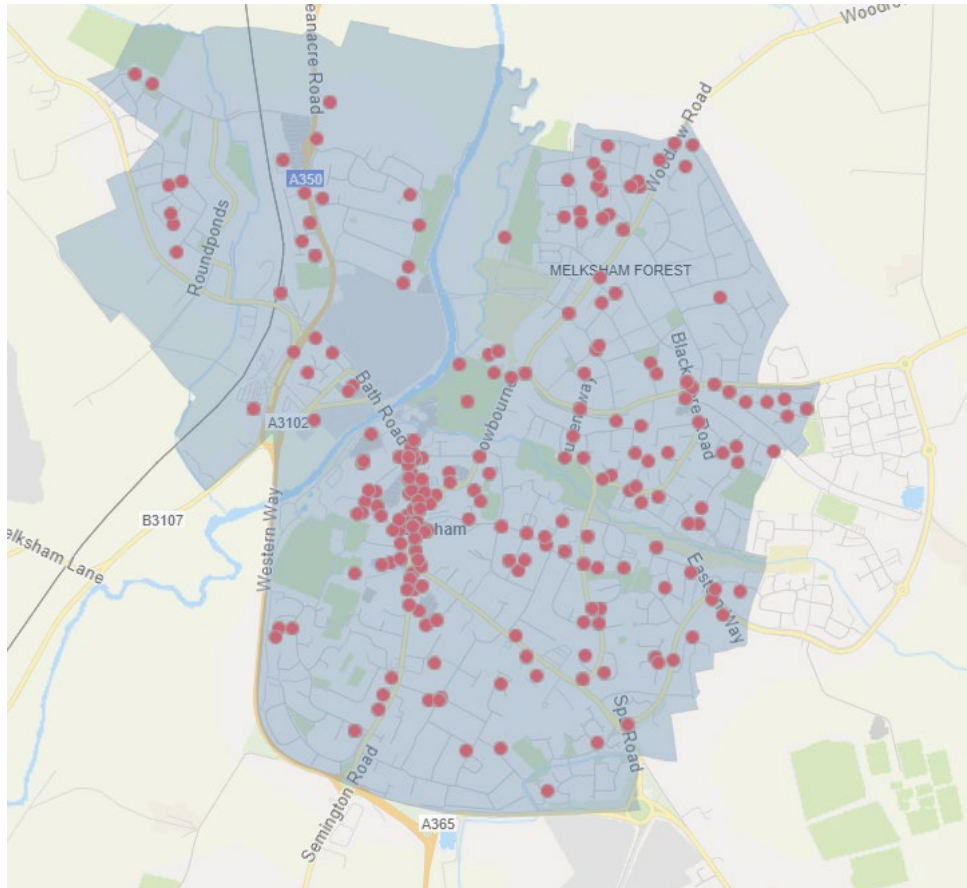
Violence Against the Person	437
Theft and Kindred Offences	288
Arson and Criminal Damage	153
Public Order Offences	83
Burglary	40
Sexual Offences	30
Vehicle Offences	26
Drug Offences	25
Miscellaneous Crimes against Society	13
Others	14

Of these Crimes, 598 were committed in Public Spaces, 95 involved Alcohol, 48 involved Drugs, 32 involved persons with Mental Health issues. In addition, 94 were Youth Related, 18 involved Weapons in some form or other. The remaining Data will focus on Public Space Crime only.

The below Heat Map showed that during 2019, the Peak Months were May, June, July, October and November. The Peak Categories were Theft, Violence and Arson / Damage.



The Map below shows all Public Space Crime for 2019. Residential areas all share a common density of Public Space offences, with more recorded along trunk roads than within estates. There is one very clearly identifiable Hot Spot of 79 Offences (13.2%) for the Town Centre area running from King George V Playing Field, Skate Park and the Adventure Centre, also encompassing Bath Road, Bank Street, Lowbourne, High Street, Marketplace, King Street and Church Walk.



Of the Total Recorded Crime, 86 offences had a recordable 'positive' outcome. This includes Charges, Cautions, Cannabis Warnings, Penalty Notices, Youth Restorative Interventions, Community Resolutions and Offences Taken into Consideration.

108 Offences were filed due to either lack of Victim support for a prosecution; Suspects being under the age of criminal responsibility, or statutory time limits for prosecution having expired.

393 Offences (65%) were filed due to lack of evidence. This includes both instances where there were named suspects identified, but the evidence was insufficient to secure a conviction; alongside instances where there were no identifiable suspects.

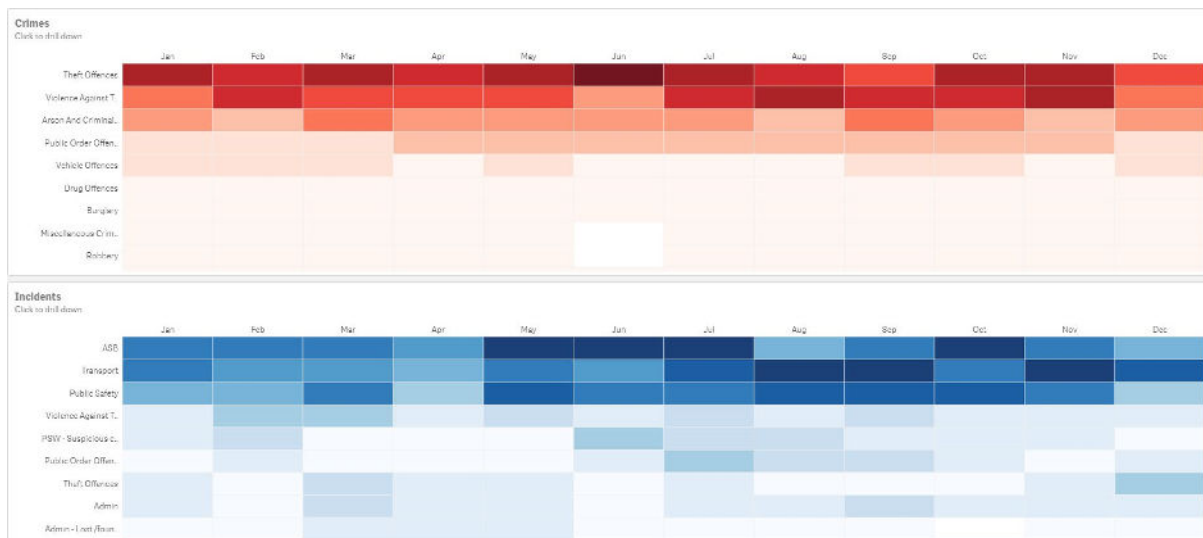
2020

Throughout 2020 a total of 1074 Crimes were Recorded. Categorised and ordered by prevalence, this is a breakdown of 2020 Recorded Crime:

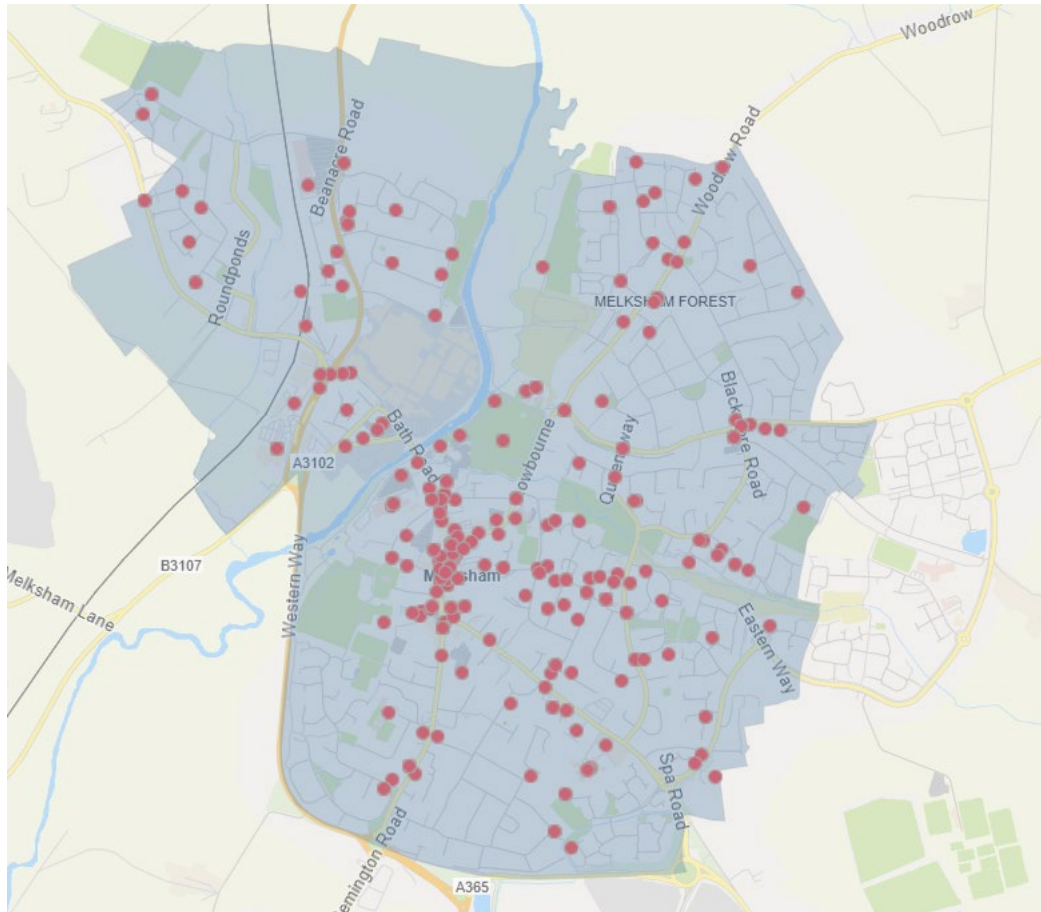
Violence Against the Person	475
Theft and Kindred Offences	210
Arson and Criminal Damage	116
Public Order Offences	76
Vehicle Offences	49
Burglary	47
Drug Offences	34
Sexual Offences	34
Miscellaneous Crimes against Society	17
Others	17

Of these Crimes, 537 were committed in Public Spaces, which represents a small decline on the previous year. 65 involved Alcohol, 31 involved Drugs, 23 involved persons with Mental Health issues. In addition, 108 were Youth Related, 22 involved Weapons in some form or other. This represents a decline in all bar the last two Qualifier Categories. As with 2019 Crime, the remaining Data will focus solely on Public Space Crime:

The below Heat Map showed that during 2020, the Peak Months were the same as with 2019.



The below is a 2020 map of all Public Space Recorded Crime. As with 2019, there is a near-identical cluster in the same locations, however there were 10 fewer instances and the total for the area was 69 Crimes (13%).



Of the Total Recorded Crime, 73 offences had a recordable 'positive' outcome. This includes Charges, Cautions, Cannabis Warnings, Penalty Notices, Youth Restorative Interventions, Community Resolutions and Offences Taken into Consideration.

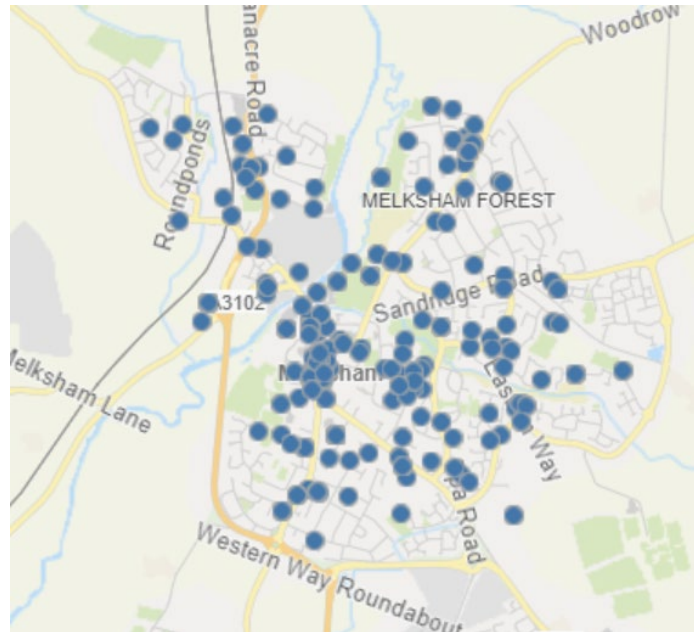
98 Offences were filed due to either lack of Victim support for a prosecution; Suspects being under the age of criminal responsibility, or statutory time limits for prosecution having expired.

290 Offences (54%) were filed due to lack of evidence. This includes both instances where there were named suspects identified, but the evidence was insufficient to secure a conviction; alongside instances where there were no identifiable suspects.

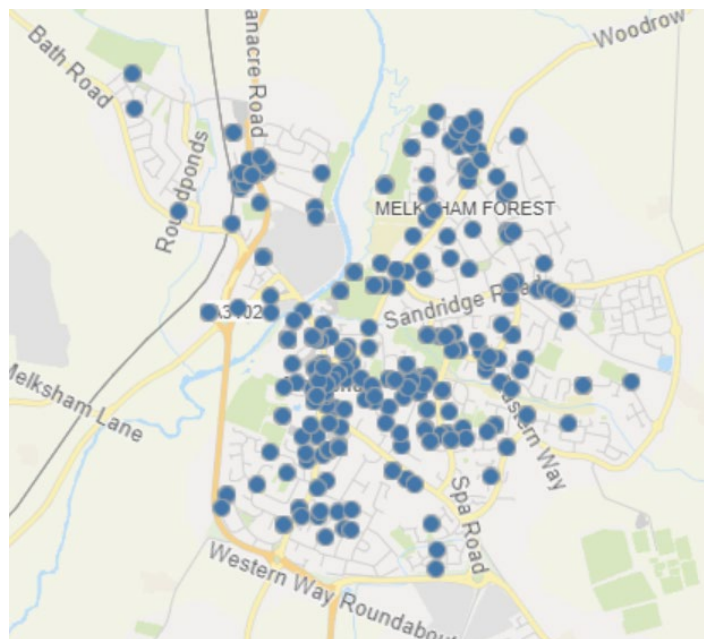
Anti-Social Behaviour

Viewing reports of Anti-Social Behaviour in an isolated manner provides a similar Geographical Picture to that created by Crime; a Hot Spot around the Town Centre, but in this instance also extending into Thackeray Crescent and as far as Pembroke Road. Melksham Forest also appears as a further, separate Hot Spot.

2019 recorded 319 instances of ASB; 2020 recorded 402 instances of ASB, although 36 were exclusively related to COVID-19.



2019 ASB



2020 ASB

Analytical Considerations

The above Data does not account for non-reported incidents and is based upon Police Recorded Crime, as opposed to the British Crime Survey which focuses Nationally and more upon serious crime.

Incidents which were dealt with informally, for example by just dispersing groups, will be lost into the wider Demand Overview.

The Offence of “Being Drunk and Disorderly” is not a Recordable Crime, so once again would be lost into the wider view of the Demand.

Many Public Order offences, as with Drug Offences, go unreported and these often rely on Officers self-identifying them whilst on patrol. On shifts where there is greater demand, the likelihood of this is reduced proportionate to the number of Officers available to undertake this proactive work.

Recorded Crime tends to paint an unfavourable picture of ‘Detection Rates’, so the Home Office Counting Rules now record each crime closure by reason code. This presents an opportunity to drill down into these reasons and establish reasons within more specific circumstances.

Instances where Victims are unsupportive of action, Offenders are below the age of criminal responsibility, or an offence is reported after the Statute of Limitations has expired account for a sizeable proportion of ‘Negative Outcomes’.

The focus for this report will therefore focus more upon Crimes closed with “Negative Outcomes” through lack of evidence, both with and without named Suspects.

Technical Summary

When viewing recorded Crime across 2019/2020, 13.1% of the Public Space Crime was enclosed within the identified Town Centre Hot Spot.

The 24-month average rate for Crimes closed with an “Evidential Difficulties” Outcome is 59.5%.

Applying the average rate in which Evidential Difficulties are experienced, this would arrive at around 44 Crimes per year, which have experienced these Difficulties within the Town Centre Hot Spot alone.

With Anti-Social Behaviour, the percentage of unresolved incidents is markedly higher, as they are dealt with in a different manner and to a different standard of proof. This will be addressed separately in another Document.



MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: CCTV Provision in Melksham and Melksham Without PROJECT UPDATE REPORT and RECOMMENDATIONS FOR PROGRESSION

1 BACKGROUND

- 1.1 For a number of years, there has been ambition in the Melksham area for a high-quality Closed-Circuit TV [CCTV] system in priority areas of the town, and hinterlands, to safeguard local residents, as well as visitors, as they go about their legitimate activities – either business or leisure.
- 1.2 Increasingly the lovely Market Place in the town centre is a focal point for activities, formal and informal gatherings; it is also a transport hub for visitors to the town from outlying areas and further afield.
- 1.3 There is existing CCTV provision in the town centre, developed by a team of volunteers, led by Mr Colin Goodhind. This provision, not currently actively monitored, with its central hub at the Town Hall, needs detailing, mapping and its fitness for purpose assessing.
- 1.4 There is also a second system covering areas of the King George V Park [KGV], with its central hub at the Pavilion in the park. This also needs assessing in terms of fitness for purpose and scope. The future use of the Pavilion is set to change with café facilities being introduced and managed by a third party (yet to be appointed).
- 1.5 There is no major CCTV provision with Melksham Without, although there is some very good quality local provision, notably in the area of Melksham Without Parish Council's offices – a system which was specified, installed, maintained and managed by Melksham provider KAN Connections, with whom Mr Colin Goodhind [see 1.3 above], is associated. We understand that this system is evidential quality and used from time to time by Wiltshire Police.
- 1.6 A CCTV Working Group comprising a broad church of interested parties, has been established, hosted by Melksham Town Council to explore the need for further developing CCTV in the town and within Melksham Without, reporting back and making recommendations to the Melksham Town Council and Melksham Without Parish Council, for discussion and consideration/decision as appropriate.
- 1.7 The Melksham Town Council Economic Development Manager is the lead officer for the Working Group. Councillor Adrienne Westbrook, of Melksham Town Council, is chair.

2 PROJECT REPORT

- 2.1 This project is easily divided into stages, from project scoping and planning, though to procurement, deployment and operation.

STAGE 1 – Establishing [or otherwise] the need for CCTV In Melksham and Melksham Without. If a need is identified, then establish priority locations.

STAGE 2 – Assessing and scoping the existing provision. Review of existing documentation.

STAGE 3 – Developing a specification across the identified priority locations in Melksham and Melksham Without, which can form the basis of a tender, taking into account existing provision/equipment and its suitability. Decide how the system will be linked / managed / monitored / information stored. Identify potential providers and obtain indicative costs for budgetary and fundraising purposes. Outright purchase and lease options should be explored at this stage; also maintenance / support specifications and annual costs.

STAGE 4 – Raising funds for the system.

STAGE 5 – Procurement and system deployment.

STAGE 6 – Recruiting and training volunteers to monitor / manage the system, as required.

STAGE 7 – Commissioning and commencing operations.

- 2.2 It is anticipated that Stages 1 – 4 will take place in 2021/22 and Stages 5-7 in 2022/23. Subject, of course, to the project passing through Stage 1 successfully, and that need is established. A Gantt chart for the project will be developed once it is apparent that Stage 1 is formally complete.

3 STAGE 1 - ESTABLISHING [OR OTHERWISE] THE NEED FOR CCTV IN MELKSHAM AND MELKSHAM WITHOUT. IF A NEED IS IDENTIFIED, THEN ESTABLISH LOCATIONS.

Progress to date

- 3.1 Sgt James Twyford of Wiltshire Police has compiled 2 reports and a detailed commentary regarding need for CCTV in Melksham Town and Melksham Without – see APPENDICES 1 and 2. The author and the Working Group are indebted to Sgt James Twyford of Wiltshire Police for his prompt assistance, and professional expertise.
- 3.2 People with local and specialist knowledge on this CCTV Working Group, have also contributed document review and expert commentary.
- 3.3 The Working Group considers that the case for CCTV provision in Melksham Town is proven and awaits the outcome of discussions regarding provision in Melksham Without.
- 3.4 Melksham Without Parish Council is meeting on 1 March and will consider, on the basis of their local knowledge and the support of Wiltshire Police, will identify any priority areas for CCTV in Melksham Without.

4 PROGRESSION TO STAGE 2

It is recommended that:

- 4.1 The Stage 1 Report is finally and formally completed once Melksham Without Parish Council has reported, after their meeting on 1 March.
- 4.2 The final, formal Stage 1 sign off by this Working Group is distributed into the reporting channels when available.
- 4.3 The conclusions of Wiltshire Police and this Working Group are sufficient to warrant the beginning of developing Stage 2 of this project from this point onwards. As Stage 2 consists of a review and scoping of exclusively existing provision and documentation, and that this is almost entirely located in Melksham Town, it appears appropriate that this stage 2 can commence now, subject to this Council's authorisation.

5 RECOMMENDATIONS

- 5.1 That KAN Connections, a local Melksham contractor with knowledge of the CCTV system in the town, is engaged to assess, specify, scope and report on existing CCTV provision.
- 5.2 That a fee of up to £250 + VAT, quoted by KAN Connections for the work in 5.1 above, is accepted. The budget for this work is within the 2021/22 budget. It is proposed that this is paid from the general reserve in the current financial year and then the monies paid back to the general reserves from the 2021/22 budget on 1 April 2021.
- 5.3 That, as an information gathering exercise, and following the advice of the Melksham Area Board, the Melksham Campus project team is contacted to establish the detail of what if any CCTV provision is planned for the campus. Also, to explore any future potential for opportunities for cooperative working on CCTV provision.

6 CONTACT

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APPENDIX 1

WILTSHIRE POLICE – MELKSHAM CCTV REPORT



Introduction

This Report is provided to support the Geographical and Crime-Trend Data with accompanying Analysis and Recommendation, with a view to helping determine the most effective way forward with any future CCTV installation.

The overarching objective behind this, is to look for ways to reduce Town Centre Crime and Anti-Social Behaviour in areas which suffer the most. CCTV has been shown to have a mild to moderate impact upon both the prevention and detection of Crime and ASB, depending on the effectiveness of its deployment. It is a resource that a vast majority of Wiltshire Towns have access to in varying guises.

The most relevant KPI's for this objective are:

- The Overall rate of Public Space Crime within the Town.
- The Rate of Detection for Crime within the Town, specifically the proportion of investigations which suffer from investigation-terminal evidential difficulties.
- The Level of Anti-Social Behaviour within the Town.

Current Situation / Background

The Charts, Graphs and Maps provided in the accompanying document, demonstrate that the levels of Crime and Anti-Social Behaviour remained roughly stable at around 2600 incidents per year, over a 24-month period covering 2019/2020. They show a clearly defined Hot Spot of incidents which encompasses the following areas:

- King George V Playing Field
- Skate Park
- Bath Road
- Bank Street
- Lowbourne
- Church Street and Church Walk with associating Car Park
- High Street and Stratton's Walk
- Marketplace and Melksham House
- King Street and King Street Car Park

There are two distinctly different types of incident which plague this area. The first is Youth-Related Anti-Social Behaviour, which predominantly afflicts the Playing Field and Skate Park. The second is broader and encompasses Violence, Damage and Alcohol-related ASB across the other areas. There is overlap between the two.

Melksham has a Pubwatch Scheme and a majority of the Town's Pubs are active members. CCTV is fitted in almost all pubs and is currently used to good effect in the Detection of Crime within individual establishments. There are however issues when incidents occur outside; often out of the reach of CCTV, in alleyways or by late night food establishments.

Issues relating to Licensed Premises account for around 20% of the total reporting, leaving 80% of incidents to chance as to whether they will be captured on CCTV or not, whether in part or in full.

Issues within the Town Park generally suffer with poor quality Witness Evidence. There is poor ambient lighting other than within the Skate Park and no natural surveillance from neighbours for the area.

Incidents are most often between teenagers and there is often evidence of alcohol and drug use left behind. If there are witnesses to incidents, they are often unwilling to assist investigations due to mixed loyalties or concern for reprisals.

- *One notable recent success was the Arrest and Charge of five individuals who attacked a handful of Skateboarders who were making good, legitimate use of the Skate Park. This prosecution was made possible thanks to the cooperation of three Witnesses, one of whom supplied a Video Recording they'd made on their phone during the incident. The phone footage was instrumental in clearing up identification issues with the Offending Group.*

Speaking more generally; common issues that Local Officers encounter when investigating crimes include:

- *Generally poor-quality footage in terms of lighting, image resolution and frame rate*
- *Footage being captured from too great a distance to portray an incident accurately*
- *Gaps in footage continuity, resulting in partial incident-capture*
- *Time taken to recover images being too great; meaning loss of evidence through overwriting, or significant Investigatory Milestones being passed before footage is recovered.*

These issues are commonplace throughout the County, with both Public and Privately-owned CCTV systems.

The current system also means that it is often the case that Officers arrive to an incident and are either faced with Witnesses who are either unwilling or unable to furnish them with sufficient detail to take further action. This contributes to the fact that 65% of reported crime is closed due to Evidential Difficulties.

Options

There are several available options to resolve the known issues and improve upon the current situation. All of these options are employed within various Wiltshire Towns, based upon individual local requirements. There are full-time, part-time (usually volunteer-led) and passive systems in use.

Full Time

The first option is a full-time, staffed, CCTV System with a Police Radio Terminal. This is only employed within Trowbridge and Swindon at this time, with the Trowbridge system being linked to The Shires Shopping Centre. This is the most expensive, but the most comprehensive solution. It allows Operators to communicate in real time with the Officers on the ground; it permits discreet observation of ongoing incidents and Operators can capture evidence for later use, ensuring its

quality through use of pan/tilt/zoom cameras.

It also mitigates against the pitfalls of Marked Police Vehicles being present at crucial stages. It has often been observed that Offenders will hide or change their appearance as they hear a vehicle approaching. This creates missed opportunities, especially if Officers are arriving at incidents 10 minutes after a report and are left with a 1-mile radius to search.

Additionally, if Offenders are tracked in real-time through an area, it is possible to connect them to scenes they would otherwise not be linked to.

Part Time

The second option is a part-time, volunteer-led scheme, as used in Devizes, Calne, Warminster / Westbury (jointly), Salisbury, Chippenham and Royal Wootton Bassett. This offers a “best of both worlds” solution, which provides monitored CCTV at Peak Times and a review facility outside of those hours. They have Police Radio Base Stations and appropriate training is given; it provides the above solution on a more cost-effective basis.

The system in Devizes is in a building where Police Officers have 24/7 access to review footage or monitor the system in real time if required. This has been utilised with great success in the past.

Passive

The third option is an unstaffed CCTV system which is available on a reactive basis. This is the system presently employed in Melksham, Marlborough and Pewsey.

This provides no proactive coverage but is a simpler scheme to operate. The success of these schemes is limited and dependent on the times of day that footage is available for review.

If nothing is changed, the latter is the service Melksham will continue to receive. The coverage is limited in terms of area and quality, which represents a risk of Crimes continuing to go undetected at a similar rate.

From a Policing perspective, a Staffed CCTV Control Room has huge advantages and in addition to the above points, it removes the delay in messages being passed through a Control Room. 24/7 access to both the Live and Recorded Footage, helps to bridge the gap between Full and Part Time run systems still further.

Recommendation

Considering the large cost of staffing a Full-Time system and the relatively small size of the Town; the Recommendation would be for a Volunteer-Led Part Time Monitored System to be implemented.

The Recommendation would also be to allow Police Officers and Staff to be able to access Live and Recorded Footage 24/7. Night-vision in poorly lit areas would be advantageous; or improving ambient lighting where required. The advantages of this system are as follows:

- Volunteers can monitor Live Footage during peak times and events such as Carnival, Party in the Park, Night-Time Economy Hours or Community Events. These events generally have Police Staff dedicated to them; so monitored CCTV at these peak times provides extra support and targeting of patrols.

- Footage would be available for review at any time. This can dramatically alter the progress of investigations in their Golden Hour. If Suspects can be identified within a short space of time after the offence, the likelihood of obtaining sufficient evidence to Charge is greater.
 - o There is a greater likelihood of recovering stolen property; catching Offenders in the same clothing or location, or with the same injuries visible, as examples.
 - o In Devizes last year a male was caught after committing an Indecent Exposure. Officers were able to access the CCTV Office out of hours and then used it to track the male through Town and identify his vehicle. The footage was of sufficient quality to read his number plate and get a clear picture of his face. He was arrested within two hours of the Offence and later convicted at Court for a series of similar incidents.
- Volunteers become subject-matter experts over time and are able to stay abreast of issues and maintenance with the system. They also become able to identify blind spots and help develop the system in line with the needs of the time.
- More Incidents would be captured on footage and identified at the time. This potentially identifies any hidden Demand that currently goes unreported. In turn, this helps to shape the overall Demand picture and ensures Melksham receives its continued fair share of Officers.
- There is scope to reduce the current percentage of crimes closed due to insufficient evidence, from its current rate at 65%.
- Perpetrators of Anti-Social Behaviour can be identified more readily, which allows for Interventions to be targeted at the right people, at the right level. At this current time, this is largely dependent on Witness evidence. This would likely be the single biggest improvement brought by any expansion to the system.
- In instances of Violence, independent CCTV evidence opens up the possibility of dealing with Offenders under the Public Order Act, without the inherent need for the support of a Victim. This technique has been used successfully a number of times this year to prosecute Officer-witnessed offences. The scope of this could potentially be expanded with the additional CCTV.
- If a physical CCTV Office were to be included in the ultimate plan, there could be potential for the Neighbourhood Team to utilise a new touchdown point and target their patrols based upon the Live Feeds. This would provide a little further informal surveillance over currently secluded locations.

Provided that any future system is of sufficient quality and camera placement were tactically sound, an upgraded system would achieve all of the stated objectives.

Sgt James Twyford
Melksham Community Policing Team

APPENDIX 2

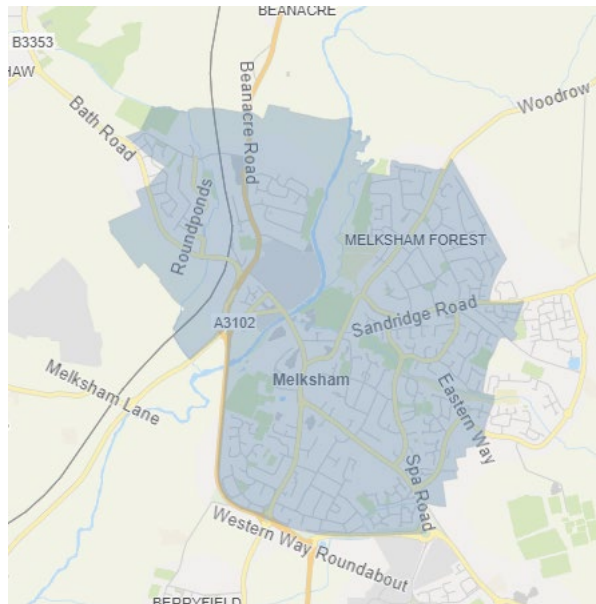
WILTSHIRE POLICE – MELKSHAM DEMAND REPORT

Police Recorded Crime and ASB Data
2019 / 2020
“Melksham Town” Beat Area



Background and Overview

“Melksham Town” Beat Area, known as “ED11” is a geographical area comprised of the three Wards Melksham North, Central and South.



“Melksham Town” Beat Area

The Town has a population of 23,000 as of the most recent data and the area is predominantly occupied by Residential Estates. The Town Centre area is comprised of a mixture of Industrial, Retail, Community Space and Licensed Premises, with four Supermarkets and the Cooper Avon Factory located toward the edge of the Town and smaller Businesses located toward the Centre. There is a large Park and an adjacent Skate Park within the Town Centre.

The Town is Policed by Response and Neighbourhood Teams based out of Trowbridge and Melksham Police Stations; these Officers cover an area known as “Community Policing Team – West”, which includes the two aforementioned Towns and Bradford on Avon. There is a Neighbourhood Sergeant; 9 Response Constables, 2 Neighbourhood Constables and 3 Police Community Support Officers allocated this Beat as their patrol area.

Using Data from 2020, CPT West have recorded a grand total of 15864 separate incidents, of which “Melksham Town” accounts for 2839 incidents, or 17.8% of the Total Demand.

This places Wiltshire amongst the safest Counties in the Country; a vast majority of these incidents are not recordable “Crimes” and a very small minority are defined as Serious Crime.

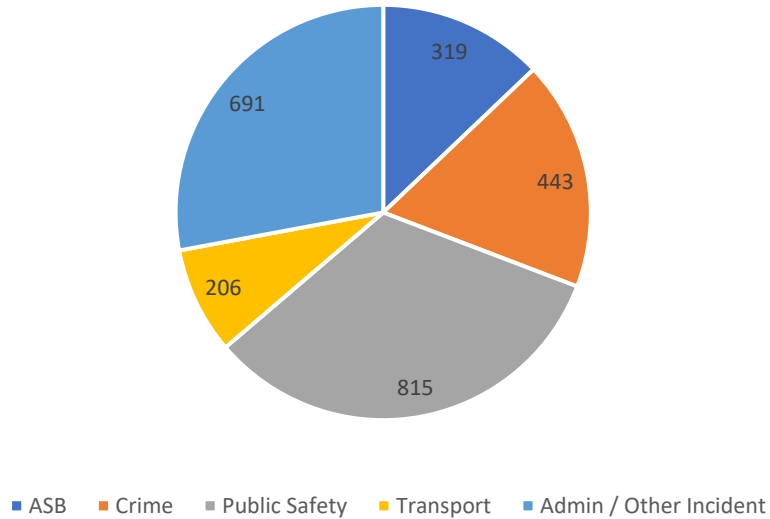
Scope

This Document is intended to inform the Melksham Town CCTV Working Group of the Data and Statistics around Crime within this geographical area. It will consider Spatial and Time-Trend data; prevalence of behavioural issues such as Mental Health problems; along with factors which traditionally impact upon Policing Demand such as Alcohol and Recreational Drug Use.

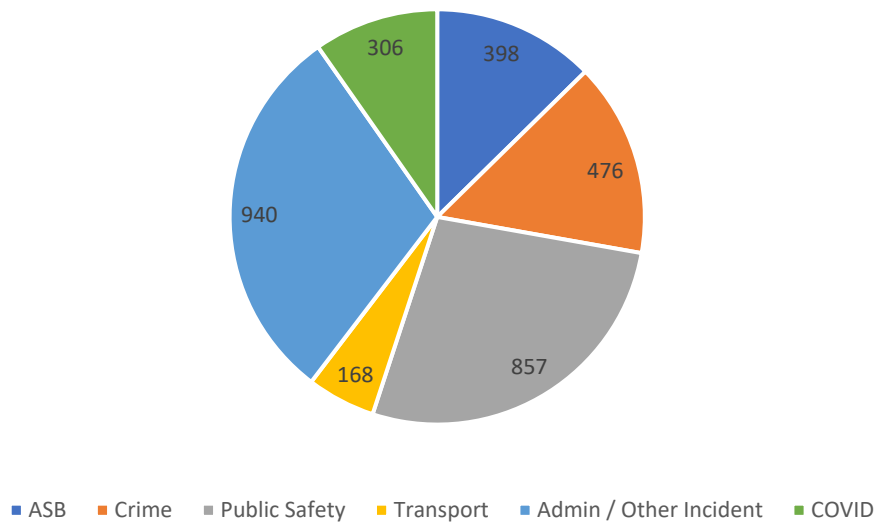
Allowances have been made for the ongoing COVID-19 Pandemic and as such, a 24-month sample of Data has been used, to show both pre and post-Pandemic levels of Demand.

Data Overview / Overall Demand

2019 - Log Types - Total: 2474



2020 - Log Types - Total: 2839



Q1 2019 - 540 Logs

Q2 2019 – 635 Logs

Q3 2019 – 643 Logs

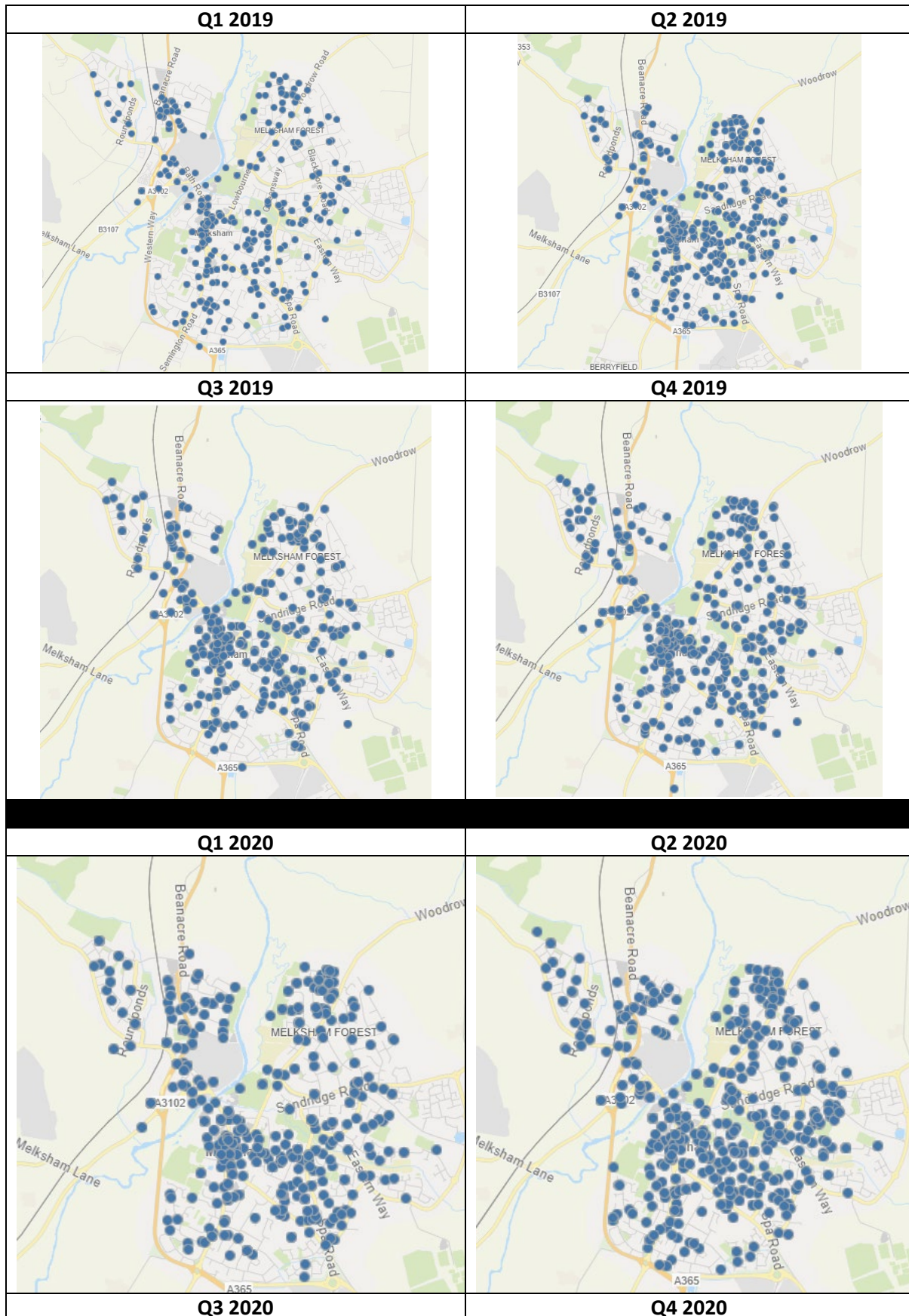
Q4 2019 – 656 Logs

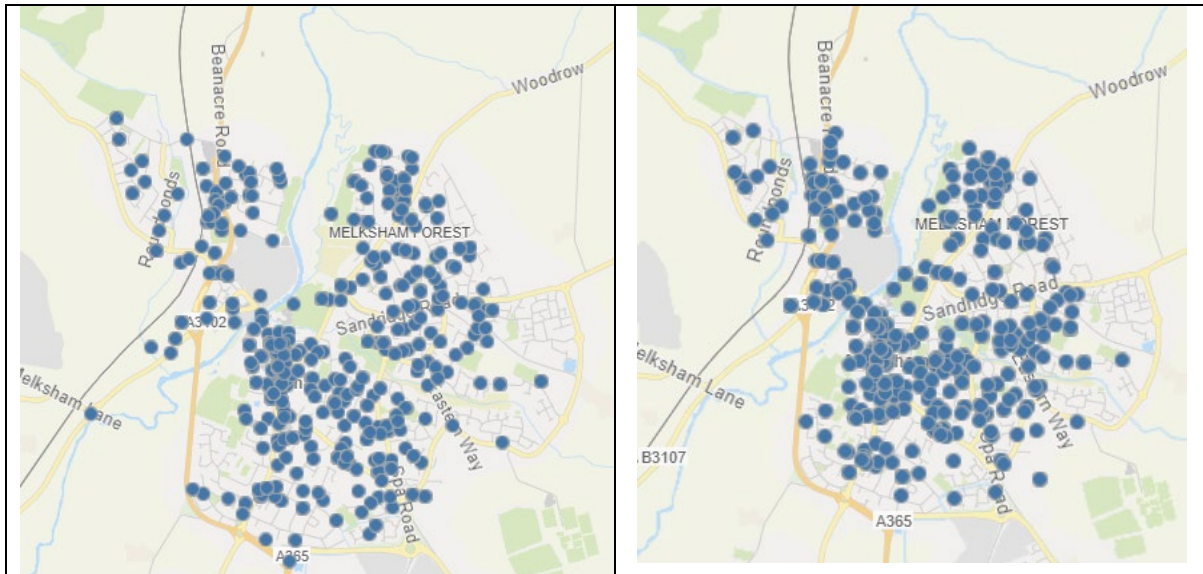
Q1 2020 – 614 Logs (4 COVID)

Q2 2020 – 804 Logs (222 COVID)

Q3 2020 – 709 Logs (29 COVID)

Q4 2020 – 712 Logs (51 COVID)





Recorded Crime

“Recorded Crime” differs from the Total Recorded Demand above; it is based on the “Home Office Counting Rules” and works on the presumption that a Crime has been committed if an identifiable offence has been alleged by a Victim, or by somebody reporting on their behalf.

A Crime will stay recorded whether ultimately proven or otherwise, unless its occurrence is categorically disproven. This intentionally creates a wide picture. It is worth noting that Harassment, Malicious Communications and s.5 Public Order are all categorised under the umbrella of Violent offences. Additionally, there is an anomaly within the Counting Rules where Harassment is recorded in addition to the primary offence; for example: two reports of Public Order involving the same two people, would generate three Crimes (two for Public Order and a third for Harassment). This has a minor effect on the general statistics, but it is however worth noting.

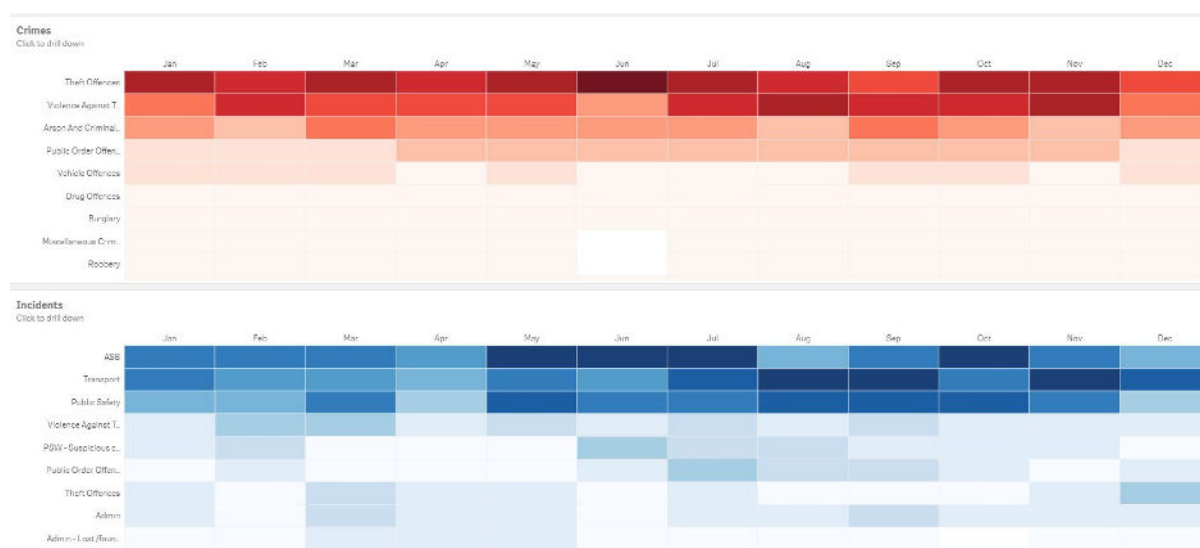
2019

Throughout 2019 a total of 1109 Crimes were Recorded. Categorised and ordered by prevalence, this is a breakdown of 2019 Recorded Crime:

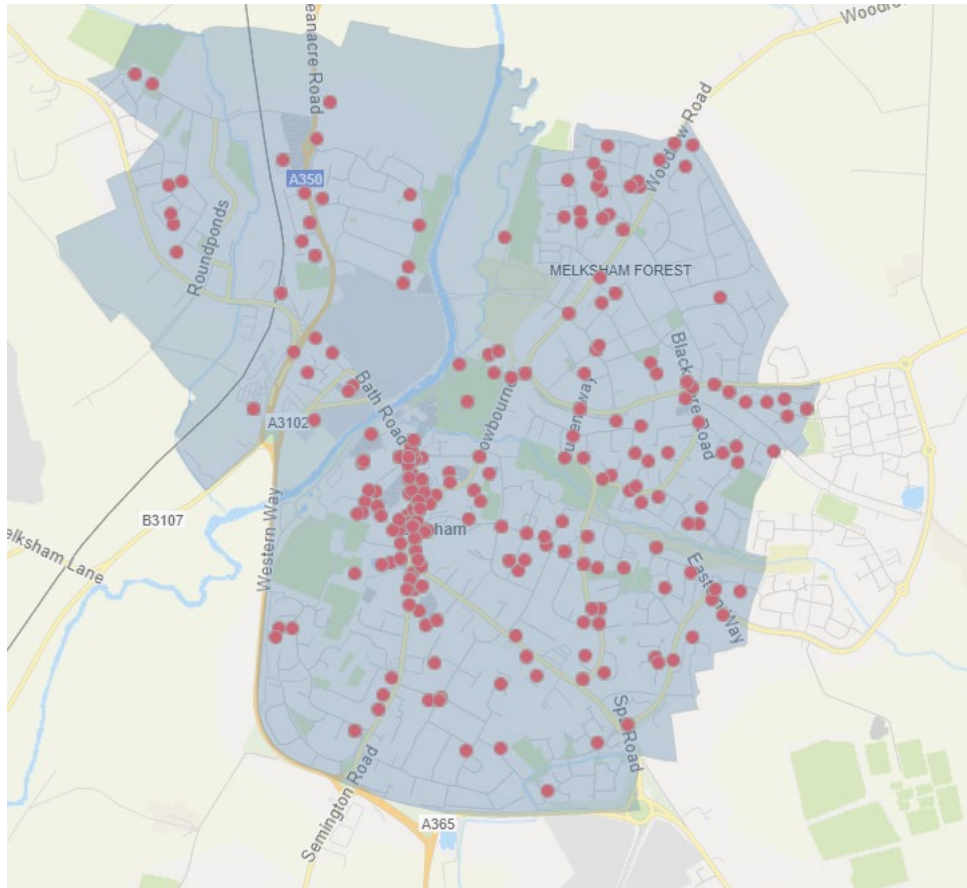
Violence Against the Person	437
Theft and Kindred Offences	288
Arson and Criminal Damage	153
Public Order Offences	83
Burglary	40
Sexual Offences	30
Vehicle Offences	26
Drug Offences	25
Miscellaneous Crimes against Society	13
Others	14

Of these Crimes, 598 were committed in Public Spaces, 95 involved Alcohol, 48 involved Drugs, 32 involved persons with Mental Health issues. In addition, 94 were Youth Related, 18 involved Weapons in some form or other. The remaining Data will focus on Public Space Crime only.

The below Heat Map showed that during 2019, the Peak Months were May, June, July, October and November. The Peak Categories were Theft, Violence and Arson / Damage.



The Map below shows all Public Space Crime for 2019. Residential areas all share a common density of Public Space offences, with more recorded along trunk roads than within estates. There is one very clearly identifiable Hot Spot of 79 Offences (13.2%) for the Town Centre area running from King George V Playing Field, Skate Park and the Adventure Centre, also encompassing Bath Road, Bank Street, Lowbourne, High Street, Marketplace, King Street and Church Walk.



Of the Total Recorded Crime, 86 offences had a recordable 'positive' outcome. This includes Charges, Cautions, Cannabis Warnings, Penalty Notices, Youth Restorative Interventions, Community Resolutions and Offences Taken into Consideration.

108 Offences were filed due to either lack of Victim support for a prosecution; Suspects being under the age of criminal responsibility, or statutory time limits for prosecution having expired.

393 Offences (65%) were filed due to lack of evidence. This includes both instances where there were named suspects identified, but the evidence was insufficient to secure a conviction; alongside instances where there were no identifiable suspects.

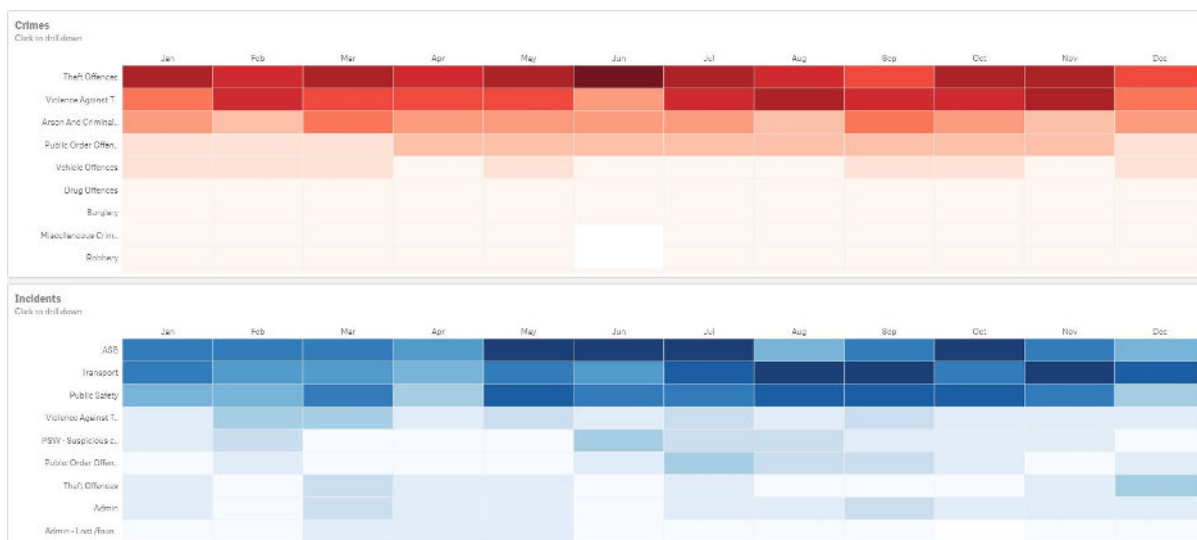
2020

Throughout 2020 a total of 1074 Crimes were Recorded. Categorised and ordered by prevalence, this is a breakdown of 2020 Recorded Crime:

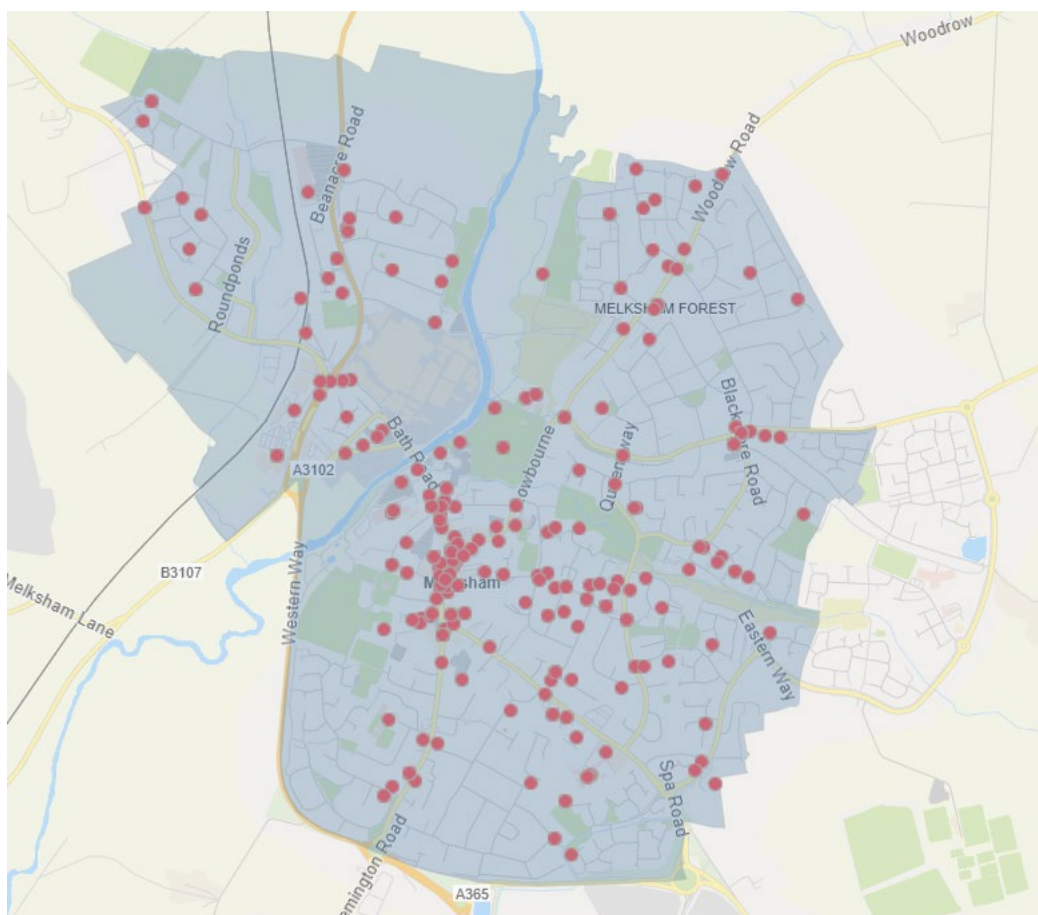
Violence Against the Person	475
Theft and Kindred Offences	210
Arson and Criminal Damage	116
Public Order Offences	76
Vehicle Offences	49
Burglary	47
Drug Offences	34
Sexual Offences	34
Miscellaneous Crimes against Society	17
Others	17

Of these Crimes, 537 were committed in Public Spaces, which represents a small decline on the previous year. 65 involved Alcohol, 31 involved Drugs, 23 involved persons with Mental Health issues. In addition, 108 were Youth Related, 22 involved Weapons in some form or other. This represents a decline in all bar the last two Qualifier Categories. As with 2019 Crime, the remaining Data will focus solely on Public Space Crime:

The below Heat Map showed that during 2020, the Peak Months were the same as with 2019.



The below is a 2020 map of all Public Space Recorded Crime. As with 2019, there is a near-identical cluster in the same locations, however there were 10 fewer instances and the total for the area was 69 Crimes (13%).



Of the Total Recorded Crime, 73 offences had a recordable 'positive' outcome. This includes Charges, Cautions, Cannabis Warnings, Penalty Notices, Youth Restorative Interventions, Community Resolutions and Offences Taken into Consideration.

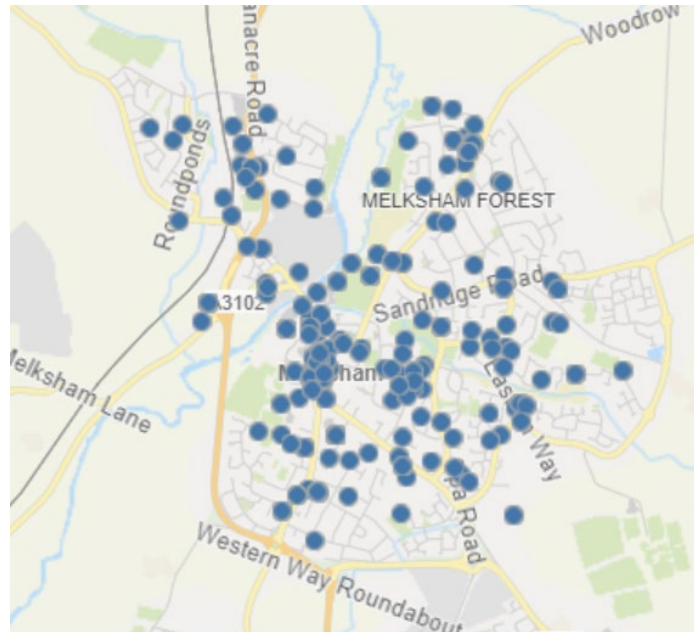
98 Offences were filed due to either lack of Victim support for a prosecution; Suspects being under the age of criminal responsibility, or statutory time limits for prosecution having expired.

290 Offences (54%) were filed due to lack of evidence. This includes both instances where there were named suspects identified, but the evidence was insufficient to secure a conviction; alongside instances where there were no identifiable suspects.

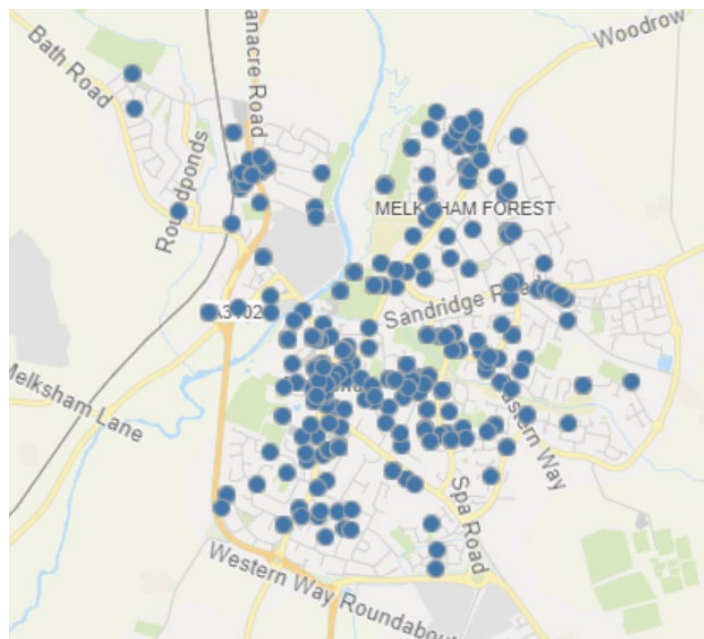
Anti-Social Behaviour

Viewing reports of Anti-Social Behaviour in an isolated manner provides a similar Geographical Picture to that created by Crime; a Hot Spot around the Town Centre, but in this instance also extending into Thackeray Crescent and as far as Pembroke Road. Melksham Forest also appears as a further, separate Hot Spot.

2019 recorded 319 instances of ASB; 2020 recorded 402 instances of ASB, although 36 were exclusively related to COVID-19.



2019 ASB



2020 ASB

Analytical Considerations

The above Data does not account for non-reported incidents and is based upon Police Recorded Crime, as opposed to the British Crime Survey which focuses Nationally and more upon serious crime.

Incidents which were dealt with informally, for example by just dispersing groups, will be lost into the wider Demand Overview.

The Offence of “Being Drunk and Disorderly” is not a Recordable Crime, so once again would be lost into the wider view of the Demand.

Many Public Order offences, as with Drug Offences, go unreported and these often rely on Officers self-identifying them whilst on patrol. On shifts where there is greater demand, the likelihood of this is reduced proportionate to the number of Officers available to undertake this proactive work.

Recorded Crime tends to paint an unfavourable picture of ‘Detection Rates’, so the Home Office Counting Rules now record each crime closure by reason code. This presents an opportunity to drill down into these reasons and establish reasons within more specific circumstances.

Instances where Victims are unsupportive of action, Offenders are below the age of criminal responsibility, or an offence is reported after the Statute of Limitations has expired account for a sizeable proportion of ‘Negative Outcomes’.

The focus for this report will therefore focus more upon Crimes closed with “Negative Outcomes” through lack of evidence, both with and without named Suspects.

Technical Summary

When viewing recorded Crime across 2019/2020, 13.1% of the Public Space Crime was enclosed within the identified Town Centre Hot Spot.

The 24-month average rate for Crimes closed with an “Evidential Difficulties” Outcome is 59.5%.

Applying the average rate in which Evidential Difficulties are experienced, this would arrive at around 44 Crimes per year, which have experienced these Difficulties within the Town Centre Hot Spot alone.

With Anti-Social Behaviour, the percentage of unresolved incidents is markedly higher, as they are dealt with in a different manner and to a different standard of proof. This will be addressed separately in another Document.



MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: CANAL WORKING GROUP UPDATE

1 BACKGROUND

- 1.1 At the meeting of Full Council on 28 September 2021, it was resolved to support a motion by Councillor Wiltshire and establish a Canal Working Group.
- 1.2 The following members from Melksham Town Council expressed a wish to be involved:
 - Cllr Wiltshire
 - Cllr Brown
 - Cllr Fiorelli
 - Cllr Mitcham

2 DETAILS

- 2.1 An early issue requiring consideration by the Working Group will be to consider implications of the many conditions thought likely to accompany a successful planning approval for the Melksham Link.
- 2.2 Councillor Wiltshire, who proposed the motion to establish the Working Group, suggests that there is no need for the working group to meet until the planning application for the Melksham Link is approved.
- 2.3 In the interim, officers are approaching other interested parties to raising awareness of the Working Group, inviting them to appoint their representatives (one or two) to join the group when it first meets.

3 RESOURCES AND BUDGET

- 3.1 None, currently, over and above officer time.

4 RECOMMENDATION

- 4.1 To note this update report.
- 4.2 To defer the first meeting of the Working Group, as requested, until planning approval for the Melksham Link is granted.

5 CONTACT

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Economic Development Manager

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Full Council 1 March 2021

CATG Projects

The three options to be considered for funding are as follows:

1. Dropped Kerbs on Old Broughton Road

This item had an initial estimated cost of £1500 for two dropped kerbs. This estimate did not allow for traffic calming and the advice from the council's contractor is that there would be a requirement for a lane closure and therefore the costs would considerably rise. It is now estimated that the project cost would be:

With High Friction Surfacing - £7,200

Without High Friction Surfacing - £5,500

The Town Council will need to decide if they still consider this to be a worthwhile project and would reap enough benefit for the cost, and if so, what level of funding support they were willing to contribute. It would usually need to be at least 1/3 of the total cost for the CATG to consider it.

2. Improvement to footway link between Maple Close and Sandridge Road

The estimated cost for undertaking this work to provide a full width barrier across the existing footway and to create a new footway diversion would be £6,000. The Town Council will need to decide if they still consider this to be a worthwhile project and would reap enough benefit for the cost, and if so, what level of funding support they were willing to contribute. It would usually need to be at least 1/3 of the total cost for the CATG to consider it.

There are a number of underground services in the locality and a CAT inspection would be required to develop a design. This would cost £450. As this cost is below the £500 threshold figure we have for splitting the cost, if the Town Council have given a clear commitment to contribute towards the cost of the substantive project, this should be funded direct from the CATG.

3. Bollards outside Chicken Hut

The estimated cost for implementing bollards to work alongside the, now filled, flower containers would be £2,000. The Town Council will need to decide if they still consider this to be a worthwhile project and would reap enough benefit for the cost, and if so, what level of funding support they were willing to contribute. It would usually need to be at least 1/3 of the total cost for the CATG to consider it.

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MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 March 2021

Report: PROPOSED CATG PROJECTS FOR MELKSHAM

1 BACKGROUND

- 1.1 The next CATG meeting is on 4 March 2021.
- 1.2 The meeting will consider 3 potential projects in Melksham.
- 1.3 If the Town Council can confirm its position on these matters at the Full Council meeting on 1 March, subject to CATG agreement at its meeting on Thursday 4 March, we could request these projects are prioritised and work commenced, rather than waiting for the next CATG meeting, date to be confirmed, but likely June 2021.

2 PROJECT PROPOSALS

2.1 **Improvement to footway link between Maple Close and Sandridge Road**

The estimated cost for undertaking this work to provide a full width barrier across the existing footway and to create a new footway diversion would be **£6,000**. Councillors will need to decide if they still consider this to be a worthwhile project and would reap enough benefit for the cost, and if so what level of funding support Melksham Town Council is willing to contribute.

There are a number of underground services in the locality and a inspection would be required to develop a design. This would cost **£450**. As this cost is below the £500 threshold figure we have with CATG for splitting the cost, it is suggested that, if the Town Council gives a clear commitment to contribute towards the cost of the substantive project, we should ask that the inspection and design element is funded direct from CATG.

2.2 **Dropped Kerbs on Old Broughton Road**

This item had an initial estimated cost of £1500 for two dropped kerbs. This estimate did not allow for traffic calming and the advice from Wiltshire Council's contractor is that there would be a requirement for a lane closure and therefore the costs would considerably rise. It is now estimated that the project cost would be:

With High Friction Surfacing - **£7,200**

Without High Friction Surfacing - **£5,500**

Councillors need to decide if they still consider this to be a worthwhile project and

would reap enough benefit for the cost, and if so, what level of funding support The Town Council is willing to contribute.

2.3 Bollards outside Chicken Hut

The estimated cost for implementing bollards to work alongside the, now filled, flower containers would be £2,000. Councillors need to decide if this is still considered to be a worthwhile project which would reap enough benefit for the cost, and if so, what level of funding support The Council is willing to contribute.

2.4 In each case above, Melksham Town Council would usually need to contribute at least 1/3 of the total cost of the project for CATG to consider it.

3 RESOURCES AND BUDGET

3.1 There are very limited monies remaining in this Council's CATG budget for 2020/21 which could be used to co-fund some of these projects.

3.2 The remaining available budget in 2020/21 is £115.

4 RECOMMENDATIONS

4.1 This Council's CATG budget, through which contributions to Community Area Transport projects are made, has insufficient funds remaining to be able to support any of the above projects this financial year given the guidance in section 2.4.

4.2 That Councillors indicate their preferred options for each of the above projects (in section 2.1, 2.2 and 2.3) this financial year – to fund some or all activity from reserves; to defer some or all of the projects until 2021/22 financial year; to cancel some or all of the projects on the basis that the costs exceed the projected benefits.

4.3 For any of the projects the Council wishes to see go ahead, either in 2020/21 or 2021/22, to indicate what level of funding support the Council wishes to contribute.

5 CONTACT

David McKnight

Economic Development Manager

david.mcknight@melksham-tc.gov.uk

07759 284 266



MELKSHAM TOWN COUNCIL

CALENDAR OF MEETINGS 2021/2022

	2021								2022				
	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
Annual Town Meeting	24												23
Asset Management	5*		12		20		29			7		11	
Community Development	20			23			22			21			19
Economic Dev & Planning	4, 25	15	6, 27	17	7, 28	19	9, 30	21	11	1, 22	15	5, 26	17
Finance & Admin	*4**		5		6		8		10		7		3*
HR	12	16		18		20		15		16		20	
KGV		16**		18**		20**		15**		16**		20**	
Neighbourhood Plan	26	30	28	25	29	27	24	22	26	23	30	27	25
Chairs Committee			9		10		5		7		11		6
Town Council	17 Annual Meeting		19		20		15		17***		21		16 Annual

* Meeting falls on Tues/ Weds (following Monday Public Holiday)
 ** Meeting will begin at 7.15 or on the Rising of Previous HR Sub Committee Meeting
 *** Budget to be approved

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MELKSHAM TOWN COUNCIL

FULL COUNCIL MEETING

1 MARCH 2021

Report: WILTSHIRE AREA LOCAL PLANNING ALLIANCE [WALPA]

1 BACKGROUND

- 1.1 A number of Wiltshire local Councils ('The Councils') have been meeting since July 2020 and have created an informal alliance on local related planning matters called the Wiltshire Area Localism and Planning Group (WALPA). Together the signatories are the first level of local government for over 200,000 residents in Wiltshire.
- 1.2 We only became aware of this group during week commencing 8 February 2021.
- 1.3 A part of the planning problems currently being experienced in Wiltshire has been caused by changes in national planning rules (The National Planning Policy Framework) introduced in 2019, which have reduced the influence of Neighbourhood Plans in the planning process in favour of developers. The Town and Parish councils are asking Wiltshire MPs and Wiltshire Council to join a joint approach to get these changes to be reversed.
- 1.4 The specific changes being sought by the Town and Parish Councils are:
 - 1.4.1 The dropping of the NPPF Section 14 requirement that, to be taken into consideration, Neighbourhood Plans must be less than 2 years old,
 - 1.4.2 Removing the changes to the definition of planning areas that in Wiltshire's case has made the whole unitary authority the planning area in place of the more meaningful North, South, East and West subdivisions, and
 - 1.4.3 Reversing the changes to the methodology for the calculation of land supply for housing which have so tipped the control of the calculation into the hands of developers.
- 1.5 As a local example of the implications of the changes in national planning rules (The National Planning Policy Framework) introduced in 2019:
 - 1.5.1 Plans have been submitted for 50 houses off Semington Road in Melksham that are contrary to the Neighbourhood Plan. There are additional undecided applications around Melksham that ignore the Neighbourhood Plan. In January 2021 approval was given at another site on Semington Road for 155 houses contrary to the Neighbourhood Plan because Wiltshire Council does not have a 5-year supply of land for housing.

2 PROPOSAL

- 2.1 The Melksham Neighbourhood Plan Steering Group agreed to support a press release on this subject, issued on 15 February 2021. See Appendix 1.

- 2.2 Melksham Town Council has been asked if this council will also support the aims and objectives of WALPA – detailed in the Appendices.
- 2.3 The signatories for WALPA’s objectives and communications are listed in the press release, notes to editors, in Appendix 1.
- 2.4 Should this council be mindful to support the aims and objectives of WALPA, it is requested that a suitably amended letter of the type included in Appendix 2, is sent by us to the listed influencers and that participation in meetings is available if requested.

3 RESOURCES AND BUDGET

- 3.1 No resource or budget implications apart from officer time.

4 RISK

- 4.1 There is a reputational risk to this council if those who receive our communications on this subject, disagree with our view. This of course is a much wider risk across many subject areas, and not restricted to the matter under consideration.

5 RECOMMENDATION

- 5.1 That Councillors consider this matter and decide whether this Council should support the aims and objectives of WALPA by participating in group communications, meetings and activities.

6 CONTACT

David McKnight

Economic Development Manager

david.mcknight@melksham-tc.gov.uk

07759 284 266

WILTSHIRE AREA LOCAL PLANNING ALLIANCE [WALPA]

APPENDIX 1

Press Release 15 February 2021

PRESS RELEASE TO:

Andover Advertiser/Bath Chronicle/BBC Wiltshire/Gazette & Herald/Wiltshire Times/Marlborough News Online/Melksham Independent News/Salisbury Journal/Wilts & Glos Standard/Swindon Advertiser/New Valley News/Western Gazette/White Horse News/Somerset Live/The Guardian/The Independent

Urgent Action Needed to Protect our Neighbourhood Plans

Embargoed until 12:00noon 15th February 2021

What was the point of communities working hard to produce Neighbourhood Plans only to find that after 2 short years the locally agreed policies can be over-turned by aggressive developers?

Over 30 town and parish councils across Wiltshire have appealed for help from Wiltshire Council and Wiltshire's five MPs to protect the future of Neighbourhood Planning in Wiltshire.

Wiltshire's town and parish councils are suffering because of significant loopholes in planning legislation means our carefully drafted Neighbourhood Plans can be overruled, unless Wiltshire Council is able consistently to maintain 5-years' worth of available housing land. At the moment, Wiltshire does not have that critical 5-year supply which means that developers are challenging Neighbourhood Plans as soon as they are 2 years old.

Speaking on behalf of more than 30 town and parish councils, Mayor of Malmesbury Campbell Ritchie said, "There is agreement between ourselves, the leadership of Wiltshire Council, and most of our local MPs that urgent changes are needed to protect Neighbourhood Plans in Wiltshire. Wiltshire Council's planning policies are being smashed by developers seeking to take advantage of this unfortunate situation. The huge effort going into creating the next stage of the Wiltshire Local Plan for housing and development is also being undermined."

"We are calling now for a joint effort to achieve the changes we all want. We have requested an urgent meeting with the leaders of Wiltshire Council and our MPs to develop a shared and public plan to protect Neighbourhood Planning in Wiltshire. We are looking forward to being able to report a positive outcome."

Ends

1. Town and Parish Councils:

Ashton Keynes
Bradford on Avon
Bremhill
Brokenborough
Calne
Calne Without Parish
Chippenham
Chirton & Conock

Corsham
Cricklade
Crudwell
Devizes
Downton
Great Somerford
Hilperton/Staverton
Holt
Idmiston
Malmesbury
North Bradley
Oaksey
Pewsey
Potterne
Purton
Sherston
Southwick Parish Council
St Paul Malmesbury Without
Sutton Benger
Tisbury
Trowbridge
Westbury
Warminster
Wootton Rivers
and Melksham Neighbourhood Plan Steering Group

2. Questions and more information:

Please contact the Clerk of the Town or Parish Council most relevant to your outlet. For the purposes of this Press Release, Campbell Ritchie, Mayor of Malmesbury, is also a spokesperson and contact for questions and more information: campbellrmte@gmail.com. T: 07802638424.

Attached:

1. Letter dated 15th February 2021 to Wiltshire MPs and the leadership of Wiltshire Council signed by over 30 Wiltshire Town and Parish Councils.
2. Original joint letters dated 13th August 2020.
3. Notes for editors.

Notes to Editors on Press Release Dated 15th February 2021:

‘Urgent Action Needed to Protect our Neighbourhood Plans’

1. The letters of the 13th August attached.
2. Public comments by the leaders of Wiltshire Council and MPs following our letters of 13th August 2020:

2.1 Leader of Wiltshire Council:

Responding in Cabinet in August 2020 the Leader of Wiltshire Council, Cllr. Philip Whitehead, advised that across the country there is outstanding permission for around 1 million new homes. He said “I think we’ve got a problem with developers not building out the planning permissions they’ve got.

2.2 James Gray

Wiltshire Conservative MP James Gray sums up the situation as stated in the press in August 2020.

“There is a fundamental flaw in the method of calculating the five-year housing land supply figures. Land on which planning permission has been granted, but on which developers have not yet started building does not count. Developers are thereby incentivised to delay the start of building until the very last minute since by doing so they stand a better chance of getting permission on land which would otherwise not be available to them. That drives a coach and horses through the Neighbourhood Planning process.” Reference: Gazette and Herald.

As recently as 28th January 2021 James Gray wrote a widely reported column on related planning matters - <https://www.jamesgray.org/index.php/weekly-column/282-stop-the-developers> - which concluded: ‘So now is the time for action. Take up cudgels on behalf of our countryside, our quiet market towns and villages and stop the onward march of philistine developers. Letters, petitions, protests, judicial reviews. Let’s go for it. Let’s keep North Wiltshire how we like it - green and pleasant.’

2.3 Danny Kruger MP

7th November 2020

Dear Mr Ritchie,

Thank you for your email about the planning process. I share your concerns and I am in discussion with my fellow Wiltshire MPs about how we can best support our towns, like Malmesbury, to protect their Neighbourhood Plans. I look forward to working with you and other Town and Parish councils on this vital agenda.

Best wishes,

Danny

Danny Kruger MP

3. A selection of proposed developments across Wiltshire that would undermine Neighbourhood Plans if approved but which developers are stating should proceed because of Wiltshire’s continuing failure to maintain a 5 years supply of land for housing.

Note: Wiltshire Council has recently approved developments contrary to Neighbourhood Plans for this reason in Calne, Malmesbury and Melksham. The developments highlighted below have not yet been decided.

3.1 Malmesbury:

One of two sites on Park Road, Malmesbury, where plans have been submitted for a total of 70 houses above those specified in the Malmesbury Neighbourhood Plan. (Pictured Mayor of Malmesbury Campbell Ritchie). Consultation has also started on proposals for a further 70 houses at a site at Filands, Malmesbury that is allocated for education use. Just last May Wiltshire Council approved plans for 71 houses at an adjacent site in contradiction to the Neighbourhood Plan.

3.2 Devizes:

Coate Road, Devizes. Consultation started on plans for 255 houses in Dec 2020.

3.3 Downton:

A site at Downton where preliminary consultations are underway for a housing development that is contrary to the Neighbourhood Plan.

3.4 Pewsey

Plans have been submitted for 50 houses in the red lined area contrary to the Neighbourhood Plan.

3.5 Calne

An application has been received for 32 houses in the red lined area at Chilvester Hill, Calne, that is contrary to the Neighbourhood Plan. An developer appeal against a recent decision to reject a proposed development of retirement flats in the town centre that would be contrary to the Neighbourhood Plan is using the lack of a five year land supply as a major reason to overturn this community supported outcome.

3.6 Melksham

Plans have been submitted for 50 houses off Semington Road in Melksham that are contrary to the Neighbourhood Plan – the red area on the photo. There are additional undecided applications around Melksham that ignore the Neighbourhood Plan. In January 2021 approval was given at another site on Semington Road for 155 houses contrary to the Neighbourhood Plan because Wiltshire Council does not have a 5 year supply of land for housing

4. National Planning Rules

A part of the current problem has been caused by changes in national planning rules (The National Planning Policy Framework) introduced in 2019, which have reduced the influence of Neighbourhood Plans in the planning process in favour of developers. The Town and Parish councils are asking Wiltshire MPs and Wiltshire Council to join a joint approach to get these changes to be reversed.

The specific changes being sought by the Town and Parish Councils are:

- a. The dropping of the NPPF Section 14 requirement that, to be taken into consideration, Neighbourhood Plans must be less than 2 years old,
- b. Removing the changes to the definition of planning areas that in Wiltshire's case has made the whole unitary authority the planning area in place of the more meaningful North, South, East and West sub divisions, and
- c. Reversing the changes to the methodology for the calculation of land supply for housing which have so tipped the control of the calculation into the hands of developers.

5. Town and Parish Councils signing the joint letter: As listed with the letter.

The Councils have been meeting together over video conference since July 2020 and have created an informal alliance on this and related matters called the Wiltshire Area Localism and Planning Group (WALPA). Together the signatories are the first level of local government for over 200,000 residents in Wiltshire.

6: Questions and more information: Please contact the Clerk of the Town or Parish Council most relevant to your outlet. For the purposes of this Press Release, Campbell Ritchie, Mayor of Malmesbury, is also a spokesperson and contact for questions: campbellrmtc@gmail.com. T: 07802638424.

END

WILTSHIRE AREA LOCAL PLANNING ALLIANCE [WALPA]

APPENDIX 2

Direct Letter to Support Co-signed Communications

Malmesbury Town Council
(ENGLAND'S OLDEST BOROUGH - CHARTER GRANTED 880)
THE TOWN HALL
MALMESBURY
WILTSHIRE
SN16 9BZ

Telephone: (01666) 822143

Facsimile: (01666) 826166

E-mail: administration@malmesbury.gov.uk

15th February 2021

Direct Letter to;

James Gray, MP Conservative North
Cllr Philip Whitehead, Lead of Wiltshire Council
Cllr Gavin Grant, Wiltshire Council

Dear

The Future of Neighbourhood Planning in Wiltshire

I am writing on behalf of Malmesbury Town Council with a copy of the letter to you dated 15th February 2021 we have co-signed with over 30 other parish and town councils in Wiltshire.

The matter raised is of very serious concern to our council and our residents. We ask you to respond positively to the request to meet with us so we can discuss and agree a common approach that can best protect the future of Neighbourhood Planning in Wiltshire.

Please also reply directly to us on this matter.

Yours sincerely
Malmesbury Town Council
Enc.

Malmesbury Town Council
(ENGLAND'S OLDEST BOROUGH - CHARTER GRANTED 880)
THE TOWN HALL
MALMESBURY
WILTSHIRE
SN16 9BZ

Telephone: (01666) 822143
Facsimile: (01666) 826166

E-mail: administration@malmesbury.gov.uk
15th February 2021

Letter to Leader and Chief Executive of Wiltshire Council and Wiltshire MP's

Wiltshire Council:

Cllr Philip Whitehead – Leader Wiltshire Council
Terence Herbert – Chief Executive, Wiltshire Council

MPs:

Michelle Donelan – Conservative – Chippenham
John Glen – Conservative – Salisbury
James Gray – Conservative – North Wiltshire
Danny Kruger – Conservative – Devizes
Andrew Murrison – Conservative – South West Wiltshire

Dear Colleague

The Future of Neighbourhood Planning in Wiltshire

On the 13th August 2020 over 30 Parish and Town Councils in Wiltshire representing half of the population of Wiltshire wrote to you asking for your urgent support to protect the future of Neighbourhood Planning in Wiltshire. I have attached a copy of our letters.

We have received words of support and agreement from the leadership of Wiltshire Council and our representatives in Parliament but there has not yet been progress by us together in Wiltshire or by government (on the essential amendments to the current NPPF) that will enable Wiltshire's democratically made Neighbourhood Plans to continue to flourish and function.

The current situation is as follows:

1. Wiltshire Council has confirmed (Dec 2020) that it has not achieved a 5 year land supply for housing for planning decision making purposes for a second year running. Made Neighbourhood Plans in Wiltshire that are more than two years old continue to be exposed to unplanned housing developments.
2. The current review period for a made Neighbourhood Plan is a minimum of 15.5 months and requires a huge voluntary effort. The two year rule means that Neighbourhood Plans intended to be valid for 10 years or more have to be in continuous review to stay valid. We all agree this is not sustainable.

3. Wiltshire Council is in the middle of consultation on the Wiltshire Local Plan. We all agree that the aim of this Plan - to create a framework for coherent future development based on Housing Market Areas through to 2035 - is being undermined by the continuing absence of a 5 year land supply for housing.

4. We believe you can do so much more to facilitate a shared action plan to tackle the issues preventing Wiltshire having a 5year land supply for housing. The statement by the Leader of Wiltshire Council in August 2020 that “I think we’ve got a problem with developers not building out the planning permissions they’ve got.” must be followed up. In particular we would like the opportunity to propose a number of practical steps that will enable us together to more quickly achieve the aim¹ that ‘The views of the local community, particularly those of Town and Parish councils will be important in considering potential benefits and impacts of proposals when planning applications are determined.’

We would re-iterate that there appears to be a broad consensus between the Parish and Town Councils, Wiltshire Council officers, the leadership of Wiltshire Council and our Wiltshire MPs on the results we want to see to protect the Future of Neighbourhood Planning. But we have to take steps together to deliver these results.

We would like to invite you to a meeting on the morning of Friday 26th February – perhaps for convenience to coincide with the regular MPs meeting with the leadership of Wiltshire Council - where we can discuss and agree a common approach that can best protect the future of Neighbourhood Planning in Wiltshire.

We look forward to hearing from you.

Yours sincerely
Campbell Ritchie
Mayor, Malmesbury Town Council

For and on behalf of the undersigned Wiltshire Town and Parish Councils:

Ashton Keynes
Bradford on Avon
Bremhill
Brokenborough
Calne
Calne Without Parish
Chippenham
Chirton & Conock
Corsham
Cricklade
Crudwell
Devizes
Downton
Great Somerford Incorporating Startley
Hilperton
Holt
Idmiston

¹ as written in Wiltshire Council Briefing Note 20-37 on the measures being adopted in view of the shortfall in the 5 year supply of land for housing

Malmesbury
North Bradley
Oaksey
Pewsey
Potterne
Purton
Sherston
Southwick Parish Council
St Paul Malmesbury Without
Staverton
Sutton Benger
Tisbury
Trowbridge
Westbury
Warminster
Wootton Rivers
and Melksham Neighbourhood Plan
Steering Group
Cc Toby Sturgis, Cabinet Member for Spatial Planning, Development Management
and Investment
Cc Wiltshire Councillors
Cc Robert Buckland – Conservative – Swindon South
Cc Justin Tomlinson – Conservative – Swindon North

Terms of Reference for the Shurnhold Fields Working Group

To agree that the following items will be included in the Terms of Reference to be prepared for the Shurnhold Fields Working Group:

- delegated powers are to be given to the two Clerks to act on the wishes of the Working Group.
- The membership is to remain at three councillors from each Council.
- The quorum for the Working Group will be three councillors, with representation from both Councils.
- The Chair will rotate and will NOT have a casting vote.
- Capital costs are to be split 50: 50.
- The delegated spend for the Friends of Shurnhold Fields would be a maximum of £500 per year for the Open Space Maintenance Fund; and for the Working Group a total of £5,000 per year for the Capital Expense.
- The Friends of Shurnhold Fields are to be strongly encouraged to apply for grant funding in their own right.
- Administration for the Working Group, including the preparation of agendas, drafting minutes and undertaking actions is to be shared by Officers of MTC and MWPC.

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